

Trade Compliance

As a global company, Moog is required to comply with the import and export laws and regulations of each country where business is conducted. We honor the trade, import, and export laws of the countries in which we operate. A number of government controls, both in the United States and internationally, restrict to varying degrees the import and export of goods, services, and the sharing and delivery of technical information.

As a U.S.-based corporation, Moog must comply with numerous regulatory regimes, such as those contained in the Department of State International Traffic in Arms Regulations (ITAR), the Department of Commerce Export Administration Regulations (EAR), the Department of Treasury Office of Foreign Assets Control (OFAC), Alcohol, Tobacco, Firearms, and Explosives (ATF), the Department of Homeland Security (DHS), and the Department of Justice.

Additionally, as a significant employer, manufacturer, and importer/exporter in the European Union (EU), the United Kingdom (UK), the Philippines, and other global locations, the Company observes UK Strategic Export Control Lists, the EU Dual Use Regulation and Military Control List, the Missile Technology Control Regime, the Australia Group, the Nuclear Suppliers Group, the Wassenaar Arrangement, TARIC, the Tariff and Customs Code of the Philippines, and other international import and export regulatory regimes.

A global trade compliance approach and strategic policy sets forth key, enterprise-wide trade compliance requirements and develops and administers training programs for all employees globally. Moog personnel are expected to be cognizant of, and sensitive to, the directives of company compliance policies in their daily activities. Employees are encouraged to utilize the Trade Compliance Department and the Legal Department for questions about how import and export laws within individual countries might apply to their work.

Operation Trade Specialists and/or Export Compliance Officers support and facilitate activities related to the export and import of goods, technology and services by obtaining required export/import licenses and similar government authorizations to insure Moog's compliance with export/import laws. These employees function as Subject Matter Experts (SME's) and Empowered Officials (EO's) for Moog's Operations as well as acting as a focal point for trade related issues, inquiries, and overall compliance driven by U.S., EU, UK and other government-specific trade controls and regulations. Technical assistance agreements and appropriate restrictions are put in place for sharing technical information with Moog's foreign locations including with employees, suppliers and customers that are citizens of different countries.

Within Moog's Operations, SME and EO trade specialists ensure compliance to export/import regulations associated with the use of Moog's multiple international sites, the Company's



continuously evolving global supply-chain and the development of Moog's international customer base. They communicate export requirements and identify, counsel, and administer aspects of business activity which are impacted by trade regulations, demonstrating Subject Matter Expertise in ITAR, EAR, ATF and OFAC regulations affecting the trade of Moog product, technical data and services.

Note on Suppliers: Per Moog's Standard Terms and Conditions, suppliers must comply with all applicable export/import requirements. In addition, each Supplier is responsible for conducting due diligence on all of its business partners which includes, but is not limited to, that the Supplier shall complete a comprehensive Denied Party Screening on all business partners. When goods originate outside of the United States, a Supplier shall provide Moog with a Certificate of Origin and, as requested by Moog, any other documentation that is reasonably required for U.S. Customs and Border Patrol (CPB) compliance.