



Code of Conduct for Employees

This code of conduct explains the standards and ethics. This code of conduct commits Ushio Europe B.V., Ushio Germany GmbH, Ushio France S.A.R.L., Ushio Poland Sp. z o.o. and Ushio UK Ltd. (“Ushio”), including all the employees and managers, commits to all these standards and ethics. These standards and ethics make sure that the working conditions within Ushio are safe, the workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically. Besides the standards and ethics the business of Ushio, in all of its activities, operates in full compliance with the laws, rules and regulations of the countries.

1. Labour

Ushio commits to stick to the human rights of our workers. These standards apply to all workers including temporary worker, migrant, student, and all other type of worker. The labour standards, based on the ILO labour standards, are:

1.1. Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. There shall be no unreasonable restrictions on workers’ freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in their native language or English, which contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees’ identity or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law. Workers shall not be required to pay employers or agents recruitment fees or other aggregate fees in excess of one month’s salary. All fees charged to workers must be disclosed and fees in excess of one month’s salary must be returned to the worker (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 2).

1.2. Young Workers

Child labour is not to be used in any stage of manufacturing. 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. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardise their health or safety, including night shifts and overtime. Ushio shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable law and regulations. Ushio shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 2).



1.3. Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 3).

1.4. Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labour will be within the limits of the local law (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 3).

1.5. Human Treatment

There is to be 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. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 3).

1.6. Non-Discrimination

Ushio is committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 3).

1.7. Freedom of Association

In conformance with local law, Ushio shall 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. (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 3).

2. Health and Safety

Ushio commits to a safe and health work environment, to reach the goal of minimizing the incidence of work-related injury and illness. The health and safety standards are:

2.1. Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire,



vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout / tag out), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Workers shall be encouraged to raise safety concerns (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 4).

2.2. **Emergency**

Preparedness Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimising harm to life, the environment and property (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 4).

2.3. **Occupational**

Injury and Illness Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 4).

2.4. **Industrial Hygiene**

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 4).

2.5. **Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 5).

2.6. **Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 5).

2.7. **Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by Ushio or a labour agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 5).



2.8. **Health and Safety Communication**

Ushio shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 5).

3. **Environmental**

Responsibility for the environment is integrated in the business of Ushio. Ushio has set up environmental standards. The environmental standards are:

3.1. **Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

3.2. **Pollution**

Prevention and Resource Reduction The use of resources and generation of waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

3.3. **Hazardous**

Substances Chemicals and other materials posing a hazard if released to the environment are to be identified 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 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Participants are to look for cost-effective methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions.

4. **Ethics**

Within Ushio there are standards and ethics where we commit to:

4.1. **Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. Ushio has a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Ushio's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 8).

4.2. **No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorised, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 8).

4.3. **Disclosure of Information**

Information regarding labour, health and safety, environmental practices, business activities, structure, financial situation and performance of Ushio is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable (Electronic



Industry Citizenship Coalition Code of Conduct, version 5.0, p. 8).

4.4. **Intellectual Property**

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and, customer information is to be safeguarded (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 8).

4.5. **Fair Business, Advertising and Competition**

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 8).

4.6. **Protection of Identity and Non-Retaliation**

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistle-blowers are to be maintained, unless prohibited by law. Ushio should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 8).

4.7. **Privacy**

Ushio is to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Ushio shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared (Electronic Industry Citizenship Coalition Code of Conduct, version 5.0, p. 9)

5. **Management System**

Participants shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. The management system should contain the following elements:

5.1. **Company Commitment**

A corporate social and environmental responsibility policy statements affirming Participant's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

5.2. **Management Accountability and Responsibility**

The Participant clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

5.3. **Legal and Customer Requirements**

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

5.4. **Risk Assessment and Risk Management**

A process to identify the legal compliance, environmental, health and safety and labour practice and ethics risks associated with Participant's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.



5.5. **Improvement Objectives**

Written performance objectives, targets and implementation plans to improve the Participant's social and environmental performance, including a periodic assessment of Participant's performance in achieving those objectives.

5.6. **Training**

Programs for training managers and workers to implement Participant's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

5.7. **Communication**

A process for communicating clear and accurate information about Participant's policies, practices, expectations and performance to workers, suppliers and customers.

5.8. **Worker**

Feedback and Participation Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

5.9. **Audits and Assessments**

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

5.10. **Corrective Action Process**

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

5.11. **Documentation and Records**

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

5.12. **Supplier Responsibility**

A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code 6.

References

The following standards were used in preparing this Code and may be a useful source of additional information.

- Dodd-Frank Wall Street Reform and Consumer Protection Act
<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>
- Eco Management & Audit System www.quality.co.uk/emas.htm
- Ethical Trading Initiative www.ethicaltrade.org/ · ILO Code of Practice in Safety and Health
www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf
- ILO International Labour Standards
www.ilo.org/public/english/standards/norm/whatare/fundam/index.html · ISO 14001
www.iso.org
- National Fire Protection Agency www.nfpa.org/catalog/home/AboutNFPA/index.asp
- OECD Due Diligence Guidance
http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html
- OECD Guidelines for Multinational Enterprises www.oecd.org
- OHSAS 18001 www.bsi-global.com/index.xalter · Universal Declaration of Human Rights
www.un.org/Overview/rights.html



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- United Nations Convention Against Corruption
www.unodc.org/unodc/en/crime_convention_corruption.html
- United Nations Global Compact www.unglobalcompact.org
- United States Federal Acquisition Regulation www.acquisition.gov/far/
- SA 8000 www.cepaa.org / SAI www.sa-intl.org Electronic Industry Citizenship Coalition Code of Conduct v5.0 13
- The EICC Code of Conduct <http://www.eiccoalition.org/standards/code-of-conduct/>

As of: February 2024