

API Export Control Compliance Policy Statement

TO:

All Advanced Programs, Inc. Employees and Contractors

FROM:

Mark Figley

President & Chief Executive Officer

Advanced Programs, Inc.

SUBJECT:

Export Control Policy Statement

Advanced Programs, Inc. ("API") is committed to compliance with all export controls associated with the International Traffic in Arms Regulations ("ITAR") and the Export Administration Regulations (EAR). This commitment extends to promoting strict compliance on an on-going basis with terms and conditions.

API business activities in the United States and abroad may involve the export and re-export of defense-related hardware, software, and technical data subject to the International Traffic in Arms Regulations ("ITAR") as well as the Export Administration Regulations (EAR).

It is API's policy that all employees comply with the United States export policies and regulations. Under no circumstances will sales, transfers, shipments or releases of any software or technology be made in contrary to U.S. export control laws or policies set forth in the API Export Control Compliance Program by any individual operating on behalf of API.

Employees outside the United States must comply with local laws, and may not re-export any commodity, technology, or software unless appropriate authorization has been obtained. This includes foreign-produced items that are the direct product of U.S. technology and software, which are subject to national security controls under ITAR and EAR.

API employees who participate in export activities (including international marketing/sales) are required to be familiar and comply with the ITAR/EAR.

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.

Tim McMichael Director Quality & Compliance 410-312-5875

email: tmcmichael@advprograms.com

This Statement of Corporate Commitment to Export Compliance will be issued annually or as necessitated by personnel changes, changes in management, or regulatory changes.

Export Empowered Officials are responsible for disseminating this Statement throughout the organization through API's Export Compliance Program, incorporation into training and posting on the API's Intranet and Web site.

Mark Figley President & CEC

Date:

1/20/23