



DATE: August 23, 2016

TO: All Employees & Contractors

FROM: Brian Montanari, President & CEO

SUBJECT: Export Policy Statement

HABCO is committed to compliance with all export controls in the Export Administration Act and the Export Administration Regulations. This commitment extends to promoting strict compliance on an on-going basis.

It is HABCO's policy that all employees comply with the United States export policies and regulations. Under no circumstances will exports be made contrary to U.S. export regulations by any individual operating on behalf of HABCO.

No activities will be undertaken that are in violation of the United States policies which seek to control national security, regional stability, firearms convention, criminal conduct, nuclear proliferation, missile technology, anti-terrorism and chemical and biological weapons.

Failure to comply with these regulations may result in the imposition of criminal and/or civil fines and penalties, including incarceration and monetary penalties, and employees will be subject to disciplinary action and/or termination.

I ask each of you to take this matter very seriously and to support me in this effort. If you have any questions concerning the legitimacy of a transaction or potential violations, please contact:

Mike Arslan, Quality Engineer at extension 122 or mike.arslan@habco.biz

Shawn LaRochelle, Director of Quality at extension 141 or shawn.larochelle@habco.biz

NOTE: This Statement of Corporate Commitment to Export Compliance will be issued on an annual basis or if necessitated by personnel, management, or regulatory changes.

Shawn LaRochelle is responsible for disseminating this Statement throughout the organization through HABCO's Export Management and Compliance Program Manual updates, incorporation into training and presentations, and posting on the HABCO's Intranet and Website.

Sincerely,

A handwritten signature in black ink, appearing to be "B. Montanari", with a long, sweeping underline that extends to the right.

Brian Montanari

President & CEO