

啓基科技供應商行為準則

本準則內容依循 RBA 行為準則 8.0 版的五大部分組成，包括勞工、健康與安全、環境、道德規範與管理體系。

A. 勞工

供應商應根據國際社會公認的準則，承諾維護勞工的人權，並尊重他們。這適用於所有勞工，包括臨時工、移民工、學生、合約勞工、直接僱員以及任何其他類型的勞工。

勞工標準：

1. 禁止強迫勞動

不允許任何形式的強迫勞動，包括但不限於擔保（包括抵債）或用合約束縛的勞工、非自願或剝削性監獄勞工、奴役或販賣的人口。這包括為了得到勞工或服務而使用恐嚇、強迫、威脅、綁架或詐騙手段運送、窩藏、招募、調配或接收勞工。除了禁止對勞工出入工作場所作出不合理限制外，也不應無理地約束勞工在工作場所內的行動自由，適用時包括勞工宿舍或生活住所。作為招聘程序中的必要部份，必須為所有勞工提供用他們母語書寫或員工可以理解的語言的僱傭協議，並且在協議中描述僱傭條款及條件。必須在海外移民勞工離開原本的國家前，為其提供僱傭協議，而在其抵達接收國家後，該僱傭協議不得有任何替換或更改，除非有關更改是為了符合當地法律的要求和提供相同或更佳條款而作出則例外。所有工作應當是自願的，勞工擁有隨時自由離職的權利，且如果勞工按照勞工協議給予合理的通知，則有權終止僱傭關係而不受懲罰，並應在員工合約中明確規定，供應商應依據當地法令規定年限保存所有離職員工的文件，如無相關規定，則至少需保存兩年。僱主、中介人及二級中介人不得扣留或以其他方式毀壞、隱藏、沒收僱員的身份證或出入境證件，如政府頒發的身份證明、護照或工作許可證。僱主只能在法律有要求的情況下才可扣留文件。就算是在此情況下，任何時候也不可拒絕勞工取用其文件。不得要求勞工繳付僱主的中介人或二級中介人的招聘費用或其他與其聘用相關的費用。如發現勞工繳付了任何該等費用，該等費用須退還予相關勞工。公司將遵循臨時性、輔助性及可替代性的原則使用勞務派遣員工，並將按照法律法規的要求逐年遞減其比例直至符合當地法規要求。

2. 未成年員工

不得在任何製造工序中使用童工。「童工」指僱傭任何未滿15歲、或未達強迫教育年齡、或該國家/地區最低就業年齡的人士（三項中取其指定年齡最大的一項）。符合所有法律與法規的合法職場學習計劃則不在此限。未滿18歲的勞工（未成年員工）不得從事可能會危及其健康或安全的工作，包括夜班或加班。公司應適當地保管學生記錄、嚴格審核教育合作夥伴、和按照適用的法律與法規保障學生的權利，從而確保對學生勞工的管理得當。供應商應採取適當的機制核實勞工的年齡。符合所有法例與法規的合法職場學習計劃則不在此列。供應商應提供適當的支援和培訓予所有學生勞工。如果沒有當地法律規管，學生勞工、實習生和學徒的薪資水平應最少與從事相同或相似工作的其他入門級員工相等。如果發現僱用童工，供應商應提供協助／補救措施。

3. 工時

根據有關的商業實踐研究，生產力降低、職員流動率上升以及受傷和患病情況的增多與勞工的疲勞度有顯著的關連。因此，工作時數不應超過當地法律規定的最大限度。此外，每週的工作時數不應超過60小時（包括加班），緊急或特殊情況除外。任何加班必須是自願的。每七天應當允許勞工至少休息一天。

4. 工資與福利

支付給勞工的工資應當符合所有相關的薪酬法律，包括有關最低工資、加班和法定福利的法律。所有員工應當按照工作內容和資格獲得平等的薪酬。根據當地法律的規例，勞工的加班工資應高於常規時薪水平或標準工資的125%，以較嚴格的標準支付。禁止以扣除工資作為紀律處分的手段。在每個支薪週期，應及時為勞工提供簡明的工資單據，內含充足的資料證實支付給勞工的薪酬準確無誤。必須按照當地法律聘用臨時工、派遣員和外派員工。

5. 反歧視/反騷擾/人道待遇

供應商應承諾提供一個無騷擾以及無非法歧視的工作場所。避免苛刻和非人道地對待員工，包括暴力、性暴力、性騷擾、性侵犯、體罰、心理或生理壓迫、欺凌、公開羞辱或口頭辱罵；也不得以威脅進行任何類似行為。供應商不得因人種、膚色、年齡、性別、性傾向、性別認同及表現、種族或民族、殘疾、懷孕、信仰、政治立場、團體背景、退伍軍人身份、受保護的基因資料或婚姻狀況等在招聘及實際工作中歧視或騷擾員工，如因此而影響工資、

晉升、獎勵和受訓機會等。有關的紀律政策及程序必須有清晰的定義，並向員工清楚地傳達。應為員工提供適當的場所進行宗教活動和殘疾便利設施。此外，不得讓員工或準員工接受帶有歧視性的醫學檢查（包括驗孕或處女檢驗）或身體檢查。

6. 結社自由和集體談判

員工與管理層之間的開放式溝通和直接參與，是解決工作場所和薪酬問題最有效的方法。員工和／或他們的代表應當能夠在不用擔心歧視、報復、威脅或騷擾的情況下，公開地就工作條件和管理方法與管理層溝通以及分享其想法和憂慮。根據這些原則，供應商應當尊重所有員工組織和參與他們所選擇的工會、集體談判和參加和平集會的權利，同時也應尊重員工迴避這類活動的權利。如果集結自由和集體談判的權利受到適用法律法規的限制，員工應被允許選擇並加入其它合法形式的員工代表組織。

B. 健康與安全

供應商應瞭解，除了儘量減少與工作有關的事故和疾病外，提供員工安全、健康的工作環境，也有助於提高產品和服務的品質、生產的永續性以及員工的留任意願和士氣。此外，持續對員工的投入與教育訓練，是辨識和解決工作場所健康與安全問題的關鍵，同時致力於維護ISO 14001及ISO 45001之管理體系，並遵從ILO職業安全與健康指南的相關規範。

安全與健康標準：

1. 職業健康與安全

供應商應透過管控層級識別，包括消除危害、替代流程或材料，以妥當設計加以管控、實行工程和行政管制、防護性保養和安全操作程序（包括上鎖掛牌程序）和持續性的安全知識培訓等，識別和評估並減輕工作場的健康及安全隱患（如化學、電力和其他能源、火災、運載工具和跌倒危險或事故），以免危及員工。若無法透過上述方法有效控制危險源，應為員工提供適當的、保養良好的個人防護裝備（PPE）以及有關這些危險事故和相關風險的教材。應採取對性別回應的措施，例如不讓孕婦和哺乳中的母親處於可能對他們或其孩子有害的工作條件，並為哺乳中的母親提供合理的場所。

2. 應急準備

應確認和評估潛在的緊急情況和事件，並通過實施應急方案和應變程序來將其影響降到最低，包括：緊急報告、員工通告和疏散程序、員工培訓和演習、適當的火警偵測和滅火設備、暢通無阻的出口、充足的疏散設施、應急人員的聯絡資料和恢復計劃。應急演習必須最少每年進行一次，或按當地法律要求進行，取較嚴格者。應急方案和應變程序應著重盡量減低對生命、環境和財產的危害。供應商應保證消防安全響應設備（包括滅火設備）和應急準備必需的所有許可證、執照和檢查/測試報告均已齊備，並且實施一個流程，以確保及時更新執照和許可證。供應商應確保煙霧報警器、滅火裝置、逃生指示標誌、逃生通道及逃生門及緊急情況報告流程的有效性，以盡可能減少對人身、環境和財產的危害。供應商應為緊急事件應對人員配備合適及充足的PPE。供應商應制定災後恢復計畫。

3. 工傷和職業病

供應商應當制定程序和體系來預防、管理、追蹤和報告工傷和職業病，包括以下規定：(a)鼓勵員工報告；(b)歸類和記錄工傷和職業病案例；(c)提供必要的治療；(d)調查案例並執行矯正措施以杜絕其根源；(e)協助員工返回工作崗位。供應商應允許員工遠離即將發生的傷害，且在情況緩解前不得返回，而不必擔心遭受報復。

4. 工業衛生

供應商應當根據管控層級識別、評估並控制因接觸化學、生物以及物理作用劑給員工帶來的影響。如果無法充分控制危害時，應當免費為員工提供和使用適當、妥善維護的個人防護裝備。供應商應提供員工安全健康的工作環境，且應透過對員工健康和工作環境的持續、系統性監控來維護。供應商應提供職業健康監測，以定期評估員工的健康是否因職業暴露而受到傷害。防護職業健康計劃須持續並包括有關暴露於工作場所危險相關風險的教材。

5. 體力勞動工作

供應商應當鑑別、評估並控制從事體力勞動工作給員工帶來的影響，包括人力搬運物料或重複提舉重物、長時間站立和高度重複或高強度的組裝工作。

6. 機器防護

供應商應當評估生產設備和其他類型機器的安全隱患。為預防機器對員工可能造成的傷害，應當提供和正確地維護物理防護裝置、連鎖裝置以及屏障。

7. 公共衛生和食宿

供應商應當為員工提供乾淨的洗手間設施、清潔的飲用水、以及衛生的煮食

用具、食物儲存設施和餐具。供應商或勞工中介人提供的員工宿舍應當保持乾淨、安全，並提供適當的緊急出口、洗浴熱水、充足的照明供暖和通風設備、獨立安全的場所以供儲存個人和貴重物品以及適當且出入方便的私人空間。

8. 健康與安全溝通

供應商應當為員工提供以其使用的語言或其能夠理解的語言進行的適當職業健康和 safety 資料和訓練，以識別員工面對的所有工作場所危險情況，包括但不限於機械、電力、化學、火災和物理危害。在工作場所的顯眼處張貼健康與安全相關資料，或將有關資料放在員工可識別和易於接觸的位置。健康資料和培訓應包括有關相關人口統計學的特定風險內容，例如性別和年齡（如適用）。在開始工作前及之後定期提供訓練予所有員工。應鼓勵員工提出任何健康和 safety 方面的疑慮，確保他們不會受到報復。

C. 環境

供應商承認環境保護責任是生產世界一流產品不可或缺的一部份。供應商應查明其製造作業過程對環境的衝擊，並盡量減少該過程對社區、環境和自然資源造成的不良影響，同時保障公眾的健康和 safety。

環境標準：

1. 環境許可和報告

應獲取所有必需的環境許可證（如排放監控）、批准和登記文件，亦要對之進行維護並時常更新，以及遵守許可證的操作和報告要求。

2. 預防污染和節約保護

應在源頭上或透過實踐（如增設污染控制設備；改良生產、維修和設施程序；或其他方法）盡量減少或杜絕排出和排放污染物以及產生廢物。應節約或實踐（如改良生產、維修和設施程序、替換材料、再用、節約、回收或其他方法）節約自然資源（包括水、化石燃料、礦物和原始森林產品）的消耗。

3. 有害物質

應當識別、標籤和管理對人類或環境造成危害的化學品、廢物及其他物質，

從而確保這些物質得以安全地處理、運送、儲存、使用、回收或再用及棄置。應加以追蹤與記錄危險廢棄物數據。

險廢棄物數據。

4. 固體廢物

供應商應實施系統性的措施來識別、管理、減少和負責任地棄置或回收固體廢物（無害的）。應加以追蹤與記錄危險廢棄物數據。

5. 廢氣排放

在排放營運過程中產生的揮發性有機化學物質、氣霧劑、腐蝕性物質、微粒、耗蝕臭氧層的物質以及燃燒副產品前，應當按照要求對其歸納特徵、例行監察、控制和處理。應依照《蒙特婁議定書》和適用的法規來有效管理耗損臭氧層的物質。供應商也應當對廢氣排放管制系統的性能進行例行監察。

6. 材料限制

供應商應當遵守所有適用法律法規和客戶要求，禁止或限制在產品和製造過程中納入特定物質（包括回收和棄置標籤）。

7. 水資源管理

供應商應當實施水管理計劃，以記錄、分類和監測水資源、使用和排放；尋求機會節約用水；以及控制污染管道。所有污水在排放或棄置前，應當按照要求對其進行分類、監察、控制和處理。供應商應當對污水處理和控制系統的性能進行例行監察，以確保達致最佳性能和符合監管規例。

8. 能源消耗和溫室氣體排放

供應商須訂立公司級別的溫室氣體減排目標並作出報告。能源消耗及所有與範疇1、範疇2以及範圍3相關的溫室氣體排放，應追蹤、記錄及公開報告，以達到溫室氣體減排的目標。供應商應當找到方法來改善能源利用效率並盡量減少能源消耗和溫室氣體排放。

D. 道德規範

為履行社會責任並在市場上取得成功，供應商及其代理商必須謹守最高的道德標準，包括：

1. 誠信經營

在所有商業互動關係中都應謹守最高的誠信標準。供應商對於任何形式的賄賂、貪污、敲詐勒索和挪用公款採取零容忍政策來禁止。

2. 無不正當收益

不得承諾、提供、批准、給予或收受賄賂或其他形式的不正當收益。此禁令包括承諾、提供、批准、給予或收受任何有價之物（無論是直接還是透過第三方間接地進行），以期獲得或保留業務、將業務轉讓他人或獲取不正當收益。應推行監控、記錄留存以及強制執行程序以確保符合反腐敗法律的要求。

3. 資訊公開

所有的業務來往應具透明度，並準確地記錄在供應商的賬簿和商業記錄上。應當按照適用法規和普遍的行業慣例公開有關參與勞工、健康與安全、環保活動、商業活動、組織架構、財務狀況和業績的資料。不得偽造記錄或虛報供應鏈的狀況或慣例。

4. 知識產權

應當尊重知識產權；須以保護知識產權的方法傳遞技術和生產知識；並必須保護客戶和供應商的資料。

5. 公平交易、廣告和競爭

供應商應謹守公平交易、廣告和競爭標準，並以簽署NDA（Non-Disclosure Agreement）作為保護客戶資訊的措施。

6. 身份保護及防止報復

除非受法律禁止，供應商應當制定程序來保護供應商和員工檢舉者，並確保其身份的機密性和匿名性。供應商應制定溝通程序，讓員工可以表達他們的疑慮，而不用害怕遭到報復。

7. 負責任地採購礦物

供應商應就其製造的產品成份中鉬、錫、鎢、金及鈷的來源及供應鏈，依據美國衝突礦產法案(Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act) 及歐盟衝突礦產法規(Regulation(EU) 2017/821)所規範的礦產對象進行合理的盡職調查，並盡力確保與經濟合作暨發展組織（Organisation for Economic Cooperation and Development, OECD）對出自衝突影響及高風險區域之礦石實施負責任供應鏈的指引，或同等及認可的盡職調查框架一致。

8. 隱私

供應商承諾合理地保護任何與其有業務來往者（包括供應商、客戶、消費者與員工）的個人資料和隱私。供應商應當在收集、儲存、處理、傳播和分享個人資料時遵守隱私和資料安全法律及監管要求。

E. 管理體系

供應商應採用或建立一個其範疇與本準則內容相關的管理體系。管理體系的設計應確保：（a）符合與供應商營運和產品相關的適用法律、法規及客戶要求；（b）符合本準則；以及（c）識別並減輕與本準則有關的經營風險。管理體系也應當推動持續改進。

該管理體系應包含以下要素：

1. 公司承諾

供應商應建立人權、健康和 safety、環境和道德政策聲明，確認供應商承諾執行管理層認可的盡職調查和持續改善。政策聲明應公開，並透過無阻礙管道以員工能理解的語言傳達給員工。

2. 管理職責與責任

供應商應明確指定高階主管以及公司代表來負責保證管理體系和相關計劃的實施。高階管理層應定期檢查管理體系運作情況。

3. 法律和客戶要求

制定程序識別、監察並理解適用的法律法規和客戶要求（包括RBA行為準則的要求）。

4. 風險評估和風險管理

供應商應採用或建立流程，以識別和供應商經營有關的法規遵循、環境、健康與安全以及勞工活動與道德風險，包括與供應商的營運相關的嚴重人權和環境影響的風險。供應商應評定每項風險的級別，實施適當的程序和實質控制，以確保合法性並對已識別出來的風險實施控制。

5. 改進目標

供應商應制定書面績效目標、指標和實施計劃以提高供應商的社會、環境、

健康及安全績效，包括為達成這些目標所取得的成效進行定期審核。

6. 培訓

應為管理層及員工制定培訓計劃，從而實施供應商的政策、程序及改進目標，同時滿足適用之法律與法規的要求。

7. 溝通

制定程序將供應商的政策、實踐、預期和績效清晰準確地傳達給員工、供應商和客戶。

8. 員工/利害關係人的參與和補救措施

供應商應建立與員工、員工代表以及其他相關或必要的利害關係人進行持續雙向溝通的流程。該流程應旨在取得有關本準則涵蓋之營運實務與條件意見，並促進持續改善。必須為員工提供一個安全的環境，讓其安心地提出申訴和意見而不必擔心受到報復。

9. 審核與評估

供應商應定期進行自我評估，從而確保符合法律與法規的要求、RBA行為準則內容以及客戶合約中社會與環境責任的相關要求。

10. 糾正措施

供應商應制定程序以確保能及時糾正在內外部的評估、檢查、調查和審核中所發現的不足之處。

11. 文件和記錄

供應商應建立並保存文件和記錄，從而確保符合監管規例與公司的要求，同時應保障隱私的機密性。

12. 供應商的責任

供應商應制定程序來將RBA行為準則的要求傳達給供應商，並監管供應商對此準則的遵行情況。

參考資料

在起草RBA行為準則的過程中使用了以下標準，這些標準可用作有用的額外資訊來源。在每個供應商可以支持或不支持以下標準。

- 責任商業聯盟（RBA）行為準則 8.0
https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf
- 多德-弗蘭克華爾街改革和消費者保護法
www.sec.gov/about/laws/wallstreetreform-cpa.pdf
- 生態管理與審核體系
ec.europa.eu/environment/emas/index_en.htm
- 道德貿易倡議
<https://www.ethicaltrade.org/>
- 國際勞工組織（ILO）安全與健康施行準則
www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf
- 國際勞工組織（ILO）國際勞工標準
www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm
- ISO 14001
www.iso.org
- 美國消防協會
www.nfpa.org
- 經濟合作暨發展組織關於來自受衝突影響和高風險區域之礦石的負責任供應鏈盡職調查指南
<https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>
- 經濟合作暨發展組織跨國企業指南
www.oecd.org/investment/mne/1903291.pdf
- 世界人權宣言
<https://www.un.org/en/universal-declaration-human-rights/>
- 聯合國兒童權利公約
<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

- 聯合國反腐敗公約
www.unodc.org/unodc/en/treaties/CAC/
- 聯合國消除歧視婦女公約
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx>
- 聯合國全球契約
www.unglobalcompact.org
- 美國聯邦採購法規
www.acquisition.gov/far/
- SA 8000
<https://sa-intl.org/programs/sa8000/>
- 社會責任國際組織（SAI）
www.sa-intl.org

WNC Supplier Code of Conduct

This Code of Conduct is divided into five sections and outlines standards for labor, health and safety, the environment, ethics and management systems corresponding to the five sections and elements of the RBA Code of Conduct Version 8.0.

A. LABOR

Suppliers are committed to upholding the human rights of workers and to treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are:

1. Prohibition of Forced Labor

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in facilities in addition to unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, worker dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a language they can understand, that contains a description of the terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to their departing from their country of origin and there shall be no substitution or change(s) allowed to the employment agreement upon arrival in the receiving country unless these changes are made to meet local laws and to provide equal or better terms and conditions of employment. All work must be voluntarily undertaken, and workers shall be free to resign their position at any time or to terminate their employment without penalty if reasonable notice is given as per the worker's contract. Suppliers are to maintain documentation on all leaving workers in accordance with local laws, or if there is none then for a minimum of two years. Employers, agents and sub-agents' may not hold or

otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker. Suppliers shall only employ temporary workers from employment agencies for temporary and/or exchangeable tasks or supporting roles and shall gradually lower the percentage of temporary workers to meet local regulations.

2. Young Workers

Child labor 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 jeopardize their health or safety, including night shifts and overtime. Suppliers 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 laws and regulations. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, shall be supported. Suppliers 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. If hiring of child labor is identified, assistance/remediation shall be provided.

3. Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours 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. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.

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. All workers shall receive equal pay for equal work and qualifications. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates, or at 125% of their standard salary, whichever is greater. Deductions from wages as disciplinary measures 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 labor will be within the limits of the local law.

5. Non-Discrimination/Non-Harassment/Humane Treatment

Suppliers are committed to providing a workplace free of harassment and unlawful discrimination. There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Suppliers shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements at suppliers shall be clearly defined and communicated to employees. Workers shall be provided with reasonable sites for religious practices and reasonable facilities for disabilities. In addition, workers or potential workers shall not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

6. Freedom of Association and Collective Bargaining

Open communication and direct engagement between workers and management is the most effective way to resolve workplace and compensation issues. 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. In accordance with these principles, suppliers shall respect the rights 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. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representation.

B. HEALTH and SAFETY

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. Management structures such as ISO 45001 and ILO Guidelines on Occupational Safety and Health should be followed. Suppliers are therefore committed to the following health and safety standards as a matter of policy:

The health and safety standards are:

1. Occupational Health and Safety

Potential for exposure of workers to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified and assessed by suppliers, then mitigated by using a hierarchy of controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not allowing pregnant women and nursing mothers to work in conditions which could be hazardous to them or their child and to provide reasonable facilities for nursing mothers.

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, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Such plans and procedures shall focus on minimizing harm to life, the environment and property. Suppliers shall ensure that all certificates, licenses, and inspection/test reports for fire-response equipment (including fire-fighting equipment) and emergency needs have been acquired and shall implement a process to ensure all certifications and licenses are renewed in a timely manner. Ensure all smoke detectors, fire-fighting equipment, evacuation indications, evacuation routes, emergency exits, and emergency reporting processes are all effective to minimize hazards to members, the environment, and properties. Proper and adequate personal protective equipment (PPE) for emergency events shall be prepared for all employees. A post-disaster recovery plan shall be established.

3. Occupational Injury and Illness

Suppliers' workplace procedures and systems are to be in place to prevent, manage, track, and report occupational injury and illness including provisions to: (a) encourage worker reporting, (b) classify and record injuries and illness, (c) provide necessary medical treatment, (d) investigate cases and implement corrective actions to eliminate their causes, and (e) facilitate the return of workers to work. Suppliers shall allow workers to remove themselves from imminent harm, and not need to return until the situation is resolved, without fear of retaliation.

4. Industrial Hygiene

Suppliers shall identify, evaluate and control worker exposure to chemical, biological and physical agents according to the hierarchy of controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Suppliers shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and their working environment. Suppliers shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposure. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

5. Physically Demanding Work

Suppliers should identify, assess, and control 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.

6. Machine Safeguarding

Suppliers should evaluate production and other machinery for potential safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

7. Sanitation, Food, and Housing

Suppliers should provide workers with ready access to clean toilet facilities and potable water as well as sanitary food preparation, storage, and eating facilities. Worker dormitories provided by suppliers or a labor agents are to be maintained clean and safe and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8. Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the workers can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in sites or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without fear of retaliation.

C. ENVIRONMENTAL

Suppliers recognize that environmental responsibility is integral to producing world-class products. Suppliers shall identify the environmental impacts and minimize adverse

effects on the community, environment and natural resources within their manufacturing operations, while safeguarding the health and safety of the public.

The environmental standards are:

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.

2. Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved or by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

3. Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Hazardous waste data shall be tracked and documented.

4. Solid Waste

Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.

5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations.

Supplier shall conduct routine monitoring of the performance of air emission control systems.

6. Materials Restrictions

Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

7. Water Management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8. Energy Consumption and Greenhouse Gas Emissions

Suppliers shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2 and significant categories of Scope 3 greenhouse gas emissions are to be tracked, documented, and publicly reported. Suppliers are to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, suppliers and their agents shall uphold the highest ethical standards including:

1. Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

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 third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

3. Disclosure of Information

All business dealings should be transparently performed and accurately reflected on the Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance 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.

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 and supplier information shall be safeguarded.

5. Fair Business, Advertising and Competition

Suppliers are committed to upholding standards of fair business, advertising, and competition and take steps through the use of NDAs (Non-Disclosure Agreements) to safeguard customer information.

6. Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be developed by suppliers, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

7. Responsible Sourcing of Minerals

Suppliers shall adopt policies and exercise reasonable due diligence in the source and supply chain of tantalum, tin, tungsten, gold, and cobalt materials which fall under Section 1502 of the Dodd-Frank Wall Street Reform and the Consumer Protection Act and Regulation (EU) 2017/821 and make every effort to ensure the source of minerals in a way consistent with the Organisation for Economic Co-

operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

8. Privacy

Suppliers are committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

E. MANAGEMENT SYSTEMS

Suppliers shall adopt or establish a management system with a scope that 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 Supplier'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:

1. Company Commitment

Suppliers shall establish human rights, health and safety, environmental and ethics policy statements affirming Supplier's commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and

communicated to workers in a language they understand via accessible channels.

2. Management Accountability and Responsibility

Suppliers shall clearly identify 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.

3. Legal and Customer Requirements

Establish a process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of the RBA Code of Conduct.

4. Risk Assessment and Risk Management

Suppliers shall adopt or establish a process to identify the legal compliance, environmental, health and safety and labor practices and ethical risks associated with suppliers' operations, including the risk of severe human rights and environmental impacts associated with suppliers' operations. Suppliers shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5. Improvement Objectives

Suppliers shall formulate written performance objectives, targets and implementation plans to improve the its social, environmental, and health and safety performance, including a periodic assessment of its performance in achieving those objectives.

6. Training

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

7. Communication

A process shall be established for communicating clear and accurate information concerning Supplier's policies, practices, expectations and performance to workers, suppliers and customers.

8. Worker Feedback, Participation and Grievance

Suppliers shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code and to foster continuous improvement. Workers must be assured of a safe environment to provide grievance and feedback without fear of reprisals or retaliation.

9. Audits and Assessments

Suppliers shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the RBA Code of Conduct, and customer contractual requirements related to social and environmental responsibility.

10. Corrective Action Process

Suppliers shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11. Documentation and Records

Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

12. Supplier Responsibility

Suppliers shall establish a process to communicate the RBA Code of Conduct requirements to suppliers and to monitor supplier compliance to the Code.

Reference

The following standards were used in preparing the RBA Code of Conduct and may be useful sources of additional information. The following standards may or may not be endorsed by each supplier.

- RBA Code of Conduct (Version 8.0)
https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf
- Dodd-Frank Wall Street Reform and Consumer Protection Act
www.sec.gov/about/laws/wallstreetreform-cpa.pdf
- Eco Management & Audit System
ec.europa.eu/environment/emas/index_en.htm
- Ethical Trading Initiative
<https://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 Labor Standards
www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm
- ISO 14001
www.iso.org
- National Fire Protection Association
www.nfpa.org
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High Risk Areas
<https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>
- OECD Guidelines for Multinational Enterprises
www.oecd.org/investment/mne/1903291.pdf
- Universal Declaration of Human Rights
<https://www.un.org/en/universal-declaration-human-rights/>
- United Nations Convention on the Rights of the Child
<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

- United Nations Convention Against Corruption
www.unodc.org/unodc/en/treaties/CAC/
- United Nations Convention on the Elimination of All Forms of Discrimination Against Women
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx>
- United Nations Global Compact
www.unglobalcompact.org
- United States Federal Acquisition Regulation
www.acquisition.gov/far/
- SA 8000
<https://sa-intl.org/programs/sa8000/>
- Social Accountability International (SAI)
www.sa-intl.org