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## Management Compliance Policy Statement

**Date:** January 18, 2024  
**To:** All Employees  
**From:** Steve Dicke, President

**Subject:** CSS Export Compliance Policy Including Serialized Defense items

CSS manufactures several types of parts that **must be controlled by all employees** according to company procedures.

- CSS manufactures **ITAR** controlled items that are adapted or used for military purposes and other parts that have both civilian and military applications (dual use), which would likely be **EAR** controlled. These items are governed by U.S. export regulations, requiring robust controls during manufacturing, secure storing of technical data and export licenses when shipping internationally. The control of these parts is identified on the drawings and on the work orders. If you have any questions in regard to this, please see your supervisor.
- CSS also manufactures **serialized receivers**. These items are regulated by The Bureau of Alcohol, Tobacco, Firearms and Explosives (**ATF**). The procedures we have established are in-line with the ATF regulations, including maintaining the acquisition & disposition books (A&D) for each of our manufacturing facilities (CSS28 & CSS48) that exhibit the traceability of all serialized receivers that CSS has manufactured.

CSS complies with the US regulations regarding the manufacturing and exporting of controlled products, services, software and technical data by paying particular attention to avoiding the release of controlled technical information to foreign nationals or distributing electronic transmissions of controlled data and/or software, and shipping controlled products internationally to unauthorized entities. We encourage all employees to remain familiar with their ITAR departmental compliance procedures that are a component of the CSS Export Management Compliance Program and continue to remain resolute when following the established procedures regarding processing serialization defense items.

If you have any questions or concerns regarding the CSS Compliance Program or Serialization Program, direct them to Gia Zarrella-Brown, our Director of Compliance.

Steve Dicke  
President