

Partner Guidelines

EM Devices Group (hereinafter called EM Devices) has established a procurement policy addressing legal compliance, fair and equitable transactions, partnerships, and social responsibility in relation to its purchasing operations. However, we recognize that fulfilling this policy requires not only EM Device's own efforts but also the understanding and cooperation of all companies involved in the supply chain.

Therefore, EM Devices has established these guidelines as a more concrete code of conduct to secure the understanding and cooperation of our suppliers.

This document is based on widely recognized guidelines such as the RBA's "Code of Conduct" and JEITA's "Responsible Business Conduct Guidelines," and defines actions we consider necessary to advance along with our suppliers.

We appreciate your understanding of the purpose and content of these guidelines. We kindly request your cooperation in implementing EM Device's purchasing policy by reflecting these principles in your company's actions and extending them to your own suppliers.

(In the following content, suppliers (including companies wishing to conduct business with EM Devices) will be referred to as "partners.")

1 . Compliance with Laws and Regulations • Respect for international norms

Partners are required to comply with applicable laws and regulations in their home country and in the countries/regions where they conduct business, and furthermore, they must respect international codes of conduct.

2 . Human Rights • Labor

Partners must not only comply with relevant laws and regulations, but also refer to international human rights standards, including the ILO core labor standards, and respect the human rights of workers.

2-1. Prohibition of forced labor

Partners cannot use labor obtained through coercion, confinement, inhumane prisoner labor, slavery, or human trafficking.

2-2. Prohibition of child labor, consideration for young workers

Partners cannot employ children who are under the minimum working age.

Furthermore, partners must not assign young workers under the age of 18 to hazardous

duties such as night shifts or overtime work that could compromise their health or safety.

2-3. Consideration of working hours

Partners must not require workers to work beyond the limits set by the laws and regulations of the region where they work. They also need to appropriately manage workers' working hours and days off, taking international standards into consideration.

2-4. Appropriate wages and allowances

Partners are required to comply with all applicable laws and regulations regarding wages paid to workers (including minimum wage, overtime pay, legally mandated allowances and wage deductions).

Furthermore, it is desirable to consider paying wages at a level sufficient to cover the necessities of life (living wages).

2-5. Prohibition of Immoral Treatment

Partners must respect workers' human rights and must not subject workers to inhumane treatment such as mental or physical abuse, coercion, and harassment. Also, they cannot do any acts that may lead to such treatment.

In addition, the amount of space provided by the partner to workers must include facilities for managing personal belongings and valuables, as well as a private space of sufficient size to allow for appropriate access.

2-6. Respect for Fundamental Principles and Right at Work

Partners must comply with local laws and regulations, respect the rights of all workers, and refrain from any discrimination, including in terms of treatment.

Furthermore, they must consider requests from employees regarding religious observances within appropriate limits.

2-7. Respect for Privacy

Partners are required to recognize privacy as a fundamental human right and respect the privacy of one by one, employees and business partners.

3. Safety and Health

Partners are required not only to comply with relevant laws and regulations, but also to observe guidelines for the ILO's occupational safety and health guidelines. They must implement measures to minimize work-related injuries and physical or mental illnesses

among workers and establish a safe and hygienic working environment.

3-1. Occupational Safety

Partners are required to identify and evaluate risks to occupational safety and ensure safety through appropriate design, technical, and administrative measures. It is necessary to be reasonable consideration, particularly toward pregnant women and nursing mothers.

3-2. Emergency Preparedness

Partners are required to prepare for emergencies such as disasters and accidents that endanger human life and physical safety. This includes identifying potential risks, developing emergency response actions to minimize harm to workers and assets, installing necessary equipment, and conducting education and training to ensure these actions can be taken during disasters.

3-3. Industrial accidents • Occupational diseases

Partners are required to identify, evaluate, record, and report the status of occupational accidents and diseases, and implement appropriate countermeasures and corrective actions.

3-4. Industrial hygiene

Partners are required to identify and assess the risk of workers being exposed to harmful biological and chemical effects in the workplace and implement appropriate controls.

3-5. Consideration for physically demanding work

Partners are required to identify and evaluate physically demanding tasks and manage them appropriately to prevent occupational accidents and diseases.

3-6. Safety Measures for Mechanical Equipment

Partners are required to assess whether machines and equipment used by workers in the course of their duties pose any safety risks and to implement appropriate safety measures.

3-7. Facility Safety and Hygiene

Partners are required to appropriately ensure the safety and hygiene of facilities provided for workers' daily lives (such as dormitories, cafeterias, and restrooms). Furthermore, dormitories must have proper emergency exits secured for use in emergencies.

3-8. Safety and Health Communication

Partners are required to implement proper health management for all employees and

actively promote their health.

3-9. Workers Health Management

Partners are required to implement appropriate health management for all employees and actively promote their health.

4. Environment

Partners are required to actively address global environmental issues such as resource depletion, climate change, and environmental pollution, and to consider local environmental issues with a focus on ensuring the health and safety of people in the relevant regions.

4-1. Environment permits and reporting

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4-2. Reduction of energy consumption and greenhouse gas emissions

Partners are required to strive for energy efficiency improvements and engage in continuous reduction activities for energy consumption and greenhouse gas emissions.

4-3. Emissions into the atmosphere

Partners are required to comply with relevant laws and regulations and implement appropriate measures to reduce emissions of harmful substances into the atmosphere.

4-4. Water Management

Partners are required to comply with legal regulations, monitor the source, usage, and discharge of the water they use, and conserve water. All wastewaters must be characterized, monitored, controlled, and treated as necessary before discharge or disposal. Additionally, they are required to identify potential sources of water pollution and implement appropriate countermeasures.

4-5. Resource Efficiency and Waste Management

Partners are required to comply with laws and regulations and to implement appropriate management to promote reduce, reuse, and recycle, thereby ensuring the effective use of resources and minimizing waste generation.

4-6. Chemical Substance Management

Partners are required to comply with all laws and regulations and to identify, label, and properly manage chemical substances and other materials that pose risks to human health or the environment, ensuring their safe handling, transportation, storage, use, recycling or reuse, and disposal.

4-7. Management of Chemical Substances in Products

Partners are required to comply with all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances contained in products.

5. Fair Trade and Ethics

Partners are required to conduct business activities not only in compliance with laws and regulations but also based on a high standard of ethics.

5-1. Corruption Prevention

Partners must not engage in any form of bribery, corruption, extortion, money laundering, or embezzlement.

5-2. Prohibition of Improper Granting and Receiving of Benefits

Partners must not provide or condone any promise, offer, or permission intended to obtain bribes or other improper or inappropriate benefits.

5-3. Appropriate disclosure of information

Partners are required to disclose information regarding labor, health and safety, environmental activities, business operations, organizational structure, financial status, and performance in accordance with applicable laws and regulations and industry practices. Falsification of records or disclosure of false information is not tolerated.

5-4. Respect for Intellectual Property

Partners are required to respect intellectual property rights, and the transfer of technology and know-how must be conducted in a manner that protects intellectual property. Furthermore, the intellectual property of third parties, such as customers and suppliers, must also be protected.

5-5. Conducting Business Fairly

Partners are required to conduct fair business practices, competition, and advertising.

5-6. Whistleblower Protection

Partners are required to protect the confidentiality of information related to reports and the anonymity of reporters, and to prevent retaliation against reporters.

5-7. Responsible Mineral Sourcing

Partners are required to conduct due diligence to ensure that minerals such as tantalum, tin, tungsten, and gold contained in the products they manufacture are not causing or contributing to serious human rights abuses, environmental destruction, corruption, or conflict in conflict-affected and high-risk areas.

6. Quality and Safety

Partners are required to ensure the safety and quality of the products and services they provide, and to provide accurate information.

6-1. Ensuring Product Safety

Partners are required to ensure that products comply with safety standards established by laws and regulations in each country, and to design, manufacture, and sell products that guarantee sufficient product safety. They must also fulfill their responsibilities as suppliers.

6-2. Quality Control

Partners are required to comply not only with all applicable laws and regulations regarding the quality of products and services, but also with their own quality standards and customer requirements.

6-3. Providing accurate product and service information

Partners are required to provide accurate and non-misleading information regarding products and services.

7. Information Security

Partners are required to prevent the leakage of confidential and personal information and strengthen information security.

7-1. Defending Against Cyber Attacks

Partners are required to implement defensive measures against threats such as cyberattacks

and manage their operations to prevent harm to themselves and others.

7-2. Personal Information Protection

Partners are required to comply with all relevant laws and regulations and appropriately manage and protect all personal information, including that of suppliers, customers, consumers, and employees.

7-3. Confidential Information Leak Prevention

Partners are required to properly manage and protect confidential information received not only from their own company but also from customers and third parties.

8. Business Continuity Plan

8-1. Development and Preparation of Business Continuity Plans

Partners are required to identify and assess risks that could disrupt business continuity, formulate a Business Continuity Plan (BCP) that details the impact on operations, necessary preemptive measures for the medium to long term, and the status of these initiatives.

9. Establishing Management Structure

Partners are required to establish internal systems to ensure compliance with each of the terms and conditions outlined above.

9-1. Supplier Management

Partners are required to communicate the requirements of these guidelines to their own suppliers and instruct them to ensure compliance.

9-2. Appropriate Import and Export Control

Partners are required to establish internal control systems and follow proper import and export procedures regarding the import and export of technologies and goods subject to legal regulations.

9-3. Establishment of a Complaint Handling System

Partners are required to establish a grievance mechanism accessible to stakeholders, including workers and suppliers, to prevent misconduct within their own organizations and supply chains. In that case, they shall ensure that whistleblowers are protected from retaliation and do not suffer adverse treatment because of their reports.

9-4. Disclosure of Progress Status

Partners are required to establish maintain appropriate systems to ensure compliance with this guideline and to provide disclosures required under relevant laws and regulations to our company or other designated parties.

*The Japanese version shall be the official version. The English version is provided for reference only. In the event of any inconsistency, the Japanese version shall prevail.