

Epson Group Supplier Guidelines (Changes in This Version)

Ver.7.01	Ver.8.0
Epson Group Supplier Guidelines	Epson Group Supplier Guidelines
<p>2. Epson Management Philosophy and Principles of Corporate Behavior Epson’s Management Philosophy describes how we want Epson to be. Epson will fulfill its social responsibility by living up to Epson’s Principles of Corporate Behavior, which is based on “trust-based management,” a concept that underlies Epson’s Management Philosophy. We aim to be an indispensable company for our customers and the world.</p> <p style="text-align: center;">Management Philosophy</p> <p style="text-align: center;">Epson aspires to be an indispensable company, trusted throughout the world for our commitment to openness, customer satisfaction and sustainability.</p> <p style="text-align: center;">We respect individuality while promoting teamwork, and are committed to delivering unique value through innovative and creative solutions.</p> <p style="text-align: center;">EXCEED YOUR VISION As Epson employees, we always strive to exceed our own vision, and to produce results that bring surprise and delight to our customers.</p> <p style="text-align: center;">Principles of Corporate Behavior</p> <p>1. Pursuing customer satisfaction We think of our customers' perspective at all times and continue to create trusted products and services that please customers around the world.</p> <p>2. Preserving the natural environment We integrate environmental considerations into our corporate activities and actively strive to meet high conservation standards when fulfilling our</p>	<p>2. Epson’s Philosophical Framework</p> <p style="text-align: center;">Purpose</p> <p style="text-align: center;">“Our philosophy of efficient, compact and precise innovation enriches lives and helps create a better world.”</p> <p style="text-align: center;">Management Philosophy</p> <p style="text-align: center;">Epson aspires to be an indispensable company, trusted throughout the world for our commitment to openness, customer satisfaction and sustainability.</p> <p style="text-align: center;">We respect individuality while promoting teamwork, and are committed to delivering unique value through innovative and creative solutions.</p> <p style="text-align: center;">Principles of Corporate Behavior</p> <p>Principle 1: Pursuing customer satisfaction Principle 2: Preserving the natural environment Principle 3: Fostering diverse values and teamwork Principle 4: Creating a safe, healthy, and fair work environment in which human rights are respected Principle 5: Ensuring effective governance and compliance</p>

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<p>responsibilities as a good corporate citizen.</p> <p>3. Fostering diverse values and teamwork We strengthen teamwork by recognizing the value of a diverse workforce and creating synergies between individuals and our organization.</p> <p>4. Creating a safe, healthy, and fair work environment in which human rights are respected We respect basic human rights and create a cheerful, safe, healthy, and fair work environment that is free of discrimination.</p> <p>5. Ensuring effective governance and compliance We institute effective corporate governance and internal control, and we observe laws, regulations, and other rules and maintain the highest ethics in all activities.</p> <p>6. Ensuring the security of people, assets, and information We protect the safety and security of people and company assets, and we exercise strict care in the management of all information.</p> <p>7. Working with business partners for mutual benefit We seek to maintain mutually beneficial relationships with our suppliers, sales channels, collaborators, and other business partners, whom we ask to live up to the highest standards of ethical conduct while respecting their autonomy and independence.</p> <p>8. Prospering with the community We actively contribute to the communities in which we operate, as well as to the international community, facilitating mutually beneficial relationships.</p> <p>9. Initiating honest dialog with our stakeholders We maintain open lines of communication with our stakeholders, thoughtfully considering their views and suggestions.</p>	<p>Principle 6: Ensuring the security of people, assets, and Information Principle 7: Working with business partners for mutual benefit Principle 8: Prospering with the Community Principle 9: Initiating honest dialogue with our stakeholders</p> <p>Closing: The spirit of "integrity and effort" and "creativity and challenge"</p> <p>Principles of Corporate Behavior Philosophy Epson</p>
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<p>3. Basic Procurement Policy</p> <ol style="list-style-type: none"> 1) We will build good partnerships with suppliers, based on mutual trust and the principles of fairness, coexistence and co-prosperity. 2) Exercising high ethical standards and a social conscience, we will conduct our procurement activities in strict compliance with both the letter and spirit of laws and regulations, both national and international, in every region where we operate. 3) We will strive to reduce the environmental impacts of our procurement activities and will always seek stable and reasonable quality, price, and delivery from suppliers. 	<p>3. Epson Group Basic Procurement Policy</p> <ol style="list-style-type: none"> 1) With high ethical standards and a social conscience, we and our suppliers engage in procurement activities that comply with international rules and with the laws and regulations of all nations, fulfilling our social responsibilities, including those related to human rights and the environment. 2) We build sustainable supply chains by forging partnerships of mutual trust with our suppliers based on fairness and mutual benefit. 3) We work with our suppliers to stabilize and optimize quality, prices, and delivery times to deliver products and services of value to our customers.
<p>4. Expectations of Suppliers</p> <ol style="list-style-type: none"> 1) Observance of laws, regulations, and social norms Conduct all business activities in accordance with the laws, regulations, and generally accepted standards of the countries in which you operate. 2) Continuous supply of goods of suitable quality The quality of raw materials, parts, and other goods procured from suppliers affects the performance of Epson products and, in some cases, has the potential to cause serious defects affecting product safety. 	<p>4. Expectations for Suppliers</p> <p>In addition to concluding transaction agreements with suppliers, Epson expects them to meet the requirements outlined below. In these guidelines, all suppliers are referred to as "suppliers," and those who deliver raw materials, parts, or finished goods (referred to collectively as "products" hereafter) to Epson are referred to as "production material suppliers."</p> <ol style="list-style-type: none"> 1) Observing laws, regulations, and social norms We ask suppliers to conduct all business activities in accordance with the laws, regulations, and generally accepted standards of the countries in which they operate. In addition to complying with applicable laws, we ask that they comply with the Responsible Business Alliance (RBA) Code of Conduct, an internationally recognized set of standards for corporate social responsibility, regardless of the country or region in which they are located. 2) Maintaining appropriate quality The quality of products that suppliers deliver to Epson affects the performance of Epson products and, in some cases, can produce serious defects. Therefore, we ask suppliers to establish and operate a quality

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<p>Therefore, we expect our suppliers to establish and operate a quality assurance system that is in line with separately presented quality assurance standards.</p> <p>3) Supply of cost-competitive goods The price of raw materials, parts, and other goods procured from suppliers significantly affects the cost competitiveness of Epson’s finished products. Continuously streamline operations and reduce prices of raw materials and parts so as to maintain market competitiveness.</p> <p>4) Ability to respond to fluctuations in demand Production fluctuates depending on things such as customer demand. Suppliers must therefore rigorously manage delivery schedules through tight communication with Epson and must sustain a stable supply of parts and raw materials by maintaining the ability to respond to demand fluctuations. Meet delivery commitments and continuously try to shorten lead-times.</p> <p>5) Responsible sourcing of minerals Establish a survey system for gathering information on minerals used in products and provide products that do not use minerals from supply chains that are involved in human rights abuses, conflicts, or environmental destruction.</p> <p>6) Environmental Agree to the Epson Group Green Purchasing Standard for Production Materials and provide direct materials that satisfy the standard.</p>	<p>assurance system that is in line with separately presented quality assurance standards.</p> <p>3) Maintaining cost-competitiveness We ask suppliers to offer competitive market pricing while actively and continuously streamlining operations and reducing costs. Epson will not demand unlawful or unreasonable cost reductions or discounts.</p> <p>4) Maintaining on-time delivery We ask suppliers to closely communicate with Epson to strictly manage delivery schedules (deliveries), endeavor to stabilize supply, and meet their delivery commitments.</p> <p>5) Sourcing minerals responsibly We ask suppliers to establish and carry out product-related supply chain surveys and answer Epson’s surveys to prevent the use of high-risk minerals that are associated with human rights violations, armed conflicts, and environmental destruction.</p> <p>6) Mitigating environmental impacts A. We ask suppliers to make efforts to reduce greenhouse gas emissions, recycle resources, manage water resources, manage chemical substances, preserve biodiversity, and take other actions deemed necessary to address environmental issues. We also ask them to answer Epson’s surveys. B. Direct material suppliers are asked to establish a system for tracking and managing chemical substances in products, agree to the latest</p>
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<p>7) Information security and cyber security Suppliers and their subcontractors that use information systems in their operations are to implement technological and organizational measures to defend against computer network security threats (e.g., unauthorized access, malware, and targeted attacks). They shall put in place systems for pinpointing the scope of damage from actual attacks, an organization for mounting an initial response to prevent harm from spreading, and an organization for promptly investigating measures to prevent future incidents. This includes readying plans and schemes for restoring IT systems that have been harmed by a cyberattack that has brought operations to a halt.</p> <p>Suppliers who are asked by Epson to preserve the secrecy of information that Epson provides under a non-disclosure agreement or other arrangement are to abide by the terms therein as they apply to the information (including goods) that Epson asked to be kept secret as well as to information (including goods) created using that information.</p> <p>8) Management of borrowed assets Suppliers are to observe applicable agreements and laws when they borrow and use Epson assets in production. They shall take appropriate care of borrowed assets so that they are in a normal, usable condition at all times. Suppliers are to promptly respond to requests for proof of receipt,</p>	<p>revision of the Epson Group Green Purchasing Standard for Production Materials, and deliver products that satisfy the standard. Refer to this website for details: https://corporate.epson/en/sustainability/supply-chain/green-purchasing/</p> <p>C. We ask suppliers to comply with environmental laws and regulations and conduct business operations in an environmentally considerate manner at their factories and other facilities.</p> <p>7) Information security and cyber security We ask suppliers and their subcontractors who use information systems in their operations to implement technological and organizational measures to defend against computer network security threats (e.g., unauthorized access, malware, and targeted attacks). We ask them to build systems for pinpointing the scope of damage from actual attacks, initiating actions to prevent harm from spreading, and promptly investigating measures to prevent future incidents. This includes readying plans and schemes for restoring IT systems that have been harmed by a cyberattack that has brought operations to a halt.</p> <p>If suppliers are asked by Epson to preserve the secrecy of information that Epson provides under a non-disclosure agreement or other arrangement, we ask them to abide by the terms therein as they apply to the information (including goods) that Epson asked to be kept secret as well as to information (including goods) created using that information.</p> <p>8) Management of borrowed assets We ask suppliers to observe applicable agreements and laws when borrowing and using Epson assets in production. We ask them to take appropriate care of borrowed assets so that they are in a normal, usable condition at all times. We ask them to promptly respond to requests from</p>
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<p>requests to conduct an inventory, and requests to conduct on-site inspections of usage conditions.</p> <p>*Note: Epson sometimes loans equipment that suppliers need to produce goods for Epson. However, such loans require the conclusion of a basic business agreement or separate lease in which the supplier's duty of care is prescribed.</p> <p>9) Business continuity management (BCM) Suppliers are to build a BCM system and have in place a multifaceted action plan (a business continuity plan [BCP]) for continuing business operations in the event of a fire, accident, disaster, disease epidemic, or other disruption. The plan shall also cover procedures for resuming business operations within a set time target. The object of the system is to minimize business harm and losses in the event of disruption. Suppliers are to fulfill their supply obligations by preventing or limiting supply disruptions.</p> <p>10) International trade control When importing or exporting goods, providing technology, or engaging in international brokered transactions, suppliers are to comply with export control laws and regulations in their country of residence. Moreover, they shall not engage in conduct that violates U.S. Export Administration Regulations when they are subject to the extraterritorial application of these regulations. When importing goods, comply with the customs laws of the country of residence and pay the appropriate tariffs, consumption taxes, and other duties. To enable Epson to sell Epson products globally, suppliers shall comply with applicable international laws and regulations when selling products to Epson and shall provide the necessary information to enable Epson to comply with all laws in the places where Epson products are sold.</p>	<p>Epson for proof of receipt, requests to conduct an inventory, and requests to conduct on-site inspections of usage conditions.</p> <p>9) Business continuity management (BCM) We ask suppliers to fulfill their supply obligations by preventing or limiting supply disruptions. We ask suppliers to build a BCM system and have in place a multifaceted action plan (a business continuity plan [BCP]) for continuing business operations to minimize business losses and damage in the event of an accident, disaster, emerging infectious disease, or other emergencies.</p> <p>10) International trade control When importing or exporting goods, providing technology, or engaging in international brokered transactions, we ask suppliers to comply with export control laws and regulations of the country of residence. Moreover, we ask them to not engage in conduct that violates U.S. Export Administration Regulations when subject to the extraterritorial application of these regulations. When importing goods, we ask them to observe the customs laws of the country of residence and pay the appropriate tariffs, consumption taxes, and other duties. To enable Epson to sell Epson products globally, we ask suppliers to comply with applicable international laws and regulations when selling products to Epson and provide the necessary information to enable Epson to comply with all laws in the places where Epson products are sold. Applicable laws</p>
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Applicable laws include, but are not limited to, export control laws, international trade regulations, and environmental or other product regulations.

11) International trade control-related security **in the supply chain and** shipping management

Suppliers **are** to ensure security in international trade control and **to** correctly manage shipping.

- (1) Area security: Control employee and visitor access to the premises of shipping centers and lock buildings and facilities.
- (2) Goods security: Prevent unauthorized persons from accessing goods for import/export and prevent unidentified goods from being mixed in with the goods for import/export throughout storage and shipping operations.
- (3) Personnel security: Employ workers whose identity has been verified.
- (4) Shipping management: Verify that actual goods and their accompanying documentation match.
- (5) Shipping management: Verify that actual goods and their export paperwork match.

Suppliers to whom the expectations apply

Expectations	Suppliers to whom expectations apply
1) Observance of laws, regulations, and social	All suppliers
2) Continuous supply of goods of suitable	All suppliers
3) Supply of cost-competitive	All suppliers
4) Ability to respond to fluctuations in demand	All suppliers
5) Responsible sourcing of	Suppliers of direct materials*
6) Environmental	Suppliers of direct materials*

include, but are not limited to, export control laws, international trade regulations, and environmental or other product regulations.

11) International trade control-related security **and correct** shipping management

We ask suppliers to ensure security in international trade control and correctly manage shipping.

- A. Area security: Control employee and visitor access to the premises of shipping centers and lock buildings and facilities.
- B. Goods security: Prevent unauthorized persons from accessing goods for import/export and prevent unidentified goods from being mixed in with the goods for import/export throughout storage and shipping operations.
- C. Personnel security: Employ workers whose identity has been verified.
- D. Shipping management: Verify that actual goods and their accompanying documentation match.
- E. Shipping management: Verify that actual goods and their export paperwork match.

12) **Respect for human rights**

We ask suppliers to commit to respecting human rights by observing the labor standards set forth in the Epson Supplier Code of Conduct (RBA Code of Conduct), as well as by respecting the rights of indigenous peoples and migrant workers.

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7) Information security and cyber security	All suppliers	
8) Management of borrowed assets	Suppliers who are borrowing Epson assets	
9) Business continuity management (BCM)	All suppliers	
10) International trade control	Suppliers that import and export	
11) International trade control-related security in the supply chain and shipping management	Suppliers that import and export goods	
<p>*Direct materials are those raw materials and parts that are needed in product assembly. Outsourced processing is also considered to be direct material procurement.</p>		
<p>5. Evaluation and Survey Program</p> <p>Epson assesses supplier compliance with Epson Group Supplier Guidelines, shares issues with suppliers, and works jointly with suppliers to make improvements. Epson decides which suppliers to evaluate based on the size and nature of transactions.</p> <p>Suppliers are typically evaluated or surveyed by using one or a combination of the following methods: a self-assessment questionnaire (checklist), interview, on-site verification, or third-party audit.</p> <p>Suppliers are asked to promptly take action to implement suggestions for improvement made on the basis of evaluation or survey results. Depending on the situation, Epson may provide assistance. If a supplier does not implement suggested improvements, does not resolve issues after a certain period of time, or does not cooperate with an evaluation or survey, Epson will consider terminating the business relationship.</p>		<p>5. Evaluation and Survey Program</p> <p>Epson evaluates both direct and indirect materials suppliers based on a comprehensive supplier evaluation program. The program consists of multiple evaluations. The primary components are an indirect evaluation, which is based on information from a third-party credit investigation, and a direct evaluation (periodic evaluation), which is a self-check that suppliers do to evaluate their own QCD and other performance metrics.</p> <p>Epson assesses supplier compliance with the Epson Supplier Guidelines, shares issues with suppliers, and works jointly with suppliers to make improvements. Epson decides which suppliers to evaluate based on the size and nature of transactions.</p> <p>Suppliers are typically evaluated or surveyed by using one or a combination of the following methods: "self-assessment questionnaire (checklist)", "interview", "on-site verification", or "third-party audit". Suppliers are asked to promptly take actions to implement "suggestions for improvement" made based on evaluation or survey results. Depending on the situation,</p>

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<p>Evaluation Program</p> <table border="1"> <tr> <td data-bbox="136 472 1097 592"> <p>Credit assessment by a credit investigation service Evaluation items: Credit score, business history, capital composition, size, financial position, financing situation, management, etc.</p> </td> </tr> <tr> <td data-bbox="136 592 1097 839"> <p>Periodic evaluation (an evaluation that is focused primarily on a supplier’s QCDEM level) Evaluation items: Quality control (Q), cost management (C), delivery management (D), environmental management (E), management (M)</p> </td> </tr> <tr> <td data-bbox="136 839 1097 999"> <p>Detailed evaluation (an assessment of adherence to the Epson Supplier Code of Conduct) Evaluation items: Labor, safety and health, environmental, ethics, and management systems</p> </td> </tr> <tr> <td data-bbox="136 999 1097 1246"> <p>Evaluation of emergency response capabilities (an assessment of ability to respond to a natural disaster, fire, or other emergency) Evaluation items: Management involvement, risk countermeasures, emergency response capability, operations resilience, ability to secure alternative sources, ability to maintain procurement, information disclosure, etc.</p> </td> </tr> <tr> <td data-bbox="136 1246 1097 1455"> <p>Safety management evaluation (an assessment of readiness to respond to fires and other emergency risks) Evaluation items: Management of electrical hazards, hazardous materials, fire prevention, etc.</p> </td> </tr> </table>	<p>Credit assessment by a credit investigation service Evaluation items: Credit score, business history, capital composition, size, financial position, financing situation, management, etc.</p>	<p>Periodic evaluation (an evaluation that is focused primarily on a supplier’s QCDEM level) Evaluation items: Quality control (Q), cost management (C), delivery management (D), environmental management (E), management (M)</p>	<p>Detailed evaluation (an assessment of adherence to the Epson Supplier Code of Conduct) Evaluation items: Labor, safety and health, environmental, ethics, and management systems</p>	<p>Evaluation of emergency response capabilities (an assessment of ability to respond to a natural disaster, fire, or other emergency) Evaluation items: Management involvement, risk countermeasures, emergency response capability, operations resilience, ability to secure alternative sources, ability to maintain procurement, information disclosure, etc.</p>	<p>Safety management evaluation (an assessment of readiness to respond to fires and other emergency risks) Evaluation items: Management of electrical hazards, hazardous materials, fire prevention, etc.</p>	<p>Epson may provide assistance. 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<p>Survey Program</p> <div style="border: 1px solid black; padding: 5px;"> <p>Conflict minerals survey Survey items: Conflict mineral use (use of 3TGs, etc.), and conflict mineral policies and initiatives</p> </div>	<p>Survey Program</p> <div style="border: 1px solid black; padding: 5px;"> <p>Survey on substances in products Survey items: Agreement to comply with the Epson Group Green Purchasing Standard for Production Materials (latest revision), maintenance or construction of a product substance assurance system, information about substances in products, etc.</p> <p>Environmental impact survey Survey items: Amounts of environmental resources used, GHG emissions, emissions reduction rate, efforts to reduce environmental impacts, etc.</p> <p>Responsible minerals survey Survey items: Supply chain surveys regarding 3TG, cobalt, and other metals and minerals used, as well as supplier policies and initiatives, etc.</p> </div>
<p>6. Whistleblowing System</p> <p>Epson has established compliance hotlines for receiving reports and consultations from suppliers regarding violations or potential violations of legislative requirements and the Epson Group Supplier Guidelines. By establishing compliance hotlines, Epson will further promote corporate ethics. Reports may be made anonymously, and whistleblowers shall be protected, including by strictly handling their personal data and prohibiting any form of retaliation.</p> <p>What you can report or consult about</p> <ul style="list-style-type: none"> - Violations or potential violations of law or the Epson Supplier Code of Conduct (in the areas of human rights, health and safety, environment, ethics, management systems) - Proposals and grievances relating to health and safety - Matters related to conflict minerals surveys 	<p>6. Whistleblowing Systems</p> <p>We take compliance seriously and provide compliance hotlines that we encourage suppliers to use to report or discuss ethical or compliance concerns. Reports can be made anonymously, and whistleblowers shall be protected, including by strictly handling their personal data and prohibiting any form of retaliation.</p> <p>(1) Suppliers can use the hotlines to report:</p> <ul style="list-style-type: none"> ● Violations or potential violations of law, internationally recognized human rights codes, or the Epson Supplier Code of Conduct (in the areas of human rights, health and safety, environment, and ethics) ● Proposals and grievances relating to health and safety ● Matters related to conflict minerals surveys etc. <p>(2) Whistleblowing system for suppliers</p> <p>https://www.epson.jp/SR/supply_chain_csr/communication/partnerline_privacy.htm</p>

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	<p>(3) Other reporting channels Epson provides compliance hotlines for suppliers, but suppliers may use other internal or external reporting mechanisms if they wish to do so.</p>
<p>7. Supplier Code of Conduct Epson, as a member of the Responsible Business Alliance (RBA), strives to operate in compliance with the RBA Code of Conduct. All suppliers are asked to observe the RBA Code of Conduct, which sets forth standards of conduct for ensuring that working conditions in the supply chain are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.</p> <p>RBA Code of Conduct: http://www.responsiblebusiness.org/standards/code-of-conduct/</p>	<p>7. Epson Supplier Code of Conduct (RBA Code of Conduct) As a member of the Responsible Business Alliance, Epson commits to operating in compliance with the RBA Code of Conduct and asks all its suppliers to do so as well.</p> <p>The Epson Supplier Code of Conduct, which is part of the Epson Supplier Guidelines, is based on the RBA Code of Conduct. It specifies supply chain requirements in the areas of labor, health and safety, environment, ethics, and management systems. The RBA requires compliance with local laws and with RBA requirements and standards when they are stricter than local laws. This guarantees a certain level of performance regardless of the legal requirements and standards of the countries and regions in which suppliers are located, and regardless of their local labor practices.</p> <p>RBA Code of Conduct: http://www.responsiblebusiness.org/standards/code-of-conduct/</p>

REF : RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT (Changes in This Version)

Version 7	Version 8
<p>A. LABOR</p>	<p>A. LABOR</p>
<p>Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international-community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The-recognized standards, as set out in the References, were used in preparing the Code and may be useful sources of additional information. The labor standards are:</p>	<p>Participants commit to respect the human rights of workers, and to treat them with dignity. This applies to direct and indirect suppliers, as well as all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The labor standards are as follows:</p>
<p>1) Freely Chosen Employment</p>	<p>1) Prohibition of Forced Labor</p>
<p>Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per-worker's contract. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are-required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents or</p>	<p>Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a language the worker can understand, that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. Participants shall maintain documentation on all leaving workers. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits.</p>

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<p>sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.</p>	<p>Notwithstanding the foregoing, employers can only hold documentation if necessary to comply with the local law. In this case, at no time shall workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.</p>
<p>2) Young Workers Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Participants shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Participants shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Participants shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation is provided.</p>	<p>2) Young Workers Child labor shall not be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Participants shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Participants shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Participants shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation shall be provided.</p>
<p>3) Working Hours Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.</p>	<p>3) Working Hours Working hours shall not exceed the maximum set by local law. Further, a workweek shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime shall be voluntary. Workers shall be allowed at least one day off every seven days.</p>
<p>4) Wages and Benefits</p>	<p>4) Wages and Benefits</p>

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<p>Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.</p>	<p>Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.</p>
<p>5) Humane Treatment There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.</p>	<p>5) Non-Discrimination/Non-Harassment/Humane Treatment Participants shall commit to a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111).</p>
<p>6) Non-Discrimination/Non-Harassment Participants should be committed to a workplace free of harassment and unlawful discrimination. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111).</p>	<p>6) Freedom of Association and Collective Bargaining Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and</p>
<p>7) Freedom of Association In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and</p>	<p>6) Freedom of Association and Collective Bargaining Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and</p>

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<p>to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.</p>	<p>compensation issues. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with these principles, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.</p>
<p>B. HEALTH AND SAFETY</p>	<p>B. HEALTH AND SAFETY</p>
<p>Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.</p> <p>Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be useful sources of additional information.</p> <p>The health and safety standards are:</p>	<p>Participants recognize that in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy working environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.</p> <p>The health and safety standards are as follows:</p>
<p>1) Occupational Safety</p>	<p>1) Occupational Health and Safety</p>
<p>Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified and assessed, mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them</p>	<p>Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) shall be identified and assessed, mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.</p>

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<p>associated with these hazards. Reasonable steps must also be taken to remove pregnant women and 'nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.</p>	
<p>2) Emergency Preparedness Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.</p>	<p>2) Emergency Preparedness Potential emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.</p>
<p>3) Occupational Injury and Illness Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.</p>	<p>3) Occupational Injury and Illness Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illnesses, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Participants shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.</p>
<p>4) Industrial Hygiene Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards were identified, participants shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use</p>	<p>4) Industrial Hygiene Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Participants shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. Participants shall</p>

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appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.	provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.
5) Physically Demanding Work Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.	5) Physically Demanding Work Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks shall be identified, evaluated, and controlled.
6) Machine Safeguarding Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.	6) Machine Safeguarding Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.
7) Sanitation, Food, and Housing Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Participant or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.	7) Sanitation, Food, and Housing Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Participant or a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, and adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.
8) Health and Safety Communication Participants shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.	8) Health and Safety Communication Participants shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and regularly

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	thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.
C. ENVIRONMENT	C. ENVIRONMENT
Participants recognize that environmental responsibility is integral to producing world-class products. Participants shall identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources within their manufacturing operations , while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information. The environmental standards are:	Across all business functions , Participants recognize that environmental responsibility is integral to producing world-class products. Participants shall identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources, while safeguarding the health and safety of the public. The environmental standards are as follows :
1) Environmental Permits and Reporting	1) Environmental Permits and Reporting
All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.	All required environmental permits (e.g. discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current and their operational and reporting requirements shall be followed.
2) Pollution Prevention and Resource Reduction	2) Pollution Prevention and Resource Conservation
Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.	Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.
3) Hazardous Substances	3) Hazardous Substances
Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.	Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.
4) Solid Waste	4) Solid Waste
Participants shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).	Participants shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.

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<p>5) Air Emissions</p> <p>Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Participants shall conduct routine monitoring of the performance of its air emission control systems.</p>	<p>5) Air Emissions</p> <p>Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable regulations. Participants shall conduct routine monitoring of the performance of its air emission control systems.</p>
<p>6) Materials Restrictions</p> <p>Participants are to adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.</p>	<p>6) Materials Restrictions</p> <p>Participants shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.</p>
<p>7) Water Management</p> <p>Participants shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Participants shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.</p>	<p>7) Water Management</p> <p>Participants shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Participants shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.</p>
<p>8) Energy Consumption and Greenhouse Gas Emissions</p> <p>Participants are to establish a corporate-wide greenhouse gas reduction goal. Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal. Participants are to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.</p>	<p>8) Energy Consumption and Greenhouse Gas Emissions</p> <p>Participants shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. Participants shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.</p>
<p>D. ETHICS</p> <p>To meet social responsibilities and to achieve success in the marketplace, Participants and their agents are to uphold the highest standards of ethics including:</p>	<p>D. ETHICS</p> <p>To meet social responsibilities and to achieve success in the marketplace, Participants and their agents shall uphold the highest standards of ethics including the following:</p>
<p>1) Business Integrity</p>	<p>1) Business Integrity</p>

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<p>The highest standards of integrity are to be upheld in all business interactions. Participants shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.</p>	<p>The highest standards of integrity shall be upheld in all business interactions. Participants shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.</p>
<p>2) No Improper Advantage Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.</p>	<p>2) No Improper Advantage Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.</p>
<p>3) Disclosure of Information All business dealings should be transparently performed and accurately reflected on the Participant's business books and records. Information regarding participant's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.</p>	<p>3) Disclosure of Information All business dealings shall be transparently performed and accurately reflected on the Participant's business books and records. Information regarding participant's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.</p>
<p>4) Intellectual Property Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information is to be safeguarded.</p>	<p>4) Intellectual Property Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.</p>
<p>5) Fair Business, Advertising and Competition Standards of fair business, advertising, and competition are to be upheld.</p>	<p>5) Fair Business, Advertising and Competition Standards of fair business, advertising, and competition shall be upheld.</p>
<p>6) Protection of Identity and Non-Retaliation Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.</p>	<p>6) Protection of Identity and Non-Retaliation Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers shall be maintained, unless prohibited by law. Participants shall have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.</p>
<p>7) Responsible Sourcing of Minerals Participants shall adopt a policy and exercise due diligence on the source and</p>	<p>7) Responsible Sourcing of Minerals Participants shall adopt a policy and exercise due diligence on the source and</p>

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<p>chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.</p>	<p>chain of custody of the tantalum, tin, tungsten, gold, and cobalt in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.</p>
<p>8) Privacy Participants are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Participants are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.</p>	<p>8) Privacy Participants shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Participants shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.</p>
<p>E. MANAGEMENT SYSTEMS</p>	<p>E. MANAGEMENT SYSTEMS</p>
<p>Participants shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant’s operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.</p>	<p>Participants shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant’s operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It shall also facilitate continual improvement.</p>
<p>The management system should contain the following elements:</p>	<p>The management system shall contain the following elements:</p>
<p>1) Company Commitment</p>	<p>1) Company Commitment</p>
<p>Corporate social and environmental responsibility policy statements affirming Participant’s commitment to compliance and continual improvement, endorsed by executive management, and posted in the facility in the local language.</p>	<p>Participants shall establish human rights, health and safety, environmental and ethics policy statements affirming Participant’s commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.</p>
<p>2) Management Accountability and Responsibility</p>	<p>2) Management Accountability and Responsibility</p>
<p>The Participant clearly identifies senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.</p>	<p>Participants shall clearly identify senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.</p>

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<p>3) Legal and Customer Requirements</p> <p>A process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.</p>	<p>3) Legal and Customer Requirements</p> <p>Participants shall adopt or establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.</p>
<p>4) Risk Assessment and Risk Management</p> <p>A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with Participant’s operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.</p>	<p>4) Risk Assessment and Risk Management</p> <p>Participants shall adopt or establish a process to identify the legal compliance, environmental, health and safety , labor practice and ethics risks, including the risks of severe human rights and environmental impacts, associated with Participant’s operations. Participants shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.</p>
<p>5) Improvement Objectives</p> <p>Written performance objectives, targets and implementation plans to improve the Participant’s social, environmental, and health and safety performance, including a periodic assessment of Participant’s performance in achieving those objectives.</p>	<p>5) Improvement Objectives</p> <p>Participants shall establish written performance objectives, targets and implementation plans to improve the Participant’s social, environmental, and health and safety performance, including a periodic assessment of Participant’s performance in achieving those objectives.</p>
<p>6) Training</p> <p>Programs for training managers and workers to implement Participant’s policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.</p>	<p>6) Training</p> <p>Participants shall establish programs for training managers and workers to implement Participant’s policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.</p>
<p>7) Communication</p> <p>A process for communicating clear and accurate information about Participant’s policies, practices, expectations, and performance to workers, suppliers, and customers.</p>	<p>7) Communication</p> <p>Participants shall establish process for communicating clear and accurate information about Participant’s policies, practices, expectations, and performance to workers, suppliers, and customers.</p>
<p>8) Worker Feedback, Participation and Grievance</p> <p>Ongoing processes, including an effective grievance mechanism, to assess workers’ understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.</p>	<p>8) Worker/Stakeholder Engagement and Access To Remedy</p> <p>Participants shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.</p>
<p>9) Audits and Assessments</p>	<p>9) Audits and Assessments</p>

REF : RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT (Changes in This Version)

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.	Participants shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.
10) Corrective Action Process	10) Corrective Action Process
A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.	Participants shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.
11) Documentation and Records	11) Documentation and Records
Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.	Participants shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
12) Supplier Responsibility	12) Supplier Responsibility
A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.	Participants shall establish a process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.