Hagiwara Electric Group Supplier Sustainability Guidelines

Established: April 1, 2024

I. Introduction

To become a company trusted by all stakeholders, the Hagiwara Electric Group created the Hagiwara

Electric Group Corporate Code of Behavior in December 2005 and has been working on it. At the

same time, the Hagiwara Electric Group Corporate Code of Conduct was also created and put into

practice as standards of conduct that can be implemented in business activities.

The Code of Conduct also shows the relationship with suppliers, and as a concrete embodiment of this,

the Hagiwara Electric Group Supplier CSR Guidelines were issued in September 2010.

In recent years, expectations and attention have been focused on corporate initiatives to improve

sustainability, and companies are increasingly required to adapt to society. In addition, with

globalization and information sophistication, environmental issues and human rights issues are

becoming more serious, and efforts to realize a sustainable society are becoming more important.

While the essential aspects of what we should be doing will not change, we have decided to change

the name of the CSR Guidelines to the "Sustainability Guidelines" and revise some of them in order

to more clearly express to society our views that we have been working on together with our suppliers.

Suppliers are encouraged to understand the purpose of these Guidelines and to implement them within

their own companies, as well as to request that their suppliers develop and implement the purpose of

these Guidelines.

April 2024

Hagiwara Electric Holdings Co., Ltd.

Representative Director, President Executive Officer

Moritaka Kimura

II. Hagiwara Electric Group Basic Procurement Policy

- We conducts fair and equitable procurement activities to all suppliers.
- We aim to build stronger relationships of trust through mutual development with suppliers through transactions.
- · We promote environmentally conscious green procurement.
- We build a supply chain that comprehensively takes into account our attitude and structure for QCD (quality, cost, and delivery).
- · We strictly observe laws and regulations and maintain confidentiality.
- · We promote sustainability initiatives throughout the entire supply chain.

III. Supplier Sustainability Guidelines

1. Human Rights and Labor

- (1) Respect for Fundamental Human Rights
 - Respect the human rights of employees and do not tolerate any form of harassment in the workplace on the grounds of race, ethnicity, national origin, religion, age, or gender, etc.
- (2) Prohibition of Discrimination
 - There will be no discrimination on any grounds, including race, ethnicity, nationality, region
 of origin, religion, gender, etc. in any employment situation (application, hiring, promotion,
 wages, right to education, benefits, dismissal, termination, assignment of duties, punishments,
 etc.).
 - Position diversity and inclusion as one of the important management foundations and promote initiatives.

(3) Prohibition of Child Labor

- Children who are under the age of 15, those who have not completed compulsory education, and those who are under the minimum age of employment under the applicable laws and regulations of each country or region, are not allowed to work.
- We do not allow employees under the age of 18 to engage in hazardous work.
- Vocational training and apprenticeships shall be permitted only to the extent permitted by applicable laws and regulations in each country and region.

(4) Prohibition of Forced Labor

- We do not tolerate any forms of forced labor involving violence, threats, debt bondage, or any other coercive means, as well as any form of modern slavery including human trafficking.
- · Ensure that all labor is voluntary and that employees are free to leave their jobs, and do not

engage in forced labor.

- We do not require employees to hand over their passports, official identity cards or work permits as a condition of employment. Employees must be legally employed.
- We do not require employees to bear costs that are deemed unreasonable under international norms, such as recruitment fees.

(5) Appropriate Wages

- Comply with laws and regulations in each country and region regarding minimum wages, overtime work, wage deduction, piecework wages, and other benefits.
- Provide legally required benefits.
- Wages, other benefits, welfare provisions, and deductions shall be clearly and promptly communicated to employees in accordance with applicable national laws and regulations.

(6) Working Hours

- Appropriately manage the working hours, holidays, and vacations of employees and comply
 with applicable laws and regulations in each country so as not to exceed legal limits.
- (7) Freedom of Association, Dialogue and Consultation with Employees
 - Employees are granted the right to freely associate or not to associate in accordance with the applicable laws and regulations of the countries in which they operate.
 - Ensure the right of employees to communicate openly and directly to management without fear of retaliation, intimidation or harassment.

(8) Human Resource Development

 Support the career development and skill development of employees through human resource development.

2. Health and Safety

(1) Occupational Safety

 Identify and assess risks to occupational safety, and ensure safety through appropriate design, technology, and management measures.

(2) Emergency Preparedness

• To prepare for emergencies such as disasters and accidents that impair the safety of human life and body, we will identify potential risks, prepare action procedures for emergency response that minimize the damage to workers and assets, install necessary equipment, etc., and provide education and training so that the action can be taken in the event of a disaster.

(3) Occupational Accidents and Diseases

 Identify, assess, record and report the situation of occupational accidents and diseases, and take appropriate measures and corrective measures.

(4) Industrial Hygiene

- Identify and assess the risks of workers' exposure to harmful biological, chemical and physical effects in the workplace and manage them appropriately.
- (5) Consideration for Physically Demanding Work
 - Identify and assess physically demanding work and manage it appropriately to prevent occupational accidents or diseases.
- (6) Safety Measures for Machinery and Equipment
 - The machinery and equipment used by workers in the course of their work should be evaluated for safety risks and all appropriate measures should be taken.
- (7) Health and Safety of Facilities
 - The health and safety of facilities (dormitories, cafeterias, toilets, etc.) provided for the living of workers should be properly ensured.
- (8) Health and Safety Communication
 - The provision of education and training on appropriate health and safety information regarding various occupational hazards that workers may suffer in a language and manner that workers can understand.
 - Build a system to provide feedback from workers on safety-related opinions.
- (9) Workers' Health Management
 - Ensure appropriate health management for all employees.

3. Environment

- (1) Environmental Management
 - In order to promote a wide range of environmental activities, we will comply with the environmental laws and regulations of each country and region, and establish and operate an environmental management system for continuous improvement.
- (2) Reduction of Greenhouse Gas Emissions
 - In order to contribute to the prevention of global warming, we will manage greenhouse gas
 emissions in our business activities and promote reduction activities in cooperation with our
 suppliers. In addition, we will strive for the effective use of resources and energy on an ongoing
 basis.
- (3) Prevention of Environmental Pollution of Air, Water, Soil, etc.
 - We will comply with the laws and regulations in each country and region concerning the prevention of pollution of air, water, soil, etc., and prevent environmental pollution by continuously monitoring and reducing pollutants.
- (4) Effective Use of Resources and Energy (3Rs*)
 - In addition to complying with the laws and regulations of each country and region regarding the proper disposal and recycling of waste, we will work to reduce the amount of final disposal of

waste through the effective use of resources.

- If requested, we will report the actual use of recycled materials.
- *The 3Rs refer to Reduce, Reuse, and Recycle.
- (5) Management of Chemical Substances
 - Ensure safe management of chemical substances that may pollute the environment.
 - All products do not contain chemical substances prohibited by local laws and regulations of each country or region.
 - In the manufacturing process, we do not use chemical substances that are prohibited by the laws and regulations of each country or region. For chemical substances specified by the laws and regulations of each country and region, we will monitor the amount of emissions and report them to the government in accordance with laws and regulations.
- (6) Building a Society in Harmony with Nature
 - Based on the recognition that biodiversity is a prerequisite for the survival of corporate activities, we will work to realize a sustainable society in which people and nature coexist.

4. Safety and Quality

- (1) Provision of Products and Services that Meet the Needs of Customers (Customers and Consumers)
 - Grasp the needs of our customers, develop products* that are useful to society, and provide support for them.
 - * Products useful to society are, for example, products that are easy to use by anyone regardless of age, gender, or disability (universal design), or products that are friendly to the earth, such as energy conservation, resource conservation, and environmental conservation.
- (2) Provision of Appropriate Information on Products and Services
 - Provide appropriate information on products and services to customers.
- (3) Ensuring the Safety of Products and Services
 - Produce and provide products and services that meet the safety laws and regulations established by each country and region.
- (4) Ensuring the Quality of Products and Services
 - Establish and implement basic requirements for the entire quality management system, and continuously improve them.

5. Compliance

- (1) Compliance with Laws and Regulations
 - In order to comply with the laws and regulations of each country and region, we will develop and implement internal systems, action guidelines, whistleblowing systems, education, and

other systems.

(2) Prohibition of Anti-Competitive Practices

• Comply with the competition laws of each country and region, and not engage in any act that impedes fair, transparent, or free competition (e.g., private monopoly, unfair restraint of trade such as cartels, bid-rigging, etc., unfair trade practices, or abuse of a dominant position).

(3) Anti-Corruption

- Maintain a sound and normal relationship with politics and government, and refrain from unfair bribery, political contributions, or inappropriate provision or transfer of benefits.
- We do not provide entertainment, gifts, or money to our business partners for the purpose of obtaining or maintaining unfair profits or preferential treatment.
- We do not engage in off-the-books transactions, fictitious transactions, or other false transactions
 or transactions that may cause misunderstandings, and create and maintain accounting records
 (forms, books, etc.) that reflect all transactions and asset disposal in a reasonably detailed,
 accurate, and fair manner.

(4) Management and Protection of Confidential Information

- Strictly manage the company's confidential information, such as trade secrets, and use it appropriately.
- Obtain the personal information of customers, third parties, and employees, as well as confidential information of customers and third parties, in a legitimate manner, strictly manage them, use them to an appropriate extent, and protect them.

(5) Appropriate Export Control

• Establish a clear management system for the export of technologies and goods regulated by the laws and regulations of each country or region. This includes confirming whether the items are subject to regulation, preparing and providing a classification judgment report, and carrying out appropriate export procedures.

(6) Responsible Procurement of Resources and Raw Materials

• In consideration of the impact on social issues such as human rights and the environment, we will take measures to avoid their use, if there is a concern about raw materials (e.g., conflict minerals, cobalt, natural rubber, etc.) that may cause social problems.

(7) Respect for Intellectual Property

 Protect intellectual property rights owned by the Company or belonging to the Company, and not infringe on the intellectual property rights of others.

(8) Whistleblower Protection

• Protect the confidentiality of information pertaining to the report and the anonymity of the whistleblower, and eliminate retaliation against the whistleblower.

(9) Protection Against Cyber Attacks

Take measures to protect against threats such as cyber attacks, and manage them so that they do
not cause damage to our company or others.

6. Disclosure of Information to Stakeholders

 We will disclose our financial status and performance, details of our business activities, risk information, etc. to our stakeholders in a timely and appropriate manner, and strive to maintain and develop mutual understanding and relationships of trust with our stakeholders through open and fair communication.

7. Risk Management

- (1) Establishment and Operation of a Risk Management System
 - Analyze risks related to corporate business behavior, and establish and operate a company-wide management system.
- (2) Formulation of a Business Continuity Plan
 - Formulate a Business Continuity Plan (BCP) for early recovery in response to disasters and accidents.
- (3) Establishment of a grievance mechanism
 - Establish a grievance handling mechanism that can be used by stakeholders, including workers
 and suppliers, (a mechanism for related parties to report and encourage correction of suspected
 violations of these guidelines), in order to prevent misconduct in the company and in the supply
 chain.

8. Contribution to Society and Local Communities

• Continue to carry out activities to create a better future society, such as activities in the local communities where business sites are located.

9. Deployment to Your Suppliers

- Your suppliers shall be informed of each company's sustainability guidelines, which are based
 on the principles outlined above. Through awareness-raising activities, you shall ensure that
 your suppliers fully understand and actively implement sustainability initiatives.
- Disseminate the guidelines with an awareness of the entire supply chain, and follow up and take corrective measures as necessary.