



Day&Zimmermann

We do what we say.®

Policy: International Business Travel

Policy No.: 1503

Responsible Officer: Senior VP, General Counsel, and Corporate 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. Business Units must seek competent assistance from knowledgeable travel agents or other travel specialists in planning and preparing for foreign travel.

Business Units must obtain travel conditions (political and otherwise) in target countries 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. Business Units must plan and provision for appropriate access to health care services prior to departure. The individual employee's health care coverage and the target country's standard practices will influence these plans. Well-being of the employee must receive priority in all cases.

2.0 Expatriate Assignments

Business Units must coordinate with the appropriate Human Resources function to ensure that employees on expatriate assignments 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 traveling 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 is that each such Company employee or consultant must:

- Prepare and submit a Foreign Travel Export Control and Security Checklist, or applicable form designated by the employee's Business Group, to the Director of

Compliance for his or her Business Group (or shared Director of Compliance, see [Policy 1505](#)) or to the Law Department, if there is no Director of Compliance available, as far as in advance of travel as is possible but not less than 48 hours prior to departure.

- 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.
- Receive guidance from the Director of Compliance or Law Department Representative about compliance obligations and any permissions that the Business Unit must obtain from U.S. Government agencies, such as the State Department's Directorate of Defense Trade Controls. (Note that if licenses for the export of technical data are required, obtaining those licenses typically requires several weeks. The foregoing consultation and submission of the associated license application must 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 U.S. Government officials.