



May 16, 2011

Corporate Trade Compliance Policy

United States export control regulations impose a strict duty on exporters to ensure that U.S. origin products, technology, and services are correctly classified, licensed, and documented at time of export, and are shipped only to legitimate and reliable foreign end-users.

It is the policy of TDI Power conduct our international transactions in full compliance with all export regulations. This includes those administered by the Department of State, Directorate of Defense Trade Controls; the Department of Commerce, Bureau of Industry and Security; the Department of the Treasury, Office of Foreign Asset Controls; the Department of Justice, Foreign Corrupt Practices Act statutes through its Criminal Fraud Division, and the Department of Homeland Security. It is also our policy to comply with the trade laws and regulations of the countries in which we conduct business.

Under no circumstance or for any reason are export transactions permitted with entities or persons listed on any U.S. government debarred parties list, or with entities or persons engaged in prohibited nuclear and missile development activities, or involved in the proliferation of weapons of mass destruction. Charles Theil, Director, Global Trade Compliance and Security, is charged with assuring compliance with export/import laws and regulations. He is responsible for interpreting trade regulations, writing compliance instructions, and providing trade compliance guidance and training for TDI employees. Employees who know or suspect that an international transaction has been or may be in violation of law must immediately halt further processing of the order or shipment and notify Mr. Theil. He can be reached in Hackettstown on 908-850-5088 ext. 1442.

TDI Power employees have a personal obligation to be certain that international transactions carried out on behalf of the company are performed in full and continued compliance with all U.S. export laws. Penalties for violations of these laws are severe and range from monetary fines to suspension or permanent loss of export privilege. Deliberate engagement in unlawful export transactions may bring fines to individual employees, and jail sentences could be imposed for violations involving conspiracy or criminal intent.

Mr. Theil may be contacted with questions or concerns about export control responsibilities or any trade compliance matter.

A handwritten signature in black ink, appearing to read "J M Feely".

James M. Feely

President and Chief Executive Officer