



Katolec Group

Supply Chain CSR Procurement Guidelines

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Katolec Corporation

Introduction

The Katolec Group (hereinafter referred to as "the Company") has established a Corporate Code of Conduct and conducts business activities based on the desire to fulfill its responsibilities as a good corporate citizen in three aspects: "environment, society, and corporate governance". Based on this, the Company concludes basic transaction agreements with suppliers that include CSR-related items such as respect for human rights, safe work environments, and environmental considerations, on the premise that they agree with our "Procurement Policy". In addition to the evaluation results of business attitude, quality, delivery, and cost, the Company strives to conduct business with suppliers who fulfill their social responsibilities, and we are working to build a sustainable supply chain with the cooperation of our suppliers. We hereby issue the "Katolec Group Supply Chain CSR Procurement Guidelines". These guidelines clearly outline the CSR items commonly required by society, and we ask for your further understanding and cooperation in promoting them in accordance with these guidelines.

*These guidelines are based on the "Responsible Business Conduct Guidelines" issued by the Japan Electronics and Information Technology Industries Association (JEITA).

Procurement Policy

1. Fair and Equitable Transactions

We will provide equal opportunities to all companies, fairly evaluate quality, delivery, cost, etc., and conduct procurement activities based on mutual trust.

2. Compliance with Laws and Regulations

We will respect international principles and comply with the laws and other social norms of the countries and regions where we conduct business activities, and engage in legitimate transactions.

3. Environmental Protection

We will strive for green procurement activities that lead to environmental conservation and reduction of environmental impact.

4. Promotion of CSR Procurement

We will strive to promote CSR activities in cooperation with our business partners towards the realization of a sustainable society.

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Section 1: Code of Conduct

1. Compliance with Laws and Respect for International Norms

Companies must respect internationally recognized standards in addition to complying with the laws and regulations of their home country as well as countries and regions where they conduct business.

2. Human Rights and Labor

Companies must respect the rights of workers in line with international human rights standards including the ILO core labor standards in addition to complying with relevant laws and regulations.

(2-1) Prohibiting Forced Labor

Companies must not use labor obtained by forced, bonded, exploitative prison labor, slavery, or human trafficking. Companies also must not force to work, and must keep the right of workers to terminate employment.

(2-2) Prohibiting Child Labor and Respecting the Rights of Young Workers

Companies must not allow children who are under the minimum age for employment. Furthermore, companies must also not allow young workers under the age of 18 to perform hazardous work that is likely to jeopardize their health or safety, including night work or overtime.

(2-3) Decent Working Hours

Companies must not allow workers to work exceeding the maximum working hours set by local laws and regulations, and appropriately manage working hours and days off in consideration of internationally recognized standards.

(2-4) Adequate Wages and Allowances

Companies must comply with all applicable laws and regulations regarding payments of work (including minimum wage, overtime payments, and allowances and deductions required by law). Furthermore, it is expected that companies pay wages at a level that allows workers to support their

basic needs (a living wage).

(2-5) Prohibiting Inhumane Treatment

Companies must respect the human rights of workers and must not treat workers in a manner that is or may be construed inhumane, including physical and psychological abuse, coercion, or harassment. Companies must also provide workers with individually secured accommodations for storing their personal and valuable items, and a reasonable personal space along with reasonable entry and exit privilege.

(2-6) Prohibiting Discrimination

Companies must not engage in discrimination or harassment. Companies must also consider requests from workers regarding religious practices where appropriate.

(2-7) Freedom of Association and Right to Collective Bargaining

In conformance with local laws and regulations, companies shall respect the right to collective bargaining of workers and openly communicate with workers for improving working environments and wage conditions.

3. Health and Safety

In addition to complying with relevant laws and regulations, Companies must take consideration of standards such as ILO health and safety guidelines to minimize injury and illness in the workplace and maintain a safe and healthy working conditions.

(3-1) Occupational Safety

Companies must identify and assess risks regarding occupational safety and maintain safety through proper design, engineering and administrative controls. Taking reasonable steps must also be taken to protect pregnant women and nursing mothers.

(3-2) Emergency Preparedness

Companies must identify the possibility of emergency situations by such as natural disasters or accidents that may adversely affect human life or safety, establish procedures in case of emergency to minimize harm to workers and property, install the required equipment, and conduct training and drills so that the required responses can be taken in case of emergency.

(3-3) Occupational Injury and Illness

Companies must identify, assess, record, and report the status of occupational injury and illness, and implement appropriate countermeasures and corrective actions.

(3-4) Industrial Hygiene

Companies must identify, assess, and appropriately control the risk of workers being exposed to hazardous biological, chemical, or physical agents in the workplace.

(3-5) Physically Demanding Work

Companies must identify and assess worker exposure to the hazards of physically demanding tasks and appropriately control such work so that it does not lead to occupational injury and illness.

(3-6) Machine Safeguarding

Companies must evaluate the machinery used by workers for safety hazards and provide appropriate safeguarding.

(3-7) Health and Safety at Facilities

Companies must appropriately maintain the health and safety of facilities and accommodations provided to workers (such as dormitories, cafeterias, and toilets). Dormitories also require appropriate emergency egress to be provided.

(3-8) Health and Safety Communication

Companies must provide training on appropriate health and safety information regarding various workplace hazards that workers are exposed to in the workplace in languages and methods that the workers can understand. A system that enables workers to provide feedback on safety is also required.

(3-9) Worker Health Management

Companies must conduct appropriate health management for all employees.

4. Environment

Companies must actively address environmental problems such as resource depletion, climate change, and pollution, as well as address regional environmental problems considering the health and safety of its relevant local community.

(4-1) Environmental Permits and Reports

Companies must obtain the permits and approvals required for conducting business as well as register and report according to local laws and regulations.

(4-2) Reducing Energy Consumption and Greenhouse Gas Emissions

Companies must address energy efficiency and make continuous efforts for reducing greenhouse gas emissions and energy consumption.

(4-3) Air Emissions

Companies must comply with relevant laws and regulations and implement appropriate measures for reducing the emission of hazardous substances to the atmosphere.

(4-4) Water Management

Companies must comply with laws and regulations, monitor the source, usage, and discharge of water used, and save water. All wastewater must be tested as required, and monitored, controlled, and

processed before discharge or disposal. Sources of pollution that may cause water pollution must also be identified and appropriately managed.

(4-5) Effective Utilization of Resources and Waste Management

Companies must comply with laws and regulations and implement appropriate management in order to promote the 3Rs (reduce, reuse, and recycle), ensure the effective utilization of resources, and minimize waste.

(4-6) Chemical Substance Management

Companies must comply with laws and regulations to identify, label, and manage chemical and other substances posing hazard to humans or the environment, and conduct management to ensure safe handling, transport, storage, use, recycling, reuse, or disposal of such substances.

(4-7) Managing the Chemical Substances Contained in Products

Companies must comply with all laws, regulations, and customer requests applicable to the prohibition and restriction of specific substances contained in products.

5. Fair Trading and Ethics

Companies must conduct business activities based on high ethical standards in addition to compliance with the law.

(5-1) Preventing Corruption

Companies must not be involved in bribery, corruption, blackmail, or embezzlement in any form.

(5-2) Prohibiting Inappropriate Provision and Improper Benefit

Companies must not provide or accept any promises, propositions, or approvals as a means of obtaining bribes or any other illicit or inappropriate benefit.

(5-3) Fair Information Disclosure

Companies must disclose information regarding labor, health and safety, environmental activities, business activities, organizational structure, financial situation, and performance according to applicable laws and regulations and industry practices. Falsification of records or the disclosure of false information is not allowed

(5-4) Respecting Intellectual Property

Companies must respect intellectual property rights and the transfer of technology and expertise must be performed in a manner where intellectual property is protected. Companies must also protect the intellectual property of third parties such as customers and suppliers.

(5-5) Conducting Fair Business

Companies must engage in fair business, competition, and advertising.

(5-6) Protecting Whistleblowers

Companies must protect the confidentiality of information regarding whistleblowing and the anonymity of whistleblowers, and avoid retaliations towards whistleblowers.

(5-7) Responsible Minerals Procurement

Companies must exercise due diligence to ensure that the minerals such as tantalum, tin, tungsten, and gold contained in its products manufactured do not cause or contribute to serious human rights abuses, environmental destruction, corruption, or disputes in Conflict-Affected and High-Risk Areas.

6. Quality and Safety

Companies must ensure the safety and quality and provide correct and accurate information on provided products and services.

(6-1) Ensuring Product Safety

Companies must fulfill their responsibility as a supplier by ensuring that products meet safety standards stipulated by national laws and conduct design, manufacturing, and sales to ensure adequate product safety.

(6-2) Quality Management

Companies must comply with their own quality standards and customer requirements in addition to all laws and regulations applicable to the quality of products and services.

(6-3) Providing Accurate Information on Products and Services

Companies must provide correct and accurate information on products and services that will not cause misunderstandings.

7. Information Security

Companies must prevent leaks of confidential information and personal information, and enhance information security.

(7-1) Defense from Cyber Attacks

Companies must implement protective measures against threats such as cyber-attacks and conduct management to prevent damage to the company and others.

(7-2) Protecting Personal Information

Companies must comply with relevant laws and regulations and appropriately manage and protect all personal information of suppliers, customers, consumers, and employees.

(7-3) Preventing Leak of Confidential Information

Companies must appropriately manage and protect the confidential information not only of their own but also received including from customers and third parties.

8. Business Continuity Planning

Companies must make preparations to ensure that they can quickly resume business activities in order to fulfill their responsibility of supply in the event that the company or a business partner becomes a victim of such as a large-scale natural disaster.

(8-1) Developing and Preparing a Business Continuity Plan

Companies must identify and assess risks to business continuity, examine their impact on the business, and establish preparatory measures required in the medium to long term and a business continuity plan (BCP) that indicates the status of those initiatives.

Section 2: Establishing a Management System

A. Establishing a Management System

Companies must establish a management system in order to comply with the code of conduct in Section 1.

B. Supplier Management

Companies must establish a process for communicating the requirements of the code of conduct in Section 1 to suppliers and monitoring supplier compliance.

C. Proper Import/Export Control

Companies must maintain a clear management system and conduct appropriate procedures for the import and export of technologies and goods regulated by law.

D. Establishing a Grievance Mechanism

Companies must establish a grievance mechanism that can be used by stakeholders including workers

and suppliers in order to prevent illicit behavior in their inside as well as throughout the supply chain.

E. Disclosing the Activities

Companies must disclose information regarding their actions according to these guidelines and relevant laws and regulations.