US CUSTOMS IMPORT DOCUMENT REQUIREMENTS

A. INVOICE
- Invoice should be “billed to” the Accounts Payable location.
- The Federal-Mogul location receiving the product must be listed as the “Consignee.”
- Supplier must include, in English, a complete part description.
- Harmonized Tariff Number
- Quantity
- Value
- Extended Value
- Discounts if applicable must be separate line item on invoice
- Country of Origin, European Union is not acceptable, must list actual country
- Currency
- Incoterm
- Commission, Royalties, Assists

B. PACKING LIST
- Packing list must provide part numbers shipped.
- Reference pallet number associated with part number.
- Net weight
- Gross weight

C. A MILL CERTIFICATE IS REQUIRED WHEN SHIPPING METAL PRODUCTS.

D. MANUFACTURER’S NAME IF THERE IS AN ANTI-DUMPING OR COUNTERVAILING CASE, i.e. Steel, Anti-friction bearings

E. THROUGH (EXPRESS) BILL OF LADING
- Description of goods must be listed on Bill of Lading.
- The Federal-Mogul location must be listed as the “Consignee.”
- Document must be signed.
- Date of Lading must be stated.
- Port of Lading must be stated.
- Bill of Lading must show the number of pallets and packages (i.e. two pallets with 24 packages)
FEDERAL-MOGUL REQUIREMENTS

The required documentation should be faxed to the following Federal-Mogul Contacts:
- Federal-Mogul Southfield, MI (Fax Number is 248-354-8972);
- The Federal-Mogul location receiving the shipment.

PALLET REQUIREMENTS
- Each pallet should be marked with the Federal-Mogul plant receiving the shipment (i.e. Federal-Mogul Maryville, MO);
- Federal-Mogul plant should be provided with total packages per pallet and the number of pallets per shipment, i.e., Pallet #1 – 27 boxes, Pallet #2 – 25 boxes;
- Required information must show on top and side of the pallet.

GLOBAL FORWARDER INFORMATION
Ocean
Hellmann Worldwide Logistics is the global ocean forwarder for Federal-Mogul North America.

Air
Kuehne & Nagel is the global air forwarder for Federal-Mogul North America

See Attachment for Contact Name, Address, Telephone and Fax number.

CONSOLIDATED SHIPPING INFORMATION - EUROPE MAINLAND, INDIA, UNITED KINGDOM
Each week, a consolidated container of Federal-Mogul product sails from Europe, India and United Kingdom to U.S.
- Federal-Mogul suppliers should contact Hellmann Worldwide Logistics in time for pick up to make the weekly sailing
- Suppliers and Federal-Mogul plants can track shipment at any point from pick up to delivery using the Hellmann Automotive Tracking System:
  - Individual ID will be assigned as requested for tracing and tracking.
GUIDELINES FOR IMPORTATION OF SOLID WOOD PACKAGING

ISPM 15 - GUIDELINES FOR REGULATING WOOD PACKAGING MATERIAL IN INTERNATIONAL TRADE.
- The Animal and Plant Inspection Service (APHIS) oversees the implementation of requirements when importing wood packaging material.
- ISPM 15 guidelines require the use of either heat treatment or fumigation and the marking of materials.
- Wood Packaging Material (WPM) includes: pallets, dunnage, crating, packing blocks, drums, cases, load boards, pallet collars and skids.
- Certified WPM must be marked and date stamped (valid for one year).

APPROVED METHODS OF TREATMENT

1. Heat Treatment:
   Material is heated to a minimum core temperature of 56 °C for 30.

2. Fumigation:
   Material may be fumigated using Methyl Bromide at the rates listed below.

<table>
<thead>
<tr>
<th>Temperature</th>
<th>Dosage Rate</th>
<th>Minimum Concentration (g/m³)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>0.5 hrs.</td>
</tr>
<tr>
<td>21 °C or Above</td>
<td>48</td>
<td>36</td>
</tr>
<tr>
<td>16 °C or Above</td>
<td>56</td>
<td>42</td>
</tr>
<tr>
<td>11 °C or Above</td>
<td>64</td>
<td>48</td>
</tr>
</tbody>
</table>

SCHEDULED DATES FOR IMPLEMENTATION:
- United States 2nd Quarter 2004
- Mexico 1 June 2004
- Canada 2nd Quarter 2004
- European Union 1 July 2004
- Australia Already in effect
- Japan 2004

AGREEMENT BETWEEN U.S. AND CANADA:
The United States and Canada have agreed not to regulate wood packaging moving between the two countries.
Canadian or U.S. untreated wood that has moved overseas is not eligible to re-enter without treatment since the identity of the wood can not be confirmed. The material must be treated prior to return as wood packaging.
C-TPAT

Customs-Trade Partners Against Terrorism

- Tier One Suppliers’ responsibility to understand and implement procedures to secure shipments to US importers
- File out questionnaire and return to US importer
  - Attached letter and questionnaire
To Whom it May Concern,

Re: C-TPAT (U.S. Import Security) Compliance

Federal Mogul has applied for membership in the **Customs Trade Partnership Against Terrorism (C-TPAT) Program** and needs information from you to complete the application process.

C-TPAT is a government program directed by U.S. Customs to encourage importers and their international suppliers to conduct internal assessments concerning their internal security and related import compliance. U.S. Customs is concerned that terrorists may attempt to use import shipments of unsuspecting companies to convey a weapon, currency or other illegal material into the United States. Importers who are accepted into the C-TPAT program receive benefits from U.S. Customs such as faster shipment clearances, fewer examinations, and the assignment of a U.S. Customs Port Account Manager.

In order to participate in this program, Federal Mogul is formally requesting that you review the following questions and provide detailed responses within thirty days of receipt.

1. **Is your company, or any related company, currently a member of C-TPAT or have you or your related company applied for the C-TPAT program?**

   Do you have written standards for security of export documentation that you prepare such as commercial invoices, manifests and/or packing lists that are required for Federal Mogul to import your goods into the United States? If so, please provide a copy or overview of those standards.

2. **Do you have written standards for **Access Controls**?** If so, please provide a copy or overview of those standards. U.S. Customs has provided the following recommendations for foreign manufacturers of goods that will be imported into the United States. Does your company follow any of these recommendations? If yes, which ones? If no, are you planning on implementing an Access Controls program in the future?

   **Access Controls**: Unauthorized access to the shipping, loading dock and cargo areas should be prohibited. Controls should include:
   - The positive identification of all employees, visitors and vendors.
   - Procedures for challenging unauthorized / unidentified persons.

3. **Do you have written standards for **Procedural Security**?** If so, please provide a copy or overview of those standards. U.S. Customs has provided the following recommendations for foreign manufacturers of goods that will be imported into the United States. Does your company follow any of these recommendations? If yes, which ones? If no, are you planning on implementing a procedural security program in the future?

   **Procedural Security**: Measures for the handling of incoming and outgoing goods should include the protection against the introduction, exchange, or loss of any legal or illegal material. Security controls should include:
   - Having a designated security officer to supervise the introduction of cargo.
   - Properly marked, weighed, counted, and documented products.
Procedures for verifying seals on containers, trailers, and railcars.

- Procedures for detecting and reporting shortages and overages before shipment to the United States.
- Procedures for tracking the timely movement of incoming and outgoing goods.
- Proper storage of empty and full containers to prevent unauthorized access.
- Procedures to notify your government’s law enforcement agencies in cases where anomalies or illegal activities are detected or suspected by the company.

(4) Do you have written standards for Personnel Security? If so, please provide a copy or overview of those standards. U.S. Customs has provided the following recommendations for foreign manufacturers of goods that will be imported into the United States. Does your company follow any of these recommendations? If yes, which ones? If no, are you planning on implementing a personnel security program in the future?

**Personnel Security:** Companies should conduct employment screening and interviewing of prospective employees to include periodic background checks and application verifications.

(5) Do you have a comprehensive Education and Training Awareness Program? If so, please provide a copy or overview of that program. U.S. Customs has provided the following recommendations for foreign manufacturers of goods that will be imported into the United States. Does your company follow any of these recommendations? If yes, which ones? If no, are you planning on implementing a comprehensive Education and Training program in the future?

**Education and Training Awareness:** A security awareness program should be provided to employees including recognizing internal conspiracies, maintaining product integrity, and determining and addressing unauthorized access. These programs should encourage active employee participation in security controls.

(6) Have you conducted an import security self-assessment in the past 90 days?

(7) If no, when do you plan on conducting such an assessment?

Please be assured that Federal Mogul is requesting this information to ensure a safer, more secure supply chain for our employees, suppliers and customers. For further information on the C-TPAT program, please visit the Bureau of Customs and Border Protection website at:

http://www.customs.gov/xp/cgov/import/commercial_enforcement/ctpat/

If you have any questions or concerns please feel free to contact me.

Very Truly Yours,

Wendy S. Himebaugh
Federal-Mogul Corporation
International Freight & Customs, The Americas
Telephone: 248-354-7084
Fax: 248-354-8972
C-TPAT Supply Chain Security Profile

Vendor Questionnaire

To be executed by all Federal Mogul Vendors

<table>
<thead>
<tr>
<th>Facility Location:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Representative:</td>
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<tr>
<td>Phone:</td>
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<tr>
<td>E-mail:</td>
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Procedural Security

Are the following physical security procedures in place?

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<tr>
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<td>A designated security officer to supervise the introduction/removal of cargo.</td>
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<tr>
<td></td>
<td>Procedures for ensuring proper marking, weighing, counting and documenting of cargo?</td>
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<tr>
<td>3</td>
<td>![ ]  ![ ]</td>
</tr>
<tr>
<td></td>
<td>Procedures for detecting and reporting overages and shortages?</td>
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<tr>
<td>4</td>
<td>![ ]  ![ ]</td>
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<tr>
<td></td>
<td>Procedures for verifying seals on containers, trailers and railcars?</td>
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<td>5</td>
<td>![ ]  ![ ]</td>
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<tr>
<td></td>
<td>Procedures for tracking the timely movement of incoming/outgoing goods?</td>
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<td>6</td>
<td>![ ]  ![ ]</td>
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<tr>
<td></td>
<td>Proper storage of empty and full containers to prevent unauthorized access?</td>
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</table>
Procedures to notify law enforcement in the case that inconsistencies or anomalies are detected or suspected?

Physical Security

Are the following physical security measures in place?

1. Buildings and railyards are constructed from materials which resist unlawful entry and protect from intrusion.
2. Perimeter fences
3. Locking devices on internal/external doors, windows, gates and fences
4. Adequate interior/exterior lighting
5. International, domestic, high-value, and hazardous merchandise is physically segregated within the warehouse(s).

Access Controls

Are the following access controls in place?

1. Positive ID of employees
2. Positive ID of visitors
3. Positive ID of vendors
4. Process for challenging unauthorized or unidentified persons.

Personnel Security
**Are the following personnel checks in place?**

<table>
<thead>
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</table>

**Security Training & Awareness**

**Are the following security awareness procedures in place?**

<table>
<thead>
<tr>
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<th>N</th>
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