



ATTO TECHNOLOGY, INC.

155 CrossPoint Parkway | Amherst, New York 14068 USA
+1.716.691.1999 | www.atto.com

TRADE AGREEMENTS ACT (TAA) AND U.S. MANUFACTURING DECLARATION

Product Country-of-Origin and Manufacturing Certification

ATTO Technology, Inc. ("ATTO") provides this declaration regarding the manufacturing location and Trade Agreements Act (TAA) status of the ATTO products specifically identified in Schedule A. This declaration is based on ATTO manufacturing records, bills of material, supplier documentation, production processes, and country-of-origin analyses in effect as of the date of this document.

U.S. Operations and Manufacturing Declaration

Function	Primary Location
Headquarters	Amherst, New York, USA
Engineering	Amherst, New York, USA
Product Design	United States
Manufacturing	United States
Final Assembly	United States
Firmware Loading and Configuration	United States
Test and Validation	United States
Quality Control	United States
Customer Support	United States

For the products listed in Schedule A, ATTO performs or controls the material manufacturing activities in the United States that create the finished, functional product. These activities may include product engineering, printed circuit board assembly or final assembly, firmware loading and programming, configuration, system integration, inspection, functional and performance testing, quality assurance, serialization, labeling, packaging, and release for shipment.

Trade Agreements Act Declaration

ATTO declares that the products listed in Schedule A are U.S.-made end products for purposes of applicable federal trade-agreement procurement requirements, based on the manufacturing operations and substantial transformation occurring in the United States. Under the Federal Acquisition Regulation, acquisitions covered by trade agreements generally require delivery of U.S.-made or designated-country end products. The applicable country-of-origin test for a product containing materials or components from more than one country is whether the product has been substantially transformed into a new and different article of commerce with a name, character, or use distinct from its constituent materials.

ATTO therefore represents that, for the listed products and configurations, the country of origin is the United States and the products are eligible to be offered as TAA-compliant U.S.-made end products, subject to the applicable solicitation, contract clauses, acquisition threshold, and agency determination.

Applicable Regulations:

This declaration is provided in accordance with:

- Trade Agreements Act (19 U.S.C. §§2501–2588)
 - FAR Part 25
 - FAR 52.225-5
 - FAR 52.225-6
 - FAR 52.225-11 (where applicable)



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Imported Components and Qualified U.S. Manufacturing Claim

ATTO products may contain semiconductors, electronic components, subassemblies, raw materials, or other inputs sourced from the United States and foreign countries. This declaration does not state that every component is of U.S. origin. The recommended general product description is: "Manufactured in the USA using U.S. and imported components." The TAA country-of-origin determination is based on the origin of the finished end product and the location of the substantial transformation, not solely on the origin of every component.

Manufacturing and Supply Chain Controls

- **Manufacturing Quality System:** Documented production procedures, work instructions, inspection criteria, test requirements, nonconformance controls, corrective actions, and record retention.
- **Traceability:** Product serialization and manufacturing records are maintained to support product, configuration, and production-history traceability.
- **Supplier Quality Process:** Suppliers are evaluated and monitored for technical capability, quality, delivery performance, authenticity, continuity, and compliance with ATTO requirements.
- **RoHS and REACH:** Product-specific environmental compliance is managed through supplier declarations, material information, and applicable ATTO compliance documentation.
- **Conflict Minerals:** ATTO maintains a reasonable country-of-origin inquiry and supplier information process supporting applicable conflict-minerals reporting requirements.
- **Cybersecurity Commitment:** ATTO applies security practices to product development, internal systems, supplier risk review, vulnerability response, and protection of customer and company information.
- **Change Control:** Material changes to components, suppliers, designs, or manufacturing processes are reviewed through ATTO engineering and change-control procedures.

Scope and Qualifications

This declaration applies only to the ATTO part numbers, models, and configurations listed in Schedule A. TAA status must be confirmed for the specific item offered or delivered. Changes in component sourcing, design, manufacturing process, manufacturing location, regulation, or contract requirements may require reevaluation.

This document is not a U.S. Customs and Border Protection binding ruling or a legal opinion. A contracting officer or other authorized government official retains responsibility for determining whether an offered product satisfies the requirements of a particular procurement. ATTO will provide additional product-specific documentation when reasonably required and available.

Statement of Assurance

ATTO is committed to maintaining a controlled, transparent, and resilient manufacturing and supply-chain program that supports product quality, authenticity, continuity, and customer requirements. The information in this letter is accurate to the best of ATTO's knowledge and may be revised as products, suppliers, manufacturing processes, or applicable requirements change.



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SCHEDULE A — TAA-COMPLIANT U.S.-MADE PRODUCTS

Item	Product Family	Manufacturing Location	Country of Origin	TAA Status
1	Celerity Fibre Channel HBA	Amherst, New York, USA	United States	TAA Compliant - U.S.-Made End Product
2	FastFrame Ethernet Adapters	Amherst, New York, USA	United States	TAA Compliant - U.S.-Made End Product
3	ExpressSAS HBAs	Amherst, New York, USA	United States	TAA Compliant - U.S.-Made End Product
4	ExpressNVM Products	Amherst, New York, USA	United States	TAA Compliant - U.S.-Made End Product
5	ThunderLink Products	Amherst, New York, USA	United States	TAA Compliant - U.S.-Made End Product
6	XstreamCORE Products	Amherst, New York, USA	United States	TAA Compliant - U.S.-Made End Product
7	ATTO360 Software, XtendSAN, ConfigTool, Disk Benchmark Software	Amherst, New York, USA	United States	TAA Compliant - U.S.-Made End Product