



INTERNATIONAL TRADE COMPLIANCE

ISSUE REPORT FORM

For use in reporting suspected export or import compliance issues

Effective as of 3/25/2016

A potential export or import compliance issue includes but is not limited to potential escapes, errors, and violations related to the International Traffic in Arms Regulations (“ITAR”), Export Administration Regulations (“EAR”), Foreign Trade Regulations (“FTR”, also known as “AES”), economic sanctions, customs, and related internal policies. It also includes the trade control regulations of other countries and/or multilateral agreements where Esterline’s activities are subject to those regulations.

Esterline is committed to full compliance with all international trade controls laws and regulations, in all countries in which we do business. All employees have responsibility to raise potential trade compliance issues for review and action. Consistent with our Code of Ethics and Responsibility, Esterline maintains a firm “no retaliation” policy to ensure that all employees can freely and independently report suspected instances of potential non-compliance without fear.

Attached is a form specifically developed for reporting trade compliance specific matters that may be used by any employee seeking to raise a potential trade compliance issue. Alternatively, an employee may report suspected issues without using this form if he/she does not have access to a computer or if he/she prefers to give a verbal report. If an alternative reporting method is chosen by the employee, the form shall be completed by local trade compliance personnel or Esterline’s Corporate Ethics & Compliance staff upon referral.

Employees may report through *any* of the methods noted below:

- Through the Esterline Ethics & Compliance Helpline (this allows you to remain anonymous) via
 - My Esterline at : <https://myesterline.ehr.com/Corporate/EN/Pages/default.aspx>
 - Via Telephone at **1-800-448-0158**
- To a Trade Compliance Officer or Administrator at the facility
- To Esterline’s Corporate Ethics & Compliance staff
- To the General Counsel’s office
- To your manager, supervisor or site leadership

If you are a manager, supervisor or site leader and you receive this form from an employee, please scan and send it to TRIssues@Esterline.com. You may also call Krista Larsen, Sr. Manager, Investigations & Disclosures at (425) 326-3091 or Debra Fisher, Director, Trade Compliance at (425) 326-3093. Once received, this form *must* be submitted to Esterline Corporate Ethics & Compliance within two (2) calendar days of identifying and reporting a potential export or import

The form should be completed with as much information as possible, however, do not delay submission if some information is not yet known. It is more important to raise issues promptly than to have all facts at hand prior to reporting.

PLEASE NOTE: Due to privacy concerns and in order to allow anonymous reporting of violations, the fields asking for names and contact information are optional and, to the extent you would like to use them, are only for use by personnel in the United States. Individuals outside the U.S. should NOT complete these fields.



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BACKGROUND INFORMATION

1. **Report Date:**
2. **Reported by (This information is Optional)**
 - a. **Name:**
 - b. **Email address:**
 - c. **Telephone number:**

** I authorize I&D to contact me regarding this issue*

BU	AIS	Esterline Avionics & Controls France SAS	LIE	Souriau-DR
	Armtec Countermeasure	Esterline Belgium BVBA	LIMEX	Souriau-India
	Armtec Defense	Esterline Federal LLC	LINA	Souriau-Japan
	Auxitrol	Esterline Georgia US LLC	LRE	Souriau-Morocco
	AVISTA	Esterline India	LTA-JV	Souriau-PA&E
	BVR	Esterline Israel Ltd.	Mason	Souriau-SAS
	CMC	Esterline-MX	Memtron	Souriau-USA
	CSG	Esterline Singapore Ltd.	Navcomm	Souriau-Sunbank
	Corporate HQ	Gamesman Hytek	NMC	Technocontact
	Darchem	Kirkhil-TA Co	Norwich Palomar	Weston
	ESS-America	Korry	Racal	
	ESS-Asia	LIAP	Sensors-MX	

3. **Potential escape date:**

4. **Potential escape origination:**

BU	AIS	Esterline Avionics & Controls France SAS	LIE	Souriau-DR
	Armtec Countermeasure	Esterline Belgium BVBA	LIMEX	Souriau-India
	Armtec Defense	Esterline Federal LLC	LINA	Souriau-Japan
	Auxitrol	Esterline Georgia US LLC	LRE	Souriau-Morocco
	AVISTA	Esterline India	LTA-JV	Souriau-PA&E
	BVR	Esterline Israel Ltd.	Mason	Souriau-SAS
	CMC	Esterline-MX	Memtron	Souriau-USA
	CSG	Esterline Singapore Ltd.	Navcomm	Souriau-Sunbank
	Corporate HQ	Gamesman Hytek	NMC	Technocontact
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Segment & Platform	Avionics & Controls Avionics Systems Control & Communication Systems Interface Technologies Advanced Materials Defense Technologies Engineered Materials	Sensors & Systems Advanced Sensors Connection Technologies Power Systems
Site Location		
Functional Area		

5. Potential areas impacted (select all that apply):

BU	AIS	Esterline Avionics & Controls France SAS	LIE	Souriau-DR
	Armtec Countermeasure	Esterline Belgium BVBA	LIMEX	Souriau-India
	Armtec Defense	Esterline Federal LLC	LINA	Souriau-Japan
	Auxitrol	Esterline Georgia US LLC	LRE	Souriau-Morocco
	AVISTA	Esterline India	LTA-JV	Souriau-PA&E
	BVR	Esterline Israel Ltd.	Mason	Souriau-SAS
	CMC	Esterline-MX	Memtron	Souriau-USA
	CSG	Esterline Singapore Ltd.	Navcomm	Souriau-Sunbank
	Corporate HQ	Gamesman Hytek	NMC	Technocontact
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Segment & Platform	Avionics & Controls Avionics Systems Control & Communication Systems Interface Technologies Advanced Materials Defense Technologies Engineered Materials	Sensors & Systems Advanced Sensors Connection Technologies Power Systems
Other Esterline Businesses		



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POTENTIAL ISSUE DETAILS

1. **Please describe what the issue is:** This description should provide a summary of the potential issue, including how it was identified, when, and by whom. It should be concise and adhere to the known facts surrounding the issue. Supporting documentation, if available, should be attached and/or submitted with this form, including photographs of any security issues.

2. **The issue involves (select all that apply):**

Hardware

Export

Technical data

Import

Defense Services

3. **Potential Escape Jurisdiction (select all that apply):**

ITAR (military)

Customs (19 CFR)

EAR (commercial)

AES (FTR)

EAR (military)

Other

OFAC

Do you know the Category(s) or Classification(s) under the USML or EAR? If so, please list them here:

Do you know the Classification(s) under non-US jurisdiction? If so, please list them here:

4. **Sensitive Countries.** Identify any sensitive countries which may be involved in the potential escape:

Afghanistan

Iran

Sri Lanka

Belarus

Iraq

Sudan

Burma

Lebanon

Syria

China

Liberia

Venezuela

Congo

Libya

Vietnam

Cote d'Ivoire

North Korea

Zimbabwe

Cuba

Russia

Other:

Eritrea

Sierra Leone

Haiti

Somalia



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5. Is the issue related to a license or agreement?

Yes No I don't know

a. If yes, list all that apply:

b. Does Esterline own the license or agreement?

Yes No

6. Does the issue involve a completed export or import?

Yes No I don't know

7. Does the issue involve third parties (i.e., non-Esterline entities)?

Yes No I don't know

a. If yes, list all that apply:

***Please list complete name, address and phone number of third parties*

6. (OPTIONAL) Personnel with knowledge of the potential escape. Identify the Esterline personnel with knowledge of the potential escape, adding more rows as necessary. (NOTE: This section should NOT be completed by employees outside the U.S. and is optional for U.S. employees.)

Name	Title	BU (Select from BU list above)	Site Location



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The section below is optional for individual reporters and is primarily for the use of Trade Compliance team members. If an individual reporter has information related to these questions, they should report as much as they are able.

POTENTIAL BUSINESS AND COMPLIANCE IMPACT

- 1. Does the potential escape have a high business impact (e.g., stop production, significant cost, significant customer impact)?**

Yes

No

I don't know

- a. If yes, please describe:**

- 2. Description of Immediate Remedial Actions.** Describe any immediate remedial actions that have been started or completed, and identify the involved personnel.

- 3. Identification of Related Investigations.** To the best of your knowledge, identify any open or closed investigations that may be related to this escape. Include any internal or external reference number to the extent known.

- 4. Reporting Process.** If the potential escapes occurred and/or were identified more than five (5) calendar days before submitting this form, please describe the reasons for delay.