

MANAGEMENT COMMITMENT STATEMENT

The success of our company depends, in part, on the business we do overseas. Export controls imposed by the UK Government and the European Community affect an increasing proportion of the goods, services and technology that we provide. Although these controls currently affect only a small proportion of our work, the consequences of breaching them are serious.

It is the policy of Gooch and Housego (G&H) to comply fully with all applicable UK, US and other countries laws and regulations controlling the export (and related Import) of military and commercial items, services and technology. This policy specifically encompasses compliance with the government agencies and departments tasked with overseeing and regulating exports (and related imports) of items subject to export control laws.

The purpose of controls on exports is to restrict the supply of strategic goods, services and/or technology to certain destinations, principally for the avoidance of arms proliferation, terrorism, human rights abuses and to promote global security.

Employees of G&H must understand and be aware of these controls and the methods of enforcement, and be absolutely certain that we ensure complete compliance at all times; failure to do so may bring serious penalties for the company and for any individuals concerned.

Each employee must be aware of their own role and ensure that no goods, services or technology are dispatched without the relevant authorization. The Chief Operating Officer has overall responsibility for the maintenance of and adherence to these procedures. Assisted by the Senior Vice President, Global Quality Assurance, and the UK & USA Compliance Managers.

Employees directly concerned with the operation of these controls and procedures will receive detailed training, which will include attendance at various Export Control Seminars organized by the relevant agencies and other providers. The relevant regulatory agencies have the legal authority to revoke open licenses in the event of non-compliance with license conditions, in addition to reporting any suspected breaches.

If any employee feels that an action being taken or contemplated by the company may lead us to be in breach of any export control regulations then he/she must report the matter immediately to either their supervisor/manager, the UK Compliance Manager or US Compliance Manager or to the Senior Vice President, Global Quality Assurance.

The following documents identify the compliance requirements of Gooch and Housego PLC

GL-CP(UK)-002 - UK Export Compliance Manual

GL-CP(US)-003 - US Export Compliance Manual

Mr. Mark Webster

Chief Executive Officer

16th June 2016