

Mitsui High-tec Group CSR Procurement Guidelines

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Mitsui High-tec, Inc.

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1. Introduction

With growing interest in corporate social responsibility (CSR) among company stakeholders in recent years, corporate CSR activities—and by extension, CSR activities throughout the supply chain—are in full motion.

Based on its corporate philosophy (House Mottoes) 1. provide products which people in the world need; 2. support all our associates by promoting each other's prosperity; and 3. build an ideal and humane workplace based on the spirit of equality, Mitsui High-tec, Inc. (hereinafter referred to as "the Company," "we," "us," "our") and its group companies (hereinafter referred to collectively, including the Company, as "the Group") recognize that further cooperation and collaboration with suppliers are essential for contributing to the sustainable growth of society through the Group's business activities, and believe that driving CSR activities together will lead to increased corporate value and the sustainable growth of the entire supply chain.

Until now, we have promoted CSR procurement by publishing our Basic Procurement Policy and Procurement Standards on our website. In order to conduct CSR activities together with suppliers and achieve sustainable growth, we have created the Mitsui High-tec Group CSR Procurement Guidelines as a more specific, concrete version of the Basic Procurement Policy and Procurement Standards. We ask suppliers to agree to the Group's basic policy, fully understand the contents of these guidelines, and engage in continuous improvement activities based on them.

In addition, we ask that partners in your company's supply chain be aware of these guidelines, and actively engage in CSR activities. Please be aware that these guidelines will be reviewed and revised as appropriate in response to the demands of the international community, which are subject to change with the times, and do not completely cover everything that we ask of our suppliers.

2. Our Corporate Philosophy

House Mottoes

- 1. We shall provide products which people in the world need**
- 2. We shall support all our associates by promoting each other's prosperity**
- 3. We shall build an ideal and humane workplace based on the spirit of equality**

Our Objectives

**Save energy.
Save earth.
Save life.**

Since its foundation more than 70 years ago, the Company has been supporting the development of a wide range of sectors, including the home appliances, electronics, automobile and industrial machinery sectors. Under the slogan "Ultra-precision technology to shape tomorrow," the high-quality, high-precision products we have developed help reduce environmental impacts through the widespread use of electric vehicles and help make life safer and more secure through the convenience and comfort afforded by semiconductors. We shall continue contributing to society through our business activities in the future.

Wanting to leave the planet in a better state for our grandchildren, we strive for harmony between protection of the environment and our business activities. In line with our core management strategy "Save energy. Save earth. Save life." our goal is to simultaneously achieve the realization of a sustainable society and long-term enhancement of our corporate value.

3. Procurement Policy

The Group's business activities are supported by suppliers who provide a variety of equipment, materials, and services. Together with our suppliers, we engage in procurement activities with consideration for global environmental conservation, legal compliance, respect for human rights, labor issues, safety and health, ensuring the safety and quality of products and services, maintaining and promoting information security, and fair trade and corporate ethics throughout the supply chain. As stated in our corporate philosophy (House Mottoes), we aim to build long-term, trusting relationships with our suppliers, and continue to exist and prosper together as good partners, based on the basic idea of "supporting all our associates by promoting each other's prosperity." In our procurement of equipment, materials, software, services, and other resources necessary for conducting business activities, we have established a Basic Procurement Policy that is distributed to all suppliers, and engage in procurement activities in accordance with this policy.

Basic Procurement Policy

(1) Fair and impartial transactions

The Company provides opportunities for fair transactions to all suppliers.

(2) Build partnerships

The Company builds sustainable relationships to grow along with suppliers.

(3) Compliance

The Company complies with laws, regulations, and social norms in Japan and abroad, including responsible mineral procurement.

(4) Green procurement

Based on its environmental management system, the Company thoroughly manages harmful substances and engages in green procurement that is easy on the global environment.

(5) Protect confidential information

The Company strictly manages confidential information it has gained knowledge of through purchasing transactions, and does not disclose confidential information to third parties without the consent of its suppliers.

The Company does not fraudulently obtain or use the intellectual property of third parties, such as their patents, utility models, designs and trademarks, and the Company does not infringe on their rights.

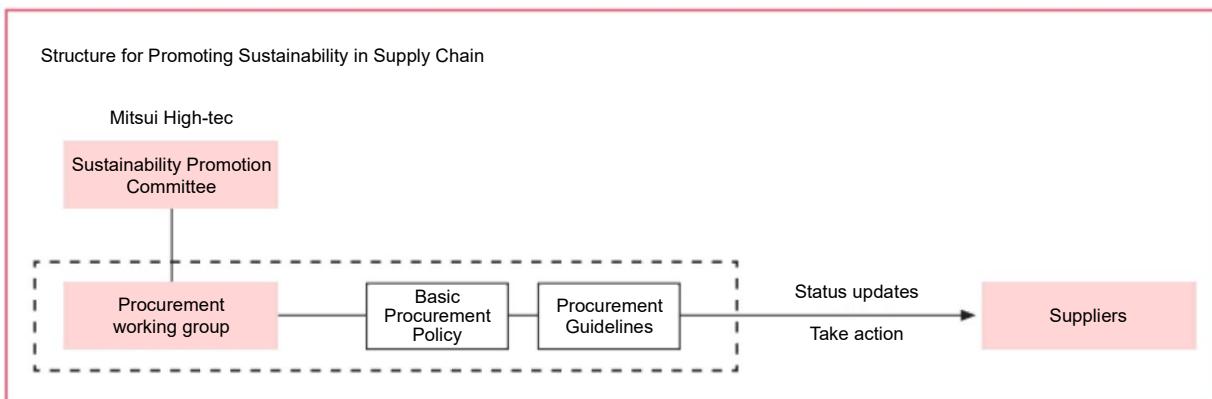
(6) Maintain healthy relationships with partners based on corporate ethics

The Company prohibits any involvement with anti-social forces, and engages in fair, impartial and highly transparent transactions with an emphasis on corporate ethics.

The Company does not grant favors, such as giving/receiving entertainment, money, or gifts, with the exception of those clearly allowed under relevant laws, regulations, social norms, and business customs.

4. Supplier Corporate Conduct Guidelines

The Group provides high-quality products by providing one-stop, integrated services globally, from mold and die design to manufacturing, prototyping, and stamping production. We recognize the importance of stable procurement of materials, equipment, services, and other resources required for corporate activities—in other words, supply chain management—to sustainably provide our products and services. In recent years, as awareness of environmental response, human rights, and compliance has increased worldwide, in order to achieve sustainable growth, it has become necessary for companies to ascertain the status of environmental response, working conditions, and legal compliance, not only for themselves but also for their suppliers, and to take corrective action when necessary. The Group's main initiatives in this area include keeping track of greenhouse gas (GHG) emissions and confirming the status of efforts to reduce them, respecting human rights (preventing child labor, discrimination, and harassment, etc.), and complying with the laws and regulations of the countries in which each supplier is located, the internal regulations of each supplier, and other social norms. Under the Mitsui High-tec Group Code of Conduct, we also clearly state that we will not do business with companies that are suspected of violating human rights, such as through the use of forced labor or child labor. Going forward, we will continue to explain our Basic Procurement Policy and CSR Procurement Guidelines to all suppliers, and ask that they understand and agree to them, to help us build a sustainable supply chain.



These guidelines are based on the Group's Basic Procurement Policy and the Responsible Business Conduct Guidelines advocated by the Japan Electronics and Information Technology Industries Association (JEITA) and the Responsible Business Alliance (RBA) Code of Conduct. They outline standards of conduct and activities that we ask our suppliers to comply with and practice. We ask all suppliers to understand and agree to these guidelines, and to actively promote and engage in CSR activities, not only within their own companies but also with related suppliers.

- Mitsui High-tec Group Basic Procurement Policy
<https://www.mitsui-high-tec.com/procurement/>
- Mitsui High-tec Group Code of Conduct
https://www.mitsui-high-tec.com/sustainability/governance/img/j_compliance.pdf

- Japan Electronics and Information Technology Industries Association (JEITA) Responsible Business Conduct Guidelines
<https://www.jeita.or.jp/cgi-bin/public/detail.cgi?id=788&cateid=1>
- The Responsible Business Alliance (RBA) Code of Conduct
https://www.responsiblebusiness.org/media/docs/RBACodeofConduct7.0_English.pdf

4-A Code of Conduct

(1) Compliance with laws and regulations and respect for international codes of conduct

Suppliers must comply with applicable laws and regulations in their own country and the countries and regions in which they operate, and also respect international codes of conduct.

(2) Human rights and labor

Suppliers must comply with relevant laws and regulations, and also refer to international human rights standards, including the ILO's core labour standards, and respect the human rights of workers.

(2-1) Prohibition of forced labor

Suppliers must not use forced labor through coercion, detention, inhumane prison labor, slavery and human trafficking. Suppliers must also protect the right of workers to leave a job or terminate their employment themselves.

Description

Suppliers must not transport, conceal, recruit, transfer or accept any person by threat, force, abduction, or fraud. Additionally, suppliers must not extract handling fees for providing work from workers, or use such fees as a debt to force workers to engage in forced labor.

(2-2) Prohibition of child labor, and paying due consideration to young workers

Suppliers must not allow children younger than the minimum working age to engage in work. Suppliers must also ensure that young workers under 18 years of age are not engaged in work which could harm their health or impair their safety such as late-night work or overtime.

Description

Child labor must not be allowed under any circumstances. The term "child" here refers to a person who is under the age of 15 or the age of completion of compulsory education, or the minimum age of employment in the relevant country, whichever is higher.

(2-3) Consideration for working hours

Suppliers must not force workers to work longer than the maximum number of hours prescribed by the laws and regulations of the regions in which they work and must properly manage the working hours and holidays of workers, taking international standards into consideration.

Description

Working hours and granting of holidays and breaks must be managed appropriately in accordance with the laws and regulations of each country. Accordingly, working hours must not exceed the limits stipulated by local laws. In addition, the weekly working hours must not exceed 60 hours, including overtime, except in emergencies. All overtime must be voluntary.

In addition, workers must be allowed to take at least one day off in a seven-day period.

(2-4) Appropriate wages and allowances

Suppliers must comply with all laws and regulations applicable to compensation paid to workers (includes minimum wages, overtime pay, and allowances and wage deductions that are required by law).

Description

The term “minimum wage” refers to the statutory minimum wage stipulated by wage-related laws and regulations in the country in which the employer is located. Employers must pay a wage that is greater than or equal to the minimum wage.

(2-5) Prohibition of inhumane treatment

Suppliers must respect the human rights of workers and must not engage in inhumane treatment such as mental or physical abuse, coercion, or harassment, or other conduct which may lead to such treatment.

Description

Suppliers must not engage in any kind of inhumane treatment, including harassment or abuse. In addition, disciplinary policies and procedures that comply with these requirements must be formulated and distributed to workers.

(2-6) Prohibition of discrimination

Suppliers must not engage in discrimination or harassment. Suppliers must also give appropriate consideration to the needs of workers in relation to religious practices.

Description

Suppliers must not engage in conduct that could lead to discrimination based on race, skin color, age, sex, sexual orientation, gender identity or expression, ethnicity or nationality, disability, pregnancy, religion, political party affiliations or political views, union membership, military service experience, protected genetic information, marital status, or other such attributes with regard to wages, promotions, compensation, education, recruitment, or employment practices. In addition, suppliers must not force workers or recruitment candidates to undergo medical examinations or pregnancy tests that could be used in a discriminatory manner.

(2-7) Freedom of association and collective bargaining rights

Suppliers must respect workers’ right to organize as a means to bring about labor-management talks on working environment, wage levels, etc., in compliance with local laws and regulations.

Description

The right of workers to form and join trade unions must be respected. In addition, workers or their representatives must be able to engage in collective bargaining to communicate publicly with management about their opinions and concerns regarding working conditions and management practices, without fear of discrimination, retaliation, intimidation, or harassment.

(3) Safety and health

Suppliers must comply with relevant laws and regulations, pay attention to the ILO safety and health guidelines, work to minimize injuries and mental and physical illnesses associated with the work being performed by workers, and endeavor to create a safe and hygienic work environment.

(3-1) Occupational safety

Suppliers must identify and assess safety risks in work and ensure safety through appropriate design, technology, and management measures. In particular, reasonable consideration must be given to pregnant women and nursing mothers.

Description

Hazards in the workplace (including the possibility of occurrence) must be identified, and safety measures must be implemented for workers. In addition, reasonable accommodations must be made to protect pregnant women and nursing mothers from dangerous conditions.

(3-2) Preparation for emergency

Suppliers must prepare for emergencies such as disasters and accidents that threaten the safety of human life or bodily harm, identify the possibility of their occurrence, create action procedures for emergency response measures that minimize harm to workers and damage to assets, install necessary equipment, and provide education and training so that they can take action in the event of a disaster.

Description

Suppliers must ensure that emergency escape and evacuation routes are secured and that all workers can be evacuated.

(3-3) Occupational accidents and illnesses

Suppliers must identify, evaluate, record, and report the status of occupational accidents and illnesses, and implement appropriate responses and corrective measures.

Description

Occupational injuries and illnesses suffered by workers must be recorded, necessary treatment must be provided, and corrective measures must be implemented. This includes investigation of accidents, identification and elimination of causes, implementation of preventive measures, management, and reporting. In addition, rules and regulations must be formulated to encourage workers to return to work (after an accident, injury, or illness).

(3-4) Industrial hygiene

Suppliers must identify and assess the risk of workers' exposure to harmful biological, chemical, and physical influences in the workplace and manage them appropriately.

Description

Potential hazards must be eliminated and/or controlled through appropriate design, engineering, and operational management. If it is not possible to adequately control a hazard by such means, then workers must be provided with appropriate personal protective equipment

that is properly maintained and managed, and it must be used correctly.

(3-5) Consideration for physically demanding work

Suppliers must identify and evaluate physically demanding work tasks and manage them appropriately, to ensure that they do not cause occupational accidents or illnesses.

Description

Suppliers must identify and manage tasks that involve manual handling of raw materials, heavy labor such as manual heavy lifting, assembly work that requires brute force, repetitive and continuous work over extended periods of time such as data entry, and work that requires workers to remain in an unnatural posture for extended periods of time.

(3-6) Safety measures for machinery and equipment

Suppliers must evaluate machinery and equipment used by workers in their work for safety risks, and implement appropriate safety measures.

Description

Assessments of production machinery and other machinery must be carried out. If there is a risk of injury to workers due to machinery or equipment, precautions such as safety devices, protective barriers, interlocks must be installed, and appropriately maintained and managed.

(3-7) Facility safety and health

Suppliers must ensure appropriate safety and health in facilities provided for workers' living (dormitories, cafeterias, restrooms, etc.)

Description

Workers must be provided with clean toilet facilities, safe drinking water, and food prepared using hygienic facilities. In addition, dormitories must ensure adequate emergency exits in case of emergency. If dormitories are provided to workers, they must provide fire safety measures, emergency evacuation routes, safe storage facilities for personal belongings, sufficient room size, and adequate ventilation, temperature control, and lighting.

(3-8) Safety and health communication

Suppliers must provide appropriate safety and health information, education, and training on various occupational hazards that workers may encounter, in a language and manner that workers can understand. In addition, suppliers must establish a mechanism for receiving feedback from workers on safety-related opinions.

Description

Appropriate workplace safety and health information, education, and training must be provided for all identified workplace hazards to which workers will be exposed (including, but not limited to, mechanical, electrical, chemical, fire, and physical hazards). Safety and health information must be clearly posted inside the facility, or installed in a location that workers can identify and access, and must be provided in a language that workers can understand. Education and training must be provided to all workers before starting work, and regularly thereafter. Workers must also be encouraged to raise safety concerns from their own side.

(3-9) Worker health management

Suppliers must provide appropriate health management for all employees.

Description

At the very least, health checks must be conducted at the level required by applicable laws and regulations, to prevent and detect illnesses among employees at an early stage. Due consideration must also be given to preventing damage to health due to overwork and caring for mental health and wellbeing.

(4) Environment

Suppliers must work actively to address global environmental issues such as resource depletion, climate change, and environmental pollution, and also give consideration to local environmental issues with a view to ensuring the health and safety of people in the relevant communities.

(4-1) Environmental permits and reporting

Suppliers must obtain the necessary permits and approvals for their business, and must register and report in accordance with the laws and regulations of the country in which their business is located.

Description

Suppliers must obtain and keep all required environmental permits (e.g., monitoring of emissions), certifications, and registrations up to date, and comply with requirements for their operation and reporting, in accordance with applicable environmental laws and regulations.

(4-2) Reduction of energy consumption and greenhouse gas emissions

Suppliers must strive to improve energy efficiency and engage in continuous efforts to reduce energy consumption and greenhouse gas emissions.

Description

Suppliers must seek to improve energy efficiency by minimizing energy consumption and associated Scope 1 and Scope 2 greenhouse gas (GHG) emissions, which must be tracked and documented at the facility or site level.

(4-3) Emissions into the air

Suppliers must comply with relevant laws and regulations and implement appropriate measures to reduce emissions of harmful substances into the atmosphere.

Description

Volatile organic compounds (VOCs), aerosols, corrosive substances, particulates, ozone-depleting substances, and combustion byproducts generated during operations must be emitted only after analysis and monitoring of their contents prior to emission, and after necessary controls and treatments based on the results. In addition, the handling of emitted substances and the performance of the treatment system must be monitored on a regular basis.

(4-4) Water management

Suppliers must comply with laws and regulations, monitor the sources, use, and discharge of the water they use, and conserve water. All wastewater must be characterized, monitored, controlled, and treated as necessary before discharge or disposal. In addition, pollutants that can cause water pollution must be identified and managed appropriately.

Description

Water sources, use, and discharge must be monitored, and water management must be carried out to conserve water and control pollution pathways.

(4-5) Effective use of resources and management of waste

Suppliers must comply with laws and regulations, and promote and engage in reduction, reuse, and recycling to make effective use of resources and minimize generation of waste by implementing appropriate management.

Description

Efforts must be made to reduce waste output, and a systematic approach must be implemented to identify and manage waste and either dispose of or recycle it responsibly, even if no hazard has been identified for that particular type of waste. In addition, the disposal of substances must be performed in compliance with the laws and regulations in the country or region where the business is located, and measures must be taken to prevent wastage of natural resources by minimizing waste output.

(4-6) Management of chemical substances

Suppliers must comply with laws and regulations, identify, label, and manage chemicals and other substances that pose a hazard to humans and the environment, and ensure their safe handling, transportation, storage, use, recycling or reuse, and disposal.

Description

Substances used in manufacturing processes (including recycling or sorting for disposal) must be managed in accordance with applicable laws and regulations.

(4-7) Management of chemical substances contained in products

Suppliers must comply with all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of use of specific substances contained in their products.

Description

Substances contained in products must comply with the laws and regulations of the country to which the product is being shipped. Suppliers must also take responsibility for the components that are incorporated into final products, and upstream companies must provide the necessary information to downstream companies.

(5) Fair trade and ethics

Suppliers must not only comply with laws and regulations, but also conduct their business activities based on a high standard of ethics.

(5-1) Corruption prevention

Suppliers must not engage in bribery, corruption, extortion, or embezzlement, etc., of any kind.

Description

Suppliers must establish a policy that prohibits bribery, excessive gifts and entertainment, corruption, extortion, and embezzlement of any kind, and must continue to comply with it.

(5-2) Prohibition of giving or accepting inappropriate advantages

Suppliers must not offer or accept promises, offers, or permits as a means of obtaining bribes, or other wrongful or inappropriate profits or benefits.

Description

Suppliers must not give or receive—either directly or indirectly—anything of value, including any promises or offers, in order to gain business or obtain inappropriate profits or benefits. Policies and procedures must be clarified and monitored in order to comply with anti-corruption laws and regulations.

(5-3) Appropriate information disclosure

Suppliers must disclose information on labor, safety and health, environmental activities, business activities, organizational structure, financial status, and business performance in accordance with applicable laws, regulations, and industry practices. In addition, suppliers must not falsify records or disclose false information.

Description

Suppliers must proactively provide and disclose information to stakeholders. This information includes details of business activities, financial status, business performance, ESG (environmental, social, and governance) information, risk information (e.g., damage caused by large-scale disasters, occurrence of adverse environmental and social impacts, discovery of serious violations of laws and regulations), and information on the supply chain. Suppliers must not falsify records relating to disclosed information, make false representations, or disclose false information.

(5-4) Respecting intellectual property

Suppliers must respect intellectual property rights, and transfer technologies and know-how in a manner that insures the protection of intellectual property. Suppliers must also protect the intellectual property of third parties, such as customers and suppliers.

Description

In addition to intellectual property rights, trade secrets and technical know-how must not be used without permission.

(5-5) Conducting fair business

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

Description

Suppliers must comply with laws and regulations relating to fair trade, including acts

concerning fair competition and subcontracting, and must not engage in illegal activities such as cartel-type operations or other anti-competitive agreements, unfair trade practices, or misrepresentation. In addition, suppliers must work to eliminate forces that threaten the order and safety of civil society, and comply with laws, ordinances, and all other social norms.

(5-6) Whistleblower protection

Suppliers must protect the confidentiality of information relating to whistleblowing reports and the anonymity of whistleblowers, and eliminate the threat of retaliation against whistleblowers.

Description

The confidentiality of reports from suppliers and employees, etc. and the anonymity of whistleblowers must be ensured. Whistleblowers must be protected so that they will not receive disadvantageous treatment from companies or individuals due to whistleblowing.

(5-7) Responsible mineral procurement

Suppliers must conduct due diligence to ensure that minerals such as tantalum, tin, tungsten, and gold contained in the products they manufacture do not cause or contribute (by complicity) to serious human rights violations, environmental destruction, corruption, or conflicts, in conflict-affected or otherwise high-risk areas.

Description

Suppliers must formulate a responsible mineral procurement policy, communicate their expectations to their own suppliers (including them in contracts where possible), identify and assess supply chain risks, and formulate and implement strategies to address identified risks.

(5-8) Prohibition of abuse of superior bargaining position

Suppliers must not take advantage of a superior or dominant position to engage in any act that disadvantages their business partners.

Description

Suppliers must not take advantage of their position as a purchaser or outsourcer to act to cause an unfair disadvantage to their own suppliers, such as by unilaterally deciding or changing the terms of a transaction or making unreasonable demands. In addition, in countries and regions which have laws and regulations governing the abuse of a superior bargaining position, suppliers must comply with such laws and regulations. (e.g., the Act against Delay in Payment of Subcontract Proceeds, etc., to Subcontractors in Japan)

(6) Quality and safety

Suppliers must ensure the safety and quality of the products and services they provide and provide accurate information.

(6-1) Ensuring product safety

Suppliers must fulfill their responsibilities as suppliers by designing, manufacturing, and selling products that satisfy the safety standards stipulated by the laws and regulations of each country and ensure sufficient product safety.

Description

When designing a product, suppliers must design it to ensure sufficient product safety and consider their responsibility as a manufacturer to market the product. In addition to complying with laws and regulations regarding product safety, suppliers must also give consideration to safety that should normally be present.

(6-2) Quality control

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

Description

In addition to complying with all applicable laws and regulations regarding the quality of products and services, suppliers must also establish appropriate mechanisms and management systems to comply with their own quality standards and customer requirements.

(6-3) Providing accurate product and service information

Suppliers must provide accurate information about products and services that does not lead to misunderstandings.

Description

Suppliers must provide customers and consumers with accurate information about products and services that does not lead to misunderstandings. Suppliers must also not provide false or falsified information.

(7) Information security

Suppliers must prevent the leakage of confidential information and personal information and seek to strengthen information security.

(7-1) Defense against cyber attacks

Suppliers must take measures to guard against threats such as cyber attacks, and manage appropriately to prevent harm to themselves and others.

Description

Suppliers must work to prevent problems such as information leaks and falsification of data due to cyber attacks, or the suspension of operation of information systems.

(7-2) Protecting personal information

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

Description

The personal information of all suppliers, customers, consumers, and employees, etc., must be handled with care, in compliance with the relevant laws and regulations of each country. In addition, personal information must be collected, stored, modified, transferred, shared, or otherwise processed to the extent necessary to achieve the specified purpose of use.

(7-3) Preventing leakage of confidential information

Suppliers must appropriately manage and protect not only their own confidential information, but also confidential information received from customers and third parties.

Description

Suppliers must establish appropriate mechanisms and management systems to manage their own confidential information and confidential information received from third parties.

(8) Business continuity plan

Suppliers must be prepared to resume production activities as soon as possible in the event that a large-scale natural disaster or other disaster damages the supplier or its business partners, in order to fulfill their supply responsibilities.

(8-1) Formulating and preparing a business continuity plan

Suppliers must create a business continuity plan (BCP) that identifies and evaluates any risks that could adversely affect business continuity, examines their impact on their business, and describes proactive measures that need be taken in the medium to long term and the progress of the implementation of these measures.

Description

As a necessary precautionary measure, it is necessary to develop a local recovery strategy describing how to guard against risks, mitigate damage, and restore individual elements of production sites that are expected to incur damage and work to secure alternative means in anticipation that recovery from damage incurred takes longer than initially expected.

4-B Building a Management System

(1) Establishing a management system

Suppliers must establish a management system to achieve compliance with these guidelines.

Description

Attention must be given to the following points when establishing a management system to achieve each of the items in these guidelines.

- Does it comply with laws, regulations, and customer requirements relating to your business and products?
- Does it conform to the contents described in these guidelines?
- Have the risks relating to the contents described in these guidelines been identified and mitigated?
- Can you expect to see continuous improvement through these measures?

(2) Management of suppliers

Suppliers must communicate the requirements of Section 4-A (Code of Conduct) of these guidelines to their suppliers, and establish a process to monitor their compliance with the code.

Description

Suppliers must communicate the requirements of these guidelines to their own suppliers,

monitor compliance, and encourage improvements.

(3) Proper control of imports and exports

Suppliers must develop a clear control system for the import/export of technology and goods regulated by laws and regulations, and implement appropriate import/export procedures.

Description

Suppliers must understand and comply with various laws and regulations relating to imports and exports. The phrase “technology and goods regulated by laws and regulations” means parts, products, technologies, equipment, or software, etc., the import and export of which are subject to laws and regulations based on international agreements, etc. In addition, procedures such as obtaining permission from regulatory authorities may be required for imports and exports.

(4) Establishment of grievance mechanism

Suppliers must establish a grievance mechanism for use by stakeholders, including workers and suppliers, to prevent wrongful or fraudulent conduct in their own company and their supply chain.

Description

In order to comply with these guidelines, in addition to due diligence, suppliers must establish a grievance mechanism for use by stakeholders, including workers and suppliers, to enable handling of issues as an ongoing process.

(5) Disclosure of the status of initiatives

Suppliers must disclose information in accordance with these guidelines and relevant laws and regulations.

Description

In addition to disclosing information as required by laws and regulations, suppliers must also disclose information to stakeholders, including customers, regarding their efforts to comply with these guidelines.

5. Suppliers Hotline

About the Suppliers Hotline

Mitsui High-tec has established the Mitsui High-tec Group Code of Conduct, and promotes compliance throughout the Group. As part of these efforts, we have established a compliance consultation and declaration desk (name: "Suppliers Hotline") to receive consultations from suppliers.

Suppliers are requested to report any act in which a Group employee, etc., has violated (or may have violated) any laws, regulations, or the Group's Basic Procurement Policy or Code of Conduct, etc., in procurement transactions with the Company to the Suppliers Hotline.

Protection of privacy

Information reported by suppliers will be handled with due consideration for the privacy of whistleblowers.

Personal information provided in reports will be used by the Group for the purpose of investigating and responding to reports, and reporting the results. When using personal information beyond the scope necessary to achieve these purposes, we will obtain the consent of the individual in question each time, except as permitted by laws and regulations.

For more information on the handling of personal information, please refer to our personal information protection policy ("Privacy Policy").

Disadvantageous treatment

The Company will not treat whistleblowers or suppliers disadvantageously because of a report. However, this does not apply to reports made for the purpose of obtaining an unfair advantage, causing damage to others, or other wrongful or fraudulent purposes.

Reporting methods

As a general rule, please use your real name when making a report. Anonymous reports are also welcome, but please be aware that there may be limitations to our ability to investigate to confirm the facts, and appropriate corrective action may not be taken.

[Contact Information] Suppliers Hotline

E-mail: procurement-5@mitsui-high-tec.com

<Information to include>

Whistleblower information: - Company name - Name - Department / affiliation
- Telephone number

Report details: - Company name of person being reported
- Name of person being reported
- Department name of person being reported
- Date of occurrence - Place of occurrence - Details of incident