

Trocellen Group CSR Procurement Guideline

*Based on and aligned with Furukawa Electric Group CSR Procurement Guideline
3rd edition*

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Table of Content

Introduction to the guideline	4
1. LABOR	5
1-1. Freely Chosen Employment	5
1-2. Young Workers.....	5
1-3. Working Hours.....	6
1-4. Wages and Benefits	6
1-5. Humane Treatment.....	6
1-6. Non-Discrimination and Non-Harassment.....	6
1-7. Freedom of Association	7
2. HEALTH AND SAFETY	7
2-1. Occupational Safety.....	7
2-2. Emergency Preparedness	7
2-3. Occupational Injury and Illness	8
2-4. Industrial Hygiene	8
2-5. Physically Demanding Work	8
2-6. Machine Safeguarding	8
2-7. Sanitation, Food and Housing.....	9
2-8. Health and Safety Communication	9
2-9. Healthcare of Workers.....	9
3. ENVIRONMENT	9
3-1. Environmental Permits and Reporting.....	9
3-2. Pollution Prevention and Resource Reduction	10
3-3. Hazardous Substances	10
3-4. Solid Waste	10
3-5. Air Emissions.....	11
3-6. Materials Restrictions.....	11
3-7. Water Management	11
3-8. Energy Consumption and Greenhouse Gas Emissions	11
3-9. Conservation of Biodiversity.....	12
4. ETHICS	12
4-1. Business Integrity	12
4-2. No Improper Advantage	12
4-3. Disclosure of Information	13
4-4. Intellectual Property	13
4-5. Fair Business, Advertising and Competition	14

4-6. Protection of Identity and Non- Retaliation	14
4-7. Responsible Sourcing Minerals.....	14
4-8. Privacy	15
4-9. Appropriate Export and Import Controls	15
5. PRODUCT QUALITY AND SAFETY	15
5-1. Ensure Product Safety.....	15
6. INFORMATION SECURITY	16
6-1. Secure Computer Networks Against Threats.....	16
7. BUSINESS CONTINUITY PLANS	16
7-1. Formulation of Business Continuity Plans	16
8. MANAGEMENT SYSTEM	16
8-1. Company Commitment	16
8-2. Management Accountability and Responsibility	17
8-3. Legal and Customer Requirements.....	17
8-4. Risk Assessment and Risk Management.....	17
8-5. Improvement Objectives	17
8-6. Training	17
8-7. Communication.....	18
8-8. Worker Feedback, Participation and Grievance.....	18
8-9. Audits and Assessments.....	18
8-10. Corrective Action Process	18
8-11. Documentation and Records.....	18
8-12. Supplier Responsibility	19
9. CONTRIBUTION TO SOCIETY	19

Introduction to the guideline

Within the Trocellen Group, ethical and socially responsible behavior is a fundamental part of everyday life. Our mission statement reflects our company's commitment:

- Creating trustworthy solutions for today's important issues.
- Trocellen delivers advanced consumer and industrial solutions that improve lives in tangible ways and ensure a brighter future for all.
- As industry leader, we build trust, respect business relationships, and contribute to global sustainability efforts at every turn.
- We commit to being a fair employer that acknowledges the value of our people – together we build long-lasting value.

With an eye to the future, the Trocellen Group management team pledges to:

- operate our businesses in harmony with society and the environment and endeavor to create social value through technological innovation, complying with laws, social norms, and ethics as a member of the international community.
- to maintain and build sound and friendly relationships with all our stakeholders and contribute to the sustainable development of society.
- live up to the expectations and trust invested in us by society, with fairness and integrity.
- nurture human resources at every level, so that we can become a more diverse and creative organization.

Trocellen Group as part of the Furukawa Electric Group is promoting ESG management with the aim of improving corporate value (Financial and social values) over the medium to long term based on ESG (Environment, Society and Governance). In addition to being responsible for legal compliance, it is also necessary for a company to fulfill its social responsibility through its corporate activities as a member of society, not to mention its responsibility to comply with laws and regulations. Our Group has established the "Trocellen Group CSR Code of Conduct" and engages in CSR activities based on this policy and the Code of Conduct.

In order to promote CSR activities with the aim of achieving ESG management, it is necessary to work not only within the group but also throughout the entire supply chain, including our suppliers. Our group has adapted the "Furukawa Electric Group CSR Procurement Guideline" to encourage our suppliers to promote CSR activities and engage together with our Partners in CSR activities.

In recent years, there has been an increasing demand for companies to take measures to create a sustainable society, including the diversification of the business environment, such as the globalization of corporate activities and the development of an information society, and the harsh evaluation of corporate activities by society. In addition, there are major changes in the international environment, such as decarbonization of global warming, efforts to protect the human rights of workers, and pandemics caused by infectious diseases.

We would like to ask our suppliers and partners for their understanding and support of this guideline, as well as for their suppliers to be informed and promote CSR activities. This guideline summarizes the approaches and details which the Furukawa Electric Group and Trocellen Group expects its suppliers to comply with.

1. LABOR

In this Guideline, workers include "direct workers, temporary workers, migrant workers, student workers, contract workers, and indirect workers and other forms of employment" and apply to all such workers.

1-1. Freely Chosen Employment

All workers shall be employed at their own free will, and no form of forced labor shall be permitted. Also, workers shall be guaranteed to freely leave work at any time or terminate their employment.

Detailed considerations:

- Forced labor, bonded labor, slave labor, involuntary or exploitative prison labor, and human trafficking labor are not permitted.
- Employers shall not impose no undue restrictions on access to workplaces, dormitories or residential areas and on the freedom of movement of workers in the workplace.
- Employers are required to provide a written employment agreement in the worker's native language or in a language that the workers can fully understand. For foreign migrant workers, an employment agreement must be provided prior to the worker departing from his or her country of origin and there shall be no substitution of or change(s) in the employment agreement allowed upon arrival in the receiving country (unless these changes are made to meet local law and provide equal or better terms).
- No penalty shall be imposed if a worker gives advance notice of retirement in accordance with relevant local laws and regulations.
- Employers, agents, and sub-agent's may not hold or otherwise destroy, conceal, or confiscate workers identification cards, passports, work permits, etc.
- Employers shall not require workers to pay recruitment fees or other related fees when the workers are recruited or hired.

1-2. Young Workers

Children under the minimum working age shall not be hired. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety. Please manage student workers appropriately based on local laws. Employers shall ensure proper management of student workers in accordance with applicable laws and regulations.

Detailed considerations:

- Child labor is not permitted. 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.
- Employers shall implement an appropriate age verification process of workers using official documents issued by the government, such as identification.
- Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, night shifts and overtime, or other hazardous work as required by local law.
- If there are student workers, monitor the training content and their workplace practices and performance according to the learning program.

1-3. Working Hours

Working hours, holidays and vacations of workers shall be appropriately managed in order not to exceed the legal limit.

Detailed considerations:

- Working hours, including overtime, must comply with local laws and regulations.
- When workers work overtime, they must comply with the relevant local laws and regulations and follow the instructions of the superiors.
- Workers shall be allowed at least one day off every seven days.
- Workers shall be granted the right to annual paid leave, maternity leave, childcare leave and rest periods as stipulated by local laws and regulations.

1-4. Wages and Benefits

Wages of workers must at least exceed the local minimum wage required by local law and the company shall not make wage deductions that deviate from local laws and regulations.

Detailed considerations:

- The calculation and payment of all other benefits, including minimum wages, overtime allowances and statutory benefits, must be in accordance with local wage laws.
- For each pay period, workers shall be provided with understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

1-5. Humane Treatment

Respect the human rights of workers and there is to be no harsh or inhumane treatment including abuse and harassment.

Detailed considerations:

- There is to be no harsh or inhumane treatment including violence, gender-based violence, abuse, corporal punishment, sexual harassment, power harassment bullying, public shaming etc.
- In order to establish a disciplinary systems and response procedures, etc. and to grasp the facts of inhumane treatment, a grievance or reporting mechanism should be set up and communicated to workers.

1-6. Non-Discrimination and Non-Harassment

All forms of discrimination and harassment related to employment and occupation shall be prohibited, and appropriate preventive measures shall be taken.

Detailed considerations:

- Workers should not be discriminated or harassed in employment, promotion, compensation, training or other opportunities or treatment based on race, national origin, creed, religion, gender, gender identity, sexual orientation, social origin, age, disability, educational background, family status, etc. These are based on factors other than the reasonable factors such as ability aptitude and performance.
- Workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

- Workers shall be provided with reasonable accommodation for religious practices.

1-7. Freedom of Association

Respect workers' freedom of association (rights to organize) in accordance with local laws, and the right to collective bargaining as a means of realizing discussions between labor and management regarding the working environment and wage levels.

Detailed considerations:

- Workers shall be able to openly communicate and share ideas and concerns regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.
- Employer should approve workers' representatives for the purpose of collective bargaining, promote voluntary negotiations between employers and workers, and employer shall not refuse collective bargaining activities without justifiable reasons.
- Respect the right of workers to participate in peaceful assemblies.

2. HEALTH AND SAFETY

2-1. Occupational Safety

Assess the risks to the health and safety of workers in the workplace and ensure safety through appropriate design, engineering controls and administrative controls.

Detailed considerations:

- Identify risks to the health and safety of workers in the workplace and eliminate or reduce such risks and take safety measures.
- Where risks in the workplace cannot be adequately controlled by appropriate design engineering controls and administrative controls, workers are to be provided with appropriate, well-maintained, personal protective equipment with free of charge.
- Consider occupational health and safety for pregnant and nursing mothers and remove them from working in conditions with high hazards.
- For female workers who are raising children less than one year after giving birth, employer should provide them with a clean place for breastfeeding and expressing milk with adequate breaks, safety and privacy.

2-2. Emergency Preparedness

In order to protect the life and physical safety of workers, prepare emergency measures assuming possible accidents and disasters, and should be communicated to workers.

Detailed considerations:

- Prepare emergency response measures, including emergency reports, notifications to workers, evacuation methods, response procedures, storage and posting of emergency response personnel contact points, evacuation drills, installation of appropriate fire detection systems, installation of fire extinguishers, securing of external communication means, easy to understand and clear and unobstructed egress, adequate exit facilities, emergency medical supplies storage and recovery plans.

- Plan and conduct evacuation drills for all workers once a year or as frequently as required by local laws and regulations, whichever is stricter.

2-3. Occupational Injury and Illness

Understand the situation of industrial accidents and diseases and take appropriate measures.

Detailed considerations:

- Encourage reports by workers, classify and record accidents and diseases, provide treatment as needed, investigate accidents and diseases, and implement corrective measures to eliminate causes.
- Establish and operate a system for supporting workers' return to work.
- Follow the necessary procedures for the administration (including participation in industrial accident insurance) in accordance with the local laws and regulations.

2-4. Industrial Hygiene

Understand the situation where workers are exposed to biologically or chemically harmful substances, noise and odors, and take appropriate measures in the workplace.

Detailed considerations:

- Identify the risks to workers' health and safety from smoke, steam, dust, toxic and poisonous substances, radiation, substances that cause chronic diseases (lead, asbestos, etc.), noise, odors, etc., and take measures to eliminate or reduce such risks (by training for workers, and job rotation etc.).
- Where risks in the workplace cannot be adequately controlled by appropriate engineering and administrative controls, workers are to be provided with appropriate, well-maintained, personal protective equipment with free of charge.

2-5. Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks is to be identified and controlled appropriately so that they do not lead to disaster or illness.

Detailed considerations:

- Identify heavy lifting work such as manual material handling and transport work, assembly tasks requiring force, long hours of standing work, long hours of repetitive work such as data input, etc., and take control measures such as improving the work environment.

2-6. Machine Safeguarding

Assess the machinery and equipment used by workers for safety risks and take appropriate safety measures.

Detailed considerations:

- If the use of machinery devices may cause accidents or health problems to workers during work, the following measures should be taken. Adoption of a safety mechanism called fail-safe, installation of safety devices and protective walls, periodic inspection and maintenance of machinery and equipment.

2-7. Sanitation, Food and Housing

Ensure the health and safety of the facilities provided for workers (such as dormitories, cafeterias, toilets, etc.).

Detailed considerations:

- Workers are to be provided with ready access to clean toilet facilities, safe drinking water, sanitary food preparation, storage, and eating facilities.
- Worker housing such as dormitories must be provided with fire prevention measures, emergency egress and appropriate living environments.

2-8. Health and Safety Communication

Provide appropriate health and safety information and conduct safety education (training) in the worker's native language or a language understood by the worker for all workplace hazards to which the worker may be exposed to.

Detailed considerations:

- Health and safety information provided for workplace hazards such as mechanical, electrical, chemical, fire and physical hazards should be clearly posted in the facilities or placed in a location identifiable or accessible by workers and should be well communicated.
- Health and safety education should be provided to all workers prior to the beginning of work and regularly thereafter.
- Establish a communication process and allows workers to raise any health and safety concerns without fear of retaliation.

2-9. Healthcare of Workers

Take appropriate healthcare for all workers.

Detailed considerations:

- In order to prevent and detect diseases of workers at an early stage, please conduct medical examinations, etc., as prescribed by relevant laws and regulations in the area.
- In addition, sufficient consideration should be given to the prevention of health problems due to overwork and mental health care.

3. ENVIRONMENT

3-1. Environmental Permits and Reporting

In accordance with relevant local laws and regulations, obtain approvals from the government if necessary, and comply with required operational and reporting requirements.

Detailed considerations:

- Strictly comply with local laws and regulations regarding the obligation to appoint a person in charge of managing poisonous and deleterious substances, specific

chemical substances, hazardous substances, etc., according to the chemical substances used in the business.

- Depending on the business content and the location of the company site, please comply with and respond to relevant laws and regulations, such as environmental impact assessments and government approvals of hazardous material handling facilities.

3-2. Pollution Prevention and Resource Reduction

Set voluntary goals for resource and energy conservation, and make continuous effective use of resources and energy, as well as implement activities to reduce environmental impact, such as reducing pollutants and waste.

Detailed considerations:

- Reduce the use of natural resources (water, fossil fuels, minerals, etc.) by substituting materials, recycling and reusing, improving the operation methods and processes of manufacturing, maintenance, equipment, and carry out resource conservation activities.
- As for pollutants and waste, please carry out activities to reduce pollutants and waste by controlling the source of pollution, installing equipment to prevent pollution, and improving the operation methods and processes of manufacturing, maintenance, and equipment.
- Reduce the amount of materials used in products and waste, promote the use of recycled resources and parts, and make effective use of resources. The 3Rs (Reduce, Reuse, Recycle) are effective in reducing waste.

3-3. Hazardous Substances

In compliance with relevant laws and regulations, identify chemical substances, waste and other substances that are harmful to human bodies and the environment, and manage them appropriately.

Detailed considerations:

- Establish rules regarding identification (including labeling) of chemical substances, safe handling, movement, storage, use, recycling or reuse, and disposal.

3-4. Solid Waste

Comply with relevant laws and regulations, manage waste appropriately, set voluntary goals for waste reduction, and continuously reduce waste.

Detailed considerations:

- Regardless of whether it is harmful or not, establish regulations regarding the identification, classification, storage, transportation, and disposal of waste, and manage their operation.
- Set voluntary reduction goals for waste, plans, and implement a systematic approach.
- Continue to implement the 3Rs (Reduce, Reuse, Recycle) to reduce waste.
- Periodically evaluate whether the contractor for disposal and transporter of hazardous waste are processing according to the contract terms.

3-5. Air Emissions

Comply with all applicable laws and regulations and take appropriate measures to reduce emissions of hazardous substances into the atmosphere. If necessary, make further improvements based on voluntary standards.

Detailed considerations:

- Before discharging hazardous substances (volatile organic compounds, aerosols, corrosive substances, fine particles, ozone-depleting substances, combustion byproducts, etc.) into the atmosphere, analyze them and discharge them as necessary based on the results.
- Manage ozone-depleting substances in accordance with the Montreal Protocol and applicable laws and regulations.

3-6. Materials Restrictions

For the management of chemical substances in parts and materials used in products and manufacturing processes, comply with applicable laws, regulations and customer requirements concerning the prohibition or restriction of the use of specific substances.

Detailed considerations:

- In addition to prohibiting the inclusion of chemical substances specified in applicable laws and regulations in products, ensure compliance with required labeling requirements, conduct tests and evaluations, and manage chemical substances contained in products.
- In addition to controlling chemical substances that should not be contained in products, suppliers shall also monitor the release of chemical substances released into the external environment and report them to the government. To reduce the release of such substances, suppliers shall manage chemical substances in its manufacturing processes.
- Chemical substances used in products and manufacturing processes must comply with applicable laws and regulations as well as customer requirements.

3-7. Water Management

Comply with all applicable laws and regulations and conduct routine monitoring of the performance of its wastewater treatment before discharging it. In addition, make further improvements based on voluntary standards as necessary.

Detailed considerations:

- In addition to monitoring water sources, water consumption, and wastewater volume, suppliers shall work to conserve water resources by conserving and reusing water. Also, conduct water management, including prevention of pollution of the waterways on the premises.
- Monitor the operating status of wastewater treatment systems and emergency response equipment to ensure optimal operation and comply with local laws and regulations.

3-8. Energy Consumption and Greenhouse Gas Emissions

Strive to improve energy efficiency and continuously reduce energy consumption and greenhouse gas emissions.

Detailed considerations:

- In order to engage in activities to improve energy efficiency (energy conservation) and to continuously reduce greenhouse gas emissions, set voluntary reduction goals, make plans, and surely implement them.
- Understand, record and document energy consumption and related greenhouse gas emissions.
- Disclose information on improving energy efficiency and reducing greenhouse gas emissions.
- Greenhouse gases refer to seven groups of substances: carbon dioxide, methane, nitrous oxide, HFCs, PFCs, sulfur hexafluoride, and nitrogen trifluoride.

3-9. Conservation of Biodiversity

Assess the impact of business activities on the ecosystem and make efforts to minimize negative impacts.

Detailed considerations:

- In order to minimize the negative impact of business activities on biodiversity on the surrounding areas, identify ecosystem risks inside and outside the premises of business sites and production sites, and implement biodiversity conservation activities appropriately.
- For example, extermination of alien species for the protection of native species, promotion and protection of endangered species should be carried out. In addition, please engage in biodiversity conservation activities as an effort for the entire value chain of companies, including efforts for products and services.

4. ETHICS

4-1. Business Integrity

In every aspect of the business, the highest standards of integrity are to be upheld of ethics and moral standards as a top priority. In conducting business activities, the company must fully understand and comply with the relevant laws and regulations of your country and the country in which you operate and respect the international codes of conduct.

Detailed considerations:

- Develop a policy prohibiting all forms of bribery, corruption, extortion and embezzlement.
- Establish a system for corporate ethics and legal compliance, disseminate information, raise awareness, and monitor the compliance status.
- Respect the religions, customs, cultures and traditions of each country and region.

4-2. No Improper Advantage

Maintain a sound and appropriate relationship with politics and governments and refrain from bribery, illegal political contributions, etc. In addition, do not give or receive inappropriate benefits in relation to all stakeholders.

Detailed considerations:

- For the purpose of obtaining and maintaining improper benefits and preferential treatment, do not directly or indirectly entertain, give gifts, give or receive money to all stakeholders.
- Do not give improper benefits to anti-social forces (an antisocial individual or organization) that would have adverse impact on the social orders or sound corporate activities.
- Do not engage in insider trading involving the purchase and sale of shares based on confidential material information related to the business of customers, etc.

4-3. Disclosure of Information

In accordance with applicable laws and regulations or general industry practices, disclose information regarding business activities, products and services to stakeholders in a timely and appropriate manner.

Detailed considerations:

- Information to be provided and disclosed to stakeholders includes details of business activities, financial status, business performance, ESG (Environment, Social and Governance) information, etc. Falsification of records and misrepresentation of conditions or practices are unacceptable.
- Disclose accurate information on the substances contained in the parts and materials used in the products.
- Keep a record of management indicators of environmental conservation activities, achievement of goals, and other important matters related to the environment, and disclose information as necessary.

4-4. Intellectual Property

Protect supplier's intellectual property, respect the intellectual property rights and avoid infringing those of other companies. In addition, please appropriately manage and protect confidential information received from customers, suppliers, etc.

Detailed considerations:

- Intellectual property refers to patent rights, utility model rights, design rights, trademark rights, copyrights, trade secrets, etc.
- Confidential Information generally refers to information disclosed in documents that have been agreed to be confidential or information that has been verbally disclosed after being notified that it is confidential.
- Do not infringe on the intellectual property rights of others and use or transfer technology or know-how.
- When developing, producing, selling or providing products or services, conduct a prior investigation into the intellectual property rights of others and do not use the intellectual property rights of others without permission unless there are reasonable backgrounds.
- Do not infringe the copyrights by illegally copying or otherwise copying computer software or other copyrighted materials.
- Do not illegally obtain or use trade secrets of others.
- Do not illegally or unreasonably obtain, use, disclose or leak confidential information.

4-5. Fair Business, Advertising and Competition

Do not engage in any conduct that impedes fair, transparent, and free competition.

Detailed considerations:

- In compliance with applicable national and regional competition laws, do not engage in any acts such as unreasonable trading restrictions, unfair trade methods, or abuse of dominant bargaining position.
- Do not engage in any acts that impede competition, such as making an agreement with other companies in the same industry regarding price, quantity, or sales area of products and services (cartels), arranging the winning bidder and winning bid price with other bidders (bid rigging), unfair transactions, such as discriminatory treatment of prices and terms, unjust low-price sales, and unreasonable expensive purchases.
- Suppliers are requested to conduct procurement transactions faithfully, and fairly based on contracts, etc. and not to engage in any abuse of dominant bargaining position that imposes unreasonable demands or obligations, such as unilaterally determining or changing the terms of transactions with suppliers, etc., using their position as purchasers or consignors.
- Do not engage in unfair competition activities such as obtaining or using trade secrets of other companies in an illegal manner or using false or misleading displays regarding products of other companies.
- Do not use expressions that are untrue or mislead consumers or customers, and do not include slander or infringement of rights of other companies or individuals in the display of catalogues and advertisements related to product and services.

4-6. Protection of Identity and Non- Retaliation

The Company is requested to ensure the confidentiality of information and anonymity of whistleblowers regarding consultations and reports, and to respond promptly in addition to establishing a consultation and reporting system that allows workers to raise concerns without fear of retaliation and striving to prevent and detect misconduct at an early stage.

Detailed considerations:

- Establish a hotline for internal and external users (workers of the company and suppliers) to consult and report on misconduct and ensure that all employees are well aware of the hotline. Fraud should be dealt with promptly and provide feedback to the whistleblower as appropriate.

4-7. Responsible Sourcing Minerals

Minerals produced in conflict areas and high-risk areas by improper methods and parts made from such minerals shall not be used in the products.

Detailed considerations:

- Establish a responsible mineral procurement policy and promote due diligence to determine whether tantalum, tin, tungsten, gold and other minerals in the products cause serious human rights violations, environmental degradation, corruption, conflicts and other incidents in conflict and high-risk areas.

4-8. Privacy

Manage and protect the personal information of customers, suppliers, consumers, workers, etc.

Detailed considerations:

- Personal information refers to information that can identify a specific individual by name, date of birth or other description.
- Comply with applicable personal information protection laws and regulations when collecting, using, storing, transferring and sharing personal information.
- Personal information must not be illegally or unreasonably acquired, used, disclosed, or leaked.

4-9. Appropriate Export and Import Controls

A clear management system must be established, and appropriate import and export procedures must be followed regarding the import and export of technologies and goods regulated by laws and regulations.

Detailed considerations:

- When importing or exporting parts, products, technologies, equipment, software, etc. which are regulated by laws and regulations based on international agreements, etc. (Wassenaar Arrangement, etc.), please go through procedures such as obtaining permission from regulatory authorities, etc., as necessary.

5. PRODUCT QUALITY AND SAFETY

5-1. Ensure Product Safety

Fulfill your responsibility as a supplier by designing, manufacturing and selling products that meet the safety standards stipulated by the laws and regulations of each country and ensure sufficient product safety.

Detailed considerations:

- Fulfill your responsibility as a manufacturer by designing products that are sufficiently safe.
- In addition to complying with the requirements set forth by laws and regulations, also consider to the safety required by society.
- In order to ensure product safety, manage traceability (history of standards, materials, parts, processes, etc.), prompt action to solve problems should be taken.

6. INFORMATION SECURITY

6-1. Secure Computer Networks Against Threats

Take precautions against threats on your computer network to prevent harm to your company and others.

Detailed considerations:

- Threats on computer networks include, for example, computer viruses, computer worms, and spyware.
- If a computer connected to the internet is infected with a computer virus, etc. it may cause a serious loss such as business suspension or loss of credibility. Therefore, take measures to ensure that computer network threats do not affect internal or external parties.

7. BUSINESS CONTINUITY PLANS

7-1. Formulation of Business Continuity Plans

Establish a business continuity plan, and in the event of an unforeseen situation, promptly restore important businesses and establish a system to provide a stable supply of products.

Detailed considerations:

- Business continuity plans should be carefully prepared for the purpose of continuing business in the event of an unforeseen situation, such as a disaster or accident, as part of a company-wide activities and carry out business continuity and early recovery in an emergency.

8. MANAGEMENT SYSTEM

Establish and operate a management system for the contents of these guidelines. The purpose of the management system is to ensure compliance with laws, regulations and customer requirements related to business activities and products, compliance with the requirements of these guidelines, identification of risks related to the contents of these guidelines, and prevention, elimination and reduction of the occurrence of risks. Management system should include the following:

8-1. Company Commitment

Post policies in the facility regarding the company's "social responsibility" and "environmental responsibility" that have been approved by management.

Detailed considerations:

- The company's policies approved by senior management should be written in local language and in a language that workers can understand and should be posted in facilities or posted in places that can be easily viewed such as the intranet so that workers can easily understand the content.

8-2. Management Accountability and Responsibility

The corporate officers or representatives should be appointed, and management reviews should be conducted regularly by the appointed management representatives to ensure the implementation of the management system and related programs.

Detailed considerations:

- The appointment of a management representative applies to each of the areas of Labor, Health and safety, Environment, Ethics, Quality and Safety, Information Security, Business Continuity Plan, and should be documented in the supporting document (organization chart, job description, management system documents, etc.).
- Conduct management reviews at least annually (once a year).

8-3. Legal and Customer Requirements

Identify applicable legal and customer requirements, including the requirements of this guideline, and establish a mechanism to monitor compliance.

Detailed considerations:

- Record the monitoring results to understand the applicable legal and customer requirements.

8-4. Risk Assessment and Risk Management

Establish a process to identify risks associated with these guidelines, manage identified risks appropriately, and comply with regulations.

Detailed considerations:

- Assess the relative importance of each risk and take steps or physical controls to address the risk.

8-5. Improvement Objectives

Prepare improvement goals and implementation plans for this guideline, and periodically evaluate the progress of the goals.

Detailed considerations:

- Evaluate the progress in achieving improvement goals and implementation plans and formulate additional action plans if progress is not being made as planned.

8-6. Training

Provide training for managers and workers (education and training) to implement the company's policies and related initiatives and procedures.

Detailed considerations:

- Training should include the content of this guideline, applicable regulatory requirements and should be documented and validated.

8-7. Communication

Establish a process to accurately communicate the company's policies, performance, expectations, to workers, suppliers, and customers.

Detailed considerations:

- As part of the communication, please hold a meeting regarding these guidelines with suppliers.

8-8. Worker Feedback, Participation and Grievance

Evaluate workers' level of understanding of the contents of this guideline and obtain feedback and examples of violations to establish an effective grievance system to foster continuous improvement.

Detailed considerations:

- Reports of complaints or violations can be made anonymously, and workers should be protected from retaliation and disadvantage.

8-9. Audits and Assessments

Regularly assess status of complying with applicable laws and regulations, the content of this guideline and the customer requirements.

Detailed considerations:

- Establish and implement a self-assessment and internal audit process to ensure compliance with the content of this guideline.

8-10. Corrective Action Process

Establish and implement corrective action processes for nonconformities identified through internal and external assessments, inspections, investigations and audits.

Detailed considerations:

- The corrective action process involves developing a corrective action plan, managing progress, and verifying effectiveness after corrective action is taken.

8-11. Documentation and Records

Prepare documentation and records in accordance with applicable laws and regulations and the companies own administrative requirements.

Detailed considerations:

- Records of personal or confidential information must be kept secret and managed appropriately.

8-12. Supplier Responsibility

Communicate the contents of this guideline to the company's suppliers and establish a mechanism to monitor their compliance status.

Detailed considerations:

- Identify your primary suppliers, communicate the contents of the guideline and obtain their consent. In addition, monitor their compliance status of this guideline and understand the situation.

9. CONTRIBUTION TO SOCIETY

Voluntarily engage in activities that contribute to the development of international and local communities.

Detailed considerations:

- The activities to contribute to the development of global society and local communities mean the support using company's management resources.
- Typical approaches are as follows:
 - Social contribution using regular business operation and existing technologies.
 - No pecuniary social contribution using facilities and human resources, etc.
 - Monetary social donation
- In the event of a disaster, determine the scope of activities that can be carried out by the company, such as cooperation with local communities, support for activities by employee volunteers, NPOs/NGOs, etc., donation activities, and the dissemination and introduction of various information, and actively contribute to society.