



Management Commitment Statement

DATE: March 2022

TO: All Employees and Contractors

FROM: Brian Larkin, SP CEO
Sarita Dankner, ATS VP, Legal and Global Compliance

SUBJECT: Management Commitment Statement

SP Industries, Inc. (SP) operates in many countries on a global basis and has statutory and regulatory systems for controlling and monitoring the movement of certain goods, information, and technologies. Among other things, these systems are designed to minimize the risk of diverting such items to locations that are not in the best interests of the governing country.

It is of the utmost importance to SP Industries, Inc. that the laws and regulations governing the movement of these goods, information and technologies be followed. This will allow SP Industries, Inc. to maintain its good corporate citizenship status, avoid inadvertent violations, costly errors, and the possible disruption of business.

It is the policy of SP Industries, Inc. to fully 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 sales, service, shipping, engineering, accounting, and other personnel are required to be familiar with, and review regularly, SP's **Export Management and Compliance Program (EMCP)**. In addition, all contractors and consultants are required to review and be familiar with the applicable elements of SP's EMCP. Particular attention must be taken when releasing technical information to foreign nationals, electronically transmitting data and/or software, and when shipping products outside across borders.

No transactions are to be conducted by or on behalf of SP contrary to any applicable export control laws and regulations, including the Export Administration Regulations (EAR), the International Traffic in Arms Regulations (ITAR), Federal Trade Regulations (FTR), and Customs and Border Protection requirements. No activities will be undertaken that are in violation of any applicable laws or regulations which seek to control nuclear proliferation, missile technology, and chemical and biological weapons. Under no circumstances shall these laws and regulations be compromised for commercial gain. Neither sales, import, nor shipments are to be made to any individual or organization appearing on any restricted party lists, or to any organization owned by or associated with the individuals or organizations therein listed.

Some of SP's goods, information and technologies can be adapted or used for military purposes. Other goods, information, and technologies have both civilian and military applications. Many of these items are governed by export regulations. These regulations are in place to prevent the



distribution of goods, information, and technologies that can compromise national security. In some cases, even the unauthorized transfer of low-level goods, information, or technologies can potentially jeopardize national security or further the development of weapons of mass destruction.

The regulations are very precise, and compliance with them is mandatory, not voluntary. No employee or contractor has the authority to act contrary to this program, nor direct, authorize, or condone violations of the program by any other employee or contractor.

Trade compliance is a daily exercise and noncompliance is very costly. All SP employees and contractors are required to comply with the policies and procedures outlined in the EMCP . **Any employee who knows of or suspects a violation of export or sanctions law or this Policy, whether intentional or accidental, is required to report the matter. Employees can report to the ATS Vice President, Legal and Global Compliance (trade.compliance@atsautomation.com), his or her designee, or, if the employee wishes to remain anonymous, the employee can report using the Report*It hotline service at 1-877-778-5463 or www.reportit.net. (Company Username: atsautomation and Company Password: atsemmployee). This system is for reports of ethics violations and policy breaches].** ATS and SP will review all reports of actual or suspected violations.

NEITHER ATS NOR SP WILL RETALIATE AGAINST ANY EMPLOYEE WHO REPORTS AN ACTUAL OR SUSPECTED VIOLATION IN GOOD FAITH, EVEN IF THE REPORTED INCIDENT IS ULTIMATELY DETERMINED NOT TO BE A VIOLATION OF APPLICABLE LAW OR THE EMCP.

Violations of export and import laws can subject SP , as well as its employees and contractors individually to severe penalties, including fines, denial of export privileges, and even imprisonment. Any employee or contractor who violates such laws, or who knowingly permits a subordinate to violate such laws, will be subject to appropriate disciplinary action, up to and including termination.

All questions regarding export compliance 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 the ATS Vice President, Legal and Global Compliance or the SP Trade Compliance Officer.

A handwritten signature in blue ink, appearing to read 'Bob Latoche', written over a horizontal line.

Bob Latoche
Interim President & CEO, SP Industries Inc.

A handwritten signature in blue ink, appearing to read 'Sarita Dankner', written over a horizontal line.

Sarita Dankner
Vice President, Legal and Global Compliance
ATS Automation Tooling Systems Inc.