



## Export and trade compliance policy

### I. Purpose

This policy ensures that Aviation Tool Pooling, LLC and its subsidiaries and affiliates under contract with Aviation Tool Pooling, LLC or one of its subsidiaries (“Company”) comply with the applicable export, re-export, import and trade compliance laws in all countries in which the Company does business.

### II. Scope

This global policy applies to the Company and its directors, officers, shareholders, employees, representatives, consultants and agents (“Representatives”) worldwide. Strict adherence to this policy is required, except to the extent that a more stringent law exists in the country in which you work. It is our policy to comply fully with applicable export and trade control laws of jurisdictions in which we operate **worldwide**. In addition, as a U.S. headquartered company, the Company and its subsidiaries must comply with U.S. export and trade control laws.

### III. Policy

It is the Company’s fundamental policy that all business and other activities be conducted at all times in strict compliance with all applicable laws and regulations of the countries and jurisdictions within which the Company conducts business. The purpose of this policy is to ensure that the Representatives of the Company conduct operations and activities both outside and within the United States in complete compliance with the U.S. export control laws and trade regulations applicable to its operations as administered by the U.S. Departments of Commerce, State and Treasury AND the local export and trade control laws within the jurisdiction in which they are geographically located from which products are being exported. The laws and regulations governing exports are detailed and complex, and because U.S. and other laws apply to the Company’s business dealings, all questions or concerns should be directed to the email address of [llcmanager@aviapool.com](mailto:llcmanager@aviapool.com) for clarification. This policy is an integral part of our Company Business Code of Conduct which requires compliance with the laws and establishes corporate ethical standards applicable to all the Company’s business dealings.

## **Reporting Possible Violations**

### **I. Reporting**

Aviation Tool Pooling, LLC Representatives must comply with this Export and Trade Compliance Policy. Any questions regarding the validity or interpretation of this Policy should be brought to the attention of the Aviation Tool Pooling, LLC management shown below. Failure to comply with this Policy and associated Aviation Tool Pooling, LLC policies will result in appropriate employee disciplinary action up to and including termination of employment.

It is each Representative's personal responsibility to take appropriate and consistent action by informing your supervisor, If your manager or supervisor is the violator or is complicit with violations of this Policy, then report the violation directly to the email address of llcmanager@aviapool.com. Violations include not only noncompliance with applicable laws, regulations and this Code, but also a failure by responsible management to detect, report and/or correct any offense. All reports will be treated as strictly confidential.

### **II. Non-Retaliation**

Aviation Tool Pooling, LLC policy prohibits any retaliation, directly or indirectly or by encouraging others, against employees for making reports of a violation of this Policy. If you believe retaliation has occurred, please inform the LLC Manager immediately.