

# Anti-Slavery and Human Trafficking Policy

### **SUMMARY**

Pacific Instruments Statement on Efforts to Combat Slavery and Human Trafficking in Our Business and Supply Chains.

## **OBJECTIVES AND RECIPIENTS**

Pacific Instruments wishes to be recognized as a responsible company whose actions comply with the requirements of both domestic and international standards.

Aware of the challenges and opportunities for progress that may arise in the business operations and supply chain, Pacific Instruments has decided to formalize a set of guidelines to promote responsible behavior on the part of its employees and its suppliers and subcontractors.

This Anti-Slavery and Human Trafficking Policy ("Anti-slavery policy") defines the minimum standard to be respected by each employee and business partner as it does not replace applicable national and international legislation, to which trading partners must strictly comply.

With this Anti-Slavery Policy, Pacific Instruments not only aims to protect its business interests but also to ensure and promote a responsible attitude throughout its supply chain. Human trafficking and use of involuntary labor are strictly prohibited in Pacific Instruments' business operations and supply chain. This prohibition is explicitly stipulated to in our Anti-Slavery Policy and our Policy requires all employees and our supply chain to uphold this Policy.

Human Rights are embedded in Pacific Instruments Employee Code of Conduct which states that we follow all labor and employment laws including laws pertaining to child labor and employee rights, such as freedom of association, privacy, and equal opportunity employment. Employees are expected to follow the Code of Conduct as a condition to employment. Employees who do not comply with the Code of Conduct are subject to termination of employment and even criminal prosecution if applicable.

Our Supply Chains are also expected to follow our Code of Conduct with their business dealings with the Company and abide by all laws, rules and regulations in jurisdictions they do business with. Pacific Instruments also conducts audits of its supply chain as assurance this policy, among other conduct, are not violated.

Pacific Instruments has a zero-tolerance approach to modern slavery. To date, we have not been made aware of or discovered any human trafficking or slavery activities within our supply chain. However, if we were to learn of any, Pacific Instruments would act immediately in accordance with our legal and moral obligations.

Recipients are encouraged to contact Legal at Pacific Instruments with any questions, concerns, issues, etc. at the following e-mail address: stephanie@pacificinstruments.biz.

Business partners also should undertake to identify a person responsible for ensuring the proper application of this Anti-Slavery Policy and provide the contact person to Pacific Instruments, if necessary.

- I. Pacific Instruments' Code of Conduct which applies throughout the organization guarantees:
  - A workplace free from forced or involuntary labor;
  - A workplace free from child labor and Compensation to employees which complies with all applicable wage laws relating to minimum wages, overtime hours, and legally mandated benefits.
- II. Pacific Instruments' Policy on Anti-Slavery specifically recognizes and addresses the issues related to modern slavery:

#### 1. Respecting human rights in the working relationship

Our business partners undertake to promote, respect, and ensure respect for human rights within their businesses. They must ensure that the working conditions of their employees are proper and comply with the applicable local and international legislation. Should there be a conflict between the legislative and regulatory provisions and our Code of Conduct and our Anti-Slavery Policy, the most favorable provisions for employees shall prevail.

#### A) Prohibiting child labor

Our business partners do not employ people who have not reached the minimum age required by the laws in each country where they operate. Should no minimum age be set, they must comply with the provisions of Convention No. 138 and 182 of the (ILO) International Labor Organization in this regard. They are therefore invited to verify, by any possible legal means, the age of their employees. The minimum working age set by the ILO is 15, except in some countries where children aged 14 are allowed to work. The age limit is also set on the basis of the arduousness of the job. People under 18 must not undertake night work, dangerous work, or any activities that may harm their physical or mental health.

#### B) Not using forced or slave labor

Our business partners undertake not to make use of any work or service exacted from any person under the threat of any penalty, and which the said person has not offered voluntarily. The detention of the employee's identity documents and the payment of a deposit on hiring are also prohibited.

Our business partners may not practice or benefit from any form of servitude, human trafficking or slavery and must comply with the provisions of Convention No. 29 of the ILO.

#### C) Paying a fair wage

Our Business Partners respect the right of employees to receive fair compensation. The remuneration paid to employees must be at least equal to the

minimum wage set by the legislation of the country in which the work is performed. It must be paid promptly, regularly and entirely in legal tender.

#### D) Ensuring decent working hours

Our Business Partners ensure that their employees are kept to a working schedule and are granted days off in accordance with the laws and regulations of the country where they operate.

Depending on local regulations and the status applicable to the employees concerned, the use of overtime must be voluntary, paid at a higher rate and must not pose an occupational risk to the employee. Our business partners may also establish, in an employment contract or an agreement, that part or all of this additional compensation be replaced by the equivalent compensatory rest time.

#### E) Ensuring the absence of discrimination, harassment and inhuman treatment

Our business partners refrain from exercising any form of discrimination based on gender, age, origin, religion, sexual orientation, physical appearance, health status, marital status, political opinion, pregnancy status, trade union membership, disability or any other form of discrimination, in particular in relation to hiring or providing access to training, promotion etc.

All forms of harassment, threats of violence, abuse, coercion, and corporal punishment of employees are unacceptable and are not tolerated. Our business partners treat their employees in a dignified and humane manner.

#### F) Ensuring diversity

Our business partners promote diversity within their companies and take measures that will encourage the inclusion of people in difficulty (e.g.: disabled people).

#### G) Protecting health and ensuring health and safety in the workplace

Our business partners analyze and evaluate the potential health and safety risks within their companies in order to implement appropriate processes to prevent and remedy them, if necessary. Training must be organized for employees exposed to risks.

They ensure that the procedures for maintaining health and safety are respected in their workplaces, by checking in particular the compliance of installations with the country's standards for indoor air quality (ventilation), noise levels, temperature, and lighting. Fire-fighting equipment must be in place and regular evacuation drills must be held.

They agree to (i) identify and mitigate the exposure of their employees to the risks associated with the activity of the company and (ii) to improve the protection of employees in the event of an accident, including by subscribing to insurance plans. Our business partners must also make appropriate personal and collective protective equipment available to employees.

#### H) Respecting freedom of association and freedom to form trade unions

Our business partners are committed to respecting the right of association and the right to trade union activities of their employees under the applicable national and international legislation and regulations. Our partners take care to maintain a collaborative attitude in relation to their employees and prevent conflict through effective and continuous social dialogue.

## **Enforcing our Anti-Slavery Policy Commitment**

#### 1. Audits may be conducted

Pacific Instruments reserves the right to audit or to have its business partners audited at any time in order to verify their compliance with the Anti-Slavery Policy. It is highly recommended that partners periodically assess, by any means they consider appropriate, their compliance with our Anti-Slavery Policy as regards their own employees and their own business partners.

#### 2. Procedures for reporting anomalies may be introduced

It is recommended that business partners introduce a measure to ensure the reporting of anomalies, with the aim of encouraging their employees to report any behavior they consider contrary to the ethical principles detailed in this Code of Conduct and Anti-Slavery Policy. Since these alerts concern the conduct of business relations with Pacific Instruments, Legal must be informed immediately at the following e-mail address: stephanie@pacificinstruments.biz.

#### 3. Corrective measures or sanctions that may be applied

Should there be any irregularities or known violations of the Code of Conduct and the Anti-Slavery Policy, the business partners will provide Pacific Instruments with a corrective action plan together with a timetable, at the end of which the irregularity or violation will have been resolved. Pacific Instruments may, if the business partner so requests, support the business partner in implementing these measures by providing its expertise. If, despite the implementation of this plan, the failure to comply with Pacific Instruments' Code of Conduct and Anti-Slavery Policy persist or should the plan be refused, Pacific Instruments will be free to end business relations with the business partner concerned in compliance with legal and contractual provisions.

## **ANTI-SLAVERY POLICY COMMITMENT:**

	Ve,(name of Employee/Supplier/Business Partner) , a
Pacific	struments' employee, supplier, and/or business partner, hereby confirm we:
-	lave received and have full knowledge of the Pacific Instruments' Anti-Slavery Policy; Inderestand that non-compliance with the Anti-Slavery Policy following the failure of a corrective action plan, could result in the suspension or termination of commercial elations; Inderstand that it is our duty to communicate the commitment that we have made arough this Anti-Slavery Policy to our own employees and business partners and exite them to respect the Code of Conduct referred to therein; as applicable, authorize the auditors commissioned by Pacific Instruments to take esponsibility for checking compliance with the Anti-Slavery Policy on our premises.
	Company Pacific Instruments
	Name (printed)

Signature \_\_\_\_\_

Signed (place) \_\_\_\_\_ on (date) \_\_\_\_\_