# OMRON Group Sustainable Procurement Guidelines

Ver.3.2

2023/November

# **Contents**

1.	Introduction · · · · · · · · · · · P.3
2.	The OMRON Principles • • • • • • • • • • • • • • • • • • •
3.	Environmental Policy and Human Rights Policy • • P.6
4.	Purchasing Policy · · · · · · · · · · · · · P.7
5.	Supplier Code of Conduct • • • • • • • • • P.8
6.	Request to Suppliers · · · · · · · · · · · · P.25
7.	Compliance Hotline • • • • • • • • • • • • • • • • • • •

# 1. Introduction

Based on our company philosophy, the Omron Group is committed to contributing to the development of a sustainable society through ESG (Environment, Social and Governance) initiatives, as well as addressing social issues through our business activities. In our procurement activities, we are strengthening supplier chain activities to fulfill greater social responsibilities in response to growing demands from society.

Specifically, we established the "OMRON Group CSR Procurement Guidelines" in 2015, and have asked our suppliers to understand the principles of the Guidelines and to implement the actions and activities necessary to comply with the requirements of the "Supplier Code of Conduct" and the "Request to Suppliers".

In order to respond to the recent needs of society, we have revised the content of and renamed the "OMRON Group CSR Procurement Guidelines" to the "OMRON Group Sustainable Procurement Guidelines" (hereinafter, the "Guidelines"). We kindly request all of our suppliers to read the Guidelines and to continue promoting and disseminating the Guidelines within your organization and throughout your supply chain.

In addition, we will be issuing a self-assessment survey to our suppliers as well as visiting our suppliers in order to evaluate their adoption of the requirements of the Guidelines.

OMRON Group desires to partner with our suppliers to establish a more sustainable society. We appreciate in advance your understanding and cooperation to achieve this goal.

Omron Corporation
Global Procurement, Quality & Logistics HQ, Procurement Process Management Dive.

Sustainability Office

# 2. The OMRON Principles

#### **Our Mission**

# To improve lives and contribute to a better society

# **Our Values**

- Innovation Driven by Social Needs
   Be a pioneer in creating inspired solutions for the future.
- Challenging Ourselves
   Pursue new challenges with passion and courage.
- Respect for All
   Act with integrity and encourage everyone's potential.

Omron Principles Revised , May 2015

# Our Mission To improve lives and contribute to a better society

Our Mission summarizes the meaning of 'Business should create value for society through its key practices' (taken from the words of our founder, Kazuma Tateishi, saying,

"A company is most valuable when it contributes to society beyond the simple pursuit of profits").

This summary offers more concise terms that are easier for our employees to identify with our Mission.

- •Our value to the world and our mission is to continue contributing to a sustainable society and resolving social issues through our business.
- •Responding to society's expectations, leads directly to sustained company growth, ongoing personal growth, and better living standards for all.
- •We pursue the creation of a society in which all people can live more comfortable lives.

#### Our Values

social issues.

# ■Innovation Driven by Social Needs

#### Be a pioneer in creating inspired solutions for the future.

Innovation Driven by Social Needs creates a better society by discovering emerging needs. We provide value to society through products and services that anticipate and resolve

Innovation Driven by Social Needs leads to new unprecedented products and drives us to find new approaches and attitudes in our work.

We look at existing products and make them easier for customers to use.

We continue to develop our foresight, our sense for latent social needs, and the creativity to push those needs to the surface.

# **■**Challenging Ourselves

# Pursue new challenges with passion and courage.

Challenging Ourselves serves as the driving force behind delivering new value, unprecedented solutions, and active change.

Continue to challenge ourselves to develop unprecedented products and services that lead to a variety of new possibilities. This ties directly to our value of Innovation Driven by Social Needs.

The more fearless we are in taking on difficult issues, the greater the joy we experience when we succeed. This results in an upward cycle of confidence. Through our failures and successes, we grow together and build an even stronger company.

#### ■ Respect for All

# Act with integrity and encourage everyone's potential.

Respect for All is more than a basic respect for diversity, personality, and individuality. Respect for All is the core value underlying all our activities in pursuit of living lives and performing jobs of purpose and promise.

We act with integrity, creating stronger relationships of trust with individuals and society. This goes to the core of our existence as a company.

We believe in the unlimited potential that is possible when our people express their talents and individuality, working with respect for others and maximizing our strengths together.

# 3. OMRON Environmental Policy & Human Rights Policy

# ● OMRON Environmental Policy (Revised: March 1, 2022)

OMRON Environmental Policy | Environment | Sustainability | About OMRON | OMRON Global The OMRON Group (hereinafter referred to as "OMRON") is committed to fulfilling our corporate responsibility to address the threat of climate change in accordance with the OMRON Principles. Specifically, we have established "Key environmental issues OMRON should address" and "Action Guidelines" as "OMRON Environmental Policy", and we will promote decarbonization and strive to reduce our environmental impact on this Policy.

# ■ Key environmental issues OMRON should address

1. Reducing greenhouse gas emissions

To prevent and mitigate climate change-caused significant impact on the ecological system and society, OMRON will strive to reduce greenhouse gas emissions in our value chain. We will practice this idea through measures such as providing products and services that contribute to decarbonization, improving energy usage efficiency, and expanding the use of renewable energy.

2. Transitioning to a circular economy

To cope with resource depletion and environmental destruction, OMRON will promote transition to a circular economy. We will practice this idea through measures such as seeking to transform our business models, extending product life, expanding recovery & recycling, procuring circular supply, and maximizing resource recyclability.

3. Coexisting with nature

To ensure and maintain opportunities for activities of wholesome and cultured living aspects for all humankind including future generations, OMRON will work in coexisting in harmony with nature. We will practice this idea through measures such as preventing pollution, managing hazardous chemical substances appropriately, using water resource effectively, conserving biodiversity, and engaging in responsible procurement with sustainability in mind.

#### **■**Action Guidelines

1. Governance to fulfill corporate responsibility

OMRON will establish a global environmental management system as we seek to continuously improve our environmental performance. As for the system to assume the responsibility covering OMRON's entire value chain, the Senior General Manager of the Global Human Resources and Administration HQ, the Senior General Manager of the Global Procurement, Quality and Logistics HQ, and the Senior General Managers of the related business divisions, who have been delegated authority from the President and CEO, will be responsible for promoting measures for environment, respectively. Important environment-related items will be decided on by the Board of Directors, with the execution status of determined matters to be reported by the President and CEO to the Board of Directors, which is responsible for oversight and supervising execution.

# 2. Compliance with legal and other requirements

OMRON will comply with legal requirements and additionally address issues of the international community to take autonomous action. When expanding our business through M&A and other projects, we will conduct due diligence to identify potential environmental risks and appropriately address the identified risks.

3. Providing products/services through partnerships with stakeholders

To resolve key environmental issues, OMRON will collaborate with various stakeholders to provide products and services that contribute to a sustainable society.

4. Stakeholder engagement and information disclosure

OMRON will emphasize engagement with customers, investors, suppliers, and various other stakeholders. We will also promote periodic information disclosure conforming to international disclosure guidelines such as Task Force on Climate-Related Financial Disclosures (TCFD) recommendations.

5. Enhancing environmental awareness

OMRON will provide appropriate education and training to ensure all executives and employees enhance their environmental awareness and work to resolve environmental issues.

6. Environmental policy formulation and review

OMRON has formulated this Policy with the approval of the Board of Directors. To effectively address environmental issues that may change in response to social trends and the changing business environment, this Policy will be undergone periodic reviews and revisions as required.

# ●OMRON Human Rights Policy (Established: March 1, 2022)

# Human Rights | Social | Sustainability | About OMRON | OMRON Global

The OMRON Group (hereinafter referred to as "OMRON"), which consists of OMRON Corporation and its subsidiaries, has established this OMRON Human Rights Policy (hereinafter referred to as "this Policy"), to fulfill its corporate responsibility in respecting human rights in accordance with "OMRON Principles", and to ensure that our management practices and actions are always in line with those of the international community.

#### ■ Scope of the Human Rights Policy

This Policy applies to all executives and employees of OMRON in order to ensure respect towards the human rights of all stakeholders involved in the OMRON Group value chain. We also expect all business partners of OMRON, including suppliers and distributors, to understand and support the content of this Policy, and will continue to work to ensure that this Policy is respected.

# ■Commitment to "Respect for Human Rights"

We declare that OMRON will carry out human rights due diligence in accordance with the United Nations Guiding Principles on Business and Human Rights and will avoid causing or contributing to adverse human rights impacts in our value chain.

To meet the above-mentioned commitment, OMRON respects human rights as those expressed in the International Bill of Human Rights, the International Labor Organization (ILO) Declaration on

7

Fundamental Principles and Rights at Work, and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. OMRON Corporation has also signed the United Nations Global Compact and upholds the 10 Principles of the United Nations Global Compact. We will respect the above internationally recognized human rights principles based on compliance with all the laws and regulations of each country and region in which we operate.

# **■**Commitment for Specific Human Rights Issues

OMRON will identify human rights-related issues to focus on throughout all our business processes, including development, procurement, production, distribution, and sales, and take the appropriate measures to deal with them.

1. Discrimination or Other Unreasonable Treatment

OMRON does not tolerate any discrimination, acts that hurt the dignity of an individual, harassment or treat others in an unreasonable manner on the basis of national origin, citizenship, color, race, belief, religion, ancestry, marital status, gender, disabilities, age, sexual orientation, gender identification, place of birth, social status, or any other basis prohibited by local law.

2. Forced Labor and Child Labor

OMRON does not tolerate any forced labor or child labor including slavery and human trafficking.

3. Privacy and Personal Information

OMRON respects the privacy of all persons and will use all reasonable care to maintain the privacy and confidentiality of personal data. OMRON complies with the laws and regulations of countries and regions related to the protection of personal information and does not tolerate unauthorized disclosure of or access to such data.

#### 4. Harassment

OMRON does not tolerate any action that causes physical or mental distress such as sexual harassment or power harassment\*.

\*Power harassment is a common form of workplace harassment that's characterized by a power disparity between the harasser and the harassed.

5. Occupational Safety and Health

OMRON will strive to create and maintain a safe and healthy working environment where persons working in each workplace can fully demonstrate their abilities.

6. Ethical Use of Technology

OMRON will take account of potential impact for human rights caused by technologies such as AI, robotics and IoT, and will take advantage of them appropriately to avoid problems, including but not limited to cause of accident, discrimination and invasion of privacy.

#### **■**Governance to Meet the Responsibility to Respect Human Rights

All persons at OMRON, from operation-level staff members to senior management, will work together to establish a system ensuring the execution of our responsibility for respecting human rights at the global level. As for the system to assume the responsibility covering OMRON's entire

value chain, the Senior General Manager of the Global Human Resources and Administration HQ and the Senior General Manager of the Global Procurement, Quality and Logistics HQ and the Senior General Managers of the related business divisions, who have been delegated authority from the President and CEO, will be responsible for promoting respect for human rights for OMRON companies and supply chains, respectively. Important points concerning our commitment fulfillment for respecting human rights will be decided by the Board of Directors. The execution status of this decision will be reported to the Board of Directors by the President and CEO and monitored and supervised by the Board of Directors.

# ■Human Rights Due Diligence

To fulfill our responsibility for respecting human rights, OMRON will carry out human rights due diligence in accordance with this Policy. OMRON will assess impacts that our activities have on human rights and will commit to avoid or mitigate any adverse impacts identified. OMRON will strive to use its leverage in the impact of our business relationships on human rights that are directly linked to the operations, products or services of the group so that this Policy will be respected.

#### ■ Remediation

Should it become apparent that we have caused or have contributed to adverse impacts on human rights through any of our business activities, OMRON will provide for remediation through appropriate processes.

#### **■**Stakeholder Engagement

OMRON will implement activities set forth in this Policy through consultation and communication with various internal and external stakeholders.

# **■**Information Disclosure

OMRON aims to realize fair and transparent management practices. We will disclose results from and progress of the human rights due diligence we carry out as appropriate exercising the utmost care for the affected stakeholders and trade secrets.

#### **■**Dissemination / Education

In order to ensure that this Policy is embedded within all members across OMRON, OMRON provides appropriate education and training to all executives and employees. We will also encourage business partners such as suppliers and distributors to fully comprehend this Policy.

#### ■Human Rights Policy Formulation Process and Review

This Policy was formulated with the approval of the Board of Directors of OMRON Corporation. To effectively address human rights issues that may change in response to social trends and the changing business environments, this Policy will be undergone periodic reviews and revisions.

# 4. Purchasing Policies

OMRON Group fulfills social responsibility by promoting comprehensive global sustainability in our procurement activities, which includes considerations for the environment, in addition to compliance with laws and regulations. We also strive to produce valuable products and services and aim to improve customer satisfaction by always procuring best "Items and Services" with a focus on QCDS (Quality, Cost, Delivery and Service).

To achieve these goals, we established a Group Purchasing Policy which consists of a "Basic Policy", a "Management Policy" and a "Supplier Code of Conduct" all of which are adhered to in our purchasing activities.

We will achieve CSR procurement practices only through collaboration and integration of efforts with every member of our supply chain and continuing to innovate with our suppliers.

# Basic policies

- ■OPEN : Our procurement policy is based on the principles of openness and free competition. Provided they share the same philosophy, we are willing to provide any suppliers, regardless of nationality, company size, previous business relationship or lack thereof, and any other status, with an opportunity to join us based on the principles of free competition.
- ■FAIR : Partnering based on fairness and equality is very important to us.

  In procuring component, materials and services, we will select suppliers in a fair manner by not only taking into consideration product quality, price, delivery period, environmental conservation, technologies and healthy business management, but also by adding to such items compliance with laws, regulations and social standards.
- ■GLOBAL: We seek strong international partners

  From an international perspective, we will procure outstanding materials, parts and services from sources all over the world, in the optimal regions.

#### Management policies

■ ECOLOGY : We carry out procurement activities that contribute to reducing adverse impact on the global environment.

We will actively use materials and parts that do not contain hazardous chemical substances and promote "green" procurement activities that contribute to reducing any adverse impact on the environment.

■ COMPLIANCE : We strictly comply with laws, regulations, and social standards by maintaining a high level of ethical standards.

We will strictly observe laws, regulations and social standards related to procurement and purchasing, and build partnerships with like-minded suppliers. Furthermore, we will appropriately manage and protect suppliers' confidential and personal information which we collect as a result of our purchasing and procurement activities.

# 5. Supplier Code of Conduct

# Concept of Supplier Code of Conduct

The following paragraphs summarize the specific actions and activities that suppliers have to respect, based on Omron Group Sustainable Conduct Policies / Rules for Ethical Conduct.

We refer to the following standards as our Guidelines.

- "Omron Group Sustainable Conduct Policies" "Omron Group Rules for Ethical Conduct"
   OMRON Group Sustainable Conduct Policies
- -RBA (RESPONSIBLE BUSINESS ALLIANCE) Code of Conduct Ver.7.0

http://www.responsiblebusiness.org/media/docs/RBACodeofConduct7.0\_English.pdf

- \*Note: Items A through E of the Supplier Code of Conduct conform to the RBA Code of Conduct.
- -JEITA (Japan Electronics and Information Technology Industries Association)
- "Responsible Business Conduct Guidelines" https://www.jeita.or.jp/cgi-bin/public/detail.cgi?id=788&cateid=1
- -JAPIA (Japan Auto Parts Industries Association)
- "CSR Guidebook"

# Supplier Code of Conduct

#### A. LABOR

Supplier is expected to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, students, contractors, direct employees, and any other type of worker.

The labor standards are:

#### 1) Freely Chosen Employment

- Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. 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 the facility, and there shall not be unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or other living quarters.
- As part of the hiring process, workers must be provided with a written document in their native language that contains a description of terms and conditions of

employment. Foreign migrant workers must receive such terms and conditions prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the terms and conditions of employment upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

- All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given according to the applicable terms and conditions of employment.
- Employers, agents, and sub-agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their 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.

#### 2) Young Workers

- Child labor is not allowed. 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 higher. Supplier 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, 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.
- Supplier 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. Supplier 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 child labor is identified, assistance/remediation is 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. 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 labor will be within the limits of the local law.

#### 5) Humane Treatment

■ 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 is allowed; 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.

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

- Suppliers should be committed to a workforce free of harassment and unlawful discrimination. Companies 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, 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 including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111).

#### 7) Freedom of Association

- In accordance with local law, suppliers 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, retaliation, intimidation or harassment.

#### B. HEALTH and SAFETY

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. And ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as ISO45001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.

The health and safety standards are:

# 1) Occupational Safety

- Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified and assessed, mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, 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 are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.
- Reasonable steps must also be taken to remove pregnant women and nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, and provide reasonable accommodations 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.
- Emergency drills must be executed at least annually or as required by local law, whichever is more stringent.
- Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans.

■ Such plans and procedures shall focus on minimizing harm to life, the environment and property.

# 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 the return of workers to work.

# 4) Industrial Hygiene

- Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls.
- If any potential hazards are identified, opportunities to eliminate and/or reduce the potential hazards should be looked for.
- If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge.
- Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

# 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.

# 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.

#### 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 suppliers or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting 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 worker 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 the facility or placed in a location identifiable and accessible by workers.
- Training is provided to all workers prior to the beginning of work and regularly thereafter.
- Workers shall be encouraged to raise any health safety concerns without retaliation.

#### C. ENVIRONMENTAL

Corporate 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. Recognized management systems such as ISO 14001

and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

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 Reduction

- 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 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, labeled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

# 4) Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

# 5) Air Emissions

- Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals 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.
- Suppliers shall conduct routine monitoring of the performance of its 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 are to establish a corporate-wide greenhouse gas reduction goal.
- Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, and publicly reported against the greenhouse gas reduction goal.
- 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 are to uphold the highest standards of ethics 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 must not 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 anticorruption laws.

# 3) Disclosure of Information

- All business dealings should be transparently performed and accurately reflected in the Supplier's business books and records.
- Information regarding Supplier 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 must 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 is to be safeguarded.

# 5) Fair Business, Advertising and Competition

■ Standards of fair business, advertising and competition are to be upheld.

#### 6) Protection of Identity and Non-Retaliation

■ Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, 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 have a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten and gold in the products they manufacture to reasonably assure that they are sourced 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 to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees.
- Suppliers are to 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 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 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 continuous improvement.

The management system should contain the following elements:

# 1) Company Commitment

- A corporate social and environmental responsibility policy including statements affirming Supplier's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.
- 2) Management Accountability and Responsibility
  - Identification of 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
  - A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.
- 4) Risk Assessment and Risk Management
  - A process to identify the legal compliance, environmental, health and safety, and labor practice and ethics risks associated with Supplier'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) Improvement Objectives

■ Written performance objectives, targets and implementation plans to improve the Supplier's social, environmental, and health and safety performance, including a periodic assessment of Supplier's 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 for communicating clear and accurate information about Supplier's policies, practices, expectations and performance to workers, suppliers and customers.

# 8) Worker Feedback, Participation and Grievance

- Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.
- Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

# 9) Audits and Assessments

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

# 10) Corrective Action Process

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

# 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.

#### 12) Supplier Responsibility

■ A process to communicate Code requirements to suppliers and to monitor supplier compliance to this Code.

#### F. OTHERS

#### 1) Securing product safety

- All manufacturers must guarantee that all products are reliable and designed following safety standards.
- Product safety should include compliance to laws together with traceability (materials, parts, process etc.) and fast reaction to problems.

- Suppliers have to properly disclose information regarding products contents and handling required by customer as well as legal compliance information.
- Suppliers have to establish and operate a system to collect and transmit information on defective parts.

# 2) Business Continuity Plan

- Suppliers have to create a Business Continuity Plan (BCP) to allow for early recovery in case of disasters.
- Strategic management including BCP operation and review ("Business Continuity Management BCM Business Continuity Management") must be performed.
- 3) Protection against information leaks.
  - All confidential information should be properly handled. Confidential Information means any information disclosed by either party to the other party, either directly or indirectly, in writing, orally or by inspection of tangible objects (including, without limitation, documents, prototypes, samples, plant and equipment), which is designated as "Confidential".
- 4) Prevention of network security threats
  - Suppliers should take appropriate measures against networks threats as computer virus, spyware, and other malicious software, in order to protect business.
- 5) Export control management
  - Export of technologies and goods should be managed in accordance with applicable rules and regulations.
- 6) Prohibition of providing improper benefits to anti-social forces (organized crime organizations)
  - Any relationship with anti-social forces, organized crime groups or other organizations that threaten social order or safety is strictly prohibited.
  - Any economic benefits to antisocial forces is strictly prohibited.
- 7) Employee Health Management System (EHMS)
  - Suppliers are requested to provide appropriate health management programs for all employees. Appropriate health management serves to prevent and detect employees' illness early by providing checkups at least according to the legal standard. This includes adequate consideration for prevention of health problems due to overwork and care for mental health.

# 6. Request to Suppliers

Supplier's commitment is indispensable to fulfill corporate social responsibility in order to produce more reliable products for customers.

We would like suppliers to comply the above "Supplier Code of Conduct".

Furthermore, to enhance both skill and establish a good relationship with OMRON Group, we would like you to support the followings.

# (1) Compliance with laws, regulations, and social norms

We ask you to comply with applicable laws, regulations, and social norms of the country and area in which you are conducting your business activities.

# (2) Assurance of the best quality

We request that you develop, maintain and improve your quality assurance system so as to allow a stable supply of parts and materials satisfying the OMRON Group's quality requirements.

# (3) Best pricing for parts and materials

We request that you supply parts and materials at competitive prices and promote the continuous reduction of prices.

# (4) Stable supply of parts and materials

We request that you establish a part supply system in line with the OMRON Group's innovations for a reliable supply of parts and materials.

#### (5) Green Procurement

In green procurement, we specified ecology (reduction of environmental impact) and compliance (observance of laws, regulations, and social norms) as key programs that should be promoted across its supply chain. As such, we certify green suppliers from dual perspectives—establishment of an EMS for environmental management and a CMS for management of chemical substances contained in products. The activities along the OMRON Green Procurement Standards\* are implemented on a voluntary basis.

\* Green Procurement | Environment | Sustainability | About OMRON | OMRON Global

#### (6) Technical capabilities

We request that you further enhance your technical capabilities so that you are able to proactively make technical propositions and recommendations to us from the first stage of product development by utilizing your technical experts and know-how.

# (7) Sound business operation

We request that you promote sound and reliable operation of the company for establishing continuous business relations as a good partner with us. To this purpose, we would like to ask you to disclose information on your business and financial conditions.

# (8) Maintaining sound business relationships

In order to build and maintain a fair and equitable business relationship, we prohibit the following in principle.

- · Dining together outside working hours
- · Invitations to social events such as golf and travel
- · Delivery and exchange of money and goods such as summer gifts or year-end gifts
- · Other acts objectively recognized as "entertainment"

# 7. Compliance Hotline (Reporting and Accountability)

We have established the "Omron Group Sustainable Action Policy/Ethical Conduct Rules" which actively promote compliance (adherence to legal and ethical standards) throughout the Group. As part of this initiative, we have set up a compliance reporting channel for Suppliers.

Suppliers are expected to report any actual or suspected violations of this Code of Conduct or any applicable law or policy by any person in connection with work done for OMRON Group.

Suppliers can report concerns through Omron's Compliance Hotline. It is available 24 hours a day, seven days a week, online via the Web Portal and through the SPEEKI App. Reports may be submitted anonymously, where permitted by law.

Suppliers are also expected to provide their employees with access to an adequate internal avenue of raising issues or concerns without fear of retaliation. Omron reserves the right at any time to review Supplier's adherence to this Code and to investigate any complaints.

Please note that the department responsible for handling reports within Omron may vary depending on the nature of the report. The reporting contact details also may vary by region, so please refer to the following information:

# ■ Americas, EMEA and Asia Pacific

SPEEKI:

https://omron.portal.speeki.com

■ China

https://www.omron.com.cn/csr/purchase.html

Japan

https://www.omron.com/jp/ja/about/corporate/purchase/

■ Korea

Email: omronhotline@kimchang.com

Telephone: 02-3703-4617 Hours: 09:00~18:00

Mailing address: Omron Compliance Hotline, Kim & Chang

39, Sajik-ro 8-gil, Jongno-gu, Seoul 03170 Korea

# <<Revision History>>

Date of	Ver.	Major revisions
revision		
2015/3	1.0	Established "OMRON Group CSR Procurement Guideline".
2015/5	1.1	Reflected the revised company philosophy.
2019/11	2.0	• Renamed to "OMRON Group Sustainable Procurement
		Guideline".
		• With regard to the Supplier Code of Conduct, (1) updated
		it to comply with RBA Ver. 6.0 and (2) reflected the trends of
		other current social issues.
		• With regard to "Request to suppliers", added the item 10.
2021/6	3.0	With regard to the Supplier Code of Conduct, updated it to
		comply with RBA Ver. 7.0
2021/12	3.1	Corrected wording and link errors
2023/11	3.2	• Changed the issuing department name
		· Added OMRON's environmental policy & human rights policy
		· Correction of Request to Suppliers
		· Added Compliance Hotline