

# AKM Group

## Supplier Code of Conduct

Asahi Kasei Microdevices Corporation and its subsidiaries (collectively “AKM Group”) are committed to comply with all applicable laws and regulations, as well as high standards of corporate ethics including social norms, and AKM Group undertakes Asahi Kasei Group Mission “Contributing to life and living for people around the world”.

To fulfill the said commitment, AKM Group need to work with whole supply chain, and support and cooperation of its suppliers are essential.

This “AKM Group Supplier Code of Conduct” (“this Code”) is established to set out what AKM Group expects from all of its suppliers who provide goods or services to AKM Group.

AKM Group requests its suppliers to comply with this code, in addition to the observance of applicable laws and regulations and social norms, and to actively and continuously conduct corporate social responsibility activities.

### A Labor

#### 1. No Forced Labor or Child Labor

Supplier must not use any forced labor in any manner, and supplier must not use any child labor under the minimum age for employment set by the applicable laws.

#### 2. Working Hours

Working hours must not exceed the maximum set by the applicable laws.

#### 3. Wages and Benefits

Supplier must pay wages to workers and provide benefits, in accordance with applicable laws.

#### 4. Prohibition of Harassment

Supplier must be committed to a workplace free of any sexual or other harassment, discriminatory statement or other verbal, mental or physical abuse.

5. No Discrimination

Supplier must not discriminate against any person, based on the person's age, race, sex, religion, nationality, skin color, physical disability, place of origin, marital status, category or employment, etc.

6. Respect for Basic Labor Right

Supplier must respect the employees' right to join union, bargain collectively and engage in union activities in accordance with applicable laws.

## **B Health and Safety**

1. Workplace Safety and Hygiene

Supplier must strive for stable and safe operation while preventing workplace accidents and securing the safety of personnel and members of the community. Supplier must conduct risk assessment, and take physical preventative measures, as well as providing an appropriate instruction manual and carrying out the education and training.

2. Health Maintenance

Supplier must strive for a comfortable workplace environment, and support the maintenance and promotion of employee health.

## **C Environmental**

1. Environmental Protection

In addition to maintaining legal compliance, supplier must give full consideration to the global environment, and make efforts to reduce the environmental burden of all operations, by promoting the activities such as reduction of greenhouse gas emissions, zero emissions, pollution prevention and energy saving.

2. Green Procurement

Supplier must promote "Green Procurement" in order to manage chemical substances in its products properly, and to provide environment friendly, safety product to AKM Group.

## D Ethics

1. Prevention of Bribery, and Sound and Appropriate Relationship with AKM Group and Suppliers

Supplier must not purvey any improper gift, entertainment, favor, or other economic benefit to a public official or the equivalent in any country.

Supplier must not violate laws or public standards, nor provide or receive to or from AKM Group or any other customers or suppliers any money, goods, or services that would depart from the norms of common sense or from the commonly accepted customs and practices of society.

2. Fair and Proper Accounting

Supplier must not engage in fraudulent accounting or embezzlement. For any accounts between the company and an external party or between an employee and the company, the accounting must be done properly, based on fact and in accordance with the accounting regulations.

3. Proper Accounting and Tax Procedures

Supplier must perform accounting and tax procedures appropriately in accordance with relevant laws, ordinances, etc.

4. Information Disclosure and Communication with Society

Supplier must constantly perform proactive information disclosure and communication for the maintenance of a sound relationship with stakeholders such as customers, suppliers, shareholders and other investors, employees, and local communities, and the general public.

Corporate information must be disclosed fairly, impartially, accurately, and as swiftly as possible.

5. Respect for Intellectual Property Rights

Supplier must respect the intellectual property rights of others.

6. Fair Business

Supplier must adhere to applicable fair trade and competition laws to ensure free and fair competition in the market.

In the course of advertising and promoting products or services, supplier must take care of the accuracy, and any comparison which refers a product of another company must be fair and accurate in accordance with the applicable laws and regulations.

#### 7. Protecting Information

Supplier must handle information gained from AKM Group or any other party properly, in accordance with the applicable laws and internal rules regarding the protection of information, as well as the confidentiality agreement with the disclosing party.

#### 8. Whistleblower System

Supplier must maintain programs that ensure employee can report any violations or suspected violations of laws or internal corporate regulations by organization or individuals in confidential and anonymously, without fear of retaliation. Whistleblowers must not incur any disfavor or other disadvantage as a result of having made a report.

#### 9. Responsible Sourcing of Minerals

Supplier must implement measures to ensure the transparency of its supply chain and to promote responsible mineral procurement, so as not to support conflict and inhumane conduct in conflict-affected and high-risk areas.

#### 10. Privacy

Supplier must handle personal information of employees, customers and other parties in accordance with the internal rules regarding the protection of personal information and applicable laws and regulations, throughout the course of receiving, using, storing and disposing personal information.

### **E Management**

#### 1. Management System

Supplier must establish a management system to comply with this code. The management system must identify the executive who is responsible to such management, and facilitate continual improvement by Plan-Do-Check-Action cycle.

#### 2. Supplier Responsibility

Supplier must request its sub-contractors and suppliers to comply with this code as well, and actively pursue the social responsibility by its whole supply chain.