

Sonfarrel Aerospace, LLC
Visitor Control Policy

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Rev. A.



VISITOR CONTROL POLICY

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1.0 Purpose

This Visitor Control Policy is issued by Sonfarrel Aerospace, LLC (“Son-Aero”) in connection with Son-Aero’s Export Compliance Manual (“ECM”).

The International Traffic in Arms Regulations (“ITAR”), issued pursuant to the Arms Export Control Act (“AECA”), requires that only *U.S. Persons* shall have access to ITAR controlled defense articles, and technical data, in the absence of an export license previously granted by the U.S. Department of State. Also, the Export Administration Regulations (EAR), administered by the U.S. Department of Commerce, imposes restrictions relating to commercial and dual-use articles and related technical data. Son-Aero is a manufacturer of both commercial and defense articles and thus falls under regulation of both the ITAR, and the EAR.

2.0 Scope

This Visitor Control Policy (“Policy”) applies to all employees, company-wide, and all visitors (unless exempted). All Son-Aero employees serve in a “security” role insofar as compliance with this Policy is concerned. The Visitor Control Policy has been published to Son-Aero’s website, and is also available from the Receptionist/Lobby. <https://son-aero.com/ethics-program>.

3.0 Responsibilities and Authorities

3.1 Receptionist/Lobby Role

The Receptionist or lobby representative is responsible for checking in a visitor and screening of that visitor to confirm “U.S. Person” or “Foreign Person” status, utilizing the electronic (“The Receptionist”) system provided for such purpose. In the unlikely event that the electronic system is out-of-order, a Visitors Log, such as that attached as Exhibit B, shall be utilized.

3.2 Son-Aero’s Host’s Role

The Son-Aero host of a visitor is responsible for full compliance with this Policy, including confirmation that the visitor has been screened appropriately per this Policy.

4.0 Definitions

4.1 U.S. Person

“U.S. Person” is a U.S. citizen, a lawful permanent resident as defined by 8 U.S.C. §1101(a)(20), or a protected individual as defined by 8 U.S.C. §1324b(a)(3) (see 22 C.F.R. §120.15). The ITAR definition of U.S. Person includes the following:

- U.S. Citizen
- Nationals of the U.S. (*i.e.*, those born in the outlying possessions of the U.S. meeting specified requirements, or individuals born of a parent who meet specified requirements);
- Aliens admitted for lawful permanent residence (*i.e.*, Green Card holders);
- Certain refugees (with restrictions); and
- Certain asylum seekers (with restrictions).

If the individual is not a “U.S. Person” as defined, then for purposes of this Policy that individual is a “Foreign Person.”

4.2 Foreign Person

Foreign Person means any natural person who is not a lawful permanent resident as defined by 8 U.S.C. 1101(a)(20) or who is not a protected individual as defined by 8 U.S.C. 1324b(a)(3). It also means any foreign corporation, business association, partnership, trust, society or any other entity or group that is not incorporated or organized to do business in the United States, as well as international organizations, foreign governments and any agency or subdivision of foreign governments (e.g., diplomatic missions) (see 22 CFR 120.16).

5.0 Process

5.1 Visitor Screening

Visits by customers, vendors, or other visitors are an important aspect of the company’s efforts to market its goods and services. However, compliance with applicable government regulations is vital to Son-Aero’s success. Prudent *advanced planning* by the host of a visitor is an important element to the successful implementation of this Visitor Control Policy, as well as ensuring accomplishing the purposes of the planned visit. Advance planning by a Son-Aero host will: (i) eliminate the “surprise” to a visitor of these ITAR-imposed controls when confronted with them in the lobby, and (ii) will provide Son-Aero sufficient opportunity to review and vet the documentation referred to in this policy to be provided by a visitor. ***Advanced planning by the Son-Aero host can result in visitors being effectively “pre-screened” thus avoiding the risk of significant delay upon arrival.***

All visitors to Son-Aero must be screened by lobby personnel, or by the visitor’s host if lobby personnel are not available. The purpose of the screening is to identify *non-U.S. Persons*, so as to prevent their access to military hardware and technology, which would be a violation of the ITAR, in the absence of a previously received export license. Screening is accomplished by utilizing the electronic screening system (“The Receptionist”) located next to the lobby window in the main lobby.

The Son-Aero host of the visitor will confirm that the visitor is properly badged prior to the visitor leaving the visitor entrance/lobby area. A U.S. Person may be badged as Unescorted; all non-U.S. Persons must be badged as Escorted. Color coded badges to distinguish between Unescorted and Escorted, is required. Foreign Persons (per 120.16) shall be permitted access to conference rooms that have been cleansed of defense articles, and related technical data, and restrooms. U.S. Person’s may have unrestricted access to Son-Aero’s operations and departments, in Son-Aero’s sole discretion.

No cameras are allowed in Son-Aero’s facilities. Cell phones with built-in cameras (which encompasses nearly all cell phones on the market today) shall be kept stored at all times during the visit.

Visitor screening requirements do not apply to government personnel (e.g., DOD representatives, including, DCIS, DCMA, DCAS, FBI, Contracting Officers), or law enforcement personnel, who have shown identification evidencing their status as government or law enforcement personnel.

5.2 Visitor Control Screening Requirements

All visitors (unless exempted) are required to demonstrate whether or not they are “U.S. Persons” (within the meaning of ITAR), as follows:

1. U.S. Citizenship.
 - U.S. Passport, or birth certificate may be used as evidence of U.S. Citizenship.
 - A driver’s license, or Social Security card, are *not* sufficient proof of U.S. Citizenship or Green Card status.
 - If the visitor claims to be a U.S. citizen but does not have a passport or copy, or other proof (e.g., birth certificate), see “3” below.
2. If the visitor is *not* a U.S. citizen:
 - has a so-called Green Card (evidence of lawful permanent residence in the U.S.); or
 - is a refugee or asylum seeker (*restrictions apply*), and in possession of government issued documentation to confirm this status. If the visitor claims refugee or asylum seeker status, obtain from the visitor government issued documentation confirming this status, and forward the documents to Son-Aero’s Ethics & Compliance Officer (ECO), Marty Bell, for review. martybell@ymail.com; (714)318-8850.
3. If the visitor cannot satisfy either 1 or 2 above, then the visitor shall be treated as a Foreign Person during the entire visit to Son-Aero facilities, **and shall require an escort** to move through the facility to a conference room. Foreign Persons are restricted to conference rooms during their visit to Son-Aero. Unescorted visits to restrooms shall be permitted.
4. All questions concerning the implementation of this Visitor Control Policy, if not immediately resolvable by Son-Aero supervisors or management, should be referred to the ECO for resolution.

5.3 Visitor Control Screening Form

All visitors are encouraged to submit the Visit Authorization Request form, Exhibit A (provided to the visitor by the Son-Aero host), in advance of a planned visit. The purpose of the form is to vet a visitor in advance, for U.S. Person compliance, to avoid potential delays upon the visitor’s arrival at Son-Aero. Regardless of whether or not the Visit Authorization Request form is utilized, all visitors shall sign into the facility, and sign out of the facility, utilizing the electronic sign-in system provided in the lobby.

The Son-Aero host of the visitor will confirm that the visitor is properly badged prior to the visitor leaving the visitor entrance/lobby area. A U.S. Person may be badged as Unescorted; all non-U.S. Persons must be badged as Escorted. Color coded badges to distinguish between Unescorted and Escorted, is required. Foreign Persons (per 120.16) shall be permitted access to conference rooms that have been cleansed of defense articles, and related technical data, and

restrooms. U.S. Person's may have unrestricted access to Son-Aero's operations and departments, in Son-Aero's sole discretion.

6.0 Record Retention

Written or electronic records of all visitors shall be maintained by Son-Aero. Evidence of visitor screening may be documented by utilizing the attached Visitor Screening form, or by a server based electronic system that captures the same information. The written documentation or electronic equivalent shall be maintained by Son-Aero for period not less than five (5) years from the date of the visit.

7.0 Revision History

Rev	ECO	Details	Approval	Date
A	MBell	Initial release.	JGreer	060623

8.0 Exhibit A, Visit Authorization Request Form

Sonfarrel Aerospace, LLC, Visit Authorization Request

Request To:		
To: Sonfarrel Aerospace, LLC	Attention: Security	Security@son-aero.com
3310 E. La Jolla Street Anaheim, CA 92806		Phone: (714) 630-7280
		Date of Request:

The below listed individuals wish to visit your facility for the purpose set forth.	
Company:	Telephone:
Address:	Website:
	Cage Code:

Visitor		
Name:	Email:	SSN:
Title:		DOB:
(i) U.S. Citizenship?	(ii) Green Card?	Place of Birth:
If not (i) or (ii), specify immigration status:		Purpose of Visit:
Date of Visit:		Sonfarrel Point of Contact:

Visitor		
Name:	Email:	SSN:
Title:		DOB:
(i) U.S. Citizenship?	(ii) Green Card?	Place of Birth:
If not (i) or (ii), specify immigration status:		Purpose of Visit:
Date of Visit:		Sonfarrel Point of Contact:

Visitor		
Name:	Email:	SSN:
Title:		DOB:
(i) U.S. Citizenship?	(ii) Green Card?	Place of Birth:
If not (i) or (ii), specify immigration status:		Purpose of Visit:
Date of Visit:		Sonfarrel Point of Contact:

9.0 Exhibit B, Visitor Control Log

Sonfarrel Aerospace LLC
Visitor Control Log

Date	Name	Company	Visiting	Time In	Time Out	U.S. Person	
						Yes	No