This document constitutes confidential information of Japan Display Inc.
Unauthorized reprinting, unauthorized copying, and unauthorized use of this material is prohibited.

# JDI Supply Chain Sustainability Guidebook (Version 3.0)

January 2023

Japan Display Inc.

#### Introduction

In recent years, the environment in which corporations exist has undergone significant changes and become increasingly diverse as corporations have continued to globalize and the information society has matured. Electronics companies have made significant contributions to this development and growth of the information society. But, when looking at society as a whole, pressing issues like global warming, economic inequality, and health inequity have not been solved, and there is a growing call for corporations to take a more leading role in solving these issues and in realizing a more sustainable world.

In this environment, corporations are expected to move away from the singular goal of maximizing short-term profits and instead take a wholistic, long-term perspective and consider the impact of their business activities on the environment, society, and the economy.

As can be seen in the revisions of the Tokyo Stock Exchange's Corporate Governance Code and Keidanren's Charter of Corporate Behavior, sustainability has become a hot-button issue for society and many Japanese companies, regardless of industry, are now pushing for sustainability. At a global level, the United Nations Global Compact and Sustainable Development Goals as well as the Responsible Business Alliance's Code of Conduct have and will continue to play a significant role in codifying and guiding corporate sustainability activities in a world where the demand for corporate action is only expected to strengthen.

From the perspective of supply chain management, in order to respond to consumers' growing interest in the full business process from how products are made--and with what materials--to how they are sold, corporations need to not only make themselves more sustainable but also push their suppliers to be more sustainable. Only when all companies involved in the chain from development, production, sales, to services cooperate to meet the demands of consumers and society can we create a supply chain that is mutually beneficial and prosperous for all.

Therefore, we have prepared this JDI Supply-Chain Sustainability Guidebook, first written in 2014 and revised in 2022, and the supplemental check sheet to help our suppliers gauge their sustainability. We thank you for your cooperation in self-assessment and evaluation.

We hope that you, our business partners, will find this guidebook helpful in your pursuit of sustainability.

\* This guidebook is built from the Japan Electronics and Information Technology Industries Association's Supply-Chain CSR Deployment Guidebook, ISO26000, and the Responsible Business Alliance's Code of Conduct 7.0.

January 2023
Responsible Departments:
Sustainability Department
Procurement Division Procurement Administration Section

# JDI Supply Chain Sustainability Guidebook

# **CONTENTS**

I Human Rights and Labor 1
(I-1) Prohibit forced labor
(I-2) Prohibit inhumane treatment
(I-3) Prohibit child labor
(I-4) Prohibit discrimination
(I-5) Pay appropriate wages
(I-6) Regulate working hours
(I-7) Respect the right to freedom of association
II Occupational Health and Safety
(II-1) Apply safety measures for equipment and instruments
(II-2) Promote safe activities in the workplace
(II-3) Promote hygiene in the workplace
(II-4) Apply appropriate measures for occupational injuries and illnesses
(II-5) Properly manage disasters and accidents
(II-6) Be careful about physically demanding work
(II-7) Promote safety and hygiene in all company facilities
(II-8) Promote health maintenance programs for employees
III Environment
(III-1) Control hazardous chemicals in products
(III-2) Control hazardous chemicals in manufacturing
(III-3) Establish and apply an environmental management system
(III-4) Minimize environmental pollution (water, soil, air)
(III-5) Obtain environmental permits
(III-6) Promote resource and energy saving by reusing, reducing, and recycling (3R)
(III-7) Promote green-house gas reduction
(III-8) Promote waste reduction
(III -9) Disclose environmental preservation activities

IV Fair Irading and Ethics 12	2
(IV-1) Prohibit corruption and bribery	
(IV-2) Prohibit abuse of a superior position	
(IV-3) Prohibit the offering and receiving of inappropriate profit and advantage	
(IV-4) Prohibit impediments to free competition	
(IV-5) Provide accurate information on products and services	
(IV-6) Respect intellectual property	
(IV-7) Use appropriate export procedures	
(IV-8) Disclose appropriate company information	
(IV-9) Detect injustice promptly	
V Product Quality and Safety	6
(V-1) Ensure product safety	
(V-2) Establish and apply a quality management system	
VI Information Security1	7
(VI-1) Secure computer networks against threats	
(VI-2) Prevent the leakage of personal information	
(VI-3) Prevent the leakage of customer and third-party confidential information	
VII Contribution to Society	9
(VII-1) Contribute to society and community	
VIII Responsible Sourcing of Minerals	0
(VIII-1) Sourcing Policy of Minerals	
(VIII-2) Conflict Minerals Survey	
(VIII-3) Supply chain management for sourcing of minerals	
IX Management 2	1
(IX-1) Policy and target setting and compliance	
(IX-2) Management accountability and responsibility	
(IX-3) Legal and customer requirements	
(IX-4) Identify and minimize the risks	
(IX-5) Audits, assessments, and corrective process	
(IX-6) Training/education program for sustainability	
(IX-7) Communication and feedback for sustainability	
(IX-8) Documentation and records	
(IX-9) Supply chain management for sustainability	

# I Human Rights and Labor

#### (I-1) Prohibit forced labor

We will employ all employees on a voluntary basis, and not to practice forced labor.

The above-mentioned forced labor means all non-voluntary labor.

The following are examples of typical forced labor:

- Labor that is against one's will
- Labor for debt that limits the freedom of job turnover due to unpaid debt, etc.
- Slave labor practiced as a result of trafficking of humans
- Inhumane prison labor in harsh environments

The following are also regarded as forced labor:

- Prohibition of voluntary job turnover
- Obligation to deposit identification cards/passports/work permit cards with employers
- Requiring an employee to pay a recruitment fee or other commission

#### (I-2) Prohibit inhumane treatment

We will respect the human rights of employees and prohibit harsh and inhumane treatment such as maltreatment and/or harassment. (Included avoidance of complicity)

Typical inhumane treatments are abuse, physical punishment, sexual harassment, and power harassment (harassment by verbal abuse and intimidating acts).

An organization may also be considered complicit if it stays silent about or benefits from such wrongful acts.

Disciplinary policies and procedures in support of these requirements shall be clearly defined.

#### (I-3) Prohibit child labor

We will not employ children who are under the minimum labor age and to not assign such jobs that impair children's development.

Generally, child labor means employment of persons who are under the minimum labor age and negligence of under eighteen years old laborer protection as specified in a treaty and/or recommendations of the International Labor Organization (ILO).

For example, employment of persons who are under fifteen years old and violations of the law to protect young laborers are prohibited as cases of child labor in Japan. Limitation of night shift work and dangerous work are concrete examples of protecting workers under eighteen years old from employment that may impair their health, security, and morality.

Internationally, employment of persons who are under the minimum labor age or the violation of the obligation to protect them as specified in a country's laws is considered child labor.

In countries where there are no relevant laws, acts violating a minimum age treaty and/or recommendations of the ILO are regarded as child labor (The rule for minimum employment age is fifteen years old: ILO treaty No.138.)

#### (I-4) Prohibit discrimination

We will prohibit discrimination during the recruiting and hiring processes, and to work toward an environment of equal opportunity and fair treatment.

Discrimination means provision of differences in opportunities and/or treatment in hiring, promotions, bonuses, and training opportunities, due to elements other than one's ability, competence, or level of achievement.

Some reasons for discrimination are race, ethnicity, nationality, birthplace, color, age, gender, sexual orientation, disability, religion, political affiliation, union membership, and marital status.

Additionally, when health examinations and pregnancy tests impair equality of opportunity or treatment, such an act is considered discrimination.

Employers shall provide reasonable accommodation for employees' religious practices when requested.

#### (I-5) Pay appropriate wages

We will pay the legal minimum wage or more and will not practice unfair wage deduction as a means of disciplinary action.

The minimum wage means the lowest wage specified in each country's and/or locality's wage-related laws. In this item, payment of other allowances including overtime compensation and legal payments are included.

Improper wage reduction means a wage reduction violating labor-related laws, etc.

#### (I-6) Regulate working hours

We will regulate employees' working hours and grant holidays and vacations as required by law.

In this item, the following are examples of proper control:

- Scheduled working days per year do not exceed the legal ceiling
- Working hours including overtime do not exceed the legal ceiling
- Providing employees with at least one holiday per week
- Providing the rights of a vacation leave on an annual basis as specified in the law

#### (I-7) Respect the rights to freedom of association

We will respect the rights to freedom of association of employees, as means of employeremployee consultation, in order to settle working conditions and/or wage issues, etc.

Respecting the rights of employees to organize means considerations for freedom of association, freedom to participate in labor unions according to laws, freedom to stage a protest, and freedom to participate in workers' council without the threat of retaliation or harassment.

We should respect all individual civil and political rights such as freedom of opinion and expression, freedom of peaceful assembly and of association.

# **II** Occupational Health and Safety

#### (II-1) Apply safety measures for equipment and instruments

We will apply appropriate safety measures for equipment and instruments used in their company.

Appropriate safety measures mean management to prevent accidents and health problems occurring on the job.

The following are examples of appropriate control:

- Adoption of safety mechanisms like fail-safes, foolproofs, and inter-locks
- Installation of safety devices and protective barriers
- Periodic inspection and maintenance of machinery

#### (II-2) Promote safe activities in the workplace

We will evaluate their own safety risks and to ensure safety in the workplace with appropriate designs, techniques, control methods and ongoing training.

The risk to safety in the workplace means potential risks of accidents and health problems on the job such as electric shock or other energy-caused accidents, fire, vehicles, slippery floors, or falling objects.

The following are examples of appropriate design, technology, and control methods:

- Monitoring dangerous places with sensors
- Blocking off sources of power to machinery by locking it (lock out)
- Setting a tag that specifies the prohibition of manipulating an energy blocking device while the source of power is blocked (tag out)
- Provision of protective equipment such as glasses/hard hat/gloves, etc.

#### (II-3) Promote hygiene in the workplace

We will be aware of the conditions in the workplace related to biological and chemical harm, noise, and odor, which are harmful to health, and to provide appropriate measures.

Chemical substances that are harmful to the human body include smoke, mist, dust, poison, nuclear radiation, and substances that cause chronic diseases (lead, asbestos, etc.). Excessive noise and odor are also elements of this section deemed to be harmful to the human body.

The following are examples of appropriate measures:

- Identification and assessment of the ways these harmful items could affect workers
- Establishment and operation of management criteria
- Appropriate education on hygiene for workers
- Provision of protective devices to workers, etc.

#### (II-4) Apply appropriate measures for occupational injuries and illnesses

We will be aware of the situation of occupational injuries and illnesses in the workplace, and to take appropriate measures.

The following are examples of appropriate measures:

- Rules and programs that enable reporting by employees
- Classification and record of injury/illness
- Provision of required medical treatment
- Investigation of injury/illness
- Execution of measures to correct and eliminate potential causes
- Social protection
- Helping affected employees return to the workplace, etc. (Including workers' accident insurance)

Performing procedures required by law are also included.

#### (II-5) Properly manage disasters and accidents

We will prepare emergency response measures for possible disasters and accidents in order to protect human lives, and to inform people in the workplace.

Typical examples of emergency response measures are as follows:

- Prompt reporting during an emergency
- Notification to employees
- Clarification of evacuation procedures
- Installation of evacuation facilities
- Storing of emergency medical products
- Installation of a fire detecting system and fire containment devices
- Securing external communication
- Development of a recovery plan, etc.

The following are ways to keep employees in the workplace informed:

- Implementation of emergency response education for employees (including evacuation drills)
- Storing or posting emergency response procedures, etc. within the reach of employees in the workplace

#### (II-6) Place controls on physical demanding work

We will identify physically demanding work and control it appropriately to prevent injury and illness.

Operations that require physically demanding work include not only hard labor like the carrying of heavy objects but also the repetitive tasks within assembly-line or data entry work.

Appropriate control can mean giving periodical breaks, providing assistive devices, or having teams of workers sharing the burden of and cooperating on heavy tasks

#### (II-7) Promote safety and hygiene in all company facilities

We will maintain appropriate safety and hygiene in all employees' living facilities provided by the company (e.g., dormitories, canteens, restrooms).

The living facilities provided for employees include the ones provided in the workplace for the employees (restrooms, drinking fountains, locker rooms, canteens, etc.), and facilities provided for employees outside the workplace (dormitories, etc.)

Along with maintaining clean and sanitary conditions, examples of proper measures include providing safe drinking water, fire prevention, air ventilation, temperature control, emergency escape routes (exits), and secure storage of personal belongings.

#### (II-8) Promote health maintenance programs for employees

### We will provide appropriate health maintenance programs for all employees.

We will create an environment where all employees can lead fulfilling lives with good physical and mental health.

Appropriate health management serves to prevent and detect employees' illness early by providing medical checkups at or beyond the legal level. Prevention of health problems due to overwork and care for mental health also need to be considered adequately.

We should provide adequate information and training to all personnel on health and safety matters.

#### **III** Environment

#### (III-1) Control hazardous chemicals in products

We will control chemical substances (contained in products) as defined by laws, regulations, and customer's requirements.

Products must not contain hazardous materials banned from use by law or by customer request. Additionally, mandatory labeling and testing must be performed.

#### (III-2) Control hazardous chemicals in manufacturing

We will control and restrict chemical substances (used in manufacturing processes) as defined by local laws, regulations, and customer's requirements.

The manufacturing process must be regulated so as to not utilize chemical substances that are specified as not to be included by law or customer request. Monitoring the amount of emissions to the external environment and reporting it to the government, trying to reduce the amount of emissions of relevant substances and keeping under relevant control are also necessary actions.

#### (III-3) Establish and apply an environmental management system

We will establish and implement an environmental management system.

An environmental management system means the part of the overall environmental management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources to promote environmental activities.

One of the typical environmental management systems is ISO 14001, which can be gained through a third-party certification process.

#### (III-4) Minimize environmental pollution (water, soil, air)

We will comply with local laws and regulations regarding drainage, sludge and air emissions and reduce such environmental pollution further through voluntary action to minimize our environmental impact.

Voluntary criteria means setting goals to reduce environment impacts beyond the standard required by law.

Besides reducing pollution generally, the following are good practices for further improvement: better monitoring, controlling, and processing drainage/sludge/exhaust, etc. and reducing their emitted amounts.

#### (III-5) Obtain environmental permits

We will obtain necessary environmental permits as defined by local laws and regulations, and to submit necessary reports to the government and to keep current such documents.

In Japan, the following are examples of legal obligations to install officers who have legally-defined qualifications:

- Waste Disposal and Public Cleaning Law: Responsible officer of specially controlled industrial waste
- Law Concerning the Rational Use of Energy: Qualified person for energy management in factories that use more than a certain level of energy
- Air Pollution Control Law, etc.: Officer in charge of pollution control in the factories that emit chemical substances, dust, exhaust, and so on.

Officers in charge of poisonous substances, specified chemical substances, and hazardous materials are also required to be installed depending on the chemical substances used in the business.

Government permits/licenses concerning environmental influence evaluation and facilities dealing with hazardous material may be needed depending on the contents of the business and location of the factory.

# (III-6) Promote resource and energy saving by reusing, reducing, and recycling (3R)

We will set goals to reduce our use of natural resources and energy and implement processes that allow for more efficient usage.

We will offer consumers socially and environmentally beneficial products and services.

We will strive to effectively utilize resources. Typical programs are as follows:

- Reduction of waste and material usage when making a product
- Utilization of recycled resource and parts, etc.

We will strive to reduce the use of heat and electric energy. By saving energy, fuel resources such as oil, natural gas, coal, coke etc. can be put to use more effectively.

3R stands for Reduce, Reuse, and Recycle.

#### (III-7) Promote green-house gas reduction

We will set goals for reducing green-house gas emissions, and commit to setting stricter goals in the future.

Although there are various types of greenhouse gases, the following six types of substance groups are specified particularly in the Kyoto Protocol: carbon dioxide, methane, nitrous oxide, HFC, PFC, and SF6.

Setting voluntary goals for reduction, making plans, routine monitoring, and actively implementing plans to reduce the emissions of these six types of greenhouse gases is good practice.

#### (III-8) Promote waste reduction

We will set goals for waste reduction, and commit to setting stricter goals in the future.

Waste means worthless and unnecessary things emitted from a factory or other facility into the outside environment. Continuous waste reduction activity includes setting a reduction objective, working out a plan, and actively implementing it, with respect to a waste emission quantity, or some waste which needs to be disposed of in landfills or through incineration.

#### (III-9) Disclose environmental preservation activities

#### We will disclose the outcomes of our environmental activities where appropriate.

Typical outcomes of environmental activities are as follows:

- Measures implemented for environmental preservation
- Emissions to air/drainage/lands
- Amount of used resources, waste, and so on

Also, environmentally harmful outcomes that business establishments have caused are included.

We will act to protect the environment and restore natural habitats and the various functions and services that ecosystems provide.

To summarize outcomes regularly, it is good practice to define the organization and to assign responsible officers to conduct environmental preservation activities, who continuously make records concerning management indicators of environmental preservation activities, achievement of the activity objectives, and other important matters relating to the environment.

Disclosures of environmental reports and/or necessary reports to stakeholders are examples of disclosing methods.

# **IV** Fair Trading and Ethics

#### (IV-1) Prohibit corruption and bribery

We will maintain a sound and normal relationship with political bodies and government administrations, without committing bribery, corruption and/or making illegal political donations.

Bribery means acts of offering money, entertainment, gifts, or other benefits/conveniences to public servants or equivalent persons (hereafter called public employees), in pursuit of some business advantage in return, such as approval and license, acquisition/maintenance of trading, or access to insider information.

In addition, bribery includes entertainment or gift-giving that is beyond social norms, even if it does not solicit any business reward.

Illegal political donation means acts of contributing political donations and requesting some business advantage in return, such as approval and license, acquisition/maintenance of trading, or access to insider information. Political donations not following the proper legal procedures is also considered illegal.

Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

#### (IV-2) Prohibit abuse of a superior position

We will not create a disadvantage for our suppliers through the abuse of our superior position.

Abuse of a superior position means acts of unilaterally determining or changing trading conditions with suppliers or imposing irrational requests or obligations on suppliers by taking advantage of one's superior position as a purchaser or outsourcer.

Procurement deals shall be fairly and faithfully conducted based on contracts, without abuse of a superior position. In countries with legislation relating to abuse of a superior position, the relevant laws shall be observed. (For example, the Subcontracting Law, in Japan)

#### (IV-3) Prohibit the offering and receiving of inappropriate profit and advantage

We will not offer and/or receive inappropriate benefits to/from stakeholders.

Typical examples of "Inappropriate benefit offering/receipt" are as follows:

- Bribery activity such as offering or receiving a gift, award, prize money, etc. beyond the bounds of the law to/from a customer
- Providing or accepting money/valuables or entertainment beyond the social norm
- Act of supplying inappropriate benefits to antisocial forces (criminal organization, terrorist organization, etc.) that adversely affect public order or the fairness of society
- Insider trading by which stock of a company is traded based on critical insider information about the operations of a customer, etc.

#### (IV-4) Prohibit impediment to free competition

We will not impede fair, transparent, and free competition.

Competition restrictive activities mean acts of making prior agreements among companies in the same trade about product/service prices, quantities, sales areas, etc. (cartel), or prior arrangements with other bidders about a winning bidder and successful tender price (collusive bidding).

Furthermore, obtaining and utilizing trade secrets of other companies in an illegal way, showing false indication and showing indication that confuses customers about other companies' products are also referred to as acts of unfair competition.

#### (IV-5) Provide accurate information on products and services

We will provide accurate information on products and services to consumers and customers.

Typical examples of accurate information are as follows:

- Accurate specification, quality, and handling procedures about products/services.
- Accurate information on substances contained within products and their components.
- Sales promotion such as catalogs and advertisements for a product/service shall not use untruthful/incorrect expressions and descriptions that mislead consumers/customers, and shall not include information that slanders or infringes other companies or individuals.

#### (IV-6) Respect intellectual property

#### We will not infringe upon intellectual property rights.

Intellectual property rights (IPR) include patent rights, utility model rights, design rights, trademark rights, copyrights, trade secrets, and so on.

Prior to development, production, sale, and/or provision of a product/service, a preliminary IPR survey shall be sufficiently conducted about the intellectual properties of third parties. The usage of a third party's intellectual property without permission constitutes an infringement of IPR, except for cases that have valid reasons.

Furthermore, any unlawful utilization or copy, etc. of computer software or other protected works falls under the infringement of intellectual property rights.

Likewise, illegal procurement and utilization of a trade secret of a third party also constitutes an infringement of IPR.

#### (IV-7) Use appropriate export procedures

We will streamline a clear-cut control system and execute proper export procedures, regarding exports of technologies and goods defined by laws and regulations.

"Technologies and goods regulated by laws and regulations" include parts, products, technologies, facilities, and software, exports of which are stipulated by international treaty/agreement/regulations (such as the Wassenaar Arrangement) and domestic laws.

Exporting may require specific procedures such as acquiring permission from the governmental regulatory authorities.

#### (IV-8) Disclose appropriate company information

We will positively disclose company information for stakeholders, regardless of legal obligation.

The information to be provided/disclosed for stakeholders includes control of business activities, participant labor, health and safety, environmental practices, independent choices about products and services, financial status, business performance, risk information (e.g., damage by a large-scale disaster, occurrence of an adverse effect on the environment and society, discovery of a serious law violation), and so forth.

Disclosing and offering information of serious risk status to customers at all times is an example of positive information provision.

#### (IV-9) Detect injustice promptly

We will perform activities to prevent fraud, and to streamline a whistleblower system to discover and to respond to fraud at an early stage.

Fraud includes human rights violations such as inhumane treatment and unethical behavior (compliance violations).

Activities to prevent fraud means to train and enlighten employees as well as to create a rich communication environment in the workplace.

Typical examples of measures for a system to discover and respond to fraud at an early stage are as follows:

- Assign in-house and outside contact persons who handle fraud so that the top management can discover an improper act at an early stage.
- Try to ensure the privacy of the whistleblower and protect the whistleblower appropriately without fear of reprisal.
- Quickly respond to an improper act and inform the whistleblower of the result of the investigation.

# V Product Quality and Safety

#### (V-1) Ensure product safety

We will satisfy safety standards defined by laws and regulations of each country for products that we develop or design.

In the product design phase, product safety shall be sufficiently ensured with consideration of product liability and responsibility as a manufacturer. For product safety, customer requested criterion and normally required safety features as well as compliance with laws are to be considered.

The following are examples of laws on product safety in Japan:

- Electrical Appliance and Material Safety Law
- Consumer Products Safety Law
- Household Goods Labeling Law

Safety standards are defined in detailed regulations of laws, JIS, etc. International safety standards include UL (U.S.), BSI (U.K.), and CSA (Canada).

Securing product safety includes management of traceability (history of materials, parts, processes, etc.) and prompt response for problem solving.

#### (V-2) Establish and apply a quality management system

#### We will establish and implement a quality management system.

The quality management system is a part of overall quality management that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources to promote quality assurance activities.

Quality assurance activities here mean to develop, implement, achieve, review, and maintain a quality policy that promotes the continuous improvement program using the so-called PDCA (Plan Do Check Act) cycle.

Appropriate laws, regulations and customer requested criterion are clearly defined in a quality management system, and the quality management system shall be designed to ensure compliance with said applicable laws, regulations and customer requirements.

Some of the typical quality management systems are the ISO9000 family, ISO/TS16949, and ISO13485.

# **VI Information Security**

#### (VI-1) Secure computer networks against threats

We will take protective action against threats against our computer network, and to prevent damage to our company and others.

Threats on a computer network refer to, for example, computer viruses, computer worms, and spyware.

If a computer connected to the Internet should be infected by computer threats, customer information and confidential information may be leaked and/or these computer threats may attack computers of other companies, resulting in serious damages such as suspension of business or loss of credibility.

Therefore, it is important to take effective measures against such threats on the computer network, so as to avoid harmful influence inside and outside the company.

#### (VI-2) Prevent leaks of personal information

We will appropriately control and protect personal information of employees, customers, and third parties.

Personal information means information on living individuals with identifying details like names, birth dates, and other descriptions (including information that can be easily compared with other information to identify a specific person.)

Appropriate control means construction and operation of an overall management scheme on personal information, including creating regulations and guidelines to be observed by employees, making plans, implementing programs, performing internal audits, complying with applicable laws, regulations and customer requirements, and performing management reviews.

Appropriate protection means not unreasonably or improperly obtaining, utilizing, disclosing, or leaking personal information.

#### (VI-3) Prevent the leaks of customer and third-party confidential information

We will control and protect the confidential information received from customers and third parties.

Confidential information usually means information disclosed in text form (including electromagneticor optically-recorded data information) that is deemed as confidential, or disclosed verbally after confidentiality is requested.

Proper control means constructing and operating an overall management scheme on personal information, including creating regulations and guidelines to be observed by employees, making plans, implementing programs, performing internal audits, and undertaking management reviews.

Appropriate protection means not unreasonably or improperly obtaining, utilizing, disclosing, or leaking confidential information.

# **VII Contribution to Society**

#### (VII-1) Contribute to society and local communities

We will practice proactive voluntary activities to contribute to the betterment of our world and local communities.

Activities contributing to the betterment of our world and local communities

Include typical approaches such as:

- Social contributions using regular business operations and existing technologies.
- Non-pecuniary social contributions using facilities and human resources, etc.
- Monetary social donations

The following are concrete examples:

- Cooperation with communities at times of disaster
- Employee volunteering
- Active support of/donation to/spreading awareness of NPOs or NGOs

Each company should determine the possible activity range and work positively on such contributions to society, education, culture, and a healthy community.

# **VIII Responsible Sourcing of Minerals**

#### (VIII-1) Sourcing Policy of Minerals

We will clearly define our conflict minerals policy for procurement of 3TG containing materials.

The conflict minerals (3TG) means the minerals (tantalum, tin, tungsten, and gold) directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or neighboring countries.

We will have an effective and clearly documented and communicated Conflict Minerals Policy that is designed and implemented to reasonably assure that the purchasing of 3TG minerals does not directly or indirectly finance, or benefit armed groups that are perpetrators of serious human rights abuses in the Covered Countries.

We will also communicate this policy to all of our suppliers whose products include 3TG

#### (VIII-2) Conflict Minerals Survey

We will institute a survey system and/or process to reasonably assure the provenance and distribution route of 3TG minerals in our supply chain.

We will set up a clear and coherent management process for conflict minerals due diligence that will be able to identify the smelters and refineries in the supply chain for by all of our 3TG suppliers.

We will provide the Conflict Minerals Report by using the latest CMRT Format upon customer request. CMRT means Conflict Minerals Reporting Template which provided by Responsible Minerals Initiative.

#### (VIII-3) Supply chain management for sourcing of minerals

We will ensure compliance with responsible sourcing of minerals in our supply chain.

We will request our suppliers to agree to the non-use of conflict minerals using as a framework JDI's Responsible Sourcing of Minerals policy. We will promote the non-use of conflict minerals with our business partners to fulfill our social responsibilities.

## IX Management

#### (IX-1) Policy setting and Commitment to Compliance

We will have policies, targets and management system/process for compliance.

We will establish adequate and effective policies/codes and management systems/processes, covering: Labor, Health & Safety, Environment and Ethics.

We will review the status of the management system/process on a regular basis.

We will set performance objectives and targets and create implementation plans to improve our positive impact on society.

#### (IX-2) Management accountability and responsibility

We will have adequate and effective policies, targets and management system/process for compliance.

We designate senior executive(s) and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

#### (IX-3) Legal and customer requirements

We will comply with applicable laws and regulations and customer requirements.

We will clarify and comply with legal regulations and customer requirements.

#### (IX-4) Identify and minimize risks

We will identify and minimize the risks of our business activities.

We will have adequate and effective risk management processes to identify, assess, and minimize/mitigate/control our risks in the areas of Compliance, Labor, Health & Safety, Environment and Fair Trading & Ethics.

#### (IX-5) Audits, assessments, and corrective processes

We will audit, assess, and correct matters in our corporate activities.

We will regularly self-assess to comply in the areas of Compliance, Labor, Health & Safety, Environment and Fair Trading & Ethics and customer requirements in our business activities. We will correct deficiencies identified.

#### (IX-6) Training/education programs for sustainability

#### We will have a training/education program for sustainability.

We will put in place programs in the areas of Human Rights & Labor, Health & Safety, Environment, Fair Trading & Ethics, Product Quality and Safety, Information Security, Contribution to Society, Responsible Sourcing of Minerals and Management for training managers and workers to implement participant's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

#### (IX-7) Communication and feedback for sustainability

We will communicate our sustainability policies and achievements to stakeholders and receive feedback from employees.

We will communicate sustainability policies and performance information to workers, suppliers, and customers.

We will provide an environment for employee feedback to facilitate continuous improvement.

#### (IX-8) Documentation and records

#### We will document and record matters related to sustainability

Suppliers should document and record sustainability policies, targets, rules, legislation, customer requirements, performance, self-assessments, corrective actions, and others.

#### (IX-9) Supply chain management for sustainability

#### We will conduct a compliance with sustainability in the supply chain.

In our supply chain, we should request your business partners to work on sustainability based on this guidebook.

We will promote sustainability with your business partners and fulfill the social responsibilities, covering Human Rights & Labor, Health & Safety, Environment, Fair Trading & Ethics, Product Quality and Safety, Information Security, Contribution to Society, Responsible Sourcing of Minerals and Management.