



EXFO Inc. and its Affiliates (hereinafter “EXFO Group”) values human rights and is committed to ensuring that all business is conducted according to ethical, professional and legal standards. EXFO Group has a zero-tolerance approach to Modern Slavery and Trafficking in Persons within its organizations and supply chains and is committed to acting ethically and in compliance with its statutory obligations.

This compliance plan (the “Plan”) is directed, amongst other things, to assist EXFO Group’s obligations in contracts and subcontracts for the supply of goods and/or services to the U.S. Government that incorporate the Federal Acquisition Regulation (FAR) 52.222-50, Combating Trafficking in Persons (available at <https://www.acquisition.gov/far/52.222-50>).

## 1. Definitions

### 1.1. Agents

Defined as EXFO Group’s suppliers, service providers, consultants, distributors, representatives and any other sales partners.

### 1.2. Child Labour

Defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

### 1.3. Debt Bondage

Defined as a form of Forced Labour and happens when a person is forced to work to pay off a debt. The persons are tricked into working for little to no pay, with no control over their debt.

### 1.4. Forced Labour

Defined as all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

### 1.5. Modern Slavery

Defined as the severe exploitation of other people for personal or commercial gain. Modern Slavery can take many forms, the most common will be defined hereinafter.

### 1.6. Trafficking in Persons

Defined as (i) Sex Trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age or (ii) the recruitment, harboring, transportation, provision, or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, Debt Bondage, or slavery. The exploitation can include Forced Labour, being made to commit crimes, or any other form of Modern Slavery;

## 2. Awareness program

EXFO has implemented a policy on Modern Slavery and Trafficking in Persons (“Policy”). Employees have been informed about both the Policy and the Plan, including prohibited conduct, consequences of violations, and mechanisms to report suspected violations, by posting at the workplace, intranet and website. Every new EXFO employee will be informed of the Plan and the Policy via the onboarding training provided upon arrival.



Additional information about Trafficking in Persons can be found on the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons website at <https://www.state.gov/Office-Monitor-Combat-TraffickingInPersons> and on the Public Safety Canada website at <https://www.publicsafety.gc.ca/hmn-trffckng/>. EXFO will provide a copy of this Plan to the contracting officer upon request.

### 3. Prohibited activities

Employees and Agents of EXFO Group are strictly prohibited to:

- a) Engage in any forms of Trafficking in Persons and/or of Modern Slavery;
- b) Purchase commercial sex acts at any time (during work hours and non-work hours);
- c) Use Forced Labour in the performance of their duties;
- d) Destroy, conceal, confiscate, or otherwise deny access by an Employee to the Employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- e) Use misleading or fraudulent practices during the recruitment of Employees or offering of employment, such as failing to disclose, in a format and language understood by the Employee or potential Employee, basic information or making material misrepresentations during the recruitment of Employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs, any significant costs to be charged to the Employee or potential Employee, and, if applicable, the hazardous nature of the work. (Where applicable);
- f) Use recruiters that do not comply with local labour laws of the country in which the recruiting takes place;
- g) Charge Employees or potential Employees recruitment fees;
- h) When applicable, fail to provide or pay the cost of return transportation at the end of employment for an employee who is not a U.S.A. national and was brought into the U.S.A. for the purpose of working on a U.S.A. government contract or award, if payment of such costs is required under existing temporary work programs or pursuant to a written agreement with the employee for portions of contracts and awards performed outside the U.S.A.;
- i) Provide or arrange housing that fails to meet the host country housing and safety standards;
- j) If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document, written in a language the Employee understands, that includes details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit Trafficking in Persons.

### 4. Consequences of violations

Any breach or violation of this Plan will not be tolerated and be subject to the proper disciplinary actions, including but not limited to, termination of employment or contractual relationship.

### 5. Reporting concerns

In accordance with our Statement on reporting ethical violations, which can be found at <https://exfoprodstorage.statement-on-reporting-ethical-violations>, employees, suppliers, sales partners, shareholders or any other interested party are encouraged to raise concerns about any issue or suspicion of improper or illegal act, which thereby includes any form of Modern Slavery and Trafficking in Persons, in accordance with the reporting procedure indicated in such Statement.

Alternatively, any person who wishes to report a violation may also do so by contacting one of the following hotlines:

- The hotline phone number of the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at [help@befree.org](mailto:help@befree.org)
- The Canadian Human Trafficking Hotline at 1-833-900-1010 and its email address [hotline@ccteht.ca](mailto:hotline@ccteht.ca)
- The U.S. National Human Trafficking Hotline at 1-888-373-7888 or by texting at 233733.

## 6. Recruitment and wage plan

To the extent EXFO uses recruitment companies, it will use only recruitment companies with trained employees. EXFO also prohibits charging recruitment fees to the employees or potential employees and ensures that all wages meet every applicable legal requirement.

EXFO prohibits using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language understood by the employee or potential employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee or potential employee, and, if applicable, the hazardous nature of the work.

## 7. Housing Plan

In the event that EXFO is providing or arranging housing, EXFO will ensure that the housing meets the applicable host-country housing and safety standards.

## 8. Agents' compliance

Agents must refrain from any conduct in violation of this Plan. EXFO Group purchasing department evaluates and verifies the Agents compliance in preventing Modern Slavery and Trafficking in Persons in the industry. All our Agents, before entering into any business with EXFO Group, must complete forms which include complying with our Code of conduct and with the United Nations Global Compact Principles. Without such commitment, EXFO Group will not engage in a business relationship or permit the Agents to take part in the supply chain in any shape or form.

## 9. Approval



Philippe Morin  
Chief Executive Officer



Suzanne Daneau  
Vice-President, Human Resources

## 10. Application date

December 2022