

COMBATING TRAFFICKING IN PERSONS POLICY

Ultra Electronics ICE, Inc. ("ICE") is opposed to human trafficking and forced labor in any form. We are committed to working to mitigate the risk of human trafficking and forced labor in all aspects of our business. The US Government has a zero tolerance policy, as set out in Federal Acquisition Regulation (FAR) Subpart 22.17 and 52.222-50, regarding any Government employees and contractor personnel and their agents engaging in any form of trafficking in person, defined to mean the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery and sex trafficking.

This policy sets out ICE's baseline standards for anti-trafficking compliance.

The contents of this policy shall be briefed to all new hires and made available to ICE employees, subcontractors, suppliers and agents via ICE's website (www.ultra-ICE.com).

Awareness Program

Pursuant to the FAR, contractors, contractor employees and their agents are prohibited from:

- Engaging in severe forms (i.e., using force, fraud, or coercion) of trafficking in persons during the period of performance of a contract or employment.
- Procuring commercial sex acts (as defined in US Code 2246(2)) during the period of performance of a contract or employment.
- Using forced labor in the performance of a contract or employment.
- 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 or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with the local labor laws of the country in which the recruiting takes place.
- Charging employees recruitment fees.
- 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 US Government contract, subcontract or portion(s) of contracts of subcontracts performed outside the US.
- Providing or arranging housing that fails to meet the host country housing and safety standards (if employer or agent provided or arranged).
- If required by law of contract, failing to provide an employment contract, recruitment agreement or other required work document in writing in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating.

Any violation of FARs and/or ICE's policy could result in disciplinary action which may include, but is not limited to, an employee's removal from a contract, reduction in benefits or termination of employment. At its discretion, ICE may elect to suspend a reported violator's employment pending the outcome of an investigation. For ICE's agents and subcontractors, including the subcontractor's employees and agents, failure

to comply with the applicable FARs is grounds for ICE to take any and all appropriate actions, up to and including immediate contract termination for default.

Reporting

Employees may report, without fear of retaliation or reprisal, activity inconsistent with this policy by notifying ICE's Ethics Officer.

Employees may elect to use other reporting methods by contacting either:

- a. Ultra Electronics Ethics Point's reporting hotline at 1-866-225-1317 or via its anonymous reporting website www.ultra-electronics.ethicspoint.com; or
- b. Global Human Trafficking Hotline at 1-844-888-FREE or its email address at help@befree.org

Upon receipt of credible information, ICE shall immediately make the necessary notifications in accordance with FAR.

Recruitment and Wage

To the extent that ICE uses recruitment companies, only recruitment companies with trained employees may be used, no recruitment fees may be charged to the employee and all wages must meet application host-country legal requirements.

Housing

Should ICE provide or arrange housing, the housing shall meet the host country safety standards.

Supplier Compliance

All agents, suppliers, and subcontractors shall be screened against World-Check which runs pertinent information against integrated US Government and internationally denied and debarred party watch lists.

When applicable and not less than annually, ICE shall require its suppliers, subcontractors, and agents to certify:

1. Its policies and practices prohibit engaging in the trafficking of persons, the use of forced labor, or the procuring of commercial sex acts (as defined in US Code 2246(2)) in the country or countries in which it conducts business; and
2. If applicable, it has implemented a compliance policy to prevent any prohibited activities identified at FAR 52.222-50 and to monitor, detect and terminate any agent, subcontract, or subcontractor employee engaging in prohibited activities; and
3. After having conducted due diligence, either (a) to the best of its knowledge and belief, neither it nor any of its agents, subcontractors, or their agents shall engage in any such activities; or (b) if abuses relating to any of the prohibited activities identified in FAR 52.222-50(b) have been found, the supplier, subcontractor, or agent has taken the appropriate remedial and referral actions; and
4. Has reviewed and understands ICE's Combating Trafficking in Persons Policy.

Failure to comply with the requirements of this policy is grounds for ICE to take any and all appropriate actions, up to and including immediate contract termination for default.

Additional Information

Additional information about Trafficking in Persons can be found at the website for the Department of State's Office to Monitor and Combat Trafficking in Persons at <https://www.state.gov/j/tip/>. For additional information regarding this policy, please contact ICE's Ethics Officer.