



Human Trafficking Policy

Purpose

Cablecraft Motion Controls (the “Company”) is committed to conducting business ethically and with integrity. This policy establishes our commitment to preventing human trafficking, forced labor, and modern slavery in all aspects of our operations.

Scope

This policy applies to all team members, officers, directors, contractors, suppliers, and business partners of the Company.

Policy Statement

The Company maintains compliance with applicable U.S. Government regulations related to combating trafficking in persons, including Federal Acquisition Regulation (FAR) 52.222-50 (Combating Trafficking in Persons) and, where applicable, Defense Federal Acquisition Regulation Supplement (DFARS) requirements.

The Company is prohibited from engaging in the following activities:

- Engaging in severe forms of trafficking in persons
- Procuring commercial sex acts
- Using forced labor in the performance of contracts
- Destroying, concealing, confiscating, or denying access to employee identity or immigration documents
- Using misleading or fraudulent recruitment practices
- Charging employees recruitment fees
- Failing to provide return transportation for employees brought to a country for work (where required)
- Providing or arranging housing that fails to meet host country standards
- Failing to provide a written employment agreement when required

The Company has zero tolerance for any form of human trafficking, forced labor, child labor, or exploitation and will not knowingly engage in or support any organization that participates in such practices.

The Company is committed to:

- Ensuring compliance with all applicable laws and regulations regarding human trafficking and labor practices
- Promoting ethical recruitment, employment, and sourcing practices
- Maintaining transparency in our supply chain

Definitions

- Human Trafficking: The recruitment, transportation, transfer, harboring, or receipt of persons through force, fraud, or coercion for the purpose of exploitation
- Forced Labor: Work performed involuntarily under threat of penalty
- Child Labor: Employment of individuals below the legal minimum working age

Responsibilities

Team members must:

- Comply with this policy and all applicable laws
- Avoid engaging in any activity that could be construed as human trafficking or forced labor
- Report any suspected violations immediately

Managers and supervisors are responsible for:

- Ensuring team awareness and compliance
- Monitoring for signs of potential violations

Supplier & Vendor Expectations

Cablecraft expects all suppliers, subcontractors, and business partners to:

- Comply with all applicable anti-trafficking laws, including FAR 52.222-50 and applicable DFARS provisions
- Prohibit the use of forced labor, child labor, or human trafficking
- Provide safe and humane working conditions
- Flow down FAR/DFARS anti-trafficking requirements to their subcontractors and suppliers
- Certify, when required, that they have implemented compliance plans and due diligence procedures
- Notify the Company immediately of any credible information regarding violations
- Allow reasonable audits or assessments upon request

Suppliers may be required to certify compliance with this policy.

Recruitment Practices

The Company will:

- Use reputable recruitment agencies
- Prohibit the charging of recruitment fees to workers
- Verify team members' eligibility to work
- Ensure employment terms are transparent and documented

Training & Awareness

The Company will provide training to relevant team members based on role and risk, particularly those involved in government contracting, supply chain management, and human resources, on:



- Recognizing signs of human trafficking
- Understanding FAR 52.222-50 and DFARS compliance obligations
- Responsibilities related to reporting and prevention
- Risk areas in global supply chains

Training will be conducted periodically and documented as part of compliance requirements.

Reporting Concerns

Team members and third parties are encouraged to report concerns or suspected violations through:

- Supervisor or management
- Human Resources
- Via email at compliance@cablecraft.com

Reports related to U.S. Government contract work may also be submitted to the U.S. Government via the Global Human Trafficking Hotline or appropriate agency Office of Inspector General.

All reports will be investigated promptly and confidentially where possible. Retaliation against individuals who report in good faith is strictly prohibited.

The Company will cooperate fully with any government investigation and will take appropriate action in response to any violations identified.

Compliance & Auditing

The Company may conduct periodic internal reviews and supplier audits to ensure compliance with this policy.

Non-compliance may result in disciplinary action, including termination of employment or business relationships.

Corrective Action

If violations are identified, the Company will take appropriate corrective actions, which may include:

- Immediate removal of team members or subcontractors involved in violations
- Requiring remediation plans from suppliers
- Terminating relationships with non-compliant partners
- Reporting violations to U.S. Government contracting officers or appropriate authorities as required under FAR/DFARS

Governance

This policy is overseen by the executive office, who is responsible for implementation, monitoring, and periodic review.



Policy Review

This policy will be reviewed periodically and updated as necessary to reflect changes in laws, regulations, or business operations.