



Anti-Trafficking and Anti-Slavery Policy Statement

Ichor is committed to being a responsible corporate citizen and at all times acting consistently with its values and ethical standards. Ichor is committed to the abolition of human trafficking and modern slavery, including forced labor and unlawful child labor. All employees, contractors, subcontractors, vendors, suppliers, partners, and anyone who conducts business with Ichor must not engage in any practice or conduct that constitutes human trafficking or modern slavery. This policy is adopted consistent with and in support of the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons; the US Trafficking Victims Protection Reauthorization Act of 2013; the UK Modern Slavery Act (2015); and the California Transparency in Supply Chains Act of 2010.

The purpose of this policy statement is to provide transparency and increase the effectiveness of Ichor's systems and controls that are in place to safeguard against any form of human trafficking or modern slavery taking place within Ichor's business and/or supply chain. Consistent with policies adopted by the United States government, Ichor's employees, contractors, subcontractors, vendors, suppliers, partners, and anyone who conducts business with Ichor shall not: (1) engage in human trafficking; (2) procure commercial sex acts; (3) use forced labor; (4) destroy, conceal, confiscate, or otherwise deny access by any employee to the employee's identity or immigration documents, such as passports or drivers' licenses; (5) use misleading or fraudulent practices during the recruitment of employees, or use recruiters that do not comply with local labor laws; (6) charge employees or potential employees recruitment fees; (7) fail to provide return transportation or pay for the cost of return transportation upon the end of employment for any employee who is not a national of the country in which the work is taking place, except where the employee is legally permitted to remain in the country of employment and who chooses to do so; (8) provide or arrange housing that fails to meet the host country housing and safety standards; or (9) if required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing in a language that the employee understands. If any person violates this policy, Ichor will take appropriate action that may include termination of or removal from a contract, reduction in benefits, or termination of employment.

Training

Ichor provides ethics and corporate policy training to all new employees, as well as a refresh training for all employees at least annually. A portion of that training includes an awareness program to inform employees about the principles and values described in this policy.

Monitoring / Verification

Ichor's supplier handbook requires that suppliers, vendors, contractors, subcontractors, and other persons who conduct business with Ichor adhere to this policy. Additionally, Ichor conducts annual surveys that require covered suppliers, vendors, contractors, subcontractors, and other persons who conduct business with Ichor to certify that they are complying with this policy. Likewise, Ichor is asked from time to time to complete questionnaires, surveys, or certifications that Ichor is committed to

combatting human trafficking and modern slavery. Ichor reserves the right to audit or investigate any employee, supplier, vendor, contractor, subcontractor, or other persons who conduct business with Ichor for compliance with this policy. If any person violates this policy, Ichor will take appropriate action that may include termination of or removal from a contract, reduction in benefits, or termination of employment.

Reporting / Notification

If any person has any credible information that any of Ichor's employees, contractors, subcontractors, vendors, suppliers, partners, and anyone who conducts business with Ichor is violating this policy, that person must immediately report that information to Ichor's ethics hotline: <https://ichor.eqs-integrity.org/>. Any person may make such a report without fear of retaliation. Ichor prohibits any person from retaliating against any person for making a report of credible information consistent with this policy.

If Ichor receives any credible information that any person has violated this policy, Ichor shall inform an appropriate law enforcement agency, contracting agency or officer, and/or contractor, subcontractor, vendor, supplier, or partner, as appropriate, in light of the circumstances. Ichor's report shall include the substance of the credible information and may include any actions taken by Ichor against the person violating this policy. Ichor shall fully cooperate with any investigation by any law enforcement agency or contracting agency/officer resulting from a report made pursuant to this policy.

If a person is not comfortable reporting credible information to Ichor, Ichor encourages that person to provide their information to the Global Human Trafficking Hotline at 1-844-888-FREE or to its email address at help@befree.org.

Related Policies

Ichor deeply respects the human rights of all employees and the wider group of stakeholders. Our Employee Code of Business & Ethics Conduct and Supplier Handbook & Code of Ethics specifically prohibit activities involving forced labor or slavery, human trafficking, and child labor.

Signed on Behalf of Ichor

Ichor's Chief Executive Officer, Senior Management Team, and Board of Directors are committed to upholding Ichor's values and ethical standards, including embedding a zero-tolerance policy against human trafficking and modern slavery.



Phil Barros
Chief Executive Officer
Ichor Systems