



Day&Zimmermann

We do what we say.®

Policy: International Travel

Policy No.: 1503

Responsible Officer: Senior VP, General Counsel and Secretary

1.0 Travel Safety

As part of its commitment to safety in all its activities, the Company requires that employees on foreign travel or work assignments exercise prudent precautions. This begins with preparations for the assignment and continues through the successful completion of the mission. Competent assistance shall be sought by the unit from knowledgeable travel agents or other travel specialists in planning and preparing for foreign travel.

Travel conditions (political and otherwise) in target countries should be obtained prior to departure. The U.S. State Department places foreign travel advisories on its website.

Health of employees while traveling internationally or while stationed on overseas assignment is of highest concern to the Company. Plans and provision for appropriate access to health care services should be arranged prior to departure. These plans will be influenced by the individual employee's health care coverage and by the target country's standard practices. Well-being of the employee should receive priority in all cases.

2.0 Expatriate Assignments

Units shall coordinate with the appropriate HR function to ensure that employees on expatriate assignment receive the appropriate visas and work permits, and understand the tax implications of their assignment.

3.0 Travel with Export-Controlled Items or Technical Data

It is the policy of the Company that each employee or consultant travelling on Company business comply with all laws and regulations related to the export and/or import of export-controlled items and technical data. The act of carrying a laptop with munitions-related data on its hard drive outside of the country can, for instance, constitute an export of "technical data" controlled by the International Traffic in Arms Regulations.

The Standard Practice of the Company shall be for each such Company employee or consultant:

- To prepare and submit to the Director of Compliance for his or her unit (see Policy 1505) or to the Law Department, if there is no Director of Compliance for the unit in question), at least 48 hours prior to departure.
- To discuss with the Director of Compliance or Law Department Representative the content of that form, the purpose of the trip, and the anticipated discussions and activities during the trip.
- To receive guidance from the Director of Compliance or Law Department Representative about compliance obligations and any permissions that must be obtained from Government agencies, such as the State Department's Directorate of Defense Trade Controls. (Please note that licenses for the export of technical data typically require several business days to obtain, and thus if technical data or export items that require a license are to be obtained, the consultation and submission of the associated license application will need to take place several weeks prior to the trip.)

Failure to comply with these requirements, or to abide by the guidance received from the Director of Compliance or Law Department, may result in disciplinary action up to and including immediate termination of employment and disclosure of the unlawful activities to the proper government officials.