



Human Trafficking Compliance Plan – U.S. Regulation FAR 52.222-50

Purpose

EaglePicher Technologies (EaglePicher) is opposed to human trafficking in all forms and is supportive of the U.S. Federal Acquisition Regulation 52.222-50 Combating Trafficking in Persons (hereafter referred to as FAR 52.222-50) to combat human trafficking, and will ensure the risk of such practices is mitigated within the business. FAR 52.222-50 prohibits U.S. Government contractors and their agents from 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, debt bondage or slavery and sex trafficking. To comply with FAR 52.222-50 all applicable businesses engaged in contract with the U.S. Government must develop a Compliance Plan to ensure such mitigation of risks.

Applicability

EaglePicher's Human Trafficking Compliance Plan applies to all acquisition activities in support of EaglePicher contracts or subcontracts with the U.S. Government for supplies or services with no exception. The plan is to be adhered to by employees, suppliers, contractors, subcontractors, subcontractor employees and agents of EaglePicher, including subsidiaries and joint ventures controlled by EaglePicher, performing work under a U.S. federal government contract.

Appropriateness

A Compliance Plan must be appropriately tailored to the size and complexity of the U.S. Government contract, and to the nature and scope of the activities to be performed. EaglePicher reserves the right to review and revise its Human Trafficking Compliance Plan should the nature and complexity of its contracts with the U.S. Government change.

Compliance Plan

Training and Awareness: Human Trafficking Awareness Training is conducted annually for all employees and on an as needed basis to reinforce the U.S. Government's and EaglePicher's zero tolerance policy. Training materials are available to contractors and third parties upon request.

Supplier Code of Conduct: EaglePicher maintains a Supplier Code of Conduct which is published on EaglePicher's public website. This Supplier Code of Conduct expresses the expectations we hold for Suppliers, including adherence to regulations prohibiting human trafficking and compliance with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and appropriately address any adverse human rights impacts of their operations.

Recruitment, Wages and Housing: EaglePicher prohibits misleading or fraudulent recruiting practices during all recruitment activities. EaglePicher will only use recruitment companies who do not charge recruitment fees to the employee and will review upon engagement recruitment companies' terms of business to ensure compliance. EaglePicher will take measures to ensure employee wages meet applicable country legal requirements or will explain any variance. In the event that EaglePicher or its contractors, suppliers and agents intend to provide or arrange housing in connection with performing work under a contract that meets the requirements, housing will meet host country housing and safety standards

Contractors, Suppliers and Agents: The requirement to adhere to FAR 52.222-50 is mandatory to all contractors, suppliers and agents EaglePicher engages with. This requirement is to be flowed down to all sub-tier contractors, suppliers and agents who engage in business indirectly with EaglePicher. The substance of FAR 52.222-50 will be included in subcontracts and in contracts with agents. However, requirements for a Compliance Plan apply only to any portion of the subcontract that meets the same prime contractor thresholds.

EaglePicher requires contractors, suppliers and agents to comply with all applicable local, state and national government laws and regulations of the local region they are conducting operations in. Upon request, information will be made available to all contractors, suppliers and agents on combating human trafficking including copies of this plan and internal training materials. EaglePicher reserves the right to observe contractor premises for any violations of FAR 52.222-50 and to take appropriate action and remedies if a problem arises, and to terminate any contract should a report of violation be substantiated.

Reporting Violations: Should employees or contractors, suppliers and agents be unsure as to whether a specific action would be a violation of FAR 52.222-50, they should consult EaglePicher's legal department. All employees or contractors, suppliers and agents are required to report information or knowledge of human trafficking internally. If the employee does not feel comfortable reporting this information internally, they should contact the Global Human Trafficking Hotline at **1-844-888-FREE** or via email **help@befree.org**. Retaliation against an individual who has reported a violation will not be tolerated.

Posting: EaglePicher displays FAR 52.222-50 Combating Trafficking in Persons posters including making available the phone number of the Global Human Trafficking Hotline (U.S.) **1-844-888-FREE** and email address of **help@humantraffickinghotline.org**. A copy of this plan will be placed on EaglePicher's external website and may be provided to contractors, suppliers and agents upon request.

Certifications: Annually after receiving an award, EaglePicher will certify that; 1) it has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, subcontractor or subcontractor employee engaging in prohibited activities and, 2) After having conducted due diligence, to the best of EaglePicher's knowledge and belief, neither it nor any of its agents, subcontractors or their agents are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, EaglePicher or its subcontractor has taken the appropriate remedial and referral actions.