

Export Compliance RUAG

Export of defence technology products; providing services in the defence technology field for customers abroad ("export of military applications")

Basic principle

As a company owned by the Swiss Confederation, RUAG is aware of its responsibilities as provider of military applications for Aerospace and Defence.

RUAG supplies military applications only to clearly identified, legitimate business partners and, thereby, makes a contribution to security, independence and stability.

RUAG strictly complies with the applicable laws and administrative orders.

Scope of application

The Export Compliance applies to all RUAG organisational units and activities, irrespective of them having their domicile in Switzerland or abroad and irrespective of the export activities being carried out from Switzerland or from a location abroad. The same applies for joint ventures.

Legal basis

All exports of military applications, irrespective of the location, from which they are carried out, must be within the framework of international law, Switzerland's international obligations and the principles of Switzerland's foreign policy.

In concrete, exports of military applications may only be carried out, if they are permitted under the relevant Swiss provisions (in particular War Material Act and Goods Control Act, including the corresponding ordinances, Embargo Act) and according to the authorisation practice of the Swiss authorities.

RUAG is committed to the Swiss export regime, in the defence technology field, corresponding to those of Western European states.

Prohibition of circumvention

RUAG renounces to accept and execute assignments, by transferring know-how, granting licences, transferring personnel and/or production facilities from a Swiss location to a production location abroad, if it would not be permitted to do so from a Swiss location.

Synergies with the main task of RUAG

RUAG strives to achieve synergies to ensure the Swiss Armed Forces' equipment when exporting military applications.

Special exports

Exports with substantial, political or strategic impact on the whole group shall be submitted to the Board of Directors of RUAG Holding Ltd for decision.

Implementation of the Export Compliance

The CEO together with the Executive Board is responsible for compliance with the Export Compliance. He makes the whole group aware of the Export Compliance and substantiates it in an appropriate way.

For this an Export Compliance Committee is appointed, which, inter alia, has following duties:

- Support of the operational division in complying with the Export Compliance
- Provision of training on the subject of Export Compliance within the group
- Keeping indicative lists of countries in view of the War Material Act and the Goods Control Act
- Assessment of all intended exports, which are supplied for (pre)examination
- Assessment of all intended exports, which concern non unobjectionable / uncritical countries (list of countries according to Annex 2 of the WMO), before a concrete export application is filed with the authorities
- Coordination of preliminary investigations with the export control authority of the Swiss State Secretariat for Economic Affairs (Seco)
- Maintaining contact to the export authorisation authorities
- Preparation of decisions by the Executive Board or the Board of Directors of RUAG Holding Ltd
- Reporting to the Executive Board, to the Audit Committee and the Board of Directors of RUAG Holding Ltd
- Specific raising of awareness of the operational division for the international efforts against corruption and the issued group guidelines thereto

Bern, October 24, 2012

Board of Directors of RUAG Holding Ltd



Konrad Peter, President