

Management Policy Statement

DATE: February 17, 2023
TO: All Employees
FROM: Steve Dicke, President
SUBJECT: CSS Export Compliance Policy Including the Serialization of Defense items

The United States regulatory system within the Department of State (**DOS**) for controlling and monitoring the movement of ITAR controlled goods, information, and technologies. The system is designed to minimize the risk of diverting such items to persons or locations that are not in the best interests of the United States.

- CSS manufactures parts that are adapted or directly used for military purposes, making them **ITAR controlled** items and some items that have both civilian and military applications, which would be **EAR controlled**. These are governed by U.S. export regulations, requiring special controls and licenses.

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (**ATF**) is the Federal agency primarily responsible for administering and enforcing the criminal and regulatory provisions of the Federal laws include the investigation and prevention of federal offenses involving the unlawful use, manufacture, and possession of firearms and explosives; acts of arson and bombings; as well as illegal trafficking of alcohol and tobacco products. The ATF regulates via an FFL license, the sale, possession, and transportation of serialized firearms, ammunition, and explosives in interstate commerce.

- CSS manufactures parts that the ATF considers an actual firearm when we produce **serialized receivers**. The processes we have put into place are in-line with the ATF regulations CSS maintains Acquisition & Disposition books (**A&D**) for each of our facilities (28 & 48 Spring Lane) regarding the traceability of each of these serialized receivers manufactured.

It is CSS's policy to comply with all laws and regulations governing the export of its products, services, software and technical data. Each employee, therefore, must be dedicated to ensuring such compliance with government regulations. All employees are required to be familiar with the CSS Export Management Compliance Program. Particular attention must be taken when releasing technical information to foreign nationals, electronic transmission of data and/or software, and the shipment of products outside the United States.

Any questions regarding the CSS Compliance or Serialization program and how it impacts your job, as well as any question concerning the legitimacy of any transaction, violation, or potential violation should be immediately referred to Gia Zarrella-Brown, our Director of Compliance.



Steve Dicke
President