

Combating Trafficking in Persons Compliance Plan

July 7, 2020

Purpose

In accordance with Combating Human Trafficking Policy and Procedure of Teledyne Technologies Incorporated (“Teledyne”), this document represents Teledyne’s human trafficking compliance plan for its sites, together with sites of its business units and subsidiaries, engaged in United States Government Contracting, and where applicable shall be provided to the cognizant Contracting Officer upon request.

Introduction

Teledyne supports efforts to eliminate human trafficking and slavery and requires the same commitment of its suppliers. Teledyne is committed to obtaining supplies and services from companies that conduct their businesses in a lawful and ethical manner. Teledyne’s expectations for suppliers and other service providers are set forth in the Company’s Ethics Code of Conduct for Service Providers. Among other things, this includes suppliers who do not condone forced labor, slavery or human trafficking. Teledyne will take appropriate action with respect to any suppliers or service providers who does not meet the standards articulated in that Code of Conduct. Teledyne recruits qualified persons to support business mission, goals, and services. Employees, agents, subcontractors, and recruiters have key roles in preventing human trafficking and related activities.

External Recruitment Agency Support

Where applicable, Teledyne Human Resources will ensure all contracts with external recruitment agencies or firms include the following contract clauses, as applicable, to facilitate compliance with prime contract requirements regarding human trafficking, in addition to requiring such agencies or firms to adhere to all applicable local, state, and national government laws:

FAR 52.222-50 Combating Trafficking in Persons (applies to all subcontracts and contracts with agents).

DFARS 252.203-7004 Display of Hotline Posters, as appropriate (applies to subcontracts under Department of Defense prime contracts that exceed \$5 million except when the subcontract is for the acquisition of a commercial item).

DFARS 252.225-7040 Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States (applies to subcontracts under Department of Defense prime contracts that require subcontractor personnel to be available to deploy with or otherwise provide support in the theater of operations to U.S. military forces deployed outside the United States in (1) contingency operations; (2) humanitarian or peacekeeping operations; or (3) other military operations or exercises designated by the Combatant Commander).

Recruitment

Where applicable, Teledyne prohibits charging of recruitment fees, as defined in FAR 52.222-50, to employees and prospective employees and prohibits the use of any recruiting firms unless the firm's employees have received training on combating trafficking related activities. Adherence to Teledyne's recruitment policies is required of individuals responsible for recruitment on behalf of Teledyne.

Wage Plan

Teledyne provides compensation and benefits that comply with country-specific laws and regulations and are competitive with relevant labor markets and levels of employee performance.

Housing Plan

Where applicable, Teledyne provided housing must adhere to Teledyne policy along with host-country housing and safety standards.

Employee Awareness Program

Teledyne's Corporate Policy, Combating Trafficking in Persons is one of the primary tools utilized for employee awareness. Reminders are circulated periodically on Teledyne's policy. Teledyne will also post this Plan and applicable posters at its sites that are so required under the FAR.

Process for Reporting Violations

Any credible information received from any source (including host country law enforcement) that an employee, subcontractor, subcontractor employee, or agent has violated FAR 52.222-50 must be reported immediately to the Teledyne Legal Department.

If an event requires reporting under FAR 52.222-50, Teledyne Legal Counsel will inform the cognizant Contracting Officer of the allegation and will inform the cognizant Inspector General of the allegation. Employees may also report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons to Ethics, Legal Counsel, and the Ethics Help Line (1-877-666-6968; www.teledyne.ethicspoint.com), or National Trafficking Hotline (1-888-373-7888). If a violation of FAR 52.222-50 is substantiated, Human Resources, in consultation with Teledyne Legal Counsel, will take the appropriate disciplinary action.

- The Chief Procurement Officer in consultation with Teledyne Legal Counsel, will impose suitable remedies, up to and including termination, on subcontractors, agents, and external recruitment agencies who fail to comply with FAR 52.222-50.
- The Senior Vice President, General Counsel, Chief Compliance Officer and Secretary or her delegee, in consultation with the Chief Procurement Officer, as applicable, will inform the Contracting Officer of any actions taken against an employee, a subcontractor, or a subcontractor employee pursuant to FAR 52.222-50.
- The Senior Vice President, General Counsel, Chief Compliance Officer and Secretary or her delegee will prepare a written draft report of the violation and investigation.
- Finally, the Senior Vice President, General Counsel, Chief Compliance Officer and Secretary or her delegee will submit the final report to the cognizant Contracting

Officer and will submit the final report to the cognizant Inspector General. The final report will include any other related disclosures required under FAR 52.203-13.

Obtaining and Reviewing Supplemental Business Area Compliance Plans

The Legal and Compliance Department and the Contracts Department are responsible for identifying the need for supplementation of this primary compliance plan to address the risk of human trafficking for any given business opportunity that might warrant additional attention and controls. For purposes of the supplemental plan, this primary plan can be used with the inclusion of the necessary additional information in the recruitment, wage, housing, and training plan areas.

Periodic Reassessment of the Plan

Teledyne will periodically review and assess the internal controls assuring compliance with this Plan and modify as required.

Supply Chain and Subcontractors

Where applicable, all subcontracts include mandatory flow down clauses necessary to ensure compliance with this Plan and the requirements of prime contracts. This includes the following:

FAR 52.222-50 Combating Trafficking in Persons (applies to all subcontracts and contracts with agents).

DFARS 252.203-7004 Display of Hotline Posters (applies to subcontracts under Department of Defense prime contracts that exceed \$5 million, except when the subcontract is for the acquisition of a commercial item).

252.225-7040 Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States (applies to subcontracts under Department of Defense prime contracts that require subcontractor personnel to be available to deploy with or otherwise provide support in the theater of operations to U.S. military forces deployed outside the United States in (1) contingency operations; (2) humanitarian or peacekeeping operations; or (3) other military operations or exercises designated by the Combatant Commander)).

Certifications

When applicable, Teledyne will obtain trafficking in persons certifications from subcontractors in accordance with FAR 52.222-50. Certificates will be required before award of subcontracts and annually thereafter when performance extends beyond one year.

Code of Conduct for Service Providers

Teledyne maintains a Code of Conduct for Service Providers which is published on Teledyne's public website and referenced on all purchase orders. Teledyne's Code of Conduct states:

No Forced Labor, Child Labor, Slavery or Human Trafficking.

Service Providers shall not engage in, facilitate or use forced or involuntary labor or child labor. Service Providers shall not engage in or facilitate slavery or human trafficking.

Monitoring of Offshore Contracts

When Teledyne personnel are present in international areas where subcontractors are performing work, the activities of the subcontractors will be monitored for potential trafficking problem or issues. If issues are suspected or found, the matter will be investigated, and appropriate action taken.

Investigations

Teledyne will investigate evidence or allegations that its employees, agents or subcontractors have violated human trafficking prohibitions.

Teledyne will make appropriate disclosures to the U.S. Government of violations and fully cooperate with any Government investigation.

Remedies

Teledyne will take appropriate action when its employees, agents or subcontractors are found to engage in prohibited conduct, including the remedies specified in FAR 52.222.50. Where appropriate or required, Teledyne will coordinate with the U.S. Government prior to the implementation of remedies.

Eligibility for Future Contracts

The record of a subcontractor's compliance with human trafficking requirements will be considered in making future subcontractor source selections. Subcontractors that have engaged in prohibited conduct may be excluded from eligibility of future awards.

Periodic Reassessment of the Plan

Teledyne will periodically review this Plan and additional controls and measures will be implemented as required.