

Combating Trafficking in Persons Compliance Plan

1. PURPOSE

“INTRACOM DEFENSE S.A.”, with the distinctive title “IDE”, hereinafter referred to as IDE, is opposed to human trafficking and forced labor in any form. IDE is committed to working to mitigate the risk of human trafficking and forced labor in all aspects of its business. The Greek (as the US) Government has a zero-tolerance policy regarding any Government employees and contractor personnel and their agents engaging in any form of trafficking in persons, 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.

The following sets forth IDE's overall general compliance plan (hereinafter called “**the Compliance Plan**” or “**the Plan**”, as required by FAR 52.222-50(h).

The purpose of this Plan is:

- a) to make all IDE employees, contractors, subcontractors, and agents aware of the conduct prohibited under the anti-trafficking laws and regulations, as well as under the company's anti-trafficking statement
- b) to make all IDE employees, agents, and subcontractors aware of the actions that may be taken against them for violations
- c) to set out IDE's recruitment, wage, and housing practices

2. APPLICABILITY

This Plan sets out the standards for anti-trafficking compliance and applies to all U.S. Government contracts, subcontracts, cooperative agreements, awards, and sub-awards. Such Plan may be supplemented, amended, or revised, as appropriate for each applicable Government contract (or applicable portions thereof), depending on the size and complexity of the contract and the nature and scope of the activities.

3. CERTIFICATION OF COMPLIANCE PLAN

When required by FAR 52.222-50(h), IDE will certify that:

- a) It maintains a combating trafficking in persons compliance plan.
- b) It monitors for any contractor, subcontractor, or agent who is violating this plan.
- c) After conducting sufficient due diligence, and to the best of its knowledge and belief, neither IDE nor any of its contractors, subcontractors, or agents are engaged in prohibited activities.
- d) If there are any violations, remedial action has been taken against the violator.

4. AWARENESS PROGRAM

Pursuant to the FARs, 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;
- Procuring commercial sex acts during the period of performance of a contract;
- Using forced labor in the performance of a contract;
- 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 U.S. Government contract, subcontract or portion(s) of contracts or subcontracts performed outside the United States;
- Failing to provide return transportation or pay for the costs of return transportation upon the end of employment, 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 and subcontracts performed inside the United States;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required by law or 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.

5. EMPLOYEES

According to the employment contracts and the Internal Labor Regulations of IDE all employees must comply with the policies, procedures and principles of IDE, including the IDE Code of Business Conduct and Ethics and agree to report any violations of which they are aware.

The IDE Code of Business Conduct and Ethics is publicly posted on its website:

<http://www.intracomdefense.com>

Any violation of the FARs, the DFARS and/or this Plan 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.

6. SUBCONTRACTORS/AGENTS

Applicable FAR and DFARS clauses are flowed down to IDE subcontractors. Subcontractors/agents are also provided link to the IDE Code of Business Conduct and Ethics and asked to certify that they have read and understood this document.

IDE agents and subcontractors must have procedures to prevent trafficking in persons and to monitor, detect and terminate any agents, subcontracts or subcontractor employees that have engaged in such activities.

Failure to comply with the requirements of the FARs and/or this Plan is grounds for IDE to take any and all appropriate actions, up to and including immediate termination of that subcontractor's or agent's contract with IDE.

7. SUPPLIERS

IDE has undertaken a review of its suppliers that it believes could reasonably fall within the requirements of the FARs, to determine what steps the supply base is taking or has taken to comply with the requirements. All suppliers included in the review were also provided with training and information on combating human trafficking.

8. CONTINGENT WORKERS

As part of the onboarding process, IDE provides each contingent worker, through their employer, a copy of IDE's Code of Business Conduct and Ethics, and IDE Compliance Plan Combating Trafficking in Persons, and requires certification:

- that they have received all of those documents, that they have read and understood those documents and that they agree to abide by them; and
- that they acknowledge that the principles of legal and ethical business behavior set

forth in those documents apply to their conduct as a contingent worker performing work for IDE; and

- that they know they are expected to, and have a responsibility to, report any concerns or possible violations, without fear of retaliation and subject to employee protection.

9. RECRUITMENT AND WAGE PLAN

To the extent that IDE 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 applicable host-country legal requirements or explain any variance

10. HOUSING PLAN

Typically, IDE does not provide housing. In the event that IDE is required to provide or arrange housing under a US Government contract, such housing will be provided that meets host-country housing and safety standards.

11. REPORTING PROCESS

Employees should consult the Human Resources Director or the Law Department if they are uncertain whether a specific action would be in violation of the FARs or DFARS or the IDE Code of Business Conduct and Ethics.

Employees should report, in good faith, and have a responsibility to, without fear of retaliation and subject to the protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9, for reprisal for whistleblowing on trafficking in persons violations, any activity that violates the FARs or DFARS to their management, or the law or human resources department. IDE employees or any third party doing work on behalf of IDE may also report violations by contacting the Human Trafficking Resource Line (operated by A21 Campaign): 1109 (for international calls: 0030-2310019880).

Retaliation against an individual who reports a violation is strictly prohibited.

12. NOTIFICATION

IDE shall promptly inform the Contracting Officer upon receipt of credible information alleging a violation of FAR 52.222-50; and any actions taken against an IDE employee, subcontractor, subcontractor employee or their agent pursuant to FAR 52.222-50.

13. POSTING

IDE shall post its Compliance Plan on IDE's website.

IDE shall provide its Compliance Plan to the Contracting Officer upon request.

14. CERTIFICATIONS

IDE will provide certifications to the Contracting Officer as required by the FAR.