

Mini-Circuits

Statement on Modern Slavery and Human Trafficking

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Introduction

This statement sets out Mini-Circuits' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2017.

As part of the RF industry, the Company recognizes that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organizational Structure and Supply Chains

This statement covers the activities of Mini-Circuits:

- A supplier of RF/microwave signal processing components with a global supply chain and multiple international facilities.

Countries of Operation and Supply

The Company currently operates in the following countries:-

- USA – Sales, manufacturing, product development
- UK – Sales
- Israel – Sales, manufacturing, product development
- India – Manufacturing, product development
- China – Sales, manufacturing
- Malaysia – Manufacturing, product development

The following is the process by which the Company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- All worldwide locations report to the USA headquarters location.
- As a company with an AS9100 Quality Management System and ISO14001 Environmental Management System we are committed to maintaining a high level of efficiency and safety in all operations.
- This includes hiring qualified operators at all levels and compliance to all local regulations.

High-Risk Activities

The following activities are considered to be at high risk of slavery or human trafficking:-

- The only activities that may pose a risk for slavery or human trafficking are the most menial operations. However, all worldwide managers are made aware of the potential risks and operate within the regulations of the areas in which they operate.

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** Policies are defined and implemented by top level management from the President on down and are communicated throughout the company in ongoing correspondence.
- **Risk assessments:** Risk assessment for human rights and slavery are conducted by the HR (Human Resources) departments for the headquarters and worldwide locations.
- **Investigations/due diligence:** The HR Departments are responsible for the investigation and due diligence tracking for all hiring.
- **Training:** Company policies are implemented worldwide by local location management.

Relevant Policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

The policies are outlined in the Code of Conduct as it appears at

https://www.minicircuits.com/quality/code_of_conduct.html.

- **Whistleblowing policy**

The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organization. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Employee code of conduct**

The Company's code makes clear to employees the actions and behavior expected of them when representing the organization. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier code of conduct**

The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labor. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment/agency workers policy**

The Company uses only specified, reputable employment agencies to source labor and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the Company's own staff which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationships.

Performance Indicators

The Company has reviewed its key performance indicators (KPIs). As a result, the Company is reviewing its existing supply chains whereby the Company evaluates all existing suppliers.

Training

The Company requires all supply chain managers within the Company to complete training on modern slavery.

The Company's modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labor engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organization;

Awareness-Raising Program

As well as training staff, the Company has raised awareness of modern slavery issues by creating a corporate code of conduct which is easily accessible on the Mini-Circuits website. The code of conduct clearly sets out the company's position with regards to modern slavery.

The code explains to staff:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;

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