

Trade Compliance Policy



TRUST. WELL EARNED.

BRUSH employees must strictly comply with all applicable import and export control laws and regulations in the jurisdictions where the Company does business.

Procedures must be maintained to ensure every import, export, or re-export of goods, services, or technology complies with applicable laws and regulations, and that all necessary Governmental approvals for such transactions are obtained. The Group Trade compliance department has primary responsibility for developing and implementing programs and procedures that maintain compliance governing the import and export of BRUSH's goods, services and technology. The department is responsible for advising on compliance with, and changes in, laws and regulations that may require modifications to such procedures. BRUSH employees involved with the import, export, or re-export of goods, services or technology must familiarize themselves with such procedures, receive training proportionate to their job responsibilities, as well as obtain and maintain a working knowledge of applicable trade and customs laws and regulations. In addition, BRUSH employees shall cooperate fully with all import and export control compliance activities, including audits and reviews

Violation of trade regulations can subject BRUSH and individual employees to civil and criminal liability. Internally, any violation of this Policy may subject the employee to disciplinary action.

Nicolas Pitrat
CEO

For further information regarding this policy:

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