

## 1.0 Purpose

As outlined in the Federal Acquisition Regulation (FAR 52.222-50) and Executive Order 13627 Strengthening Protections Against Trafficking in Persons in Federal Contracts, Amphenol PCD Inc. (“Amphenol PCD”) is required to develop and maintain a compliance plan during the performance of contract(s) or subcontract(s) that is appropriate for the size and complexity of the contract or subcontract and the nature and scope of the activities performed, including the risk that the contract or subcontract will involve services or supplies susceptible to trafficking. In accordance therewith and with Amphenol Corporation’s Code of Business Conduct and Ethics (COBCE), this document represents Amphenol PCD’s compliance plan and must be provided to its higher tier customer or the U.S. Government contracting officer, as applicable, upon request.

## 2.0 Audience and Scope

This policy and plan applies to employees, subcontractors, subcontractor employees and agents of Amphenol PCD’s business units, including subsidiaries and joint ventures controlled by Amphenol PCD, and Amphenol PCD’s corporate offices performing work under a federal contract subject to Federal Acquisition Regulation (hereafter “FAR”) 52.222-50 (Combating Trafficking in Persons) and/or Defense Federal Acquisition Regulation Supplement (hereafter “DFARS”) 252.203-7004 (Display of Hotline Posters), 252.222-7007 (Representation Regarding Combating Trafficking in Persons) and/or 252.225-7040 (Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States), in each case as applicable.

This policy and plan sets forth Amphenol PCD’s policy against trafficking in persons and Amphenol PCD’s combating in trafficking in persons compliance plan in compliance with FAR 52.222-50. This policy and plan are consistent with Amphenol Corporation’s Code of Business Conduct and Ethics and Amphenol PCD’s core values of practicing respect for all people and conducting ourselves in an ethical, lawful manner.

Terms applicable to FAR 52.222-50 that are not defined herein shall have the meanings assigned to such terms in FAR 52.222-50.

## 3.0 Compliance Statement

Human trafficking and related activities include 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. Amphenol PCD is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labor and all other trafficking-related activities. We are committed to (i) fully complying with all applicable labor and employment laws, rules and regulations and (ii) working to mitigate the risk of human trafficking in our business and supply chains.

The United States has long had a policy prohibiting government employees and contractor personnel from engaging in trafficking in persons activities, including severe forms of trafficking in persons. The FAR prohibits federal contractors and subcontractors from engaging in prohibited practices such as destroying, concealing, confiscating, or otherwise denying access by an employee to his or her identity or immigration documents; using misleading or fraudulent recruitment practices; charging employees recruitment fees; and providing or arranging housing that fails to meet the host country housing and safety standards. Amphenol PCD complies with, and requires that its employees, subcontractors, subcontractor employees and agents to comply with, FAR 52.222-50, which can be accessed at [www.acquisition.gov](http://www.acquisition.gov).

To that end, Amphenol PCD's employees, subcontractors, subcontractor employees and agents (i) shall fully comply with all applicable labor and employment laws, rules and regulations, and (ii) shall not:

- Engage in severe forms of trafficking in persons;
- Procure commercial sex acts;
- Use forced labor;
- Destroy, conceal, confiscate, or otherwise in any manner deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Use misleading or fraudulent 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 or offering of employment 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 cost to be charged to the employee, and, if applicable, the hazardous nature of the work; or (ii) use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charge employees recruitment fees;
- Fail to provide return transportation or pay for the cost of return transportation upon the end of employment—
- For an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a
- U.S. Government contract or subcontract (for portions of contracts performed outside the United States); or
- For an employee who is not a United States national and who was brought into the United States for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee

(for portions of contracts performed inside the United States); except that—<sup>1</sup>

- The requirement to provide or pay for such return transportation as described above shall not apply to an employee who is-
- Legally permitted to remain in the country of employment and who chooses to do so; or Exempted by an authorized official of the applicable contracting agency of the U.S. Government from the requirement to provide return transportation or pay for the cost of return transportation;
- Provide or arrange housing that fails to meet the host country housing and safety standards; or If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands.<sup>2</sup> The employee's work document shall include, but is not limited to, details about 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 persons.

## 4.0 Compliance Plan: Employees

Amphenol PCD has established the following compliance plan in compliance with FAR 52.222-50(h):

### 4.1 Awareness Program

Amphenol PCD distributes this policy and plan as necessary to employees performing work under a federal contract subject to FAR 52.222-50(h). Amphenol PCD requires that each such employee comply with the provisions of FAR 52.222-50, Combating Trafficking in Persons, and complete the general awareness training regarding combating trafficking in persons prior to commencing work under the contract and on a regular basis thereafter. Amphenol PCD prominently displays,

- Department of Defense's Combating Trafficking in Persons Hotline Poster,
- Fraud Hotline Poster and Whistleblower Protection Hotline Poster,
- Department of Homeland Security's Fraud Hotline Poster, and/or an employee bill of rights,

in each case as applicable, in the common work areas within business units performing work under a federal contract.

Should an employee be unsure of what to do in a particular situation or for guidance

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<sup>1</sup> Notwithstanding the foregoing, if under the policy stated above, Amphenol PCD is required to provide or pay for such return transportation, but the employee is a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or is a witness in an enforcement action related to trafficking in persons, then Amphenol PCD shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity.

<sup>2</sup> 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.

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on any aspect of the policy, they are encouraged to and should consult their manager, Human Resources, or Amphenol corporate Legal Counsel for guidance on the policies, procedures, or the law.

## 4.2 Recruitment and Wage Plan

Amphenol PCD ensures that employee wages meet host-country legal requirements or explains any variance.

Amphenol PCD also prohibits employees, subcontractors, subcontractor employees and agents from:

- Using misleading or fraudulent 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 cost to be charged to the employee, and, if applicable, the hazardous nature of the work; or (ii) using recruiters that do not comply with local labor laws of the country in which the recruiting takes place; and charging employees recruitment fees.

In addition, Amphenol PCD only permits the use of recruitment companies that provide proper training to their own employees with respect to combating trafficking related activities, do not charge recruitment fees to Amphenol PCD recruits and prospective employees, and that have established procedures to ensure that wages meet applicable host country legal requirements.

## 4.3 Housing

In the event Amphenol PCD or a subcontractor intends to provide or arrange housing in connection with performing work under a federal contract subject to FAR 52.222-50(h), Amphenol PCD, and if applicable, the subcontractor shall establish a housing plan for such work that ensures that the housing meets host-country housing and safety standards.

## 4.4 Posting

This policy and plan shall be posted (i) at the workplaces in the business units performing work under a federal contract and (ii) on Amphenol PCD's website at [www.AmphenolPCD.com](http://www.AmphenolPCD.com)

## 5.0 Compliance Plan: Subcontractors

Amphenol PCD shall flow down to its subcontractors, and such subcontractors shall comply with, FAR 52.222-50 and DFARS 252.203-7004, 252.222-7007 and 252.225-

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7040, each as applicable; provided, however, that the requirements set forth in FAR 52.222-50(h) shall apply only to any portion of a subcontract that (i) is for supplies, other than commercially available off-the-shelf (COTS) items, acquired outside the United States, or services to be performed outside the United States, and (ii) has an estimated value that exceeds \$500,000. If a subcontractor is required by FAR 52.222-50(h) to submit a certification in connection with work to be performed under a federal contract, the subcontractor shall submit the certification set forth in FAR 52.222-56 to Amphenol PCD prior to the initial performance of the subcontract and annually thereafter. Amphenol will also flow the same requirements to other major suppliers regardless of participation in a large government contract and will have a human trafficking due diligence questionnaire on file for any supplier with whom greater than \$500,000 annual spend is incurred.

In order to prevent agents and subcontractors at any tier and at any dollar value from engaging in trafficking in persons (including the activities identified in the U.S. Government's policy prohibiting trafficking in persons set forth in FAR 52.222-50(b)) and to monitor, detect, and terminate any agents, subcontracts, or subcontractor employees that have engaged in such activities, Amphenol PCD requires that its agents and subcontractors performing work under a federal contract subject to FAR 52.222-50(h) complete annually the Amphenol PCD Combating Trafficking in Persons Due Diligence Questionnaire. The questionnaire is designed to provide Amphenol PCD with sufficient information to adequately assess the practices of its agents and subcontractors with respect to combating trafficking in persons compliance. To the extent that red flags or other issues are identified in completed questionnaires, these issues and red flags are addressed first by Amphenol PCD Ethics & Business Compliance Personnel and are then, as appropriate, subsequently reported to and reviewed by Amphenol Legal Counsel. If, on the basis of red flags that are identified as a result of such review, Amphenol PCD determines that there is a reasonable risk that an agent or subcontractor has engaged in trafficking in persons or any other act prohibited by this Compliance Plan (including the activities identified in the U.S. Government's policy prohibiting trafficking in persons set forth in FAR 52.222-50(b)), or has otherwise violated FAR 52.222-50, Amphenol PCD will take action or determine and administer disciplinary action in accordance with the terms of this policy and plan.

Amphenol PCD monitors multiple sources of third party information, including international news sources. If adverse information concerning an Amphenol PCD supplier or subcontractor is discovered, the matter will be investigated and appropriate action taken.

Amphenol PCD will make appropriate disclosures to the U.S. Government of violations by subcontractors and cooperate with any Government investigation. Furthermore, the record of a subcontractor's compliance with human trafficking requirements will be considered in making future subcontractor source selections. Subcontractors that have

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engaged in prohibited conduct may be excluded from eligibility of future awards.

## 6.0 Grievance Mechanism and Reporting

Any credible information received or observed from any source (including host country law enforcement) that an employee, subcontractor, subcontractor employee, or their agent has violated FAR 52.222-50 must be reported immediately to Amphenol PCD management and to Amphenol Legal Counsel, who in turn will inform Amphenol PCD's higher tier customer under the program, or the Contracting Officer and Inspector General, as applicable, of the allegation. Amphenol Legal Counsel will make any other disclosures required under FAR 52.203-13.

Any such report may be made without fear of retaliation by using the Amphenol PCD Ethics and Compliance Helpline, which can be accessed at [www.AmphenolPCD.com](http://www.AmphenolPCD.com) under the "Resources" tab, and may also contact the Global Human Trafficking Hotline at **+1-844-888-FREE** or via email at [help@befree.org](mailto:help@befree.org). Consistent with this Compliance Plan and Amphenol Corporation's Code of Business Conduct and Ethics, no person who makes a good faith report of any information described above shall be subject to any retaliation for making any such report.

If a violation of FAR 52.222-50 is substantiated: Amphenol PCD in consultation with its legal counsel, will ensure that the appropriate disciplinary action is taken and will impose suitable remedies, up to and including termination, on subcontractors, agents, and external recruitment agencies who fail to comply with FAR 52.222-50; and will inform its higher tier customer under the program, or the Contracting Officer, as applicable, of any actions taken against an employee, a subcontractor, or a subcontractor employee pursuant to FAR 52.222-50.

## 7.0 Disciplinary Action

Amphenol PCD will take appropriate action against employees, subcontractors, subcontractor employees and agents that violate this policy and plan, which action may include, but is not limited to, the following, as applicable:

### 7.1 For Amphenol PCD employees

- Termination of employment;
- Removal of employees from work under the contract; and/or
- Reporting such conduct to the proper authorities.

## **7.2 For Amphenol PCD subcontractors, subcontractor employees, and other Amphenol PCD agents**

- Requiring the subcontractor to remove a subcontractor employee or employees from the contract;
- Declining to exercise available options under the contract;
- Termination of the contract for default or cause, in accordance with the termination clause of the contract, or requiring the subcontractor to terminate a contract;
- Termination of the business relationship with the subcontractor; and/or
- Reporting such conduct to the proper authorities.

## **8.0 Review & Approval**

The Quality & Compliance Manager, the General Manager, the Operations Director, and the Human Resources Manager are responsible for providing implementation, management and enforcement for this Policy. This policy and all supporting documents will be reviewed and updated as needed.

**HISTORY:**

<b>Revision</b>	<b>Date</b>	<b>Reason</b>	<b>Originator</b>
-	1/17/2019	Initial Release per DCN536	R. White
A	4/24/2019	To add Amphenol will also flow the same requirements to other major suppliers regardless of participation under page 5 per DCN572	R. White

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