



Anti-Human Trafficking Policy

Qnnect is committed to ethical business conduct in all its dealings. This policy affirms Qnnect's, as well as its Board of Directors', commitment to preventing and eradicating slavery and human trafficking from its business and supply chain. Qnnect has adopted the United States Government's zero tolerance policy regarding trafficking in persons. Qnnect has established procedures to implement this anti-human trafficking and slavery policy, and they are addressed below. Qnnect will not knowingly do business with any third party that violates this policy.

The California Transparency in Supply Chains Act of 2010 and section 54(1) of the U.K. Modern Slavery Act 2015 require that manufacturers and retailers provide information about their efforts to address the issue of slavery and human trafficking, and the efforts taken during the previous fiscal year (2020) to ensure that slavery and human trafficking are not taking place within the business and its supply chain.

Qnnect is a global microelectronics manufacturer serving the defense, aerospace, medical and industrial markets and employs approximately 1600+ employees worldwide. Qnnect has a number of wholly owned / controlled subsidiaries that are required to adopt Qnnect's compliance requirements, including those related to human trafficking.

Qnnect advises every employee to immediately report any concerns regarding human rights, child labor, human trafficking or slavery laws.

Qnnect and its Supply Chain

Verification of Supply Chain

Qnnect expects its direct suppliers to treat people with respect and human dignity, and to promote equal opportunity for all, as well evaluate and address risks of human trafficking and slavery. Qnnect also expect that its direct suppliers will ensure that child labor is not used in performance of work; however, Qnnect currently does not require them to verify compliance with the human rights, child labor or human trafficking and slavery laws in the country or countries in which they do business.

Supplier Audits

Qnnect does not at this time conduct independent audits of direct supplier compliance with human rights, child labor or human trafficking and slavery requirements in the country or countries in which they do business.

Supplier Certification

Qnnect requires that direct suppliers certify that materials incorporated into products supplied to the Qnnect comply with the laws regarding human rights, child labor and slavery and human trafficking in the country or countries in which they do business.

Internal Accountability

Non-compliance with the standards of Qnnect regarding slavery and trafficking may result in corrective action or termination, depending on circumstances including the number of non-compliances found and the severity of the non-compliances. Qnnect management team works with employees and contractors to develop action plans to resolve any such instances of non-compliance. While Qnnect believes in sustainable remediation, Qnnect reserves the right to terminate a business relationship with an employee or contractor if it is deemed necessary.

Training

Qnnect will provide initial hire and annual training on human trafficking and slavery for company employees and managers who have direct responsibility for supply chain management, including mitigating risks within the supply chain of products. Employees are encouraged to identify and report breaches (or potential breaches) of the Qnnect human trafficking and slavery policy. Qnnect will continue to develop training that supports its commitment to human rights, including training on child or forced labor, trafficking of persons, adherence to labor laws, adherence to truthful and trustworthy practices during the recruitment of employees or offering of employment, proper disclosure of information and proper representations during the recruitment process to include key conditions of employment, wages, benefits, work location and environment and nature of work.

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)

Qnnect'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, Qnnect has adopted the U.S. Government's zero tolerance policy regarding trafficking in persons. Specifics of the program are disseminated to applicable customers and suppliers and our purchasing teams are responsible for ensuring that DFARs requirements are flowed down as required to relevant suppliers.

Qnnect will review, reassess and further develop its anti-trafficking policies on an annual basis, both to ensure compliance with applicable law but also as a commitment to our company's values.