



# **Fujitsu Group**

# **Sustainable Procurement Policy**

November 2023

First Edition

**Fujitsu Limited**  
Global Supply Chain Unit

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## I. Introduction

Fujitsu Group aspires “being a technology company that realizes net positive through digital services” and is offering a full range of technology products, solutions and services to a variety of customers.

Fujitsu Group’s purpose is “Make the world more sustainable by building trust in society through innovation”. In order to realize the purpose, by driving our experience and technology, we aim to deliver values to our customers and contribute to reliable society. Fujitsu operates all business based on “Fujitsu Way” which organizes purpose, values and Code of Conduct.

To realize our purpose, we have established non-financial management indicators in addition to financial indicators. Fujitsu Way Code of Conduct is stipulated as a keystone for Fujitsu to promote sustainability movement. Fujitsu will further enhance enterprise value and contribute to the local and international community throughout communicating with stakeholders.

The Responsible Business Alliance (RBA)\* is the world's largest industry coalition dedicated to corporate social responsibility in global supply chains.

Fujitsu Group joined the Responsible Business Alliance (RBA) in March 2017. Together with our partners, our strategy is to further strengthen initiatives related to Sustainability in our supply chain through the framework of RBA.

From 2018, Fujitsu has adopted the RBA Code of Conduct\*<sup>1</sup> as its CSR Procurement Guidelines. We expect our suppliers to support the Fujitsu Group CSR Procurement Guidelines and conduct their worldwide operations in a socially and environmentally responsible manner.

At this chance the Guideline is revised in 2023 and named “Fujitsu Group Sustainable Procurement Policy” to transform our views from company-based CSR to social-based sustainability. It is redesigned for suppliers to refer in accordance with their categories of business, i.e., a universal abridgment is prepared in Chapter II. Codes to be applied to Every Supplier, and RBA Code of Conduct is applied in Chapter III. Codes to be applied to Suppliers for Goods.

We Fujitsu have engaged in efforts to advance diversity and inclusion (D&I), based on the idea that “We respect fairness and equality, and promote diversity and inclusion,” as described in the Purpose Statement of the Fujitsu Way. Through this more inclusive and holistic approach to DE&I, we aim to achieve a sustainable society, looking not only at our own business, but also at the positive impact our technologies and solutions have on society. In FY2017, the Fujitsu Group issued a CEO Statement of Support for the Women’s Empowerment Principles, which were created by the UN Global Compact and UN Women. In doing so, we pledged our support of the principles. In FY2018, we also became the first Japanese company to pledge our support to the UN’s LGBTI\*<sup>2</sup> Standards of Conduct for business, and have been proactive overall in our adaptation to global trends in diversity. Fujitsu celebrates and respects different cultures within our organization and its supply chain.

\*1 RBA Code of Conduct : <http://www.responsiblebusiness.org/code-of-conduct/>

\*2 LGBTI: Lesbian, Gay, Bi, Trans, Intersex as defined by the UN Business Standards.

## II. Codes to be applied to Every Supplier

This chapter is applied to every supplier/partner for Fujitsu.

The term “we” herein shall have the meaning of Fujitsu’s suppliers and partners.

Furthermore, chapter III is applied to every supplier that may design, manufacture or provide goods that are used for Fujitsu to design, manufacture or provide goods.

## II. Codes to be applied to Every Supplier

### 1. Labor

#### 1.1 Freely Chosen Employment

We do not use forced labor and we allow workers to leave our employment in accordance with the terms of their contract of employment.

We will support and respect the protection of internationally proclaimed human rights and ensure human rights laws are adhered to.

Any violations will be investigated and taken seriously.

Workers will be provided with a written employment agreement in their native language and any changes will only be made in agreement with the worker, and/or in accordance with local legislation.

Neither we, nor our agents will hold, destroy, or deny access by employees to their government-issued identity or immigration documents unless required by law.

Workers will not be required to pay employers, agents' recruitment fees, or other related fees for their employment.

#### 1.2 Young Workers

We do not use child\* labor.

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.

#### 1.3 Working Hours

The working hours of our employees will not exceed the maximum set by local law.

#### 1.4 Wages and Benefits

We will pay all workers in line with applicable laws, including minimum wages and overtime.

We will not withhold payments as a disciplinary measure, and will provide a clear statement to employees as to how payments are calculated.

#### 1.5 Humane Treatment

We will ensure there is no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment within our own organization or throughout our supply chain. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

\* 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. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.

## II. Codes to be applied to Every Supplier

### 1.6 Non-Discrimination

We have a zero-tolerance policy towards all forms of discrimination and/or harassment. We are wholly committed to creating an inclusive work environment in which every employee, customer or supplier is able to contribute and thrive in hiring and employment practices such as wages, promotions, rewards, and access to training, irrespective of any identifying attribute including: age; sex, gender identity or expression; sexual orientation; race or ethnic origin, nationality; religious belief; disability; social background; political affiliation; marriage and civil partnerships; and carers and responsibility for dependents.

When acting as an approved supplier to Fujitsu, this commitment will be demonstrated when interacting with any Fujitsu, Customer or Supplier employee, regardless of the location and jurisdiction.

### 1.7 Freedom of Association

We shall, in accordance with local laws and regulations, 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. 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.

### 1.8 Supply Chain Diversity

We promote collaborations with a variety of suppliers in order to foster innovative cultures.

### 1.9 Accessibility

We are committed to providing workplace adjustments for any employee with a disability or health condition to enable them to carry out their role effectively, reach their potential and contribute to our success.

We will endeavor to ensure the offerings of our organization are accessible.

## II. Codes to be applied to Every Supplier

### 2. Health and Safety

#### 2.1 Occupational Safety

Worker potential for exposure to safety hazards are to be identified, assessed and controlled, and ongoing safety training provided. Where hazards cannot be adequately controlled, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with specific hazards.

#### 2.2 Emergency Preparedness

Potential emergencies and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans.

#### 2.3 Occupational Illness and Injury

Procedures are to be in place to prevent, manage, track and report occupational injury and illness.

#### 2.4 Sanitation, food and housing

We will ensure workers are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by our organization 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, air conditioning, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

#### 2.5 Health and Safety Communication

We will ensure workers are provided with appropriate workplace health and safety information and training is given in the language of the worker, or in a language the worker can understand, for all identified workplace hazards that workers are exposed to. Workers shall be encouraged to raise safety concerns.

## II. Codes to be applied to Every Supplier

### 3. Environmental

#### 3.1 Environmental Permits and Reporting

We will ensure all required environmental permits (e.g. hazardous materials storage), approvals and registrations are obtained, maintained and kept current and their operational and reporting requirements are to be followed.

Critical environmental concerns that pose a threat to our operations will be communicated to Fujitsu at the time of identification.

We will proactively communicate opportunities for changes to operations that could result in positive environmental impacts in the supply chain (providing such disclosure will not adversely impact our business or breach confidentiality).

#### 3.2 Pollution Prevention and Resource Reduction

We will look to minimize or eliminate discharges of pollutants and generation of waste throughout our organization and supply chain.

We will reduce the use of water, fossil fuels, minerals, single use plastics and virgin forest products, and where possible, replace with renewable alternatives.

We will safeguard the natural environment by recycling or reusing our waste products wherever possible. Where this is not possible, we will ensure that waste is disposed of in an environmentally friendly way in line with local legislation.

To the best of our ability, we will disclose our key environmental data targets at an organizational level to enable our customers to understand our broader impact on the environment.

We will promote environmental sustainability both within our own organization and throughout our supply chain, through work practices, policies and training.

#### 3.3 Hazardous Substances

We will ensure that chemicals and other materials posing a hazard to humans or the environment are identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

#### 3.4 Energy Consumption and Greenhouse Gas Emissions

Energy consumption and all relevant greenhouse gas emissions (both direct emissions from owned or controlled sources, and indirect emissions from the generation of purchased energy) will be tracked, documented, and reduction target is planned at the facility and/or corporate level. We will endeavor to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

## II. Codes to be applied to Every Supplier

### 3.5 Procurement of Goods & Services

We will procure goods & services based on environmental sustainability.

We will consider environmental sustainability in our own procurement processes and promote best practice within our own supply chain.

## II. Codes to be applied to Every Supplier

### 4. Ethics

#### 4.1 Business Integrity

(a) We have a zero tolerance policy towards all forms of bribery and corruption, including facilitation payments. This policy is communicated to our employees and suppliers. We have evaluated our exposure to bribery risks and understand the risks our business faces.

(b) We have procedures in place to prevent bribery in our business and in our supply chain. We will perform Due Diligence checks on all suppliers engaged by our organization. All employees will receive appropriate training on all aspects of our Anti-Bribery & Corruption policy.

#### 4.2 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 supplier, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

We do not take advantage of competitors through unethical behavior or illegal means.

We do not use our position to secure an unfair advantage in dealings with business partners, and we do not correspond to any of economically unreasonable and/or unethical request from our counterpart.

We prepare management approval process for gifts and hospitality, and we record all the amount and number of time of them.

#### 4.3 Disclosure of Information

We will ensure that business dealings are transparently performed and accurately reflected on our organization's business books and records. We understand and acknowledge that falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

## II. Codes to be applied to Every Supplier

### 4.4 Intellectual Property

We understand and acknowledge that intellectual property rights are to be respected; transfer of technology and knowledge is to be done in a manner that protects intellectual property rights; and, customer and supplier information is to be safeguarded.

### 4.5 Fair Business, Advertising and Competition

We do not enter into any agreements or discussions with our competitors regarding restrictions on pricing, production or sales volumes, customers, sales territories, or other matters that impede fair competition.

### 4.6 Protection of Whistleblower's Identity and Non-Retaliation

We will ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers\* is maintained, unless prohibited by law. We will endeavor to implement, or already have a communicated process for whistleblowers to be able to raise any concerns without fear of retaliation.

### 4.7 Information Management

We understand the regulations of the territories in which we do business governing the handling of different types of information and we comply with those regulations. In addition, we acknowledge the vital importance of information security to our customers and those they serve.

We have implemented security policies and procedures to prevent data loss and / or breach of confidentiality.

We comply with relevant security standards applicable to the data we handle.

We 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.

\*Whistleblower: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

## II. Codes to be applied to Every Supplier

### 5. Management Systems

#### 5.1 Company Commitment

We have management procedures in place to ensure compliance with The Policy. These procedures aim to protect our reputation and the reputations of those with whom we do business.

We will adopt and communicate this Policy, and work with our customers to allow its effectiveness to be monitored.

#### 5.2 Management Accountability and Responsibility

We will identify a Senior Executive Sponsor ensuring implementation and monitoring of performance against this Policy.

#### 5.3 Legal and Customer Requirements

We respect and comply with all applicable laws and regulations of the territories in which we do business. We endeavor to understand all relevant laws and regulations prior to initiating any business, abide by their principles and ensure through our actions that we do not inadvertently violate those laws.

We also conform to socially accepted business practices, use common sense in our dealings, and are careful to check whether our commercial terms are in line with local requirements. Customs vary from country to country, therefore, in addition to understanding the laws and customs of our home territory, we also respect and familiarize ourselves with the laws, customs and local requirements of other territories in which we do business.

#### 5.4 Improvement Objectives

We will strive to continuously improve in all areas of responsible business and monitor and share the results of these improvements with our customers.

#### 5.5 Supplier Responsibility

We make reasonable efforts commensurate with the size of our organization to flow the requirements of this Policy and monitor our supply base for compliance.

### III. Codes to be applied to Suppliers for Goods

Responsible Business Alliance (RBA) Code of Conduct is introduced in this chapter.

<http://www.responsiblebusiness.org>

It is applied to every supplier that may design, manufacture or provide goods that are used for Fujitsu to design, manufacture or provide goods.

Term "participants" herein shall be construed as abovementioned suppliers.

The RBA Code of Conduct was initially developed by a number of companies engaged in the manufacture of electronics products between June and October 2004.

Requirements regarding the following items are in this Part III in addition to Part II.

- A. Labor: equivalent to Part II 1. Labor
- B. Health and Safety: Occupational Safety, Physically Demanding Work, and Machine Safeguarding
- C. Environment: Solid Waste, Air Emissions, Materials Restrictions, and Water Management
- D. Ethics: equivalent to Part II 4. Ethics
- E. Management System: Risk Assessment and Risk Management, Training, Communication, Worker Feedback, Participation and Grievance, Audits and Assessments, Corrective Action Process, and Documentation and Records



**Appendix - Fujitsu Group Sustainability Procurement Policy**

# **Guidebook for RBA Code of Conduct**

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## **Aim and Purpose of this Appendix**

“Fujitsu Group Sustainability Procurement Policy” introduces “Responsible Business Alliance (RBA) Code of Conduct (CoC)” in Chapter III.

This brochure “Guidebook for RBA Code of Conduct” is a summary corresponding to each of requirement from RBA CoC, by giving background, explaining terms and introducing concrete actions to be taken to fulfill requirements.

We would appreciate if this Appendix helps suppliers’ and partners’ better understanding on RBA CoC.

## **A. LABOR**

### **1) Freely Chosen Employment**

In this paragraph, codes such as (1) provision of employment agreement written in worker's native language (for workers from foreign countries, prior to departure from the country of origin), (2) representation of voluntary work, i.e. prohibition of forced labor, (3) securing labor's freedom of moving and leaving from work, (4) prohibition for employer to withhold labor's identification, passport and/or work permit, and (5) prohibition for employer and agent to exploit are stipulated. Some employers forcibly hold a passport to impede foreign labor's escape, labors are forced to pay large-value recruitment fees to a vicious agent, or other relevant problems are underlying these prescriptions.

Term "unreasonable restrictions" herein shall have a meaning of any wrongful constraint to limit labor's freedom such as but not limited to, a permit to go out dormitory and/or making a curfew.

### **2) Young Workers**

In this paragraph, codes such as (1) prohibition of child labor, i.e. maintaining a system to confirm labor's age, (2) prohibition of a work that is likely to jeopardize workers under 18 (young workers) health or safety, including night shifts and/or overtime work, (3) proper benefits for student workers, (4) support and remedy for child labor when so identified are stipulated.

Term "child labor" is defined in an international protocol as a worker under 15 or 14 in developing countries i.e. those who shall receive compulsory education work as if an adult but not getting education or a worker under 18 who engages in a dangerous and/or hazardous job.

### **3) Working Hours**

In this paragraph, working time upper limitation is stipulated. Overtime work shall be voluntary, but not to be performed forcibly. Term "at least one day off every seven days" herein shall have the same meaning of "Continued working days shall be six days or lesser".

### **4) Wages and Benefits**

In this paragraph, wages and disciplinary measures for labors are stipulated.

When labor is required by a company to attend any activity such as but not limited to a toolbox meeting, a safety meeting or a warm-up exercise before the start of the business hour, wages equivalent to such binding hour shall be compensated to the labor.

Furthermore, no reduction shall be accepted from wages for already performed work as a disciplinary measure.

### **5) Humane Treatment**

Any inhumane treatment to a labor is prohibited. In addition, a policy and a procedure of disciplinary measures applicable to such inhumane treatment shall be clearly defined and communicated to labors.

### **6) Non-Discrimination/Non-Harassment**

Any discrimination, harassment or bullying from labor's identifying attribute but not labor's skill, competence, outcome or other reasonable aspect in employment and/or treatment shall be prohibited. In addition, workers shall be provided with reasonable accommodation for religious practices such as preparing a proper environment for worker's prayer. Furthermore, workers or potential workers should not be subjected to pregnancy tests or physical exams that could be used in a discriminatory way.

### **7) Freedom of Association**

Workers shall be entitled to make a preference to join trade unions or not, and to communicate with management regarding working conditions without fear of discrimination or reprisal.

## B. HEALTH AND SAFETY

Participants are required to recognize that safe and hygienic workplace controls occupational injuries and sickness, maintains product and service quality and/or consistency of production and leverages worker's motivation.

Furthermore, participants shall recognize continual information sharing and training to workers are integral in order to monitor and resolve issues about workplace health and safety.

Codes stipulated in this section refers management systems such as ISO 45001 and/or ILO Guidelines on occupational safety and health management systems.

### 1) Occupational Safety

In this paragraph, necessities of identifying, assessing and mitigating by using the Hierarchy of Controls on worker potential for exposure to health and safety hazards.

Hierarchy of Controls is illustrated as figure in right. It is a concept to classify levels of correspondence where the most effective on the top and the least effective at the bottom, such as, elimination of the hazard, substitution of the hazard, alternative process or materials, physical controls by proper design or equipment, training, and using personal protective equipment.

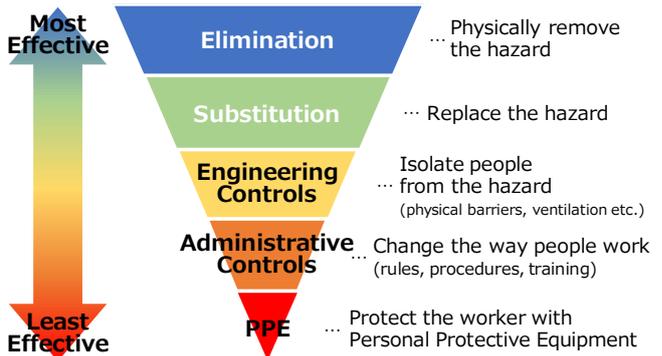
When the hazard cannot be controlled enough by these correspondences, properly maintained PPE such as masks, gloves, goggles etc. and training materials shall be provided without any charge to workers.

For workers who are pregnant women and nursing mothers, proper actions must be taken such as replacement to a less hazardous working environment, a split of work, working a reduced schedule and milk pumping room.

Term "lockout" and "tagout" herein are mandatory system simultaneously in place to secure safe work preventing an improper operation when a machine or equipment inspection and maintenance are carried out.

"Lockout" is a locking process applied when a machine or equipment inspection and maintenance are carried out. Energy supply to a machine or equipment from energy source is physically isolated by a shut-off device such as a breaker, a mechanical switch or a valve, and then a protective device is attached to the shut-off device.

"Tagout" is a visual control by placing a warning tag to a locked-out machine or equipment to prevent mistakenly restarting the machine or equipment.



### 2) Emergency Preparedness

Emergency drills must be planned as practicable for all employees to attend (e.g. available for night shift as well if any) and carried out at least yearly or required by local legislation whichever more frequent. Furthermore, workers' native or other comprehensive language must be applied to smoke detectors, extinguishes, emergency exit plans, evacuation light and any other emergency preparedness. Inspection record for each of preparedness must be maintained.

### 3) Occupational Injury and Illness

In this paragraph, codes for procedures and operations of occupational injury and illness prevention, control, investigation and reporting to labor standards inspection offices are stipulated.

Term "worker(s)" herein shall have a meaning of those who belong to direct department.

Term "employee(s)" herein shall include those who belong to indirect department in addition to worker.

### 4) Industrial Hygiene

In this paragraph, necessity of identifying, assessing, controlling and training of hazards based on hierarchy of controls (see paragraph 1)) are stipulated. Hazards are enumerated such as a contact to chemical, biohazard or other hazard by contacting pathogens or any biological agents and a contact to physical agent such as water, spark or electricity.

Term “exposure” herein shall have a meaning of being in a place or situation where there is no protection from something harmful or unpleasant.

Term “Protective programs” herein shall have a meaning of a measure to secure worker’s safety.

### **5) Physically Demanding Work**

Hazards of physically demanding work must be identified, assessed and controlled.

To reduce physical load to workers as possible, for example, company’s actions are required such as, maintaining enough workforce for shifts, confirming safety in a daily toolbox meeting, providing a manual illustrating proper working posture and training is given in advance, giving an enough break appropriate to the load and regularly reviewing such safety measures by working closely with employment medical advisors.

### **6) Machine Safeguarding**

As concrete examples that companies are required in this paragraph, when purchasing and installing a machine or equipment, company shall assign a responsible person as provided by law. Assigned responsible person will verify and understand operation and maintenance manual from the machine or equipment supplier, and receive an explanation from a supervisor from the supplier when installation and commissioning, then take a safety measure. Furthermore, the responsible person will provide safety training in comprehensive language with workers, especially from foreign countries or subcontractors.

Term “interlock” herein shall have a meaning of a safety device that is used to prevent undesirable conditions in machines or equipment etc. It controls a feature active only when all designed multiple conditions are met.

### **7) Sanitation, Food, and Housing**

Clean and safe drinking water, food, warm shower, toilet, lighting and air conditioners shall be supplied with due considerations to employee’s health and privacy. Problems are underlying that some employers provides especially foreign workers with problematic accommodation through a perspective of health and safety and/or privacy.

### **8) Health and Safety Communication**

As explained in paragraphs 1) to 7), company shall provide workers in advance they start assignment and regularly afterwards as well with training about hazards and health & safety measures in workplaces and accommodation displayed in comprehensive language for workers. Furthermore, company cannot encompass health & safety measures suitable for workplace only with downward communication from company to workers. Company shall, with enhancing psychological safety of workers, make health & safety measures of the organization more effective by incorporating workers’ daily realizations. Workers shall be encouraged to raise any health & safety concern to company without any fear of retaliation by setting up worker’s improvement suggestion system etc.

## C. ENVIRONMENT

### 1) Environmental Permits and Reporting

Documents required by laws, regulations and ordinances or in accordance with agreement that company is engaged, such as permit related to environment, inspections certificate and registration certificate must be always kept in effect.

Below-mentioned are examples of certificates for environment-related permit, inspection and registration. These must be renewed before expiry and operated internally or reported to stakeholders.

- Environmental Permits for industrial waste, production and import of chemical agent etc.
- Inspection Certificates for water treatment, leak test of underground tank etc.
- Registration Certificates for ISO14001, EMAS: EU's Eco-Management and Audit Scheme or any other environment management system certified by a third-party certification institution
- Reports for requirements from state and local governments, clients, or any other stakeholders, such as pollutant release and transfer register (PRTR), energy consumption, etc.

In some countries, company is required by laws to assign managers who are qualified. For example, qualified persons for specially controlled industrial waste (SCIW) management, energy management, pollution control, and depends on the chemical in use, poisonous material control, specified chemical substances (SCS) control and hazardous material management (HMM).

### 2) Pollution Prevention and Resource Reduction

The "Polluter Pays Principle" is a concept recommended by OECD to government in the developed world and established in 1970s, appealing that cost and expense for preventing and removing pollution shall be borne by the one who have caused the pollution, instead of using taxpayers' money which is unfair and inefficient. In addition, a concept "Prevention Principle" is also widespread claiming that adverse effect to environment shall be proactively prevented, instead of reacting after it comes up. Companies are required to endeavor to reduce the effects on the environment from the conceptual and design phases of products and services.

Use of natural resources is directly linked to depletion of limited resource as well as associated with effects on the environment all the way down the line of its lifecycle such as mining or collecting, smelting and refining, processing, distributing, consuming and disposing. Companies are required to endeavor to save energy, alternating to environment-friendly materials, reducing defects, waste, use of hazardous substances etc.

### 3) Hazardous Substances

Waste Electrical and Electronic Equipment in the world have reached to 53.6 million tons in 2019, increased by 21% in previous five years according to figures by UNEP. Resulting from improper waste treatment during recycling process, pollution due to hazardous substances especially in APAC is serious.

National governments and industry organization have consolidated laws, regulations and industrial guidelines. Abide by these, company is required to endeavor to reduce use of and management during all life cycle phases such as using, transfer, storage and disposal of hazardous substances.

In some countries, company is required by laws to assign qualified persons for specified chemical substances (SCS) and organic solvent controls depends on the chemical in use. Some substances are subject to specially controlled industrial waste (SCIW) management such as flammable waste oil, strong acid and strong alkali.

### 4) Solid Waste

In general, waste management shall be carried out based on an appropriate procedure.

Term "systematic approach" herein shall have a meaning of defining procedures for operation flows and rules of: legitimate description, storage life, storage location and such displays of waste, and agreement between a contractor, manifesto-based control, waste disposal subcontractor and disposal frequency based on the consignment standard etc.

## **5) Air Emissions**

“Long-range Transboundary Air Pollution” problem is very serious globally. It is caused by air pollutants emit from factories and vehicles who travel thousands of kilometers away from the place it is originally discharged and then damage to ecosystems are widely spread due to air pollutions and acid rain. In 1979, “Convention on Long-range Trans-boundary Air Pollution (LRTAP)” is concluded and afterwards, global action is evolved to reduce emissions of SO<sub>x</sub>, NO<sub>x</sub> and other hazardous substances introduced in this paragraph.

Company is required to reduce air pollutants emissions, to identify before air emission and to carry out periodic operation and performance check of scrubbers or other emission control equipment.

## **6) Materials Restrictions**

Materials used in production shall be compliant with laws, regulation and customer requirement. Term “applicable laws” and “regulations” herein shall include requirement for labelling for recycling and disposal, and nonuse or threshold level of restricted substances. 10 substances restricted under EU’s “Directive on the Restriction of the Use of Certain Hazardous Substances in Electrical Equipment” are known as a typical example.

## **7) Water Management**

In a factory or other premises, company uses variety of water usage such as “clean water” for drinking, “recycled water” for cooling, sprinkling, or toilet flushing, “well water” for drinking in emergency, industrial water for production, and wastewater. Company is required to monitor, manage and save usage of each of these.

## **8) Energy Consumption and Greenhouse Gas Emissions**

GHG (Greenhouse Gas) Protocol is an international standard used for greenhouse gas emission accounting and reporting. It stresses values of indirect emission of GHG in whole supply chain as well in addition to direct emission from a company.

In this paragraph, company is required to visualize in document separately for scope 1 and scope 2 defined by GHG Protocol.

Term “Scope 1” herein shall have a meaning of direct emission of GHG from company, including energy consumptions to operate company’s own production line, gas-fired boiler or other utilities.

Term “Scope 2” herein shall have a meaning of indirect emission of GHG from company, including GHG emissions resulting from purchased electric power for in-house use.

## **D. ETHICS**

### **1) Business Integrity**

To operate bona fide business, company is required to have a zero-tolerance company policy to strongly prohibit any and all forms of bribery, corruption, extortion and/or embezzlement. Term "zero-tolerance" herein shall have a meaning of intolerant, the policy of applying rules very strictly and no clemency is granted even for a slight breach.

### **2) No Improper Advantage**

In this paragraph, prohibition of using improper or unfair means to win or maintain business is stipulated. Such means shall include promising, offering, accepting, and giving or receiving valuable items regardless of directly or via a third party. Company is also required to conduct business ethics training for employees to enforce prevention of such bribery, bid-rigging, insider trading or any other compliance violations or misconduct.

### **3) Disclosure of Information**

In this paragraph, codes are stipulated to properly record documents or in systems of trading status in supply chain for auditor and/or internal auditor to verify financial or non-financial (such as labor, health and safety, environmental activities, business development, company structure etc.) report is properly prepared.

For example, company is required to ensure following systems in practical operations in supply chain:

- In order to ensure that fictitious booking shall not be done by improper approval from an individual person or organization, company shall establish an internal control system for internally independent organizations of (1) request for purchase / proposal (2) purchase order / order acceptance (3) inspection and goods receipt / delivery and invoice issuance to mutually supervise each other and to book a business record properly;
- By periodical reviewing of undelivered purchase items list, company will ensure minimizing unhealthy off-the-book debts through executing business process from purchase order / order acceptance to inspection / invoice issuance within a reasonable time.

### **4) Intellectual Property**

Term "intellectual property" herein shall include patent right, utility model right, design right, trademark right, copyright and any other rights or interests defined and protected by laws (collectively called as "Intellectual Property Rights") and "trade secret" as well. Today, "trade secret" is defined in laws of EU, USA and Japan and recognized as a part of "intellectual property".

For example, company is required to ensure systems and provide training for employees to prevent following problems in practical operations in supply chain:

- Unintended use of specifications or know-how without prior consent by a supplier that have been shared in a meeting or during a trading with the supplier;
- Improper photography of document, product, workplace or factory;
- Leakage to outside resulting from posting on social media; and
- Taking out of information related to intellectual property by a resignee.

### **5) Fair Business, Advertising and Competition**

In this paragraph, prohibition of cartel, bid-rigging, false or misleading advertising, acquisition of a trade secret of other company by illegal means are stipulated.

### **6) Protection of Whistleblower's Identity and Non-Retaliation**

Company shall maintain a system to assure whistleblower's anonymity and to protect whistleblower from disadvantageous treatment resulting from whistleblowing when company receives a whistleblowing from a supplier or inhouse.

In addition, such system shall be got across and well-known to workers. For example, establishing contact information or hotline both for inhouse and outsider of company to report incompliant act, behavior or such suspicion by an employee or executives, and utilizing posters and employee training for familiarization.

## **7) Responsible Sourcing of Minerals**

Term "due diligence" herein shall have a meaning of an appropriate framework or a duty of care that company shall proactively carry out, including identifying, preventing and reducing negative impact from company's operation.

Recent years, problems are widespread such as financial outflow to armed groups and/or antisocial organizations and human rights abuse such as working under dangerous environment or child labor etc. at mining sites all over the world.

Company is expected to establish a policy and its implementation of high-risk materials that are mined in the areas and under working environment of human rights abuse, and/or procuring minerals by means of OECD due diligence guidance or relevant means, and in accordance with client's request disclose information.

## **8) Privacy**

When company handles; collect, storage, process, transfer and share personal information, it shall comply applicable laws and regulations for personal information in areas and countries where company is registered and operates business.

## **E. MANAGEMENT SYSTEMS**

Company is required to establish a management system that fits to size of the company, i.e. a system to ensure the code of conduct and efficiently operate Plan, Do, Check, and Action (PDCA) of business to improve continually.

Management systems shall include following elements:

### **1) Company Commitment**

Commitment shall be displayed in workplace in languages workers understand.

### **2) Management Accountability and Responsibility**

Person in charge of management system shall periodically arrange reviewing by CEO and executives for management system status and collaborate with related persons internally to have CEO and executives being prepared to explain challenges and achievement of the company by their own voice to stakeholders.

### **3) Legal and Customer Requirements**

System to identify laws, regulations and customer requirement applicable to company's business and to confirm if it covers latest requirement.

In particular, enforcement of internal control by preparing company rules such as work demarcation, engineering standards, contract review procedure, to support engineering and quality control to verify technical requirement for product or service and reflect them to specification and inspection procedure of company product and purchased items, to support procurement to verify commercial terms to reflect them to agreement between suppliers.

### **4) Risk Assessment and Risk Management**

In particular, assessment means to identify risks that may occur from business and quantify frequency and levels of impact of them to determine comparative criticality, while risk management means to assign countermeasure for each risk whichever avoidance, transfer, reduction or retention.

### **5) Improvement Objectives**

Improvement objectives shall be planned from the abbreviation "SMART" viewpoint:

- Specific;
- Measurable;
- Achievable, not so easy nor impracticable;
- Relevant, with company commitment and major roles of each organization;
- Time-bound.

### **6) Training**

Program shall be renewed periodically to cover the latest requirement.

### **7) Communication**

Typical approaches are posting on company's website and release of annual integrated report.

### **8) Worker Feedback, Participation and Grievance**

Typical approaches are employee engagement survey, suggestion box, workers review session for issues, meeting between the union and executives, team activities for business process, and whistleblowing contact.

### **9) Audits and Assessments**

An auditor for internal audit which is separately carried out from client or certification authority, shall endeavor to support audited worker's solution to challenges by advising on corrective action process but not merely pointing out of non-conformance.

Furthermore, internal auditor shall endeavor to listen attentively to auditee for annoying of the moment such as a conflict between current company rule or procedure and the latest challenges to way forward to continually improve internal system, instead of just confirming in accordance with an audit routine.

### **10) Corrective Action Process**

When executing corrective action process, root cause analysis of findings (why), identification of corrective actions (what), person in charge for the actions (who), and due dates (when) must be recorded for executives to ensure PDCA cycle of corrective action process is properly facilitated.

### **11) Documentation and Records**

Company rules shall be prepared in use for document control, handling of confidential information and personal information. Furthermore, periodic training and internal audit shall be carried out to ensure such rules are properly administrated.

### **12) Supplier Responsibility**

Typical approaches are flowing down, surveying in document or meeting, audit, or receiving commitment declaration from suppliers, staffing services and subcontractors.

## [Points to be confirmed]

Typical examples of concrete measures to be taken are introduced hereinafter for readers' reference, which are required by RBA Code of Conduct and/or may be interviewed during sustainability audit.

### A. LABOR

#### 1) Freely Chosen Employment

1	Policies and procedures are properly established for recruiting and hiring, including points to be cared for hiring foreigners and hiring through agencies.
2	Company does not ask labors to pay commissions when hiring them through agencies.
3	Company does not retain labor's passport, government-issued identification, bank account book, pension book etc.
4	Employment agreement is written in labor's native language. Following items shall be covered at minimum in agreement or acknowledgement: (a) nature of the job; (b) terms and conditions for work; (c) day-offs and national holidays; (d) requirement for leave; (e) benefits such as living quarters, commuting expense, pension, insurance etc.; (f) wage, retention, and these formulas; (g) commissions and its amount which are borne by labors etc.
5	Terms and conditions for employment agreement is explained to labors: (1) before departure if the labor is not Japanese; and (2) before labor's acknowledgement of company's offer letter if the labor is Japanese.
6	Company properly manages agreement for subcontractor employees, subcontractors, and agencies.
7	Company does not make any curfew for company-provided living quarters.
8	Labors does not have to have management approvals to have a break for water drinking and/or restrooms etc.
9	Company does not ask labors to pay for any item required to be equipped in work such as a uniform.

#### 2) Young Workers

1	Company does not employ anyone under 15. Company prohibits night shift performed by anyone under 18.
2	Company refers official certificates when confirming labor's age.
3	Company stipulates employing procedures for interns, student workers, part-timers etc. Term "intern" herein shall have a meaning of a worker who works to land an educational degree who is not provided studying procedures from schools. Term "student worker" herein shall have a meaning of a worker who is provided studying procedures from schools.

#### 3) Working Hours

1	Company regulates working hours maximum 60 per week or in accordance with local laws requirements.
2	Company establishes a system to regulate continued working days of seven or more. In concrete, prior approval by managers and/or a system to flag when continued working days excess an alert level.
3	Company implements short meetings, if any which company needs to have, in regular working hours instead of before or after regular working hours.

#### 4) Wages and Benefits

1	Company pays wages not less than minimum wages to every worker including dispatched employees.
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	Company is able to explain basis of wages (how the wage is determined).
2	Company pays in extra rate for overtime working.
3	Commensurate payments in accordance with workers' tenure and working situation can be confirmed and no improper reductions such as disciplinary measure are made when reviewing company's records of wage payments for resignees.
4	When company makes any reduction or retention from wages other than tax or assurance social, such items are reasonable. This is to be confirmed especially for dispatched workers and workers in overseas facilities.
5	Pay advice is written in languages which is easily understandable for foreign workers.

## 5) Humane Treatment

1	Company verifies if any harassment, abuse, corporal punishment, or other inhumane treatment is committed inhouse, by whistleblowing, interviewing, surveying, or other means.
2	Helpline or other means are available for and familiarize to workers to highlight inhumane treatment.
3	Company institutes disciplinary policy applied for inhumane treatment and the procedure is familiarized to workers. Management investigates disciplinary measures in disciplinary committee etc., and it is recorded. Furthermore, workers have access to the record to confirm.

## 6) Non-Discrimination/Non-Harassment

1	Company has evidence to prove non-discrimination in employing activities. For example, job application form or job description do not require representing age or gender.
2	Company does not misapply worker's medical checkup report in employment or treatment which endanger equitableness.
3	Employment agreement stipulates the same starting pay for any gender.
4	Company institutes policies and rules, and considers corresponding worker's religious requirement such offering a prayer, dietary restrictions etc.
5	Company's code of conducts stipulates non-discrimination. Company institutes whistleblowing means when someone observes or experiences discrimination.

## 7) Freedom of Association

1	Company establishes policies and rules to assure worker's rights such as freedom of association.
2	Company does not intervene labor union meeting.
3	Labor union has collective bargaining rights including wage improvement, and company attends upon request.
4	Procedure to appoint a chairperson or labor union, such as by adopting, voting, etc., is stipulated.

\*Items introduced in this section for dispatched worker are in accordance with dispatching company's rules.

## **B. HEALTH AND SAFETY**

### **1) Occupational Safety**

1	Company institutes a list of licenses and certificates required for occupational safety.
2	If Company uses machines and/or equipment, company maintains and operates in accordance with standards and procedures for lockout / tagout applied to them.
3	Company limits workers involved for high risk works in terms of safety such as work at height, electrical construction those having license, training, satisfying requirements of laws, regulations, client and/or Company rules.
4	Company takes proper actions and monitor how it works to reduce potential safety risks from traffic accident, electric shock, fire, or other natural disasters that may occur inhouse. For example, maintaining walkways and traffic speed limit in factory, electric insulation, and tip resistant.
5	Company indicates necessity of PPE (personal protective equipment) where required. Use of PPE is appropriate.
6	Company considers proper allocation to expectant and nursing mothers, handling of heavy items, utilizing industrial robots in risk assessment of work.
7	Company properly maintains performance test reports of equipment and machines such as elevators, boilers, forklifts, etc.)

### **2) Emergency Preparedness**

1	Company has s system to confirm firefighting and disaster prevention equipment* inspection is the latest. Company has a plan to renew these. Company has a rule to decide the plan. *fire alarm, smoke detector, highly sensitive detector, sprinkler, gas alarm, fire extinguisher, fire hydrant, fire door, emergency light, evacuation sign, electric leakage detector etc.
2	Appropriate and effective fire detect, alarm and control system is installed. Evacuation sign is self-illuminating type. Fire doors and evacuation routes are not blocked.
3	Dangerous items storage is maintained not to be brought outside, such as double structure.
4	Company has a system to confirm detectors are working.
5	Emergency calling tree is maintained as the latest, familiarized and if necessary posted.
6	Evacuation drill is carried out, and everyone is planned to attend it, and carried out at night as well if Company has a night shift.
7	Evacuation routes are shown and posted at proper places. Evacuation directions are properly shown as same as the actual routes.
8	Every exit to outside is open outward. Locks are automatically unlocked when emergency.
9	Equipment* is prepared where accessible in emergency. * masks, gloves, helmets, AEDs, litters, flashlights, first aid kits.
10	Personnel for emergency such as emergency life guard, safe guides etc. are trained properly.
11	PPE is supplied by Company and stored at proper place.

### **3) Occupational Injury and Illness**

1	First-aid room staffs (doctors, nurses) have licenses and doctor is dedicated.
2	Company provides appropriately frequent health screenings for workers involved in high-risk jobs* in terms of safety and health. *Jobs handling Machining, Welding, Organic Solvent or other chemicals, heavy cargo etc.
3	Company properly manages and operates (1) introduction to workers who have to have health screening (2) storage until expiry of, and access right to screening data
4	Company properly reviews industrial doctor license revision.

5	If any medical treatment is done, infectious waste is properly stored, such as marked biohazard, and/or capped containers.
6	First-aid kit is (1) prepared for each jobsite corresponding to potential incident, (2) timely and properly inspected, and (3) place of preparation is properly decided.
7	Incident record, record of reporting to officials, training for first-aid person in charge and its record is available.
8	Root cause analysis and corrective action are accurate. Company confirms effect of these actions, and these are shared to employees.
9	Company corresponds to those injured and/or medical crisis properly.
10	First-aid person in charge has sign such as armband or badge.

#### 4) Industrial Hygiene

1	If any workplace require license, permit, test report in terms of industrial hygiene, license holders* are enough, and company has plan to maintain enough holders. *license holders for such as organic solvent, poisonous material, working environment measurement, boiler, forklift, crane, etc.
2	Report of environment measurement* is available. *in workplace where required to identify hazardous activities, in order to prevent labor's health disorder, company assesses existence of hazard in workplace scientifically, and if the result is not good, improvement is done, in accordance with local laws and regulations.
3	If company purchases chemical substance, company assigns division in charge, manages, and maintains how to purchase it, application route, obtaining Safety Data Sheet. *such as EU REACH regulations, USA TSCA, local regulations require these.

#### 5) Physically Demanding Work

1	Risk assessment is performed.
2	Upper limitation of manual handling is stipulated.
3	Labors do not take unnatural position to operate nor work in dark place. If any work in confined space, training is done and two or more employees secure safety.

#### 6) Machine Safeguarding

1	Company provides subcontract workers and/or workers from overseas with proper training for machine operation.
2	Company posts certifications of inspection and license for cranes, elevators, forklifts, boilers etc.
3	Company maintains procedures for machines and equipment.
4	Company properly performs inspections for interlock and emergency shutdown.

#### 7) Sanitation, Food, and Housing

1	Company manages (1) temperature control for food, (2) expiry of condiment, (3) fire prevention at canteen, and (4) preparation of first-aid kit.
2	Company properly confirms (1) business license of canteen operating subcontractor, (2) posting of chefs' names, (3) inspection certification for sanitation, and (4) inspection of water.
3	Company properly confirms periodical performance of sanitation inspection and training for canteen operation staffs.
4	Company dormitory has (1) earthquake resistance level in accordance with the local earthquake occurrence risk, and (2) firefighting equipment properly installed, such as fire and gas detectors, fire extinguishers, evacuation routes, etc.
5	Company's facilities such as rooms, bathrooms, showers, toilets, kitchens etc. have no concerns about sharing and sanitation.

#### 8) Health and Safety Communication

1	Health and safety training is performed in languages and contents comprehensive to workers.
2	Chemicals are labeled properly in languages and with warning comprehensive to workers.
3	Company has a framework and system that workers can highlight near miss or other issues related to safety.

## **C. ENVIRONMENT**

### **1) Environmental Permits and Reporting**

1	Company properly obtains revisions of permits such as installation, name of person in charge etc. at facilities*. *Facilities: something having environmental impact to air and/or water, generating noise and/or vibrations, high pressure gas, treating hazardous and poisonous material, fertilizer production lines etc.
2	Company periodically reports energy consumption in accordance with local environment laws and regulations.
3	Company timely submits reports in accordance with permits, local laws and/or protocols.

### **2) Pollution Prevention and Resource Reduction**

### **3) Hazardous Substances**

### **4) Solid Waste**

1	Company draws up environmental target, purpose, and plan.
2	If company uses hazardous materials, company maintains procedures for storage, transfer, and disposal.
3	Storage area of waste has a sign as can be seen to workers, fenced from three dimensions, and properly segregated.
4	Company properly maintains (1) agreement, permit, manifesto for a subcontractor of waste collection, transportation, and disposal, and (2) internal rules to award a subcontractor.
5	Company performs site audit for solid waste subcontractor. It must be performed by each individual company but not copied from which already performed by group companies internally.

### **5) Air Emissions**

1	Company constantly monitors properly identified air emissions.
2	Company properly determines voluntary standards for air emissions.
3	Company properly inspects funnel and combustion status.
4	Company properly operates factory in accordance with area classification in local regulations.
5	Company inspects noise level, such as, standard to determine measurement point, registration of facility generating noise, noise level classification, stipulating countermeasure for unusual situation, etc.

### **6) Materials Restrictions**

1	Company has internal standard for green procurement*. *Green Procurement stands for procurement activities considering eco-friendliness.
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### **7) Water Management**

1	Company properly manages (1) identifying water source for usage in a factory, (2) routes for feed water and wastewater, and (3) classification of wastewater and water discharge.
2	Company properly manages (1) identifying equipment which are bound by legal requirement, and (2) periodic inspection for wastewater treatment system, tanks etc.
3	Company properly manages drinking water tanks installation, air release, prevention of small animals coming into overflow piping.
4	Company properly manages and operates control limit level of water discharge and wastewater, final discharge point, and emergency action points.
5	Company has a procedure to control manageable wastewater in emergency.

### **8) Energy Consumption and Greenhouse Gas Emissions**

1	Company maintains management record of energy and it is in accordance with scopes 1 and 2.
2	Company considers actions to be taken and reviews energy efficiency improvement and minimizing GHG discharge.
3	Company operates energy consumption by means to minimize GHG discharge such as alternating heavy fuel oil boiler to methane boiler.

## **D. ETHICS**

### **1) Business Integrity**

1	Company has a policy for business integrity, and it is familiarized to workers.
2	Employees submit declarations not to perform conflict of interests.

### **2) No Improper Advantage**

1	Company has a policy to prohibit bribery, and an internal rule for business entertaining, such as defining how many times and amounts who are giving and receiving entertaining.
2	Company has records of whistleblowing.

### **3) Disclosure of Information**

1	Company is audited for accounting to secure no improper accounting.
2	Company is audited by an independent third party or has any other system to ensure no false in annual report disclosure.
3	Company has a proper internal rule to post product information on its website etc.

### **4) Intellectual Property**

1	Company has an internal rule for intellectual property protection.
2	Company has an internal rule to protect confidential information of outside of the company, such as clients and/or suppliers.
3	Company properly processes confidential documents.

### **5) Fair Business, Advertising and Competition**

1	Company has a proper process to check product information to be disclosed to outside of the company in order to give a false impression.
2	Company has a proper process to check publicizing articles on websites and/or leaflets.

### **6) Protection of Whistleblower's Identity and Non-Retaliation**

1	Company has a whistleblowing rule.
2	Company has a system to secure anonymous whistleblowing and protection of whistleblowers.

### **7) Responsible Sourcing of Minerals**

1	If company uses high-risk minerals such as 3TG: Tungsten, Tin, Tantalum and Gold, and Cobalt etc. for products, below-mentioned countermeasures are taken. *Recently, for mining not only 3TG but also cobalt and other minerals having concern of human rights abuse is required to take equivalent countermeasures as high-risk minerals.
2	Company performs due diligence for high-risk minerals.
3	Company identifies high-risk minerals suppliers and confirms no human rights abuse at suppliers. If any risk concern, company encourages suppliers for corrective actions.

### **8) Privacy**

1	Company properly protects privacy in accordance with its information management rule.
2	If company manages privacy information electronically, company manages access rights assignment.
3	If company manages privacy information on paper, especially human resource and/or medical related information, company stores it in locked cabinet.

4	Company has an internal rule for bringing privacy information outside.
5	Company obtains privacy control certification.

## **E. MANAGEMENT SYSTEMS**

### **1) Company Commitment**

1	Company has a policy to represent actions to comply laws and regulations, and continual improvement regarding labor, health and safety, environment, ethics etc.
2	Company posts abovementioned in local languages.

### **2) Management Accountability and Responsibility**

1	Company has an organization chart and assigns person in charge to promote sustainability. Company also assigns deputy to act for the person in charge when absence.
2	Company reviews periodically for laws and regulations compliance.
3	Company has and reviews management systems for labor and ethics.

### **3) Legal and Customer Requirements**

1	Company has a system to pick up laws and regulations to be complied.
2	Company properly manages client requirement.
3	Company has a list of applicable laws and regulations, and client requirement.

### **4) Risk Assessment and Risk Management**

#### **5) Improvement Objectives**

1	Company has a procedure and record of risk assessment for such as: environmental impact, chemical substance, internal control record etc.
2	Company has improvement target and progress control record.

### **6) Training**

1	Company provides training for Code of Conduct.
2	Company properly manages (1) assigned person in charge to make a training plan, (2) training record, (3) list of trainees to confirm training is provided to whom need to have.
3	Company has an internal rule for training plan coordinating program.
4	Company properly communicates to employees of company information and targets.
5	Company provides suppliers with training.

### **7) Communication**

1	Company information is available on intranet for employees and on website for clients.
2	Company properly communicates to suppliers such as having a conference or meeting to present company information.

### **8) Worker Feedback, Participation and Grievance**

1	Company maintains whistleblowing system which is available for suppliers and anonymity.
2	Whistleblowing logs are recorded.
3	Company has a system to receive opinions from employees, such as a comment box, improvement suggestion etc.

## 9) Audits and Assessments

### 10) Corrective Action Process

1	Company has an internal rule and plan for internal audit.
2	Company performs internal audit with proper contents, such as, monitoring system for Code of Conduct, internal control, accounting process, quality, environment, information security etc.
3	Company has a system to carry out corrective actions if any findings from audit or internal / external evaluation.

### 11) Documentation and Records

1	Company secures privacy on document control and record management.
2	Company has an internal rule for document control.
3	Company has a classification for confidential documents.
4	Company has a rule to ensure employees, dispatched workers and resignees not to leak confidential information.

### 12) Supplier Responsibility

1	Company requires suppliers in agreement etc. to comply RBA Code of Conduct.
2	Company has a process to confirm suppliers comply RBA Code of Conduct and take corrective actions for incompliance.
3	Company has equivalent confirmation process to suppliers not only for product materials but also service providers such as staffing, canteen, guard etc.