

A. PURPOSE

The purpose of this document is to set forth the policy (“Import Compliance Policy”) to be followed by Meggitt OC personnel in relation to the importation of goods into the Customs territory of the United States, as well as the communication and distribution of said policy and procedures.

B. POLICY

- In keeping with Meggitt OC’s Core Beliefs of Integrity, 100% Responsibility, Interdependent Collaboration, and Customer Focus, it is the policy of Meggitt OC to comply with all federal, state, and local laws and regulations.
- With specific regard to import compliance, it is the policy of Meggitt OC to comply with all laws and regulations promulgated by U.S. Customs and Border Protection (“CBP”), as well as other federal agencies, by:
 - Ensuring data accuracy
 - Ensuring complete, accurate, and on-time filings to CBP, and
 - Cooperating with U.S. Government inquiries including, without limitation, general inquiries, formal audits, and negotiations
- Currently Meggitt OC does not self-file entry declarations directly with CBP. Meggitt engages partners under Powers of Attorney to serve as its import customs brokers.
- Efforts will be made to harmonize the import compliance policies, procedures, and practices of Meggitt OC with its affiliated companies.
- Meggitt OC’s import compliance policies will support and be consistent with Meggitt Global Trade Compliance policies.

C. APPLICABILITY

Meggitt OC’s “Trade Compliance Policy” clearly communicates the company’s intent to comply with U.S. Import laws and regulations, as well as the applicable legal requirements of foreign governments.

The Meggitt OC Import Compliance Policy provides direction regarding Meggitt OC’s Import Compliance activities. The policy processes, and relevant Site work procedures provide the framework for Meggitt OC’s Import Compliance Program.

The Meggitt OC Import Compliance Work Procedure documents provide specific direction for the performance of compliance tasks and activities. These tasks and activities are incorporated into relevant Site work procedures.

a. Regulatory Requirements

Tariff Act of 1930 as amended, 19 USC 1202 et seq, 19 C.F.R. Parts 0-199, as well as Other Government Agency regulations.

b. Industry Best Practices

Although not specifically required by the aforementioned regulations, the Meggitt OC Import Compliance Program requirements are also in line with the recommendations contained in the Summary of Laws Enforced by CBP and other government agencies as applicable (Please refer to <http://www.cbp.gov/xp/cgov/trade/legal/>).

Additionally, the Meggitt OC Import Compliance Program strives to meet the “reasonable care” standards, as required by CBP.

c. Re-issuance of the Meggitt OC Import Compliance Policy

Meggitt OC’s Import Compliance Policy is re-issued annually to all Meggitt Sites for communication to all employees together with the local Site policy statement. Meggitt Sites shall also communicate the policy to each new employee during new hire orientation.

d. Communication and Distribution of the Meggitt OC Import Compliance Policy


The Meggitt OC Import Compliance Policy Statement will be included in the Human Resources New Employee Orientation Materials. All Policy-related changes and updates will be communicated and distributed through the Meggitt OC Intranet Export/ Import Compliance portal.

D. DEFINITIONS

Meggitt OC Trade Compliance Policy Statement: A statement designed to communicate to employees, Meggitt OC’s commitment to complying with Import and Export regulatory requirement. It instructs all company employees to comply with the requirements of Meggitt OC’s USA Import Compliance Program.

Meggitt Site Import Compliance Policy Statement: Each Meggitt business unit and manufacturing site (“Site”) shall issue its own Import Compliance Policy Statement in support of the Group Trade Compliance policy. The Site policy statement should affirm the company’s commitment to adhere to the Meggitt OC’s policy and instruct the Site employees with regard to the specific requirements of the Site’s Import Compliance Program. The Site policy statement should also identify the Trade Compliance Officer (TCM) and other key compliance personnel. The policy is updated and reissued when Trade Compliance personnel changes occur and at minimum once per year.

Meggitt Site Work Procedures: The Meggitt OC’s Site work procedures, developed and implemented by each Site, provide detailed instructions for those Sites, departments, functions and employees involved in Import transactions. They are intended to ensure uniform compliance with the applicable import regulations in the course of each Meggitt Site’s operational activities. The Meggitt Site work procedures are maintained by each respective Site TCM.

Signed:  Date: 10/22/14

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