

Compliance With Human Trafficking Laws and Regulations

Updated October 15, 2021

Econolite Group, Inc. (Econolite) is committed to upholding the human rights of workers, and to treating them with dignity and respect. We strongly oppose human trafficking and slavery and adopt a no-tolerance approach for any non-compliance by employees and any third parties acting on our behalf. Violations of basic human rights are abhorrent and run contrary to our deepest-held core value as a Company—that of integrity, above all else. For any U.S. Government contract that exceeds \$500,000 and is for supplies to be acquired outside the United States, or services to be performed outside the United States, we will create and implement a compliance plan to prevent any prohibited activities as enumerated in Federal Acquisition Regulation (FAR), subpart 22.17, Ending Trafficking in Persons, and FAR 52.222-50, Combating Trafficking in Persons. The compliance plan would involve training and educating our employees on human trafficking, and fully cooperating with any human trafficking related investigations.

In compliance with the requirements of the California Transparency in Supply Chains Act of 2010, we make the following disclosure on our efforts to eradicate human trafficking in supply chains. We primarily rely on the Department of Labor’s Bureau of International Labor Affairs (ILAB) reports to identify risks in our supply chains. Our direct product suppliers do not include sources on the ILAB’s most current 2020 List of Goods Produced by Child Labor or Forced Labor. Therefore, at this time, we do not engage in independent verification of our product supply chains through audits or supplier certification to further evaluate compliance with the laws regarding slavery and human trafficking. We support the efforts of ILAB to research and shed light on abuses through its lists and other programs to help bring an end to these forms of exploitation.

While we do not yet provide formal training on human trafficking and slavery to personnel who have direct responsibility for supply chain management, nor maintain internal accountability standards and procedures for compliance with our company standards, our management remains mindful of the origins of various goods and products by asking the important question suggested by ILAB: “Who made this and under what conditions?” Our mission at all times is to facilitate a culture committed to conducting business in accordance with the highest ethical standards and in compliance with human trafficking laws and regulations while delivering superior products and services.

A blue ink signature of Abbas Mohaddes, consisting of a stylized cursive script.

Abbas Mohaddes,
President and Chief Operating Officer