

Anti-Human Trafficking Compliance Plan

1. Applicability

In accordance with FAR 52.222-50(h), Excalibur Systems has developed this Anti-Human Trafficking Compliance Plan to be implemented on United States Government contracts or subcontracts for suppliers, other than commercially available off-the shelf items, acquired outside the United States or services to be performed outside the United States and has an estimated value that excess \$500,000. The purpose of this Plan is to ensure employees, agents and subcontractors are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations.

2. Appropriateness of Plan

This Compliance Plan may be appropriately tailored with respect to the size and complexity of the contract and to the nature and scope of the activities to be performed for the Government, including the number of non-U.S. citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.

3. Plan Requirements

A. Awareness Program

Excalibur Systems has adopted internal policy USP5014 Anti-Human Trafficking Regulation Compliance, to comply with anti-human trafficking laws and regulations of the United States and those territories in which Excalibur operates. It is in alignment with the Government policy as stated in FAR 52.222.50. This policy is also included in Excalibur Systems Employee Handbook MAN0002 that is distributed to employees upon hiring and whenever updated. USP5014 Anti-Human Trafficking Regulation Compliance describes prohibited trafficking related activities and the actions that will be taken against employees for violations.

Additionally, Excalibur Systems includes an overview of Anti-Human Trafficking Regulation Compliance in its purchasing procedure documentation. Training is provided with general information, reporting requirements and examples of trafficking in the supply chain.

Excalibur Systems periodically conducts training on the Anti-Human Trafficking regulations, the company policy regarding such and this plan.

B. Process to Report

Any Excalibur System employees or third party doing work on behalf of Excalibur Systems are required to report information or knowledge of the actual or potential human trafficking violations to Excalibur Management Representatives, their supervisor, or in the instance of a third party, the Excalibur activity that has engaged their services.

Excalibur Systems employees or third parties doing work on behalf of the company may also report violations by contacting the Global Human Trafficking Hotline a 1-844-888-FREE or help@befree.org.

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

C. Recruitment and Wage Plan

Excalibur Systems does not currently use recruitment companies. In the instance that Excalibur at some time in the future would use a recruitment company, it will only use recruitment companies that have trained employees, prohibit charging recruitment fees to the employee and ensure that wages meet applicable host country legal requirements or explain any variance.

D. Housing Plan

Excalibur Systems does not currently provide housing for employees. In the instance that Excalibur at some time in the future would provide housing will take actions to ensure that housing provided meets host country housing and safety standards.

E. Procedures for Agents and Subcontractors

All Excalibur Systems agents and subcontractors must agree to comply with USP5014 Anti-Human Trafficking Regulation Compliance and all applicable anti-trafficking laws and regulations. Excalibur Systems shall include FAR 52.222-50 and FAR 52.22-56 in supplier agreements where applicable.

Excalibur Systems 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.

4. Posting

Excalibur Systems will post this Plan at the workplace and on its external website, www.mil-1553.com. This Plan is also available to the contracting officer upon request.

5. Certification

Annually after receiving an award, Excalibur Systems will certify to the government that:

- i. 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,
- ii. After having conducted due diligence, to the best of Excalibur Systems 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, Excalibur Systems or its subcontractor has taken the appropriate remedial and referral actions.