

Procedure Number: **PROC-2513**

Procedure Name: **Human Trafficking**

REV	ECO	DESCRIPTION	SIGNATURE	DATE
-		Initial Release		7/25/2017

**Purpose**

Ciao Wireless is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. Ciao Wireless will not tolerate or condone human trafficking or slavery in any part of our organization. This policy is consistent with Ciao Wireless’s Code of Ethics and Business Conduct and our core values to protect and advance human dignity and human rights in our business practices.

Ciao Wireless employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Ciao Wireless conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

PROPRIETARY DATA  
THIS DOCUMENT CONTAINS DATA WHICH IS PROPRIETARY OR CONFIDENTIAL TO CIAO WIRELESS. THIS DOCUMENT AND THE DATA CONTAINED HEREIN SHALL NOT BE USED, DUPLICATED OR ALTERED WITHOUT THE EXPRESSED WRITTEN CONSENT OF CIAO WIRELESS. ALL RIGHTS RESERVED.

**Approvals:**

Management: G. Wasylewski Date: 7/25/17

Manufacturing: J. Harrison Date: 7/25/17

Quality Assurance: T. Amoroso Date: 7/25/17

**Ciao Wireless, Inc. Procedure**



**PROC-2513**



**Human Trafficking**  
Total Quality Through Continuous Improvement

**REV**  
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## Scope

This Policy applies to all personnel employed by or engaged to provide services to Ciao Wireless, including, but not limited to, Ciao Wirelesses' employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this Policy, "employees").

Every Ciao Wireless employee is responsible for reading, understanding and complying with this Policy. Ciao Wireless managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them. If you have any questions or concerns relating to this Policy, consult the Ciao Wireless HR Department. If you learn of any conduct that you believe may violate this Policy, report it immediately by any of the means listed under the heading "Policy Compliance" below.

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## Procedure

### Policy Statement

Ciao Wireless prohibits trafficking in persons and slavery. Ciao Wireless employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Ciao Wireless conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons;
- Procuring commercial sex acts;
- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided by Ciao Wireless), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants/candidates recruitment fees;
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

Ciao Wireless has undertaken actions, and is committed to maintaining and improving its systems and processes, to eradicate human trafficking and slavery in its direct hardware supply chain.

Ciao Wireless requires its direct hardware supply chain suppliers to observe all applicable laws and conduct business in an ethical and responsible manner. Ciao Wireless has adopted the Electronic Industry Citizenship Coalition (EICC) Code of Conduct, which prohibits the use of forced, bonded, indentured or involuntary prison labor.

Ciao Wireless continues to verify, evaluate, promote awareness about, and address risks associated with forced labor and human trafficking in its direct hardware supply chain. Examples of actions undertaken include the following:

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**Evaluating and addressing supply chain risks:**

Ciao Wireless has incorporated by reference the EICC Code of Conduct into its standard direct hardware supply chain supplier agreements. Ciao Wireless also participates in industry efforts to increase awareness of human trafficking and to implement EICC programs.

**Auditing suppliers:**

Ciao Wireless audits its direct hardware supply chain suppliers based on the EICC Code of Conduct and also reviews the audit results for these suppliers.

**Supplier certification:**

Ciao Wireless has initiated a supplier certification process that requires direct hardware supply chain suppliers to certify to the best of their knowledge that the materials they incorporate into products were generated in compliance with applicable anti- slavery and human trafficking laws.

**Accountability standards:**

Ciao Wireless upholds accountability standards and procedures for employees and direct hardware supply chain suppliers who fail to meet Ciao Wirellesses’ business conduct requirements.

**Training:**

Ciao Wireless provides training on human trafficking and slavery issues to employees that directly manage the direct hardware supply chain. Investigations and Audits

Ciao Wireless will perform investigations and audits to verify that business is being conducted in compliance with this Policy. All Ciao Wireless employees and third parties through whom Ciao Wireless conducts business are required to fully and promptly cooperate with Ciao Wirellesses’ internal and external auditors and investigators, and must respond fully and truthfully to their questions, requests for information, and documents. Any failure by an employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting email or other documents, may be grounds for disciplinary action, up to and including termination, subject to applicable law.

**Policy Compliance**

Report any conduct that you believe to be a violation of this Policy directly to the Ciao Wireless HR Department, or to Ciao Wirellesses’ President. Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy as permitted by applicable law. Ciao Wireless will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report. Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

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