

Anti-Human Trafficking Policy

The Hermetic Solutions Group is committed to ethical business conduct in all its dealings. This policy affirms the Hermetic Solution Group's commitment to preventing and eradicating slavery and human trafficking from its supply chain. The Hermetic Solutions Group has adopted the United States Government's zero tolerance policy regarding trafficking in persons. The Hermetic Solutions Group has implemented procedures to implement this anti-human trafficking and slavery policy, and they are addressed below in the context of specific disclosure programs.

Disclosures under the State of California Transparency in Supply Chains Act

1. Verification

Currently, although we expect our direct suppliers to evaluate and address risks of human trafficking and slavery, we do not require them to verify compliance with the human trafficking and slavery laws in the country or countries in which they do business.

2. Supplier Audits

We do not at this time conduct independent audits of direct supplier compliance with human trafficking and slavery requirements in the country or countries in which they do business.

3. Certification

We require that direct suppliers certify that materials incorporated into products they supply to the Hermetic Solutions Group comply with the laws regarding slavery and human trafficking in the country or countries in which they do business.

4. Internal Accountability

Hermetic Solutions Group is in the process of establishing company-wide internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.

5. Training

The Hermetic Solutions Group provides training on human trafficking and slavery for company employees and managers who have direct responsibility for supply chain management, including with respect to mitigating risks within the supply chain of products.

UK Modern Slavery Act Transparency Statement for 2020

The Hermetic Solutions Group does not currently meet the threshold reporting requirements for the UK Modern Slavery Act Transparency Statement for 2020.

Policy with Respect to Compliance with Federal Acquisition Regulations 48 C.F.R. 22.1700 (Strengthening Protections Against Trafficking in Persons in Federal Contracts) and 52.222-50 (Combating Trafficking in Persons)

The Hermetic Solutions Group's Federal Acquisition Regulation ("FAR") policy applies to all forms of human trafficking and slavery, including those involving coercion, debt bondage, involuntary servitude, forced labor, and sex and other forms of trafficking, as defined in 48 C.F.R. 22.1702 and 52.222-50(a). As noted above, the Hermetic Solutions Group has adopted the U.S. Government's zero tolerance policy regarding trafficking in persons. Specifics of the program are disseminated to all customers and suppliers [that are covered by FAR provisions] and our purchasing teams are responsible for ensuring that dFARs requirements are flowed down as required to relevant suppliers.