

## Iteris, Inc.

### Policy Statement Against Trafficking in Persons and Slavery

---

#### Overview and Purpose

Iteris, Inc. (“**Iteris**,” “**we**,” “**our**,” or “**us**”) is committed to treating everyone who works at or with Iteris with dignity and respect, and explicitly prohibits human trafficking and use of involuntary labor, including forced labor and unlawful child labor. Iteris will not tolerate or condone human trafficking or slavery in any part of our organization. This Policy Statement Against Trafficking in Persons and Slavery (“**Policy**”) is consistent with Iteris’ [Code of Ethics and Business Conduct](#) and our core values to protect and advance human dignity and human rights in our business practices.

The purpose of this policy is to instill a climate of full compliance with all federal and state laws concerning the United States (U.S.) Government’s policy prohibiting trafficking in persons, including requirements of Federal Acquisition Regulation Subpart 22.17 and clause 52.222-50. This policy applies to all employees of Iteris and its wholly owned subsidiaries as well as all applicants for regular, temporary, part-time employment (including intern positions), suppliers and contractors.

#### Policy

In support of the U.S. Government policy prohibiting trafficking in persons, Iteris expects our employees and contractors to not engage in the use of forced, bonded or indentured labor, involuntary prison labor, and slavery, and to not procure commercial sex acts, or engage in trafficking of persons. Specifically, we expect employees and contractors to not participate in the following activities or practices:

- Recruiting, harboring, transporting, providing, or obtaining a person for labor or services through the use of force, fraud, or coercion for the purpose of subjecting them to involuntary servitude, peonage, debt bondage, or slavery;
- Inducing or engaging in a commercial sex act induced by force, fraud, or coercion, or in which the person induced to perform such act is younger than eighteen (18) years of age;
- 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 the issuing authority;
- Using misleading or fraudulent practices during the recruitment of employees or failing to disclose, in a language accessible to the worker, information relating to the terms of employment, living conditions, housing, the hazardous nature of the work, or using recruiters who do not comply with local labor laws of the country in which the recruiting occurs;
- 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 is not a national of the country in which the work occurs, or for an employee who is not a United States national and who was brought to the United States for the purpose of working on a United States Government contract or subcontract;
- Providing or arranging for housing that fails to meet the host country’s housing and safety standards; and

- Failing to provide for an employment contract, recruiting agreement, or other required work document in writing, if required by law or contract.

**Violations of this Policy**

Each employee, contractor, and supplier of Iteris is responsible for ensuring compliance with this Policy. Iteris prohibits retaliation against anyone who files a complaint or reports a suspected violation of this Policy. Any violation of this Policy could result in disciplinary action, up to and including (without limitation), disclosure of the violation to government officials, when required by law or contract, removal from a contract, reduction in benefits, termination of a business relationship, or termination of employment, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

**Training and Awareness**

Iteris has implemented a standard mandatory training program on anti-slavery and human trafficking issues to employees as part of our annual training/onboarding program. We are also implementing awareness initiatives, such as how to identify signs of slavery and human trafficking.

**Responsibilities**

All Iteris employees, contractors, and suppliers are expected to be familiar with this Policy and the prohibited human trafficking activities described above and to avoid them. Management of Iteris are expected to adhere to and administer this Policy and to report any concern or violation to Human Resources. Human Resources is responsible for administering this Policy and investigating all areas of non-compliance.

**Reporting**

Individuals may report, without fear of retaliation, any suspected violations of this Policy by contacting Iteris' Sr. Vice President, Human Resources, its Vice President, Legal, and/or our corporate Whistleblower Hotline which permits anonymous reporting.

Effective: December 2020