

ASTRONICS CORPORATION
COMBATTING HUMAN TRAFFICKING

As of April 1, 2018

I. Purpose

The purpose of this policy is to ensure that employees, agents and suppliers of Astronics Corporation do not engage in human trafficking or human trafficking activities.

II. Policy

Astronics Corporation strictly prohibits employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.

Astronics Corporation also prohibits employees, subcontractors, subcontractor employees, and agents from engaging in practices relating to trafficking in persons, including, without limitation:

- Destroying or otherwise denying access to an employee's identity or immigration documents;
- Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment;
- Using recruiters that do not comply with local labor laws;
- Charging employees recruitment fees;
- Failing to provide return transportation to certain employees who are brought to a country for the purpose of working on a U.S. Government contract;
- Providing housing that fails to meet host country standards; and
- Failing to provide an employment contract or work document where required by law.

Astronics Corporation and its subsidiaries will take appropriate disciplinary action for violations of these rules, up to and including termination of employment.

Astronics Corporation and its subsidiaries must cooperate fully with the U.S. Government or other appropriate governmental authorities in audits or investigations relating to such violations. Employees of Astronics Corporation and its subsidiaries are required to cooperate in any internal or external investigation of suspected wrongdoing under this policy. Failure to cooperate may result in disciplinary action, up to and including termination of employment.

III. Mandatory Reporting Requirements

Employees having knowledge of credible information concerning actual or potential violations of this policy must report them immediately to their executive management team. The executive management team is responsible for contacting Astronics Corporation's Corporate Counsel.

Employees may also report possible violations to line management, human resources, compliance professionals throughout the organization, or directly to Astronics Corporation's Corporate Counsel.

Timeliness of reporting any suspected violation is critical as the U.S. Government has imposed an especially stringent reporting obligation when there is credible information of violations.

Failure to report actual or potential illegal behavior or actual or potential violations of this policy may also subject employees to disciplinary action, up to and including termination of employment.

Any person who receives a report of possible violations under this policy must notify Astronics Corporation's Corporate Counsel immediately. When making a report, employees are encouraged to share as much information as possible so that appropriate action can be taken.

IV. Non-Retaliation Policy

Astronics Corporation and its subsidiaries do not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy or who assists with an internal or governmental audit or investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, up to and including termination of employment.