



36 Newburgh Rd.  
Hackettstown, NJ 07840  
908-850-5088

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## TDI Power Corporate Trade Compliance Policy

United States law imposes a duty on exporters to ensure that U.S. origin products, technology, and services are correctly classified, documented, and licensed at time of export, and are shipped only to legitimate, reliable, and screened foreign end-users who are not prohibited from receiving them.

It is the policy of TDI Power to comply with both the export and import regulations of the United States, and to conduct our international transactions in accordance with them. This includes those administered by the Department of State, Directorate of Defense Trade Controls; the Department of Commerce, Bureau of Industry and Security; Department of The Treasury, Office of Foreign Asset Controls; the Department of Justice, Criminal Fraud, Foreign Corrupt Practices Act; the Department of Energy, Nuclear Regulatory Commission; the Department of Homeland Security, and other Federal agencies as they are involved. It is also the policy of TDI Power to comply with the trade laws and regulations of countries in which we conduct business.

TDI Power employees have a personal obligation to assure that export transactions carried out on behalf of the company are performed in full compliance with U.S. trade law. Under no circumstance or for any reason are export transactions permitted with entities or persons listed on any U.S. Restricted Parties List, or with entities or persons who are or may be engaged in prohibited nuclear and missile development activities or in the proliferation of weapons of mass destruction. Charles McCleary, Vice President and General Counsel, has overall responsibility for maintaining our compliance program. Employees who know of or suspect that an export or import transaction has violated or could violate U.S. regulations must halt further processing of the order and advise Mr. McCleary or his staff immediately. Mr. McCleary may be reached on 908-850-5088 ext. 1514.

Trust, integrity, and accountability are paramount values in TDI Power. The employees and leadership of the company are expected to give their full support to our trade compliance obligations. Penalties for violations are severe, and may result in substantial fines, loss or suspension of export and import privileges. Persons who deliberately engage in illegal transactions may receive personal fines and prison sentences could be imposed for violations involving conspiracy or criminal intent.

James M. Feely

A handwritten signature in black ink, appearing to read "J M Feely", written in a cursive style.

President and Chief Executive Officer