

Ref.: RC-EX-001 Rev. 2

Export Compliance Policy

DATE: 12/11/2020

FROM: Richard Davis

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SUBJECT: Export Compliance Policy

In support of national security, U.S. and global efforts to fight the battle against terrorism, and the legal responsibilities and business interests of this company, WPG Americas, Inc. has implemented export control procedures that all company employees are required to follow.

Because of the potential use of electronic components in weapons and weapon systems, the U.S. Government is rightly concerned that electronic components are not be diverted to military use by enemies of the United States. Therefore, the export, re-export and transfers of electronic components are subject to government-specified controls. These controls are very precise and compliance with them is mandatory, not voluntary. No employee has the authority to act contrary to this policy, nor direct, authorize, or condone violations of the policy by any other employee.

Employees outside the United States may not re-export or transfer any commodity, technology, or software unless appropriate authorization has been obtained, and this includes foreign-produced items that are the direct product of U.S. technology and software and are subject to national security controls under the Export Administration Act.

All employees should remember that violations of the Export Administration Regulations can result in severe penalties and denial of exporting privileges as follows:

Administrative Penalties: Each violation of the export control regulations can result in the imposition of civil penalties amounting to the greater of \$250,000, or twice the value of each transaction.

Denial of Export Privileges: Violations of the Export Administration Regulations or the conditions of an export license may result in the denial of export privileges. This denial can restrict the ability of the company to engage in export or re-export transactions or restrict access to items subject to the Export Administration Regulations.

Criminal Penalties: Violators can be fined \$1,000,000 and/or up to 20 years in prison.



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Voluntary Self-Disclosures: BIS generally grants a reduction of at least 50% of the calculated penalty.

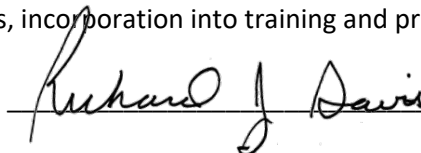
Failure to comply with these regulations may result in the imposition of criminal and/or civil fines and penalties, including jail time and monetary penalties, and employees will be subject to disciplinary action and/or termination.

I ask each of you to take this matter very seriously and to support me in this effort. If you have any questions concerning the legitimacy of a transaction or potential violations, please contact:

Kathy Smith, Trade Compliance Manager, 631-716-5025,

kathy.smith@wpgamericas.com

The Trade Compliance Manager is responsible for disseminating this Statement throughout the organization through WPG Americas Inc. Export Management and Compliance Program Manual updates, incorporation into training and presentations, and posting on the WPGA Intranet and Web site.

 (SIGNATURE) 12/18/2020 (DATE)

Richard Davis

President

Note: This Statement of Corporate Commitment to Export Compliance will be issued on an annual basis or if necessitated by personnel changes, changes in management, or regulatory changes.

All employees are required to read and sign the following verification statement on an annual basis and submit to the Human Resources Office to be filed in their personnel file.

I, _____, hereby acknowledge that I received, on ____/____/____ WPG Americas Inc. policy statement dated 12/11/2020 and signed by Richard Davis – WPG President, regarding WPG Americas Inc. commitment to export control compliance. I have read such policy statement and will comply with WPG Americas Inc. export compliance policies and procedures in support of WPG Americas Inc. compliance efforts.

Employee Signature, Title, Date