



Supply Chain Management

Supply Chain Management



Working Together with Suppliers



Responsible Mineral Procurement



Green Procurement



Thorough Fair Business Dealings





Supply Chain Management

Our Basic Policy

In order to allow high-quality, reliable and stable manufacturing, it is essential not only to ensure the quality of parts in procurement and their stable supply, but also to engage CSR procurement which takes into consideration labor ethics and the environment. ROHM Group will cherishing continuous relationships of trust and cooperation with suppliers and aim for procurement activities in which both parties can grow on a sustainable basis.

Supply Chain Management Policy

ROHM shall view its corporate activities from economic, environmental, and social perspectives, and work toward the development of both the company and society by conducting procurement and logistics activities in accordance with the following seven policies.

1. Mutual Reliability and Prosperity

ROHM will recognize Suppliers as important partners of the enterprise activities, and importantly have a reliable and cooperative relationship, so that Rohm is able to mutually aim at building up win-win relationship.

2. Fair and Equal Footing Trade

ROHM shall deal with Suppliers on a fair and equal footing with humility when purchasing materials, semi-finished products, equipment, and other items needed for business activities or when outsourcing import/export services and logistics services. ROHM shall never enforce unfair trading practices by abusing it superior position.

3. Fair Selection

ROHM shall open its doors globally to a broad range of Suppliers to assure equality of trading opportunities. When selecting Suppliers, ROHM shall comprehensively consider a wide variety of aspects, including not only quality, technology, delivery, price, and support services, but also eagerness and systems to continuously improve their strengths and commitment to social responsibility in terms of ethics, respect for human rights, risk management, environmental conservation, occupational health and safety, and elimination of antisocial forces.

4. Proper Evaluation and Distribution for Added Value of Product and Service

ROHM shall conduct new products' development and cost reduction activities on the basis of strong partnership with Supplier. Also, Rohm shall promote proper evaluation and price for provided product and service through these activities.

5. Promotion of Green Logistics

ROHM shall actively promote green logistics together with Suppliers and aim to build a triple-win relationship that benefits ROHM, its suppliers, and society. ROHM shall perform fair evaluations in these activities and never force Suppliers to unfairly shoulder associated costs.

6. CSR Procurement/Logistics

ROHM shall promote CSR procurement/logistics by disseminating it, while fostering the understanding of Suppliers, in accordance with the ROHM Group Supply Chain Management Guidelines.

7. Security Export Control

ROHM shall establish a clear control system for the export of technologies and goods regulated by national or regional laws and regulations and properly conduct export procedures.



Supply Chain Management

Promotional Structure

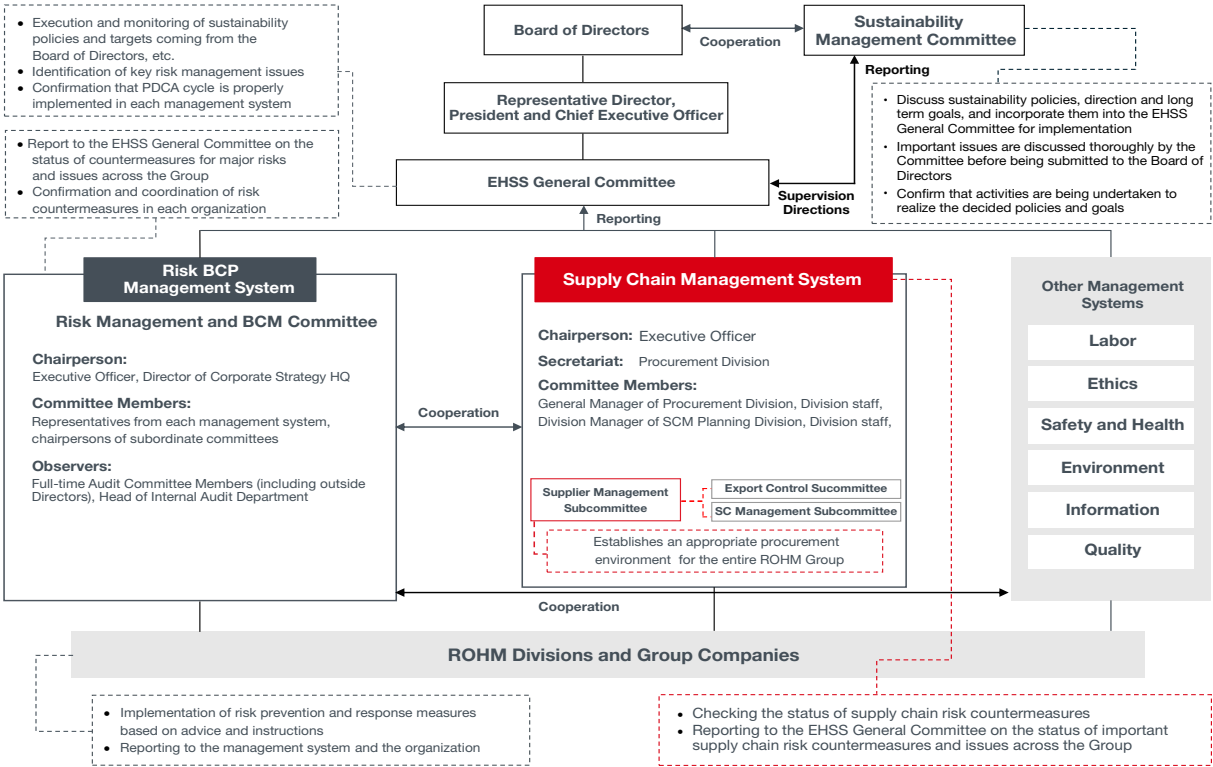
ROHM Group promotes the establishment of sustainable supply chains with suppliers through the effective operation of the supply chain management system.

Chaired by the Director in Charge of Sustainability, the EHSS General Committee* oversees eight management systems—including the Supply Chain Management System—and holds overall responsibility for addressing supply chain risks.

The Supply Chain Management System is chaired by an Executive Officer, with its sub-body, the Supplier Management Subcommittee, serving as the primary driving force. This subcommittee formulates goals, implements measures, and conducts evaluations focused on establishing an appropriate procurement environment across the entire ROHM Group, regularly reporting its progress and results to the Supply Chain Management System.

The EHSS General Committee evaluates and confirms that the PDCA cycle of the supply chain management system is properly implemented, and reports and consults with the Sustainability Management Committee as necessary, and checks that a system is in place to maintain and improve the accuracy of the management system. The Board of Directors works in conjunction with the Sustainability Management Committee to discuss sustainability-related policies, directions, and long-term targets, and incorporates the decisions made into the EHSS General Committee and supervises whether activities are being carried out to achieve these targets.

*EHSS (Environment, Health and Safety, Sustainability) General Committee: A committee composed of executive officers in charge of eight subordinate management systems (Risk Management BCP, Supply Chain, Labor, Ethics, Health and Safety, Environment, Information, Quality) and ensures that the PDCA cycle for each system is being properly implemented.





Supply Chain Management

Targets

ROHM achieved the goals outlined in its Medium-Term Management Plan formulated in 2021. We will continue to promote initiatives aimed at realizing the sustainable growth of both society and ROHM in the years ahead.

Sustainable Supply Chain Management

[Background and Challenges for Activities]

In order to stably bring high-quality products to the world that meet the needs of society, it is essential to establish a robust procurement system and build strong partnerships with our business partners, which are important partners. In addition, to provide society with high-quality products in preparation for natural disasters and infectious diseases, which have recently become a threat to business continuity risks, it is essential to establish a management system with all suppliers surrounding the ROHM Group in terms of quality, safety, the environment, human rights, and BCM together with business partners, and to improve management quality throughout the supply chain.

With our business partners, we will work together to establish a procurement system that meets the expectations of society and build a sound supply chain to provide society with high-quality products based on the concept of mutual trust and prosperity.

Theme	Targets (Target Year: FY2025)	Targets for FY2025	FY2025 Results	Targets for FY2026
Strengthening BCM System	①Purchasing ratio of 90% or more from suppliers who have completed comprehensive evaluation of supplier activities	90.0%	93.1%	-
	②100% CSR self- assessment ratio of critical suppliers	100.0%	100.0%	Maintain the previous year's performance
	③100% prior agreement rate for emergency response of critical suppliers	100.0%	100.0%	-
Promotion of CSR procurement activities	90% or more of purchases from suppliers* with CSR Self-Assessment result of B or higher *The target value for FY 2025 has been revised to include only material suppliers in the calculation.	90.0%	90.7%	Achieve a procurement ratio of 95.0% or higher from suppliers rated B or above

[Related Activities]

- ③ Working Together with Suppliers
- ⑤ Green Procurement



Working Together with Suppliers

Supplier Selection

ROHM Group has adopted the RBA Code of Conduct to pursue sound and sustainable procurement activities. Cooperation with suppliers is essential for promoting CSR procurement activities based on the RBA Code of Conduct.

When selecting suppliers, we make decisions based on objective standards, including the supplier selection criteria outlined below. Among these, ESG-related criteria account for 57% of the evaluation weighting during selection, demonstrating the importance we place on our suppliers' ESG initiatives. In addition, ROHM Group distributes the ROHM Group Supply Chain Management Guidelines, which specify ROHM Group's approach to CSR procurement, to all suppliers and requests them to promote activities based on the guidelines.

Supplier Selection Criteria

- 1. Promotion of ROHM Group Supply Chain Management Guidelines
- 2. Conclude “basic transaction contract” that encompasses the RBA Code of Conduct
- 3. Properly ensure the quality, price, and delivery date of materials and services
- 4. Stable supply capacity and ability to flexibly respond to fluctuations in demand
- 5. Supply continuity plan to prepare for unforeseen circumstances, such as the occurrence of natural disasters
- 6. Technological capabilities that can contribute to the product
- 7. Sound business conditions
- 8. Responsible mineral and green procurement to meet our demands
- 9. Appropriate management and protection of confidential information obtained through transactions with us

ROHM Group Supply Chain Management Guidelines

ROHM Group Supply Chain Management Guidelines are based on the RBA Code of Conduct, which covers occupational health and safety (including human rights), environment, labor and safety, environment, ethics, and management systems, and combines requirements for crisis management, information security, logistics, and quality compliance. We ask our suppliers to comply with these guidelines. We distribute the guidelines directly to our suppliers, but they can also be downloaded from the link below.

- [ROHM Group Supply Chain Management Guidelines Rev.13 \(Japanese\)](#)
- [ROHM Group Supply Chain Management Guidelines Rev.13 \(English\)](#)

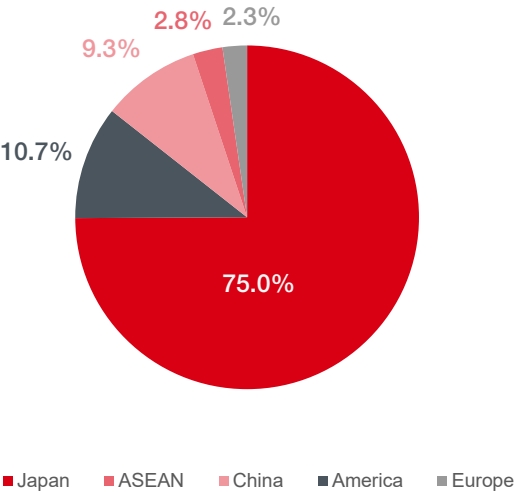


Working Together with Suppliers

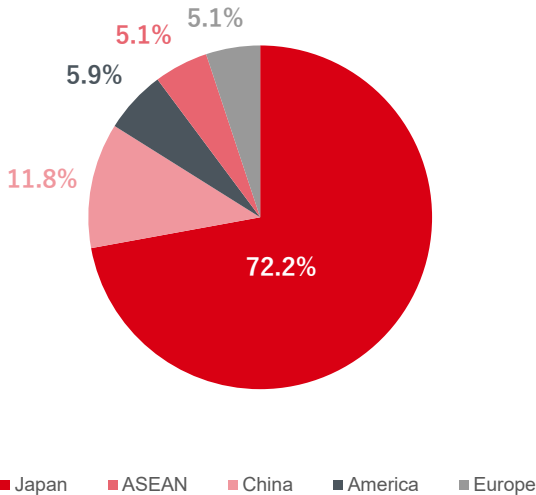
Supply Chain Overview

ROHM Group's supply chain is as follows. (FY2024)

Ratio of Procurement Amount by Region (Materials)



Ratio of Number of Suppliers by Region (Materials)



Identifying Critical Suppliers

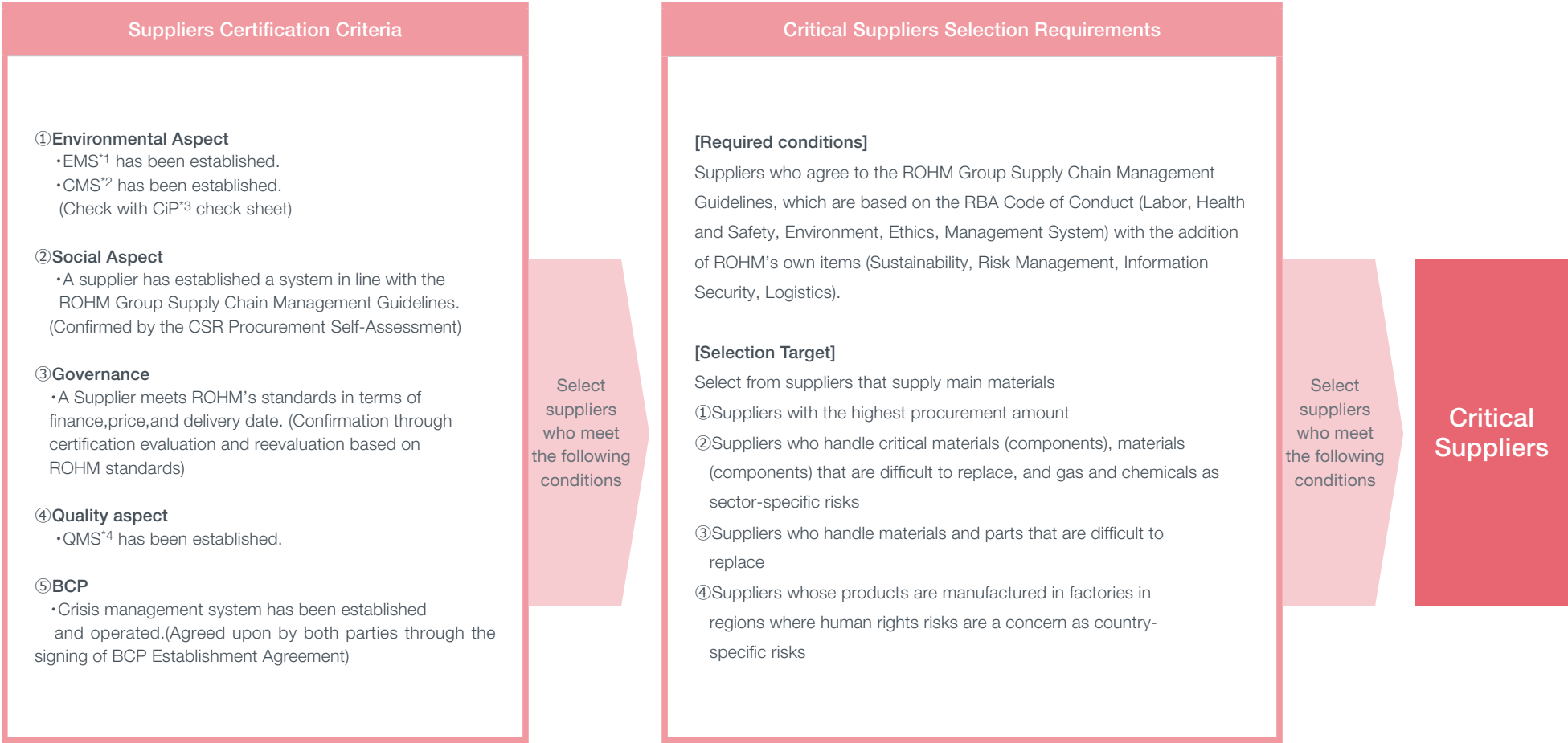
ROHM Group recognizes suppliers particularly important for business continuity as “Critical Suppliers”.

Critical suppliers are identified from among material suppliers that meet all of our supplier certification criteria. As a prerequisite, suppliers must agree to comply with ROHM's “ROHM Group Supply Chain Management Guidelines.” In addition, we select suppliers based on procurement amounts, product-specific risks, country-specific risks, and sector-specific risks (critical materials and materials that are difficult to replace).



Working Together with Suppliers

Flow of Selection of Critical Suppliers



【 Measures for All Suppliers 】
For suppliers, we request and support continuous improvement by providing support for the establishment of management systems for quality and BCP, in addition to the environment, society, and governance, and by evaluating their operations.

【 Measures for Critical Suppliers 】
We ask our critical suppliers to comply with the RBA Code of Conduct requirements to ensure sustainable transactions. Specifically, we request that suppliers aim to obtain an A or A- rating in the CSR Procurement Self-Assessment. In addition, through reviews of self-assessments conducted by suppliers and audits, ROHM provides support to identify and improve our suppliers' issues. We also report the results to the company management through management reviews to ensure the management of business continuity risk.

*1:Environment Management System
*2:Chemical Substances Management System
*3:Chemicals in Products
*4:Quality Management System



Working Together with Suppliers

In order to promote sustainable procurement, it is essential to have a relationship of trust and cooperation with suppliers. ROHM Group strives to strengthen these relationships through close communication with suppliers as well as evaluation and audit programs.

Assessment and Audit Program	
1.Comprehensive Activity Evaluation	①Environmental aspects ②Social aspects ③Governance ④Quality
2.CSR Procurement Self-assessment	Self-evaluation of Labor (including human rights), Health and safety, Environment, Ethics, and Management systems that are in accordance with the RBA Code of Conduct, as well as ROHM's original items of Information security, Procurement BCP, Logistics, and Quality Compliance. For suppliers identified as high-risk sustainability suppliers, ROHM provides support for corrective actions and improvements.
3.CSR Procurement Audits	Through dialogue with suppliers, ROHM checks the contents of self-assessments, checks factories, and requests improvements as necessary, with the aim of gaining their understanding and endorsement of the ROHM Group's policies and approach to CSR procurement, the importance of consideration for the environment, safety, and human rights, as well as the content of our activities.
4.Procurement BCP	Assess risks and their impact on stable supply, and quarterly check the response status to the identified critical risks.

Comprehensive Activity Evaluation

ROHM Group comprehensively evaluates the activities of our business partners across four key dimensions: environmental, social, governance, and quality. The comprehensive evaluation is conducted at the following times:

- 1) Supplier Selection and Contracting
We evaluate candidates based on objective, rational standards—including environmental, social, governance, and quality criteria—in accordance with our supplier selection guidelines.
- 2) Annual Periodic Evaluation (Once per Year)
We comprehensively assess each partner’s performance over the past year and provide feedback.
For partners that fall below established criteria, we request corrective action and collaborate on joint improvement programs.



Working Together with Suppliers

CSR Procurement Self-Assessment

Every year, ROHM Group asks suppliers to self-evaluate their CSR activities regarding Labor (including human rights), Health and safety, Environment, Ethics, and Management system as specified in the RBA Code of Conduct, as well as ROHM's original items of Information security, Procurement BCP, Logistics, and Quality Compliance, to check the progress of their CSR activities.

The ranks are assigned based on the overall score of the self-assessment, and suppliers' ESG risks are identified.

We recognize critical suppliers with a rank lower than B and other suppliers with a rank lower than C as sustainability high-risk suppliers, and we request each supplier identified as a sustainability high-risk supplier to take corrective action and provide support for improvements.

However, if there is no sign of improvement despite repeated requests for improvement, we may consider the risk of continuing transactions in the "Overall Activity Evaluation" of the supplier and make a decision to suspend transactions.

< CSR Procurement Self-Assessment Process >





Working Together with Suppliers

< Self-assessment Achievement Target >

ROHM Group has set a goal of having all of its clients, which account for 90% of its annual purchases, achieve a rank of B or better by 2025.

Achievement Target (FY2025)	Subject	FY2024 Target	FY2024 Result	FY2025 Target	FY2025 Result
90% or more (in terms of value)	ROHM Group	85.0%	90.7%	90.0%	94.9%

< Self-assessment Evaluation Criteria >

Rank	A+	A-	B	C	D
Average Score	4.50~5.00	4.00~4.49	3.00~3.99	2.00~2.99	0~1.99

We calculated the average score for each item in the FY2025 CSR Procurement Self-Assessment.
We compare the results for material-related and equipment-related suppliers, as well as year-over-year changes as follows.

CSR Procurement Self-Assessment Year-over-Year Comparison Result



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< Percentage of ROHM (Non-consolidated) Suppliers (Resident Vendors on Premises) Conducting Assessments >

	FY2025		A	A-	B	C	D
	Assessment Results	Of which Sustainability High Risk Suppliers (*)					
Manufacturing Contracting	1	-	1				
Security	3	-	2	1			
Cafeteria	3	-		1	2		
Cleaning	3	-		2	1		
Equipment & Facilities	3	-	1	2			
Other	3	-		1	2		
Total/Number of Companies (Percentage)	16 100%	0 0%	4 25%	7 44%	5 31%	0 0%	0 0%

*Sustainability High-risk suppliers:
Suppliers other than critical suppliers with an overall rating of C or below in the CSR Procurement Self-Assessment and who are deemed to have negative impacts on sustainability aspects. We request improvements from them every year after the assessment is completed.



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For critical business partners identified as high-risk sustainability suppliers, we issue requests for improvement, conduct CSR procurement audits, and provide remediation support. To address risks across five key human rights areas—specifically when low ratings occur on assessment items covering forced labor, freedom to terminate employment, retention of identification documents, child labor, or discrimination—we issue formal requests for corrective action.

	Number of companies	Number of Companies Completing SAQs	FY2025 Assessment Results				
			A	A-	B	C	D
A ROHM Group Material Suppliers	358	101					
Number of SAQ Target Suppliers (B+C)	101						
Purchase Value Share	95.0%						

B	Critical Suppliers within A	Tier-1 15 companies	27	27	14	4	8	1	-
		Tier-2 12 companies	80.9%						
		Purchase Value Share							
	Percentage of Target Suppliers				7.5%				
C	Other than critical suppliers within A subject to SAQ		74	74	46	20	8	-	-
Request to Establish Human Rights Policies									

Number of Companies Requested Improvements	CSR Procurement Audits / On-Site Verifications				Number of Contract Terminations Among Supported Companies
	Number of Companies Provided with Improvement Support	Number of Improvement Requests Issued	Number of Completed Cases	Improvement Completion Rate	

9	3	10	10	100	0
2.5%	0.8%				
0	-	-	-	-	-
4					



Working Together with Suppliers

CSR Procurement Audits

ROHM Group conducts CSR procurement audits in accordance with the RBA Code of Conduct. The audits are conducted by CSR procurement staff in a second-party audit format, with on-site or online document checks and factory and dormitory inspections. The audits target critical suppliers of ROHM Group, and their main purpose is to verify the CSR Procurement Self-Assessment. If corrective actions are deemed necessary during the audit, ROHM consults the suppliers and has them prepare and submit an improvement plan. Until the corrective action is completed, ROHM provides follow-up for the supplier. The CSR procurement audit is not only a means of ascertaining the actual situation but also an opportunity to communicate the ROHM Group’s policies, CSR procurement policies, and activities to suppliers, as well as an opportunity to deepen mutual understanding of CSR activities with suppliers.

< CSR Procurement Audit Results >

	Subject	FY2022	FY2023	FY2024	FY2025
Number of Suppliers Audited	ROHM Group	13	23	3	3

CSR Procurement Audit Corrective Action and CAP Process

ROHM Group uses the results of the CSR Procurement Self-Assessment as follows. ROHM Group conducts on-site audits of critical suppliers to verify the results of the CSR Procurement Self-Assessment. In FY2025, ROHM requested improvements from nine companies that received a B rating or C rating among the ROHM Group's critical suppliers. We also conducted CSR procurement audits of three of those companies. We have confirmed that all of the requested improvements have been made. If any of the requests for improvement made during the CSR procurement audit are useful as a reference for improvement, ROHM will provide the information on the measures it has implemented and the formats it uses upon request. For non-critical business partners receiving a C or D rating, our standard protocol is to issue an improvement request notice and select a sample of material and equipment suppliers for on-site interviews. In FY2025, no companies fell into this category. Furthermore, four suppliers that recorded low scores in the five items related to human rights (forced labor, child labor, freedom to leave employment, etc.) were asked to improve their performance.



Working Together with Suppliers

BCP of Procurement

As part of the Business Continuity Plan (BCP), ROHM Group deepens its cooperation with suppliers from normal times to maintain a system that can be quickly restored, and prepares alternative materials, so as not to interrupt customers' business even in emergency situations.

① Definition of Risk in the Procurement Department

At ROHM Group, risk management is overseen by the Supplier Management Subcommittee within our supply chain management framework. In addition to the four traditional risk categories—quality, delivery, price, and compliance—the subcommittee evaluates risks to stable supply and their potential impact, conducting quarterly reviews of response status for identified critical risks.

② Selection of suppliers

As also asked in the Basic Stance Requested of suppliers, information is shared across the entire supply chain, including our suppliers, during times of emergency. We therefore select suppliers who can do so and respond in a way that ensures a continuous supply. Furthermore, when entering into business relations, we respectfully ask suppliers for the understanding of our basic stance, and to submit written pledges.

③ BCP Initiatives

In order to be able to promptly confirm the damage, safety, and supply status of our suppliers in the event of an emergency, we are researching and compiling a database of information on the manufacturers and manufacturing locations of procured parts and materials.

< Survey of Tier-1 Suppliers' Production Sites >

We achieved our goal of 100% completion by FY2025 for production site surveys covering all materials, equipment, and parts—totaling approximately 70,000 items—procured from tier-1 suppliers to enable the immediate identification of affected areas during an emergency.

	Achievement Target (FY2025)	FY2025 Target	FY2025 Result
Main Materials	100%	80%	90%

• BCP Initiatives for Critical Suppliers

[Prior Agreement on Emergency Response]

In addition to the measures mentioned above with suppliers who handle critical materials, ROHM Group is promoting efforts to ensure that ROHM and suppliers agree in advance on how to respond to emergency situations. We achieved our target of 100% prior agreement by FY2025.

Achievement Target (FY2025)	FY2025 Target	FY2025 Result
100%	80%	86%



Responsible Mineral Procurement

Responsible Mineral Procurement

The considerations for responsible minerals procurement are heightened lately, following the enactment of The US Dodd-Frank Wall Street Reform and Consumer Protection Act in July 2010. Especially the concern regarding conflict minerals (tin, tantalum, tungsten, and gold commonly known as “3TG”) that are mined from the Democratic Republic of the Congo and surrounding areas and used by an armed group or anti-government force as a source of funds.

According to the Article 1502 of The Securities and Exchange Commission (SEC), companies listed on securities exchanges in the US are required to investigate/report usage conditions regarding conflict minerals that are mined from the Democratic Republic of the Congo and surrounding areas that are used by an armed group or anti-government force as a source of funds. With the EU Conflict Minerals Regulation coming into effect in 2021, the need for and importance of responsible mineral procurement will become increasingly important. As we enter a new phase, ROHM Group is committed to responsible mineral procurement throughout the supply chain, not only with regard to conflicts, but also with regard to risks such as human rights violations and environmental destruction, including OECD Annex II risks, as well as tin, tantalum, tungsten, gold, cobalt, mica, and other minerals that may be involved in illegal activities.

Policy

- 1. We do not use conflict minerals illegally mined in the DRC and adjoining countries as raw materials for our products.
- 2. In conflict and high-risk areas (CAHRAs), we will establish a management system based on the “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict and High-Risk Areas (OECD Guidance)*1” of the Organization for Economic Cooperation and Development (OECD), and will implement measures to avoid procuring from suppliers with risks such as human rights abuses, environmental destruction, and conflict.
- 3. In the unlikely event that we discover the use of conflict minerals as a source of funding for armed groups, we will promptly inform our customers and take corrective measures.

*1. OECD Due Diligence Guidance :OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

We also request that our suppliers understand ROHM Group's policy and make efforts to comply with them.

Promotion System

The executive officer chairs the Supply Chain Management System Committee of the EHSS General Committee, which formulates targets, implements measures, and conducts evaluations under the theme of creating an appropriate procurement environment for the entire ROHM Group.

Responsible mineral procurement is led by the Supplier Management Group in the Supplier Management Subcommittee, a subordinate organization of the Supply Chain Management System, and its activities are based on the ROHM Group's standard ROHM Group Procedures for Responsible Mineral Procurement.

Every year, we analyze the results obtained through CMRT*2 and EMRT*3 surveys to identify risks and take corrective actions. We also report the progress and results to the supply chain management system every three months.

In addition, as a member of the “Smelter Support Team” of the JEITA*4 Responsible Mineral Procurement Study Group, ROHM sends a letter to smelters requesting their participation in RMAP*5 audits.

*2. CMRT:Conflict Minerals Reporting Template
*3. EMRT:Extended Minerals Reporting Template
*4. JEITA:Japan Electronics and Information Technology Industries Association
*5. RMAP:Responsible Minerals Assurance Process(Program to certify smelters by RMI)



Responsible Mineral Procurement

Responsible Mineral Procurement Survey

To ensure that customers can use ROHM products with peace of mind, the Supply Chain Management Headquarters plays a central role in conducting the following assessment processes in accordance with OECD Due Diligence Guidance.

Mineral Procurement Survey Process

STEP1 : Construction of a Management System

- ROHM uses the Sustainability Guidebook, an in-house educational material on sustainability, and our website to inform people both inside and outside the company about ROHM Group's Responsible Mineral Procurement Policy.
- ROHM provides education on responsible mineral procurement to procurement division staff in charge of surveys, in an effort to increase their knowledge, understanding, and motivation regarding the initiatives.
- ROHM has established a system for surveying and assessing the risk of 3TG, cobalt, and mica contained in its products in cooperation with related departments in Japan and overseas in accordance with the group standards.
- ROHM seeks the support of the suppliers for ROHM Group's responsible mineral procurement activities and asking for their cooperation in submitting consent forms.
- ROHM appropriately manages and stores information on survey results in accordance with internal rules.
- ROHM requests the suppliers to do business with RMAP-certified smelters at the time of survey request.
- ROHM requests the suppliers to comply with ROHM Group's Responsible Mineral Procurement Policy and to sign an agreement. ROHM requests the suppliers to comply with ROHM Group's Responsible Mineral Procurement Policy and to sign an agreement.

STEP2 : Identifying and Assessing Risks in the Supply Chain

- Selecting from parts and materials purchased annually those that need to be surveyed, we conduct surveys for suppliers using CMRT and EMRT provided by RMI.
- ROHM collects and processes the data provided by the suppliers and identifies the supply chain down to the smelter level. We also ask suppliers to disclose the country of origin of the mines they use during the survey so that we can identify all countries of origin.
- For smelters, ROHM confirms participation and completion of third-party audits such as the latest RMAP.
- Conducting a risk assessment and identify risks within the supply chain.

STEP3 : Develop Strategies and Implement Measures to Address Identified Risks

- To ensure continuous risk mitigation, ROHM establishes a Responsible Mineral Procurement Survey Plan every year, updates the latest information, and conducts due diligence as necessary.
- For smelters that have not yet completed third-party audits such as RMAP, ROHM works with the suppliers to request third-party audits.
- If a smelter is identified by a customer as a concern, ROHM confirms the issues raised, informs the customer of the nature of the risk, and discusses appropriate measures (e.g., re-inspection of the smelter) with the customer.
- In the event that a relationship with armed forces or human rights violations becomes clear, we will promptly discuss with our business partners to suspend transactions.

STEP4 : Conducting an Audit of the Smelter's Due Diligence Status by an Independent Third Party

- As a member of the JEITA Responsible Mineral Procurement Study Group and Smelter & Refinery Support Team, ROHM works directly with smelters to request third-party audits.
- ROHM reviews RMI and smelter websites to confirm their participation and schedule for audits.

STEP5 : Annual Report on Supply Chain Due Diligence

- ROHM's responsible mineral procurement initiatives will be disclosed annually on our website.



Responsible Mineral Procurement

3TG Survey Results

In FY2025, ROHM Group continued to conducting a survey of the parts and materials it purchases. We carefully examined the responses, and for suppliers who used smelters that were not RMAP-certified or who responded at the company level, we requested a re-survey and due diligence in order to improve their responses' reliability.

- Suppliers surveyed : 254 companies
- Suppliers who provided survey responses : 249 companies, 98% response rate
- Specified smelters : 202 companies for all minerals (Of these, 195 have obtained RMAP certification for RMI)

3TG Survey Results (FY2025)

	Gold	Tantalum	Tin	Tungsten	Total
All Smelters	95	31	43	32	202
Number of CFS* Certified Smelters	92	31	41	31	195
CFS* Certification Rate	97%	100%	95%	97%	97%

* CFS:Conflict Free Smelter ROHM defines a CFS as a smelter certified by the Responsible Minerals Assurance Program (RMAP) of the Responsible Minerals Initiative (RMI).

As a result of the FY2025 survey, our CFS (Conflict-Free Smelter) rate stood at 97%, unchanged from the previous fiscal year. For the remaining 3% of non-certified smelters, we will continue working through our business partners to encourage a transition to CFS-certified smelters.

We track revenue generated from products containing minerals sourced from Conflict-Affected and High-Risk Areas (CAHRAs) and use this data as one of our key due diligence metrics.

	FY2022	FY2023	FY2024	FY2025
Percentage of total revenue from products containing minerals sourced from Conflict-Affected and High-Risk Areas (CAHRAs)	22.1%	17.9%	18.0%	42.8%
Percentage of revenue from CAHRA mineral-containing products derived from verified conflict-free suppliers	99.9%	99.6%	99.8%	99.8%



Responsible Mineral Procurement

Cobalt and Mica Procurement

Cobalt is used in lithium-ion batteries, which are essential for electric vehicles, cell phones, and laptop computers, while mica is widely used for components in the fields of home appliances and next-generation energy. In the Democratic Republic of Congo (DRC), the world's largest producer of cobalt, and in India, where mica is mined, unsafe working conditions and child labor risks have emerged in recent years.

ROHM Group SCM Guidelines stipulate a labor and ethics policy that includes the prohibition of all forms of forced labor and child labor, and based on this policy, ROHM promotes responsible mineral procurement for minerals that it deems to be a risk. With regard to cobalt and mica, which have become a social issue as mentioned above, ROHM has determined that it is necessary to take immediate action and is conducting investigations using EMRT provided by RMI to ascertain the content of cobalt and mica, investigate the country of origin, and identify the smelter. ROHM will continue the same activities in the future, as we regard it as our mission to increase “transparency” in the responsible mineral supply chain.

Results of Cobalt Survey

- Suppliers surveyed : 66 companies
- Suppliers providing survey responses : 63 companies, 95% response rate
- Cobalt smelters identified: 106 companies

Cooperation with Industry Groups

ROHM is a member of the JEITA Responsible Mineral Procurement Study Group, which was established in 2012 with the aim of collaborating with industry and establishing researindustrial ch methods for responsible mineral procurement. Every year, we participate in responsible mineral surveys held by the Responsible Mineral Procurement Study Group, and work to penetrate the industry supply chain. In order to respond to growing international demand, we are promoting responsible procurement activities through industrial activities, such as encouraging smelters that have not received RMAP (Refinery Audit Protocol) certification to undergo RMAP audits.





Green Procurement

Attitude toward Promoting Green Procurement

ROHM Group recognizes the importance of natural capital as stated in our Environmental Policy, and has made the promotion of efforts that contribute to and take into consideration the global environment as an important management issue. Aiming for the sustainable development of society without destroying the global environment requires recycling business activities with a lower impact on the environment. ROHM Group not only complies with environmental laws, regulations, treaties and international guidelines throughout the entire supply chain, but is also engaged in the procurement of environmentally friendly parts and materials.

As legal regulations on the management of chemical substances become increasingly stringent, ROHM Group has worked to increase the precision of investigations of chemical substances contained in the parts and materials it procures to promote green procurement. The Group has created a system for not procuring prohibited substances by screening the substances contained in parts and materials by referring to ROHM’s own standards and only registering those that meet the standards in the “Procurement System” as allowed products. Furthermore, in order to ask suppliers to conduct thorough management of chemical substances contained in products, ROHM Group issues Control Standard of Chemical Substances in Products, and asks them to confirm compliance with the designated standards for the parts and materials handled.

 [Control Standard of Chemical Substances in Products Rev.004](#)

Achievement Targets and Initiatives

[Target]

Raise suppliers’ environmental management systems to a level acceptable to our standards through feedback and improvement activities based on the results of their environmental management system self-assessments.

[Achievement Indicator]

Pass rate of self-assessment of suppliers’ environmental management systems : 100%

Subject	Target for FY2025	FY2025 Result
ROHM	100.0%	95.8%
ROHM Group	100.0%	91.7%

*All business partners identified for corrective action in FY2024 have completed remediation, achieving a 100% pass rate.

*Figures for FY2025 reflect the results of this fiscal year's periodic self-assessment.

We are continuing to drive improvements aimed at reaching a 100% pass rate.



Green Procurement

Assessment Results for ROHM

Evaluation Category	ROHM Standards Compliance Rate	FY2024		FY2025		Corresponding
		Number of Companies	Percentage of Total	Number of Companies	Percentage of Total	
A	70% or more	415	99.5%	384	95.8%	-
B	Less than 70%	0	0.0%	4	1.0%	•We check the results of self-assessment of suppliers' environmental management systems, and understand their issues and situations based on the items with low scores. •We send a written request for improvement to suppliers and ask them to make improvements.
C	Unsubmitted/Refusal to Submit	0	0.0%	9	2.2%	
Requested Correction		0	0.5%	4	1.0%	•We support the improvements to increase the results of our suppliers's environmental management system self-assessment to 40% or more.
Total		415	100.0%	401	100.0%	

Assessment Results for ROHM Group

Evaluation Category	ROHM Standards Compliance Rate	FY2024		FY2025		Corresponding
		Number of Companies	Percentage of Total	Number of Companies	Percentage of Total	
A	70% or more	962	94.1%	977	91.7%	-
B	Less than 70%	7	0.7%	28	2.6%	•We check the results of self-assessment of suppliers' environmental management systems, and understand their issues and situations based on the items with low scores. •We send a written request for improvement to suppliers and ask them to make improvements.
C	Unsubmitted/Refusal to Submit	53	5.2%	57	5.3%	
Requested Correction		0	0.0%	4	0.4%	•We support the improvements to increase the results of our suppliers's environmental management system self-assessment to 40% or more.
Total		1,022	100.0%	1,066	100.0%	



Green Procurement

Past Activities

FY2021	As a result of their efforts to improve corrective actions, two suppliers met ROHM's required standards.
FY2022	Conducted periodic self-assessment using the Survey Sheet for Chemical Substances Contained in Products once every three years. The number of companies subject to the survey has been reduced due to close scrutiny of the supply chain. In addition, for suppliers that did not meet some of the requirements this time, we have started activities for improvement by identifying issues and sharing the situation with them.
FY2023	Started assessments at ROHM Group level. For suppliers who do not meet some of the ROHM's standards or who are not responding, we are trying to check the situation and identify the issues, and to promote initiatives for improvement.
FY2024	The percentage of compliance increased as corrective measures progressed. For business partners that do not meet some of ROHM's standards and those that did not respond, we are working to confirm the situation and identify issues, and are promoting initiatives for improvement.
FY2025	The domestic ROHM Group conducted its triennial periodic self-assessment using the Survey on Chemical Substances Contained in Products. For business partners that did not meet ROHM standards or have not yet responded, we are actively assessing their current status, identifying underlying challenges, and initiating improvement efforts.



Thorough Fair Business Dealings

Thorough Fair Business Dealings

The business activities of ROHM Group are made possible by the cooperation and support of our suppliers. ROHM Group Business Conduct Guidelines, which serves as the basic code of ethics for conducting business activities, also mentions equal and fair dealings, and stipulates that all officers and employees comply with the law which relates to the purchase transactions and will never abuse our position to force suppliers into unfair circumstances.

ROHM has created mechanisms for preventing corruption such as embezzlement and bribery, and thoroughly educates and informs its employees to ensure dealings with suppliers are fair and ethical.

[🔗 ROHM Group Business Conduct Guidelines](#)

1. Partnership Building Declaration

Since January 2021, ROHM has set up the Partnership Building Declaration. The Partnership Building Declaration aims to build new and strong partnerships with suppliers and businesses that create their value. This system has been established by the Council on Promoting Partnership Building for Cultivating the Future which consists of the Japan Business Federation Chairman, the Chairman of the Japan Chamber of Commerce and Industry, the President of the Japanese Trade Union Confederation, and related ministers.

ROHM will conduct fair and ethical transactions with suppliers in compliance with “coexistence and co-prosperity of the entire supply chain and new cooperation that transcends scale and affiliates” and “promotion standards (*)”.

Promotion standards:
Refers to desirable trading practices between the contracting client and small and medium-sized subcontractors.
ROHM has set the following five compliance items to optimize transactions.

- 1. Optimization of price determination method
- 2. Optimization of type management
- 3. Thorough implementation of the principle of cash payment
- 4. Protection of intellectual property and know-how
- 5. Do not impose a burden on the supply chain when advancing our work style reform such as long working hours, short delivery time, etc.

 Partnership Building Declaration





Thorough Fair Business Dealings

2. Education on the Subcontractors Act

In order to conduct fair business transactions, every employee of the ROHM Group must remember that they serve as the "face of ROHM" and build and maintain healthy relationships with our business partners. Promoting transactions based on appropriate pricing requires a solid understanding of relevant regulations, such as the Act on Proper Subcontracting Transactions for Small and Medium Enterprises (hereinafter, the "Fair Subcontracting Act").

ROHM Group conducts e-learning programs on fair trade practices to deepen employee understanding of the Fair Subcontracting Act and the official Promotion Standards to ensure fully compliant transactions.

[Participation Percentage]

Educational Contents	Subject	FY2022	FY2023	FY2024	FY2025
E-learning on proper trade	ROHM	98%	-	100%(*)	100%(*)

*Since FY 2024, we have been providing practical training on the Fair Subcontracting Act to procurement staff who negotiate directly with business partners.

3. “Conduct Guidelines” Training

In order to ensure that members of the ROHM Group Procurement Department do not have a private interest with suppliers, we have formulated “Conduct Guidelines for suppliers” and thoroughly educated the procurement department employees to ensure compliance based on ethics.

[Guidelines for Conduct with Suppliers Department Staff Trained in Compliance Based on Ethics Guidelines]

Training Content	Subject	FY2022	FY2023	FY2024	FY2025
Compliance based on ethics Guidelines Education	ROHM Group in Japan	100%	-	100%	100%

4. Promotion of Fair Trade Program

In FY2025, fair trade education was provided to all employees whose work involves contact with business partners, regardless of department affiliation. For domestic participants in Japan, the coursework included content on the Act on Proper Subcontracting Transactions for Small and Medium Enterprises (the "Fair Subcontracting Act"). Across the entire ROHM Group, 100% of the 347 targeted employees completed the training.

[Number of participants in Fair Trade Program]

Training Content	Subject	FY2023	FY2024	FY2025	
		Participants	Participants	Participants	Participation Rate
Fair Trade Program	ROHM Group Procurement Staff	55	47	-	-
	Staff interacting with business partners	-	-	347	100%

[Mandatory Training Participants]
Buyers and assistants, personnel responsible for receiving, waste and valuable materials handling, import/export, and warehouse operations, regardless of whether they belong to purchasing or procurement departments.

5. Feedback on Compliance Survey Results

ROHM conducts surveys of suppliers through a third-party organization to investigate compliance of ROHM employees in order to establish an environment where misconduct or dishonest behavior do not arise and are not caused by our employees in day-to-day operations. The feedback on the results of the survey is provided to employees, including executives, to further prevent impropriety such as collusion and embezzlement.



Thorough Fair Business Dealings

6. Compliance Hotline for Suppliers

ROHM Group has established a “Compliance Hotline for Suppliers” as a contact point where suppliers can consult and report compliance issues related to transactions.

We ask our suppliers to contact the Compliance Hotline for Suppliers in case they encounter any behavior that violates laws or ethical standards in their business dealings with ROHM or any ROHM Group company. In order to raise awareness of this hotline among our business partners, we distribute information about it every year when requesting CSR procurement self-assessments. Information about the hotline is also posted in each room and booth of the business meeting lobby at ROHM's Head Office.

We will not treat anyone who reports a violation for legitimate reasons in an unfavorable manner on the basis of their report.



[🔗 Compliance Hotline for Supplier](#)