

Anti-Human Trafficking Compliance Plan

Applicability

In accordance with FAR 52.222-50(h), Germanow Simon has developed this Anti-Human Trafficking Compliance Plan (the “Compliance Plan” or the “Plan”) to be implemented on United States Government contracts or subcontracts for supplies, other than commercially available off-the-shelf items, acquired outside the United States or services to be performed outside the United States and has an estimated value that exceeds \$500,000. The purpose of this Plan is to ensure employees, agents and subcontractors are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations.

Appropriateness of Plan

This Compliance Plan may be appropriately tailored with respect to the size and complexity of the contract and to the nature and scope of the activities to be performed for the Government, including the number of non-U.S. citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.

Plan Requirements

Awareness Program: Germanow Simon has adopted an internal policy, Anti-Human-Trafficking Policy, to comply with anti-human trafficking laws and regulations promulgated in the United States and those territories in which the Company operates. The policy describes prohibited trafficking related activities and the actions that will be taken against employees for violations.

Process to Report: Any Germanow Simon employees or third party doing work on behalf of the Company are required to report information or knowledge of the actual or potential human trafficking violations to their Supervisor, Human Resources Manager or President.

Germanow Simon employees or third party doing work on behalf of the Company may also report violations by contacting the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

Retaliation against an individual who reports a violation is strictly prohibited.

Recruitment and Wage Plan: Germanow Simon permits only the use of recruitment companies who have trained employees, prohibit charging recruitment fees to the employee and ensure that wages meet applicable host country legal requirements or explain any variance.

Procedures for Agents and Subcontractors: All Germanow Simon agents and subcontractors must agree to comply with all applicable anti-trafficking laws and regulations. Germanow Simon has included FAR 52.222-50 and FAR 52.222-56 in supplier agreements where applicable.

Germanow Simon agents and subcontractors must have procedures to prevent trafficking in persons and to monitor, detect and terminate any agents, subcontracts or subcontractor employees that have engaged in such activities.

Posting: Germanow Simon will post this Plan at the workplace (unless the work is to be performed in the field or not in a fixed location) and on its external website, www.gsoptics.com. This Plan is also available to the Contracting Officer upon request.

Certification: Annually after receiving an award, Germanow Simon will certify to the Government that;

1. It has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, subcontractor or subcontractor employee engaging in prohibited activities and,
2. After having conducted due diligence, to the best of Germanow Simons' knowledge and believe, neither it nor any of its agents, subcontractors or their agents are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, Germanow Simon or its subcontractor has taken the appropriate remedial and referral actions.