

CURTISS-WRIGHT CORPORATION

Policy No. 29

COMPLIANCE WITH GLOBAL TRADE COMPLIANCE LAWS

(REVISED DECEMBER 2024)

POLICY

Export Controls are laws and regulations are enacted by nations to prevent unauthorized transfers that may undermine the national security, foreign policy or impact their obligations and commitments to international non-proliferation regimes and within and among the international defense community. The Company is subject to such controls in all jurisdictions where it operates, to include national unilateral controls, “catch-all” controls for unlisted items, and application of extraterritorial controls on certain reexports particularly those of the United States.

Legal Department, Global Trade Compliance is responsible for issuing the policy and supporting procedures.

Business units Leadership and GMs are responsible to ensure all Curtiss-Wright employees are familiar with and abide by this Policy.

Internal Audit is responsible for deploying annual compliance risk assessment which integrates Trade Compliance and provides Business Units a tool to document their internal control plans for mitigating risk.

Internal Control Plans are used to reduce broad risk areas and provide a mechanism for mitigating unique business risks. All business unit operations are reviewed to adequately protect the commodities, technology and services they provide to prevent unauthorized access/transfer through:

- A. Leader/Employee Participation
- B. Jurisdiction and Classification
- C. Destination Control Statements and Document Marking
- D. Restricted Party Screening
- E. End Use Information Collection
- F. Commodity Exports
- G. Technology Exports
- H. Import Compliance
- I. Anti-boycott Reporting
- J. Brokering of Military Items

PROCEDURE

The Company and its employees must comply with all relevant laws and regulations. Failure to do so could bring serious penalties for the Company and for the individuals concerned and could harm the national security and foreign policy interests of our respective nations. Employees should contact the Legal Department, Global Trade Compliance at CW_GTC_helpdesk@curtisswright.com if they are contacted by the US or any other governments concerning export or import control matters.

Reporting Obligation. Company personnel are strongly encouraged to report suspected violations of this Policy or any export or import control compliance by the Company, any fellow employee or any third party. Reports of suspected violations should be made to

- (i) an employee's manager, or to
- (ii) any member of the Law Department, or to
- (iii) the Curtiss-Wright Hotline at (844) 286-0072, or
- (iv) by making a report online at www.curtisswright.ethicspoint.com.

For international dialing instructions, go to www.curtisswright.ethicspoint.com. You may report anonymously if you are unwilling to provide your name. As permitted by law, an employee's failure to report known or suspected wrongdoing of which the employee has knowledge may, by itself, subject that employee to disciplinary action.

The Company will not permit retaliation of any kind against any employee who in good faith reports suspected misconduct.

Relevant laws, regulations and resources to which Curtiss-Wright is subject and adheres:

- United States export and import control laws and regulations;
 - Export Administration Regulations (EAR)
 - Foreign Trade Regulations (FTR)
 - International Traffic in Arms Regulations (ITAR)
 - Office of Foreign Asset Controls (OFAC)
 - Nuclear Regulatory Commission (NRC) Regulations
 - Customs Regulations.
- Canada export and import control laws and regulations;
 - Global Affairs Canada (GAC)
 - Canadian Controlled Goods Program (CGP)
- United Kingdom export and import control laws and regulations;
 - Export Control Act 2002
 - Export Control Order 2008
 - Council Regulation (EC) No 428/2009 (in Northern Ireland Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021)
- European Union and member country national export and import laws and regulations such as France, the Netherlands, or Ireland and
 - The European Union laws and regulations include but are not limited to the Council Regulation (EC) no. 1061/2009 for exports and Council Regulation (EC) no. 260/2009 for imports administered by member country organizations.
- Any national export and import laws and regulations of countries not members of the European Union such as Switzerland (Arms Control and Arms Control Police SECO) or China (Export Control Law of the People's Republic of China).