



## Human Trafficking Compliance Plan

### 1. Applicability

In accordance with FAR 52.222-50(h), Analog Modules, Inc. has developed this Anti-Human Trafficking Compliance Plan (the “Compliance Plan” or the “Plan”) to be implemented on United States Government contracts or subcontracts for supplies, other than commercially available off-the-shelf items, acquired outside the United States or services to be performed outside the United States and has an estimated value that exceeds \$500,000. The purpose of this Plan is to ensure Team Members, agents and subcontractors are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations.

### 2. Appropriateness of Plan

This Compliance Plan may be appropriately tailored with respect to the size and complexity of the contract and to the nature and scope of the activities to be performed for the Government and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.

### 3. Plan Requirements

#### a. Awareness Program

Analog Modules, Inc. has adopted internal policy HR-202 Anti-Slavery and Anti-Trafficking Policy to comply with applicable laws and regulations. The Company will periodically provide training on combating human trafficking. This training, required for all Team Members with supplier delegation of authority, provides Team Members with general information, reporting requirements and examples of trafficking in the supply chain.

#### b. Process to Report

Analog Modules, Inc. Team Members or third parties doing work on behalf of the Company are required to report information or knowledge of the actual or potential human trafficking violations to the Team Member’s supervisor, department manager or Human Resources. Reports may be made anonymously unless prohibited by law.

Analog Modules, Inc. Team Members or third parties doing work on behalf of the Company may also report violations by contacting the Global Human Trafficking

Hotline at 1-844- 888-FREE or help@befree.org. Retaliation against an individual who reports a violation is strictly prohibited.

c. Recruitment and Wage Plan

Analog Modules, Inc. permits only the use of recruitment companies who have trained Team Members, prohibit charging recruitment fees to the Team Member and ensure that wages meet applicable legal requirements or explain any variance.

d. Analog Modules, Inc. agents and subcontractors must have procedures to prevent trafficking in persons and to monitor, detect and terminate any agents, subcontracts or subcontractor Team Members that have engaged in such activities.

4. Posting

Analog Modules, Inc. will post this Plan in each of the facility's buildings and on the Company's website.

5. Certification

Annually after receiving an award, Analog Modules, Inc. will certify to the Government Contractor that:

- 1) it has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any Team Member, agent, subcontractor, or Team Member engaging in prohibited activities and,
- 2) After having conducted due diligence, to the best of Analog Modules, Inc.' knowledge and belief, neither it nor any of its Team Members, agents, or subcontractors are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, Analog Modules, Inc. or its subcontractor has taken the appropriate remedial and referral actions.