

ANTI-TRAFFICKING POLICY

Background and Purpose

Allied Telesis Capital Corp. (“ATCC”) has developed this Anti-Trafficking Policy (the “Policy”) in compliance with FAR 52.222-50, Combating Trafficking in Persons and USAID Standard Provision M20 for U.S. Nongovernmental Organizations (“Anti-Trafficking Provisions”).

The purpose of this Policy is to set out ATCC’s program requirements and procedures for:

1. Making ATCC Employees aware of the conduct prohibited under ATCC’s Anti-Trafficking Policy and the Anti-Trafficking Provisions and the actions that may be taken against ATCC Staff for violations;
2. Employing fair recruitment, wage, and housing practices; and
3. Preventing prohibited trafficking activity by ATCC Delivery Partners, and monitoring, detecting, and terminating those who engage in such activities.

Anti-Trafficking Policy

ATCC supports a zero-tolerance policy to combat human trafficking and forced labor. We are committed to high standards of ethics and integrity and compliance with all applicable local laws across our global operations, including the prohibition of actions that facilitate trafficking in persons. ATCC's may work with vulnerable populations, potentially exposing ATCC staff and Delivery Partners to issues of human trafficking and forced labor. ATCC staff and ATCC Delivery Partners should be particularly vigilant when contracting with local businesses that may use forced labor tactics to grow their workforce.

This policy expands on ATCC's Standards of Conduct, which outlines ethical standards and acceptable behavior applicable to ATCC operations. This policy should be read and applied to avoid or minimize adverse environmental and social impacts, and to enhance positive impacts to the maximum extent possible in our projects.

Scope

This Policy applies to all ATCC employees, interns, and representatives (jointly, "ATCC Staff"), as well as ATCC grantees/awardees, contractors, suppliers, consultants, and their employees, sub-grantees/awardees, and representatives (jointly, "Delivery Partners") engaged by ATCC,

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including for the performance of U.S. federal government contracts, awards or cooperative agreements and other applicable agreements.

Prohibited Activities

ATCC prohibits all ATCC staff and Delivery Partners to engage in the following:

- Trafficking in persons.
- Procuring commercial sex acts that may be directly associated with ATCC, including but not limited to during work hours, while attending work-related off-site functions, and at any time while in work travel status.
- Using forced labor.
- Destroying, concealing, confiscating, or otherwise denying any employee access to their identity or immigration documents, such as a passport or driver's license.
- Using misleading or fraudulent recruiting practices during the recruitment of employees or offering of employment to employees, such as failing to disclose (in a format and language accessible to the employee) or making material misrepresentations about the key terms and conditions of employment, including wage and benefits, work location, living conditions, housing and associated costs, significant costs to be charged to the employee and hazardous nature of the work (if applicable).
- Using recruiting or staffing agencies that do not comply with the labor laws of the country where the recruitment of the employee takes place.
- Charging recruitment or placement fees to prospective employees.
- Failing to provide or pay the cost of return transportation at the end of employment for an employee who is not a national of the country where the work took place and who was sent to that country for purposes of ATCC business.
- Providing or arranging housing that fails to meet the host country's housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work documents, written in a language the employee understands, that includes details of the work description, wages, work location, living accommodations (if applicable) and the content of applicable laws and regulations that prohibit trafficking in person.

Applicable agreements with ATCC Delivery Partners will include a provision proscribing the above Prohibited Activities.

Recruitment and Wage Plan

- ATCC prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. ATCC employees must fully and accurately disclose, in a format and language accessible to the employee, all key terms and conditions of employment, including wages and benefits, work location, living conditions, housing and associated costs (where provided or arranged by ATCC), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.
- ATCC prohibits the use of recruiters that do not have trained employees, or that do not comply with all labor laws of the country where the recruitment takes place.
- ATCC prohibits charging recruitment fees to any individual employee.
- ATCC will pay to all employees wages that meet applicable host-country legal requirements, or will explain any variance.
- Where required by law or contract, ATCC will provide to every employee an employment contract, recruitment agreement or other required work document, written in a language the employee understands, containing all required information about the terms of conditions of employment, which may include, by way of example work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in person. If the employee must relocate to perform the work, ATCC will provide the required work document at least five (5) days prior to relocation.
- ATCC prohibits destroying, concealing, confiscating or otherwise denying any employee access to his or her identity or immigration documents.
- ATCC will provide or pay the cost of return transportation at the end of employment for any employee who is not a national of the country where the work took place and was brought into that country by ATCC for purposes of working on a Covered Agreement.
- ATCC will provide or pay the cost of return transportation at the end of employment for any employee who is not a US national and was brought into the US for purposes of working on a Covered Agreement, if payment of such costs is required under existing temporary work programs or pursuant to a written agreement with the employee for portions of Covered Agreements performed outside the US.

Housing Plan

If/when ATCC provides or arranges housing facilities to employees, the housing will meet host country housing and safety standards.

Delivery Partner Compliance

All ATCC awardees, contractors, suppliers, consultants, at any tier, (jointly “ATCC Delivery Partners”) engaged in the performance of a Covered Agreement must agree to comply with the

Policy and all applicable Anti-Trafficking Provisions. ATCC will include language to that effect in all ATCC supplier contracts, sub-contracts and sub-agreements (“Supplier Contracts”), including inserting FAR 52.222-50, FAR 52.222-56 and USAID Standard Provisions where applicable.

All ATCC Delivery Partners engaged to perform under Covered Agreements must have a compliance plan to prevent prohibited trafficking-related activities and to monitor, detect and terminate any of its contractors, consultants, suppliers, sub-contractors or sub-recipients engaging in prohibited trafficking-relating activities, and provide a copy of its plan to ATCC.

The ATCC Delivery Partner’s compliance plan must meet the minimum requirements in the Anti-Trafficking Provisions and be appropriate to the size and complexity of the contract, sub-contract or sub-agreement with ATCC and the nature of the activities to be performed under it.

Prior to the award of any Supplier Contract, and on an annual basis thereafter, all ATCC Delivery Partners must submit a certification to ATCC:

1. That the ATCC Delivery Partners has implemented a compliance plan and has complied with its compliance plan; and
2. That after conducting due diligence, to the best of the ATCC Delivery Partner’s knowledge and belief, neither it nor any of its employees, or its contractors, consultants, suppliers, sub-contractors, sub-recipients or their employees, have engaged in any prohibited trafficking-related activities, or if any abuses relating to prohibited trafficking-related activities have been found, ATCC Delivery Partner has taken appropriate remedial and referral actions.

For ATCC Delivery Partners and Supplier Contracts that may be more susceptible to trafficking-related activities, ATCC may, in situations where it has direct access, inspect the ATCC Delivery Partner’s workplace or any housing provided by the ATCC Delivery Partner for signs of trafficking-related activities. In lower-risk situations, and in situations where the ATCC Delivery Partner is remote, ATCC will review the plans and certifications of the ATCC Delivery Partner to ensure they include adequate monitoring procedures and reporting mechanisms.

If any ATCC Delivery Partner fails to comply with the Policy, applicable contractual language in the Supplier Contract, or applicable Anti-Trafficking Provisions, ATCC will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:

1. Requiring the ATCC Delivery Partner to remove an employee or agent from a project;
2. Requiring the ATCC Delivery Partners to terminate its relationship with any ATCC Delivery Partner contractor, consultant, supplier, sub-contractor or sub-recipient;
3. Suspending payments to ATCC Delivery Partner until violation is remedied;
4. Terminating the ATCC Delivery Partner Contract for cause with immediate effect.

Reporting Requirements and Procedures

All ATCC staff and Delivery Partners are required to report any trafficking in persons-related concerns, activities, or violations to ATCC. Individuals may report concerns on a confidential basis by contacting the Company's Safe Hotline Anonymous Reporting Service at: +1 (855) 622-SAFE or by submitting a report online:

safehotline.com/submitreport

Allied Telesis Company ID: 3771271674

All ATCC staff who receive a report or hear a concern from another individual must immediately share all pertinent information with the Company's Chief Administration Officer ("CAO"). Project-level grievance mechanisms will be designed to be community friendly, and any related reports immediately elevated to ATCC's Executive Management. In addition, any ATCC staff or ATCC Delivery Partner staff who believe that they or others have been subjected to Prohibited Activities may submit a report as outlined above or may contact the Global Human Trafficking Hotline at 1-844-888-FREE or via its email address at help@befree.org.

ATCC will promptly and thoroughly investigate all complaints in accordance with established investigation procedures. Every effort will be made to protect the privacy of all complainants, reporters, and subjects of a complaint. Delivery Partners shall cooperate and ensure the cooperation of persons and entities (under their control) with ATCC and ATCC designated parties in any child abuse-related investigation.

ATCC strictly prohibits retaliation against any ATCC staff who report Prohibited Activities or other violations of this Policy. ATCC Staff who engage in retaliation against those who report Prohibited Activities or other Policy violations are subject to disciplinary action, up to and including termination.

The Company's CAO will make all required disclosures as outlined in its Compliance Plan. As appropriate and with the expressed desire of the victim, ATCC will make reports to state agencies with authority over the criminal prosecution of child abuse offenses.

Investigations

If ATCC receives credible information from an employee report or any other source alleging prohibited trafficking-related activity, ATCC's Executive Management will investigate and report its findings and determine what, if any, remedial action is appropriate. ATCC's Executive Management will also monitor ATCC management's implementation of such remedial action.

ATCC's Chief Operating Officer ("COO") will be responsible for immediately notifying the contracting officer and the appropriate agency Inspector General of the information received and any resulting remedial action taken.

ATCC will cooperate fully with any US Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to ATCC facilities and staff.

ATCC will protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited and will not prevent or hinder these employees from cooperating fully with US government authorities.

Posting

ATCC will post this Compliance Plan on its Intranet and on its external website, atcc-gns.com. ATCC will also make available this Compliance Plan at all workplaces, except where the work is being performed in the field or not otherwise at a fixed location.