

1. POLICY STATEMENT

- 1.1 GKN Aerospace is committed to compliance with the Export Control and Sanctions laws and regulations of all relevant jurisdictions and regimes in which it operates. Breaches of Export Controls and Sanctions can result in civil and criminal penalties, loss of trust from regulators and business partners, commercial losses and reputational damage.
- 1.2 Export Controls regulate the transfer of certain categories of goods, software, technology and services in the interests of national security and foreign policy. Sanctions restrict dealings with certain individuals, entities, groups and countries for a range of objectives, including (among others) international peace and stability, the promotion of human rights, democracy and the rule of law, and the deterrence of malign activities such as terrorism and weapons proliferation. For GKN Aerospace, Export Controls and Sanctions cover all military Items and areas of dual-use Items, the extraterritorial application of regulations of some countries and end use and/or destination controls applied to certain dual-use Items.
- 1.3 Compliance with Export Controls and Sanctions is the responsibility of all GKN Aerospace Employees and incorporated in the GKN Aerospace Code of Ethics (applicable to all Employees) which guides how we should act and sets out what is expected as an Employee of GKN Aerospace. GKN Aerospace has therefore implemented and maintains a programme designed to enable compliance with Export Controls and Sanctions, to avoid non-compliance, detect breaches promptly when they occur and take appropriate remedial actions. This compliance programme consists of this Policy, the Export Controls Governance Framework, the Export Controls Procedures issued pursuant to the Policy as listed in Annex I, and where required more detailed guidance, tools and procedures are available at the levels of Business Lines, Operations, Global Functions and Sites which operationalise this Policy and the Export Controls Procedures at Annex I. The guidance, tools and procedures of Business Lines, Operations, Global Functions and Sites are subject to and must not derogate from the Policy and Export Controls Procedures without the prior written approval of the GKN Aerospace General Counsel.
- 1.4 This Policy applies to GKN Aerospace, its Business Lines, Operations, and Global Functions, subsidiaries (including controlled joint ventures), maquiladoras and their Employees. Joint ventures not controlled by GKN Aerospace should be encouraged to adopt procedures for compliance with Export Controls and Sanctions substantially equivalent to those set out in this Policy and the Export Controls Procedures.
- 1.5 This Policy has been reviewed and approved by the GKN Aerospace Executive Team.
- 1.6 Capitalised terms in this Policy have the meanings given in the [Export Controls Procedures Glossary](#).

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2. SCOPE

2.1 This Policy:

- (a) provides an overview of the compliance standards that must be applied throughout GKN Aerospace on a global basis; and
- (b) establishes who is responsible for implementing the Policy and the Export Controls Procedures.

3. STANDARDS OF COMPLIANCE

3.1 GKN Aerospace must identify and Classify all Items it receives from any external source or that it generates internally, and must ensure that its possession of any Items which are determined to be Controlled Items is lawful.

➤ Refer to: [Export Controls Classification](#)

3.2 GKN Aerospace must ensure that access to and use of Controlled Items is restricted to authorised persons, locations and purposes.

➤ Refer to: [Accessing and Using Controlled Items](#)

3.3 GKN Aerospace must screen Employees (to the extent permitted by law), third parties and transactions in order to assess the risk of any direct or indirect involvement of, or diversion of any products or services to, individuals, entities or countries that are restricted under Export Controls or Sanctions. GKN Aerospace must also ensure that its products and services are applied only to appropriate end uses.

➤ Refer to: [Third Party Screening and End Users](#)

3.4 GKN Aerospace must ensure that it has all Authorisations necessary to lawfully Transfer or use Controlled Items, or to engage in transactions involving any individuals, entities or countries that are restricted under Export Controls or Sanctions. GKN Aerospace must also impose appropriate controls on the outbound Transfer of all Items, including compliance with the terms of Authorisations.

➤ Refer to: [Export Controls Licensing, Export Controls Outbound Transfers](#)

3.5 GKN Aerospace must create, maintain and dispose of records in accordance with its obligations under Export Controls and Sanctions and otherwise as may be required to effectively demonstrate compliance.

➤ Refer to: [Export Controls Record Keeping](#)

3.6 GKN Aerospace must provide Employees with training and communications on Export Controls and Sanctions that are appropriate to their roles.

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➤ Refer to: [Export Controls Induction and Training](#)

- 3.7 GKN Aerospace must take appropriate steps to identify, assess and mitigate its risks in respect of Export Controls and Sanctions. It must also monitor compliance with the Policy and the Export Controls Procedures, and assess whether they are implemented effectively and continue to be appropriate to GKN Aerospace's risks and business operations.

➤ Refer to: [Export Controls Risk Assessment, Reporting & Assurance](#)

- 3.8 GKN Aerospace must encourage and equip Employees to raise concerns about non-compliance or potential breaches of this Policy, the Export Controls Procedures, local procedures and/or Export Controls and Sanctions. It must take appropriate steps to investigate and remediate potential breaches.

➤ Refer to: [Export Controls Investigations and Disclosures](#)

4. RESPONSIBILITIES & COMMITMENT

- 4.1 The GKN Aerospace Executive Team has overall responsibility for ensuring that the requirements of this Policy are sufficient to enable GKN Aerospace to comply with its obligations under applicable Export Controls and Sanctions. The GKN Aerospace Executive Team shall:

- (a) be responsible for approving any major amendments to this Policy;
- (b) maintain active oversight of the implementation of the Policy and compliance programme and ensure that sufficient resources are allocated to its implementation;
- (c) ensure that the Employees within the Export Control Sub-Function, and other Employees with responsibilities under the Export Controls Procedures, have sufficient expertise, authority, tools and resources to fulfil their responsibilities;
- (d) ensure that the Export Control Sub-Function has a reporting line into the GKN Aerospace Executive Team;
- (e) ensure that the Business Lines, Operations and the Global Functions provide appropriate support to the Export Control Sub-Function; and
- (f) lead by example and actively promote a culture of compliance with Export Controls and Sanctions throughout GKN Aerospace.

- 4.2 The GKN Aerospace General Counsel is ultimately responsible for ensuring that the requirements of this Policy are implemented throughout GKN Aerospace. Responsibilities for implementation of the compliance programme, including the roles and responsibilities within the Export Control Sub-Function, are set out in the Export Controls Governance Framework.

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- 4.3 Advice from the Export Control Sub-Function shall be sought where there is any doubt as to the legality of any export transaction. All Employees shall report as soon as possible if they suspect a potential non-compliance or breach of this Policy, the Export Controls Procedures, local procedures and/or Export Controls and Sanctions laws and regulations in accordance with Export Controls Investigations and Disclosures.

5. BREACHES

- 5.1 Breaches of Export Controls and Sanctions can result in severe consequences and are regarded seriously by GKN Aerospace. Employees who breach this Policy, the Export Controls Procedures and/or Export Controls and Sanctions may be subject to disciplinary action, up to and including dismissal, as allowable by applicable law and in accordance with applicable policies and procedures established by Human Resources.

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ANNEX I

EXPORT CONTROLS PROCEDURES

- [Export Controls Classification](#)
- [Accessing and Using Controlled Items](#)
- [Third Party Screening and End Users](#)
- [Export Controls Licensing](#)
- [Export Controls Outbound Transfers](#)
- [Export Controls Recordkeeping](#)
- [Export Controls Induction and Training](#)
- [Export Controls Risk Assessment, Reporting & Assurance](#)
- [Export Controls Investigations and Disclosures](#)

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➤ **References**

Ref	Reference Number	Reference Title
1	COMP-PROC-10-01	Export Controls Procedures Glossary
2	COMP-PROC-10-02	Export Controls Governance Framework
3	COMP-PROC-10-03	Export Controls Classification
4	COMP-PROC-10-04	Accessing and Using Controlled Items
5	COMP-PROC-10-05	Third Party Screening and End Users
6	COMP-PROC-10-06	Export Controls Outbound Transfers
7	COMP-PROC-10-07	Export Controls Licensing
8	COMP-PROC-10-08	Export Controls Record Keeping
9	COMP-PROC-10-09	Export Controls Induction and Training
10	COMP-PROC-10-10	Export Controls Risk Assessment, Reporting & Assurance
11	COMP-PROC-10-11	Export Controls Investigations and Disclosures

➤ **Change Record**

Issue	Date	By	Details of change(s)
01	June 2021	Julie Smyth	First Issue
02	23 rd March 2023	Terry Irvine	Updated CEO statement from David Paja, and new APMS2 front page.

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