Xcerra Corporation (Xcerra) Anti-Slavery and Human Trafficking Policy

Xcerra Policies and Actions: Xcerra opposes the practice of slavery or human trafficking. We endeavor to use companies in our supply chain that create an environment where workers have the right to freely choose employment and the ability to enjoy a workplace that honors the minimum required payment of wages and provision of employee benefits.

Risk-based supplier assessments: As a part of our supplier management process, our employees regularly evaluate suppliers against pre-determined evaluation criteria, including compliance with their applicable statutory and regulatory requirements. Our supplier evaluation program includes planned business reviews, site visits and performance audits, some of which may be unannounced.

Our primary supplier is a founding member of Electronics Industry Citizenship Coalition (EICC), which prohibits the use of forced, bonded, indentured labor or involuntary prison labor. We review their public statements concerning their continuing adherence to the EICC code.

Contractual requirements: As condition of doing business, our purchase order standard terms and conditions require that the supplier comply with all applicable laws, including laws related to slavery, human trafficking and child labor in those countries in which they do business.

Xcerra Standards of Business Conduct: Xcerra's <u>Business Conduct and Ethics Policy</u> establishes mandatory rules and guidelines for Xcerra's employees. These standards require adherence to all applicable laws and regulations, which would include adherence to laws prohibiting forced or compulsory labor practices. These standards apply to all Xcerra employees. Every Xcerra employee receives a copy and annually certifies receipt and understanding of these principles. In the event an employee violates these standards, Xcerra will take immediate and appropriate action, which may include termination of employment.

Training: Xcerra provides training to company employees and management who have direct responsibility for supply-chain management including the review and mitigation of possible human trafficking and slavery.