



Telephonics Corporation Combating Trafficking in Persons Compliance Policy

Telephonics Corporation (“Telephonics”) supports the United States Government policy prohibiting trafficking in persons and trafficking-related activities, and is opposed to human trafficking and forced labor in any form. As such, Telephonics expects its employees, agents, suppliers and subcontractors to comply with FAR 52.222-50, Combating Trafficking in Persons Policy, as well as Telephonics Combating Trafficking in Persons Compliance Plan.

Pursuant to the FAR and Telephonics Combating Trafficking in Persons Plan, Telephonics strictly prohibits its employees and all subcontractors and agents from:

- Engaging in severe forms (i.e., using force, fraud or coercion) of trafficking in persons during the period of performance of a contract;
- Procuring commercial sex acts during the period of performance of a contract;
- Using forced labor in the performance of a contract;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
- Using misleading or fraudulent recruiting practices during the recruitment of employees;
- Using recruiters that do not comply with the local labor laws of the country in which the recruiting takes place;
- Charging employees recruitment fees (as defined by the FAR) ;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who was not a national of the country in which the work is taking place and who was brought into that country for the purposes of working on a U.S. Government contract, subcontract or portion(s) of contracts or subcontracts performed outside the United States;
- Failing to provide return transportation or pay for the costs of return transportation upon the end of employment in specified circumstances;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and,
- If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing in a language the employee understands.

Telephonics employees, agents, suppliers, and subcontractors must comply with Telephonics Combating Trafficking in Persons Plan. For subcontractors, suppliers, and its agents and employees, failure to comply with these requirements, including certification, as required by FAR, is grounds for Telephonics to take any and all appropriate actions, up to and including immediate termination of that subcontractor’s contract or Purchase Order with Telephonics