



Combating Trafficking in Persons Compliance Plan

Background and Purpose

ON Semiconductor developed this Combating Trafficking of Persons Compliance Plan (“Plan”) in accordance with the U.S. Government’s zero tolerance policy regarding trafficking in persons by government contractors and award recipients, as set out in FAR 52.222-50(h). The purpose of this Plan is:

- (a) to make all ON Semiconductor employees, contractors, subcontractors, and agents aware of the conduct prohibited under the anti-trafficking laws and regulations, as well as under the company’s anti-trafficking statement
- (b) to make all ON Semiconductor employees, agents, and subcontractors aware of the actions that may be taken against them for violations
- (c) to set out ON Semiconductor’s recruitment, wage, and housing practices; and

Applicability

This Plan sets out the standards for anti-trafficking compliance and applies to all U.S. Government contracts, subcontracts, cooperative agreements, awards, and sub-awards. However, if the size, complexity, nature, and scope of the particular contract are such that involve greater risk of trafficking activity, then the plan may need to be tailored accordingly.

Certification of Compliance Plan

When required by FAR 52.222-50(h), ON Semiconductor will certify to the Government that:

- (a) It maintains a combating trafficking in persons compliance plan
- (b) It monitors for any contractor, subcontractor, or agent who is violating this plan
- (c) After conducting sufficient due diligence, and to the best of its knowledge and belief, neither ON Semiconductor nor any of its contractors, subcontractors, or agents are engaged in prohibited activities
- (d) If there are any violations, remedial action has been taken against the violator

Awareness Program

Pursuant to the FARs, contractors, contractor employees and their agents are prohibited from:

- Engaging in severe forms (i.e. using force, fraud or coercion) of trafficking in persons during the period of performance of a contract;
- Procuring commercial sex acts during the period of performance of a contract;



- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent recruiting practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, 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, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with the local labor laws of the country in which the recruiting takes place;
- Charging employees recruitment fees;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who was not a national of the country in which the work is taking place and who was brought into that country for the purposes of working on a U.S Government contract, subcontract or portion(s) of contracts or subcontracts performed outside the United States;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who is not a United State national and who was brought into the United States for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee for portions of contracts or subcontracts performed inside the United States;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating.

Any violation of the FARs, the DFARS and/or this Plan could result in disciplinary action which may include but is not limited to, an employee's removal from a contract, reduction in benefits or termination of employment. For subcontractors and subcontractor employees, failure to comply with the requirements of the FARs, the DFARS and/or this Plan is grounds for ON Semiconductor to take any and all appropriate actions, up to and including immediate termination of that subcontractor's contract with ON Semiconductor.



Employees

On an annual basis, ON Semiconductor requires all employees to complete Code of Business Conduct training and certify that they have read and understand the ON Semiconductor Code of Business Conduct which is publicly posted on its website:

<http://www.onsemi.com/PowerSolutions/ir.do?page=governance>

Subcontractors/Suppliers

FAR and DFARS clauses are “flowed down” to our subcontractors, as applicable.

Reporting Process

Employees should consult the Chief Compliance and Ethics Officer or the Law Department if they are uncertain whether a specific action would be in violation of the FARs or DFARS.

Employees should report, in good faith, and have a responsibility to, without fear of retaliation and subject to the protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9, for reprisal for whistleblowing on trafficking in persons violations, any activity that violates the FARs or DFARS to the Chief Compliance and Ethics Officer, a CEL, the law or human resources department or at Hotline.onsemi.com. Employees may also contact the Global Human Trafficking Hotline at 1-844-888-FREE or via email at help@befree.org.

Notification

ON Semiconductor shall promptly inform the Contracting Officer upon receipt of credible information alleging a violation of FAR 52.222-50; and any actions taken against an ON Semiconductor employee, subcontractor, subcontractor employee or their agent pursuant to FAR 52.222-50.

Certifications

ON Semiconductor will provide certifications to the Contracting Officer annually as required by the FAR.

Prior to award of a subcontract, and annually during performance of the contract, ON Semiconductor shall obtain from each subcontractor with subcontracts for supplies, other than COTS items, to be acquired outside the United States, or services to be performed outside the United States, a certification as required by the FAR.



For individual contracts for supplies, other than COTS items, acquired outside the United States or services to be performed outside the United States, and has an estimated value exceeding \$500,000, ON Semiconductor will obtain from each subcontractor a certification as required by the FAR.