ROHM GROUP SUPPLY CHAIN MANAGEMENT GUIDELINES

April 2025 12th Edition

ROHM Co., Ltd.

I. Introduction

The progress in globalization of corporate activities has made the supply chain diverse and complex, and the risks to the companies due to social problems and issues around the world have made business operations uncertain. As there are limits to the results that could be obtained from the CSR (Corporate Social Responsibility) activities by a single company, expanding them to the whole supply chain through the procurement sources is required, thereby contributing to the resolution of social issues.

Under such social environment, the ROHM Group has been working on the following 6 main CSR Procurement Activities:

① Conclusion of RBA-compliant "Basic Purchase Agreement"
② Publication of ROHM Group SCM Guidelines
③ Holding a Partner's Meeting
④ Implementation of "CSR Procurement Self-Assessment"
⑤ Improvement activities based on the results of CSR procurement self-assessment
⑥ Implementation of "CSR Procurement Audit"
⑦ Implementation of "Export Control"

We will continue to conduct these activities as they evolve and develop in the future.

However, for further dissemination and penetration to the whole supply chain, the understanding, agreement and specific activities of our business partners are important more than ever. Motivated by transactions aimed at co-existence and co-prosperity with our business partners, ROHM Group will make efforts for steady dissemination and penetration of CSR procurement activities through sincere and courteous communication. We look forward to your continued understanding and cooperation.

ROHM Co., Ltd.
Procurement Division

II. Company Mission / Management Policy

Company Mission

Quality is our top priority at all times.

Our objective is to contribute to the advancement and progress of our culture through a consistent supply, under all circumstances, of high quality products in large volumes to the global market.

Basic Management Policy

Secure reasonable profit through a concerted company-wide effort for a comprehensive quality assurance program.

Develop globally leading products by improving upon technologies held by each department for continued advancement of the company.

Maintain healthy and vigorous lifestyles and refine intellect and humanitarianism, hence contributing to society.

Search extensively for capable human resources and cultivate them as cornerstones for building long-term prosperity.

ROHM Group Human Rights Policy(1)

Our Basic Policy

ROHM Group recognize "Human rights are the fundamental right, freedom, and standard for treatment that individuals around the world possess". This policy is a superordinate policy of all documents and norms regarding the efforts to respect human rights in the ROHM Group's business activities and is applied to all activities carried out by the ROHM Group around the world. ROHM Group respects for human rights as the higher policy of all documents and norms regarding efforts to respect human rights in business activities and is applied to all activities conducted by ROHM Group around the world.

As a company with a globally growing business, ROHM Group views respect for human rights as one of the most basic conditions for its business activities. We recognize that it is important to build a sustainable society in which human rights are respected. In particular, we support and respect the following global standards.

And where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will seek ways to respect internationally recognized human rights to the greatest extent possible.

[Global Principles and Rules]

・Ten Principles of the United Nations Global Compact (UNGC)

・Universal Declaration of Human Rights

・The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work

・United Nations Guiding Principles on Business and Human Rights

・OECD Guidelines for Multinational Enterprises

・ISO26000

・RBA（Responsible Business Alliance）Code of Conduct

Scope of Application of This Policy

This policy applies to all officers and employees, which consists of ROHM Group and its consolidated subsidiaries. In addition, based on this policy, we will ask our business partners and other parties connected to ROHM Group's business, to respect human rights and not to violate them.

ROHM Group Human Rights Policy(2)

<u>Initiatives to Respect Human Rights</u>

・ROHM Group will prohibit any form of discrimination based on race, ethnicity, nationality, social status, lineage, gender, disability, health conditions, ideology, faith, gender identity, sexual orientation, occupation or occupational status and harassment.

・ROHM Group will commit to responsible labor practices including the provision of a safe and healthy environment in the workplace as well as ensuring adequate working hours and minimum wage. We also commit ourselves to respecting freedom of association and the right to collective bargaining.

・ROHM Group never allow or complicit in slave labor, forced labor, or child labor, including personal transactions.

・ROHM Group will acknowledge and seek to uphold our responsibility to the communities, including indigenous groups, affected by our operations.

<u>Practice of Respect for Human Rights</u>

・In accordance with principles and norms which we support, ROHM Group will exercise human rights due diligence to identify, prevent and mitigate adverse human rights impacts related to our business activities. We will also endeavor to take appropriate and effective remedies when it becomes clear our activities, products and services by our business relationships have caused or contribute to adverse human rights impacts.

・ROHM Group will establish a hotline for human rights violations, and continue to establish an effective reporting response system.

・ROHM Group will provide the training necessary for our board member and employees to have the knowledge and capacity to implement this policy.

・ROHM Group will strengthen its efforts to respect human rights through the professional advice of external stakeholders about this policy and efforts based on this policy.

・ROHM Group will regularly and properly communicate our progress on our efforts to address adverse human rights impacts including through our CSR website and/or integrated report.

ROHM Group Sustainability Policy

We conduct business conscientiously, fairly, and transparently from a global perspective, strive to achieve the Sustainable Development Goals (SDGs), and contribute to sustainable progress of society based on our company policies such as our Company Mission and Basic Management Policy.

We also endeavor to establish good relationships with our stakeholders through interactive communication (as exemplified below), gain trust from society, and achieve continued growth of our company.

1. Customers

ROHM seeks to obtain customer satisfaction and confidence by continuing to supply high quality products and services in a timely and appropriate manner. ROHM is also open to customer feedback and suggestions, and will evaluate them internally. ROHM places the highest priority on the safety of its products and strives to disclose relevant information as necessary.

2. Business Partners

ROHM selects its business partners according to equitable and rational criteria. ROHM values the relationship with its business partners and conducts equal and fair transactions for mutual prosperity.

3. Employees

ROHM strives to ensure a safe and pleasant working environment, respect human values and individuality, and create a fair and appropriate workplace where each employee may demonstrate individual initiative.

4. Shareholders and Investors

ROHM seeks to continuously improve corporate value and secure appropriate profits in order to provide a steady return to both shareholders and investors. ROHM offers financial information in order to keep shareholders and investors actively informed.

5. Local Societies and Communities

ROHM works to deepen its relationship with different countries, societies, and communities, respect their cultures and customs, and develop together. ROHM conducts or supports activities for social contribution and arts and culture, and positively engages in the conservation of the global environment through its business activities.

ROHM Group Supply Chain Management Policy (1)

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 its 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.

ROHM Group Supply Chain Management Policy (2)

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.

ROHM Group Labor Policy (1)

"Respect for Humanity and Personality"

The ROHM Group will respect the humanity and personality of each employee, and ensure sound and stable lives of the Group's employees. In addition, the ROHM Group will comply with international standards of conduct and related laws and regulations of each country and region, and will encourage an open and comfortable office environment that respects cultural diversity, different customs, and other values.

1.Conduct guidelines: The ROHM Group will act as specified below in accordance with this Policy.

1.1 Maintenance and improvement of labor conditions: The ROHM Group will value the individuality of each and every employee. The Group aim to build diversified systems to handle personnel and employment as well as improve working conditions, in order for employees to feel affluent and comfortable.

1.2 Safe and comfortable office environment: The ROHM Group strives to secure a safe, healthy and comfortable working environment. In order to prevent work-related accidents, the Group will comply with relevant laws and regulations, and in line with international standards (ISO45001), make every effort to maintain occupational health and safety management programs. If any accident occurs in the workplace, the Group will promptly take appropriate measures, and strive to prevent the expansion and recurrence. In addition, the Group will not engage any employee under the minimum age provided for in international standards of conduct, and in related laws and regulations of each country and region, in jobs that endanger their health and safety.

1.3 Realization of work-life balance: The ROHM Group realizes that there are diverse working styles. The Group will support work-life balance and strive to maximize possibilities in promoting job satisfaction.

1.4 Respect for privacy: The ROHM Group will respect the privacy of individuals. The Group will pay close attention when dealing with personal data and ensure the appropriate management of it.

1.5 Respect for human rights and prohibition of discrimination: The ROHM Group will respect human rights and other rights of everyone. The Group will not allow discriminatory words, behavior, or treatment.

1.6 Understanding of diversity: The ROHM Group will strive to act in ways that respect the diversity of cultures, religions, customs, systems and other values of each country and region. Efforts will also be made to provide workers with disabilities with measures based on reasonable consideration (consideration for the physical environment, consideration for communication, and flexible changes to rules and practices etc.).

1.7 Humane treatment: The ROHM Group will work to prevent harassment and inhuman treatment in the workplace, including sexual harassment, physical or mental oppression, and verbal abuse, and will define disciplinary policies and procedures to eliminate the threat of the foregoing treatment and make those policies and procedures known to every employment.

ROHM Group Labor Policy (2)

1.8 Right to work: The ROHM Group will not employ any forced, bonded, or inhumane labor. All work will be voluntary, and the Group will allow employees to freely leave their job by offering to terminate their employment in accordance with the standards provided for by the relevant laws and regulations of each country and region. In addition, the Group will allow employees to leave the workplace during periods in which they do not engage in work in accordance with internal rules. As employment conditions, the Group will not require employees to surrender their identification card or pay unlawful fees, and will disclose any and all fees incurred by employees. The Group will work to notify employees of labor conditions in writing and verbally so that they are able to understand the contents thereof.

1.9 Prohibition of child labor: The ROHM Group will not employ any person under the minimum employment age provided for in international standards of conduct, and in related laws and regulations. The Group will establish a system to enable the use of job-training programs in compliance with laws and regulations. In addition, the Group will not engage employees under the age of eighteen (18) in jobs that endanger their health and safety.

1.10 Working hours: The ROHM Group will not require employees to work above and beyond the working hours provided for by international standards of conduct, and related laws and regulations, except in emergencies or unusual situations. Furthermore, the Group will strive to prevent overworking that impairs the physical or mental health of the employees, and allow them to have appropriate break time in accordance with related laws and regulations, as well as at least one day off per seven-day week.

1.11 Wages and benefits: The ROHM Group will pay wages and overtime allowances to employees without delay in compliance with international standards of conduct and related laws and regulations. The Group will communicate appropriately in writing the working hours, the basis for payment of overtime allowances, and other details to employees, and appropriately retain the records thereof including taxes, social insurance premiums, and other deductions. In addition, the Group will not deduct wages in excess of the basis provided for in related laws and regulations as a disciplinary measure.

1.12 Freedom of association: The ROHM Group will respect the employees' right of freedom of association as well as their right to join or not to join labor unions in accordance with international standards of conduct and related laws and regulations. In addition, the Group will work to provide opportunities for employees to have frank discussions with management about working conditions and management practices without fear of reprisal, intimidation, or harassment.

2. Management System: The ROHM Group will build a management system to observe this Policy and work on the continual improvement of this Policy. The management system will be designed to ensure compliance with applicable international standards of conduct, related laws and regulations, and customer requirements, and the identification and mitigation of operational risks related to this Policy.

ROHM Group Labor Policy (3)

2.1 Responsibility: The ROHM Group will operate the management system in accordance with this Policy approved by top management as provided for in in-house rules.

2.2 Identification of representative: The ROHM Group will identify an internal representative responsible for ensuring implementation of the management system and related items. The top management will review the status of the management system on a regular basis.

2.3 Legal and customer requirements: The ROHM Group will define the procedures for identifying, monitoring, and understanding international standards of conduct, related laws and regulations, and customer requirements.

2.4 Risk assessment and risk management: The ROHM Group will define the procedures for identifying risks involved in the Group's business activities, determining the relative significance of each risk, managing the identified risks, and ensuring regulatory compliance.

2.5 Improvement objectives: The ROHM Group will define improvement objectives and implementation plans, and periodically assess the achievement of those objectives in order to fulfill its social responsibilities.

2.6 Training: The ROHM Group will provide training to employees to implement this Policy and the improvement objectives, and to meet requirements in international standards of conduct and related laws and regulations, as well as customer requirements.

2.7 Communication to employees, etc.: The ROHM Group will define the procedures for communicating this Policy, improvement objectives, and the assessment of the achievement thereof to employees, suppliers, and customers in a clear and accurate way.

2.8 Participation of employees: The ROHM Group will define the procedures for assessing employee's understanding of matters provided for in this Policy and making sustained improvements to this Policy based on those assessment results.

2.9 Audits and assessments: The ROHM Group will conduct periodic self-assessments to ensure conformity with international standards of conduct, related laws and regulations, and customer requirements.

2.10 Corrective and preventive action: The ROHM Group will define procedures for correcting and preventing within an appropriate period of time the recurrence of defects/inadequacies detected in the course of internal or external audits.

2.11 Documentation and records: The ROHM Group will create and retain records related to the management system in accordance with international standards of conduct, related laws and regulations, and customer requirements.

2.12 Supplier responsibility: The ROHM Group will define procedures for communicating requirements provided for in this Policy to suppliers and monitoring the compliance of the suppliers with this Policy.

ROHM Group Occupational Health & Safety Policy

In accordance with the CSR policy, ROHM Group consider safety and health the top priority in our business activities, thereby proactively work to comfortable work environment without worries as well as preserve and promote our physical and mental health.

1. We comply with health and safety laws and their related regulations, other requirements, and our company's rules.
2. We prevent occupational accidents by implementing managerial measures based on the identification of hazard sources in our workplace and their severity via risk assessment.
3. We pursue highly-ranked awareness by systematic education, training, and other things concerning health and safety. Additionally we strive to prevent injuries, physical and mental illnesses by promoting the creation of a comfortable workplace through energized, voluntary activities.
4. We design and operate the occupational health and safety management system through consultation with our workers and their involvement in decision-making.
5. We carry out continuous improvement activities with full participation by setting the health and safety objectives and the action plan that are supported with adequate resources.

ROHM Group Environmental Policy

We shall always give due consideration to the conservation of the global environment and contribute to the healthy existence of humankind and the permanent prosperity of the company.

1. In order to realize a sustainable society, we engage in environmental conservation activities while promoting the effective use of resources, and taking into consideration the prevention of environmental pollution and biodiversity.
2. In order to improve our environmental performance, we ensure the operation of a series of environmental management systems for setting environmental targets, carrying out implementation plans, monitoring and evaluating our environmental performance, and continuously improve our issues.
3. We contribute to the solution and alleviation of social issues such as environmental problems by developing environmentally friendly products that help our customers save energy and miniaturize their products .
4. In order to pursue the minimization of environmental impact through a series of business activities from development to procurement, production, distribution, and sales, we make effective use of energy, raw materials, and water resources while reducing emissions of greenhouse gases, wastes, and water as well as ensuring management of chemical substances contained in materials and sub-materials.
5. We strive to nurture employees who care about the living environment and the global environment, and to educate all concerned.
6. We comply with domestic and international environmental laws and regulations, regional agreements, and the customer requirements to which we have agreed
7. We appropriately disclose environmental information and contribute to the local environment, and work in partnership and collaborate with stakeholders.

ROHM Group Ethics Policy (1)

"Respect for International Standards, and Compliance with Laws, Business Ethics, and in-house rules"
The ROHM Group will conduct its business observing the laws, business ethics, and in-house rules in order to continue to gain the trust of various stakeholders as a company in compliance with the laws. The Group will also, in line with the globalization of business activities, respect international standards of conduct.

1. Conduct guidelines: The ROHM Group will act as specified below in accordance with this Policy.

1.1 Fair action: The ROHM Group will act with virtue and fairness based on good social sense. The ROHM Group will be fully conscious of its social responsibility, that the Group is a public entity of society, and with the awareness that each individual employee represents the Group.

1.2 Compliance with laws and business ethics: The ROHM Group will always conduct its business faithfully in strict compliance with the laws and business ethics. The Group will continuously work to collect, manage and understand the laws and regulations of each country that are relevant to its business. The Group will also introduce and organize in-house rules corresponding to related laws and regulations.

1.3 Prohibition of personal conflict of interest: The ROHM Group prohibits any conduct that causes or may cause a conflict of interest between the Group and relevant individuals.

1.4 Compliance hotline and whistle-blower protection: The ROHM Group will, by following the provisions of in-house rules, establish a contact point (e.g. compliance hotline) to which Group employees may report business activities that, they suspect, may be in violation of this Ethics Policy, related laws and regulations, or business ethics, or that are creating or may create a conflict of interest. Moreover, in case the violation or possible violation of the law is discovered, the ROHM Group will promptly correct the condition, plan for the prevention of recurrence (or occurrence), and will deal strictly with the act of violation. The Group will not tolerate any negative treatment against any person or group who refuses to engage in an act of violation or who reports an act of violation or possible violation on the grounds of such refusal or reporting.

1.5 Prevention of bribery: The ROHM Group will not, by following the provisions of in-house rules and agreeing with the importance and necessity of preventing corruption as dictated by international agreements and standards, engage in any form of bribery or action, which may be otherwise deemed as bribery or invite suspicion, to any country's governmental agency, to members in official positions, nor to politicians for the purpose of gaining improper benefit or advantage, in order to continue transparent and honest business activities.

1.6 Prohibition of excessive business entertainment: The ROHM Group will not, by following the provisions of in-house rules, provide gifts, meals or other channels of financial advantage to its customers or other business associates beyond the bounds of what is socially acceptable. Furthermore, the Group will establish clear policies and supervisory procedures in each country or region for dealing with offers of entertainment or gifts from its suppliers and will not accept anything which may result in personal profit.

1.7 Disclosure of information: The ROHM Group will disclose timely, fairly and actively its corporate information in accordance with both legal requirements and its company policies. This includes relevant information on company missions and policies, business activities and social contributions of the ROHM Group to its stakeholders.

ROHM Group Ethics Policy (2)

1.8 Intellectual property rights: The ROHM Group will strive to improve its own technology in every division. The Group will establish and accumulate the results of its development as its intellectual property, and utilize these effectively in growing its business. The Group will hold great value for intellectual property rights. As such, the Group will not use third parties' rights without their permission, nor abuse the Group's own rights.

1.9 Implementation of fair sales activities: In line with the globalization of business, the ROHM Group will observe the provisions of in-house rules and value free market competition and practice fair sales activities. The Group will pursue neither sales nor profit unless the group will comply with the law, social ethics, and contractual obligations. The Group will not violate any law, social ethics or contractual obligations nor engage in any unlawful or unethical conduct, such as anticompetitive behavior (cartel), collusive bidding, fictitious transactions, restraining of selling prices, etc. Moreover, the Group will comply with import/export laws and regulations in order to contribute to a peaceful and safe international community.

1.10 Fair and appropriate content: The ROHM Group will release fair and appropriate content in public relations activities based on accurate, fact-based information in accordance with applicable laws and regulations.

1.11 Conflict minerals: The ROHM Group will strive for the protection of human rights, as such, the Group will aim not to use conflict minerals as raw materials, that benefit armed groups in disputed regions whose activities are linked to human rights violations.

1.12 Management of Confidential and individual information: The ROHM Group will thoroughly and securely manage information acquired through its business activities including confidential information of the ROHM Group, third parties, and privacy information of individuals concerned, in accordance with the provisions of in-house rules.

1.13 Fair accounting and disclosure: The ROHM Group will appropriately record and report information based on fair accounting principles and facts. Accordingly, the Group will pay tax obligations in compliance with the applicable tax laws. The Group aim to pay attention to the interests of all stakeholders and hold in high esteem the other party's position. The Group's aim is to establish and foster the relationship of mutual trust through disclosure of information.

2.Management System: The ROHM Group shall build a management system to observe this Ethics Policy and work on the continual improvement of this Policy. The management system shall be designed to ensure compliance with applicable international standards of conduct and related laws and regulations, and the identification and mitigation of operational risks related to this Policy.

ROHM Group Ethics Policy (3)

2.1 Responsibility: The ROHM Group will operate the management system in accordance with the provisions of in-house rules and this Policy.

2.2 Identification of representative: The ROHM Group will identify an internal representative responsible for ensuring implementation of the management system and related items. The top management will review the status of the management system on a regular basis.

2.3 Legal and customer requirements: The ROHM Group will define the procedures for identifying, monitoring, and understanding international standards of conduct, related laws and regulations, and customer requirements.

2.4 Risk assessment and risk management: The ROHM Group will define the procedures for identifying risks involved in the Group's business activities, determining the relative significance of each risk, managing the identified risks, and ensuring regulatory compliance.

2.5 Improvement objectives: The ROHM Group will define improvement objectives and implementation plans, and periodically assess the achievement of those objectives in order to fulfill its social responsibilities.

2.6 Training: The ROHM Group will provide training to employees to achieve the improvement objectives and to meet the requirements of international standards of conduct and related laws and regulations in accordance with this Policy.

2.7 Communication to employees, etc.: The ROHM Group will define the procedures for communicating this Policy, improvement objectives, and the assessment of the achievement thereof to employees, suppliers, and customers in a clear and accurate way.

2.8 Participation of employees: The ROHM Group will define the procedures for assessing employee's understanding of matters provided for in this Policy and making sustained improvements to this Policy based on those assessment results.

2.9 Audits and assessments: The ROHM Group will conduct periodic self-assessments to ensure conformity with international standards of conduct, related laws and regulations, and customer requirements.

2.10 Corrective and preventive action: The ROHM Group will define procedures for correcting and preventing within an appropriate period of time the recurrence of defects/inadequacies detected in the course of internal or external audits.

2.11 Documentation and records: The ROHM Group will create and retain records related to the management system in accordance with the provisions of in-house rules and related regulations.

2.12 Supplier responsibility: The ROHM Group will define procedures for communicating requirements provided for in this Policy to suppliers and monitoring the compliance of the suppliers with this Policy.

ROHM Group Information Security Policy

1. Compliance

   The ROHM Group shall comply with domestic and international laws and regulations, codes, and contractual requirements concerning information security. The ROHM Group will establish internal regulations for information security that conform to these requirements and ensure that these regulations are observed.

2. Information security management system

   The ROHM Group will recognize information security measures as one of its priorities in management and business, establish an information security management system, and maintain and continuously improve organizational, personal, physical, and technical information security under the leadership of top management.

3. Protection of information assets

   The ROHM Group will appropriately protect the information assets it handles from threats to confidentiality, integrity, and availability, and take appropriate management measures.

4. Prevention of and response to incidents

   The ROHM Group will strive to prevent information security incidents and, in the event of an incident, quickly and appropriately take initial action to minimize the impact, followed by investigations to determine the cause and efforts to prevent a recurrence.

5. Education and training

   The ROHM Group will continuously educate and train its top management and employees on information security to increase their awareness of this area.

6. Assurance of information security throughout the supply chain

   The ROHM Group will work to maintain and improve information security throughout its supply chain, including suppliers and contractors.

ROHM Group Risk Management and Business Continuity Policy

The following is defined to implement the objectives and policies such as " Company Mission" and "Basic Management Policy" and to promote risk management and business continuity management within ROHM Group.

Risk Management
・Promote group-wide global risk management.
・Identify and assess critical risks and take measures to minimize losses.
・Regularly review the status of evaluation and response to critical risks and share them with the management team.
・In the event of an incident, promptly gather and report information, and transition to a business continuity and recovery plan as appropriate.

Business Continuity
・Place the highest priority on ensuring the safety and confirming the safety of employees and related persons, and strive to prevent secondary disasters such as fire and environmental pollution.
・To maintain the supply chain, we will work for prompt restoration of production and business.
・Fulfill our social responsibilities as a company.
・The entire company will work together to promote business continuity management and recovery activities under the direction of the management team.
・Periodically review the business continuity plan in response to changes in the business environment and strive for continuous improvement of the business continuity management system.

ROHM Group Quality Compliance Conduct Guidelines (1)

1. Fair Action (Integrity/ethics-based Action)
   We act with virtue and fairness based on good social sense. We are fully conscious of our social responsibility, that the company is a public entity of society, and with the awareness that we as individuals represent the company.
2. Production Activities Keeping Quality as Top Priority
   Throughout every process, to ensure product quality we establish strict standards and procedures and perform activities in accordance with the established standard and procedures.
3. Production for Customers' Trust and Expectation
   We always strive to consider our customers' point of view and produce products following changes in customers' needs. Therefore, we strive to achieve customers' satisfaction in quality, performance, safety, and price.
4. Quality as Top Priority
   We strive to conduct our development, production, and sales activities with full attention to quality and safety as our top priority in accordance with the legal requirement, contract terms of our customers' and our internal rules and standards. We strive to secure high functioning, high performance and reliability while assuring no product liability issue can arise.
5. Provision of Correct and User Friendly Information
   In order to prevent misuse, improper use and accidents, we provide our customers with "information about safety" including usage patterns using comprehensible displays and explanations.

ROHM Group Quality Compliance Conduct Guidelines (2)

> 6. Our Action when an Accident Occurs
>
> If we receive information concerning the safety of our products, we will immediately conduct an investigations to uncover the facts. In the event we discover problems in the safety of our product, we will faithfully and promptly investigate the root cause and will act to prevent the expansion and recurrence of the problem.

III. ROHM Group Supply Chain Management Guidelines

ROHM Group Code of Conduct for Business Partners

Business partners must operate in compliance with each country's laws and regulations in all business activities. Business partners must not only comply with laws and regulations but also enhance their responsibilities and corporate ethics for society and environment based on the globally acknowledged higher standards.

⊙ Matters of request for the Guidelines in general are as follows:

(1) Business partners must understand that the ROHM Group shall promote its activities in accordance with the Code of Conduct established by the Responsible Business Alliance (RBA), an organization consisting mainly of manufacturers related to electronic devices, as well as automobiles, toys, airplanes, and IoT technology companies, based on the policies set forth in Chapter II, and also strive to comply with it.

【RBA code of conduct】

The RBA (Responsible Business Alliance) Code of Conduct is a code established by an organization consisting mainly of manufacturers related to electronic devices, as well as automobiles, toys, airplanes, and IoT technology companies. The RBA Code of Conduct states that the working environment is safe and that workers are treated with respect and dignity in the electronics industry, or in industries where electronic devices are the main component, and in their supply chains, and to the environment. Along with our responsibilities, we have established standards for conducting business ethically. The Code of Conduct covers areas such as occupation, health and safety, environmental protection, and ethics and their management systems, and is the basis of Rohm Group SCM Guidelines.

(2) Business partners must cooperate with self-assessment and CSR Procurement Audit conducted by the ROHM Group in order to verify the compliance status in the previous clause.

(3) Business partners must strive to improve the compliance status if the ROHM Group determines it rationally necessary based on the results of the self-assessment and CSR Procurement Audit.

(4) Business partners must notify the relevant buyer in the ROHM Group's Procurement Division if they are affected by a natural disaster, an information security accident, or a similar event that is likely to have an impact on the ROHM Group's business activities.

（1）Sustainability* Promotion System

The RBA (Responsible Business Alliance) Code of Conduct is a code established by an organization consisting mainly of manufacturers related to electronic devices, as well as automobiles, toys, airplanes, and IoT technology companies. The RBA Code of Conduct states that the working environment is safe and that workers are treated with respect and dignity in the electronics industry, or in industries where electronic devices are the main component, and in their supply chains, and to the environment. Along with our responsibilities, we have established standards for conducting business ethically. The Code of Conduct covers areas such as occupation, health and safety, environmental protection, and ethics and their management systems, and is the basis of Rohm Group SCM Guidelines. The ROHM Group has established a sustainability promotion system under the initiative of the EHSS (Environment, Health & Safety, Sustainability) General Committee to ensure that the ROHM Group's business activities related to the promotion of sustainability are adapted to changes in the customers' standards, including the RBA Code of Conduct. Under the EHSS General Committee, there are management systems in place for labor, health and safety, the environment, ethics, information, the supply chain, quality, and risk management/BCM. The ROHM Group seeks to enhance contribution to a sustainable society throughout our supply chain by linking CSR with management under these management systems.

Quality of the company

Product quality | Management quality
QCDS + CSR
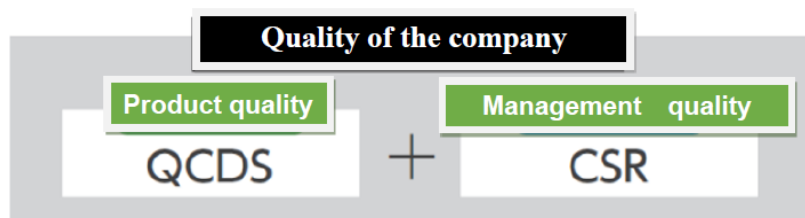
At the ROHM Group, we would like to ask every partner to contribute to this idea and build a sustainability promotion system. For this purpose, we would like you to conduct the following practices ① to ④.

* Sustainability refers to the ability of people, companies, society, or the global environment to be sustained into the future.

① Formulation and dissemination of company management policy (Sustainability policy)

The policy of sustainability, which indicates the direction of corporate quality of management, is determined by the management layer, and the content of the intention is to be educated to the employee, and it is required to be known by all means such as posting and distribution.

② Formulation and education of Sustainability Code of Conduct

In order to achieve Management policy (Sustainability policy), it is important to specify the guideline of action to describe the action that the employee should practice in detail of the item shown in the SCM guidelines, and to complete it by the education.

③ Construction and remotion of Sustainability Promotion System

To promote the sustainability, build an organization to promote the policy and grant responsibility and authority for each and every individual, It is necessary to build a management system to practice and review based on the plan.

④ Participation and Implementation for social contribution

Coexistence with society and the region is indispensable in the sustainability of the enterprise. The contribution activity to society and the region can increase the existence value of the enterprise, and it also can lead to high evaluation.

(2) Labor

Your company is committed 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, student, contract, direct employees, and any other type of worker. The recognized standards, as set out in the annex, were used as references in preparing the Code and may be a useful source of additional information.

The labor standards are:

① Prohibition of Forced Labor

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons 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 in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a language the worker can understand, that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. Your company shall maintain documentation on all leaving workers. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Notwithstanding the foregoing, employers can only hold documentation if necessary to comply with the local law. In this case, at no time shall 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 shall not be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. 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. Your company shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Your company 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. Your company 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 shall be provided

③ Working Hours

Working hours shall not exceed the maximum set by local law. Further, a workweek shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime shall be voluntary. Workers shall be allowed at least one day off every seven days.

④Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. 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 shall be within the limits of the local law

⑤Non-Discrimination/Non-Harassment/Humane Treatment

Your company shall commit to a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or 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. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. 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).

⑥Freedom of Association and Collective Bargaining

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with these principles, your company 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. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

(3) Health and Safety

Your company recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Your company also recognize that ongoing worker input and education is 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 safety hazards (e.g. chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag out), and ongoing 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 the risks to them associated with these hazards. Eliminate or reduce the risk to pregnant women, women within one year after childbirth, and nursing period from high-risk working environment considering the risks. Appropriate procedures should also be followed, such as the inclusion of appropriate facilities for nursing mothers.

② Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities 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: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and e) facilitate return of workers to work.

④ Management of occupational safety risks

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or 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. Protective programs shall include educational materials about the risks associated with these hazards.

⑤Ergonomics Management

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 Inspection of chemicals

In using and purchasing chemicals, we must have a process to inspect and approve those substances. Also, for approved substances, a chemical list (chemical name, CAS No, use and storage location, quantity of hazardous substances, max. amount of storage permitted by law) that can explain these details shall be prepared and updated once a year.

⑧Chemical storage

When storing chemicals, they shall be stored in a container that is free from damage and leaks of materials suitable for the substance. In addition, if storing in containers where there is a risk of chemical spills, it shall not be stacked and shall be stored inside the secondary containment vessel (facility) that limits the spill area to prevent contamination of the surrounding area and the environment.

⑨Chemical hazard communication

The Material Safety Data Sheet (MSDS) or the Safety Data Sheet (SDS) shall be prepared in the mother language or understandable languages and shall be readily accessible to employees in areas where chemical substances are used. Containers for chemical substances are labeled with the names of their contents and GHS (Globally Harmonized System for Classification and Labeling Chemicals) labels in accordance with applicable laws and regulations.

⑩ 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 the Auditee or a labor agent are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, and 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.

⑪Health and Safety Communication

Your company 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 health and safety concerns without retaliation.

(4) Environmental

Your company recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized 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 Conservation

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products is to be conserved 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 to the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Hazardous waste data is to be tracked and documented.

④ Solid Waste

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

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. Your company is to conduct routine monitoring of the performance of its air emission control systems.

⑥ Materials Restrictions

Your company is 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.

⑦Water Management

Your company 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. Your company shall also conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

⑧Energy Consumption and Greenhouse Gas Emissions

Your company is to establish and report progress toward a corporation-wide greenhouse gas reduction goal. Energy consumption and all relevant Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions are to be tracked, documented, and publicly reported. Your company is to look for methods to improve energy efficiency and to minimize its energy consumption and greenhouse gas emissions.

(5) Ethics

To meet social responsibilities and to achieve success in the marketplace, Your company and their agents shall uphold the highest standards of ethics including the following:

The ethics standards are:

① Business Integrity

The highest standards of integrity shall be upheld in all business interactions. Your company shall have a zero tolerance policy that prohibits any and all forms of bribery, corruption, extortion, and embezzlement.

② No Improper Advantage

Bribes or other means of obtaining undue or improper advantage shall 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 anti-corruption laws.

③ Disclosure of Information

All business dealings shall be transparently performed and accurately reflected on Your company business books and records. Information regarding Your company labor, health and safety, environmental practices, business activities, organizational structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions and practices in the supply chain is unacceptable.

④ Intellectual Property

Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

⑤ Fair Business, Advertising and Competition

Standards of fair business, advertising and competition shall be upheld.

⑥ Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers[1] shall be maintained unless prohibited by law. Your company should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

[1] Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

⑦ Responsible Sourcing of Minerals

Your company shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold, and cobalt in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization 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.

⑧Privacy

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

(6) Establishment of Crisis Management System

Business partners must establish a crisis management system and supply chain that are resistant to disasters and unforeseen circumstances in order to protect the lives and physical safety of their employees and ensure business continuation and stable supply of products.

The standards for crisis management system are as follows:

① BCP Formulation

The types and degree of risks that may affect the business continuation shall be defined and a business continuity plan (BCP) must be formulated.

② Establishment of Emergency Contact Network

An emergency contact network that includes your company business partners must be established and maintained, to be able to minimize damages and take actions to ensure quick recovery.

③ Securing Multiple Production Bases or Alternative Production Base

Multiple production bases or an alternative production base must be secured on the assumption that your company's production base is hit by disaster.

④ Setting of Safety Inventory of Your Company's Products

Safety inventory of your company products must be set and practiced to strive to minimize a supply risk on the assumption that your company production base is hit by disaster.

⑤ Listing of Critical Raw Materials

For critical raw materials[2] necessary for production of your company products, the business partners and production bases must be listed up and routinely reviewed.

Methods or means of procurement in case raw material supply is withheld must be in place.

Critical raw materials refer to products that are supplied by one company and produced in one production base.

⑥ Promotion of BCP in Supply Chain

Dissemination and penetration of BCP to your company business partners must be promoted in order to establish the crisis management system throughout the entire supply chain.

(7) Information security

Risk management for information security must be regarded as one of important management issues. In particular, dealing with important information such as personal information and customer information is also a social responsibility to protect them. "The recognized management system ISO 27001:2022 has been referenced in the formulation of this standard, and it is possible to obtain useful additional information from it."

① Decision of Information security policy （ISO27001:2022: A.5.1）

In order to be effective for policies and regulations to make the content suitable for the situation of the organization. For the purpose it is important not to be a copy of the sample but to consider the business and the risk of the organization itself. In order to ensure the actual effect of the countermeasures, it is necessary to let all staffs know the specified regulations, and regularly confirm the compliance of the procedures. It is particularly important to modify the contents according to the needs.

② Confidentiality obligations of employees （ISO27001:2022: A.6.5、A.6.6）

When hiring and dismissing, let all employees swear to abide by the security obligations, and the confidentiality obligations after resigning. At the same time, notify the employment rules and service rules clearly to make the information security countermeasures effective. Especially when dismissing or changing jobs, it is also very important to ensure the return of borrowed assets and cancel the access authority granted.

③ Entry exit management （ISO27001:2022: A.7.1～A.7.6）

There are many information and related facilities in the building and office. It is necessary to carry out the rule based on situation of each risk and follow it to prevent the outsiders who have opportunity to touch these information and facilities,

④ Documents Media management （ISO27001:2022: A.5.9～A.5.14、A.7.10）

There are many accidents leaking information by documents and electronic storage media. It is necessary to appropriately manage documents and storage media with important information recorded, such as locking of storage cabinets, prohibition of printing output, and crushing of storage media. In addition, it is important to keep the office and the meeting room in order to avoid improper handling due to important documents are lost in other goods.

⑤ Application management of information system（ISO27001:2022: A.8.6、A.8.15、A.8.25、A.8.26）

Information security measures necessary for the operation and management of information systems and communication networks include preparation of various procedure documents including matters necessary for securing security, implementation of operations according to rules such as procedure instructions, monitoring, acquisition and analysis of logs. It is also important to monitor the performance and capacity of the information system in order to operate the operating system stably.

⑥ Antivirus　（ISO27001:2022: A.8.7）

Antivirus programs include antivirus software to update the pattern files. In addition, it is important to carry out regular virus inspection and to know the treatment which should be taken when the problem arises.

⑦ Vulnerability measures（ISO27001:2022: A.8.8、A.8.9、A.8.27〜A.8.32）

The appropriate weakness measures include setting up security, such as regular availability of vulnerability information and threat information, unwanted service stops, patches (fixes), version control, configuration management, and change management.

Once completed, operational systems are difficult and costly to modify. It is essential to include information security considerations from early stages, such as planning and design. For this purpose, regardless of whether development activities take place internally or externally, emphasis should be placed on actions such as including security requirements in the specification document, considering avoidance of vulnerabilities during design and development, and performing appropriate system tests to eliminate vulnerabilities.

⑧Loss and theft measures　（ISO27001:2022: A.6.7、A.8.12）

The location of storage media such as mobile PC and USB memory includes external public space, remote office, home etc. In outside, considering the high risk of theft and loss as compared with internal use, the provision of carrying out is examined, and the countermeasures such as strong authentication and encryption are examined.

⑨Managing user IDs（ISO27001:2022: A.5.16）

For proper user ID management, there are some improvements in the user ID rules, the deletion of unnecessary IDS by regular revision of the user ID, the restriction of the use of the common ID, the discovery and the identification of the ID which sets the privilege not originally necessary, and the simple password setting which is easy to be found .

⑩Managing access rights　（ISO27001:2022: A.5.18、A.5.20〜A.5.22）

The appropriate access control can be set in advance, and the information system that can be accessed based on the policy is limited to the user, the limited functionality is available, and the user's access rights are reviewed.

Network connectivity increases risk, such as the risk of intrusion via the connected network. To reduce such risk, imposing appropriate access controls on networks is essential. This can be done, for example, by dividing networks and authenticating external connections.

⑪ System Trouble Prevention （ISO27001:2022: A.5.29、A.5.30）

It is no exaggeration to say that the biggest impact of an event affecting the availability of one of the important elements of information security is the failure of information systems related equipment. In order to satisfy the requirements of availability required for information systems, it is essential to incorporate appropriate fault prevention functions corresponding to requirements for availability in the information system.

⑫ Responses to Incidents and Accidents （ISO27001:2022: A.5.24～A.5.28）

Should an information security incident or accident occur, measures suited to the event must be taken appropriately and quickly across the organization to prevent the escalation of damage and contain the impact. For this purpose, it is necessary to determine the actions to be taken and establish procedures for them, based on the incidents and accidents that are likely to occur, and to prepare front-line personnel for such situations by making them ready to take necessary actions smoothly.

(8) Management System

> Your company shall adopt or establish a management system whose scope is related to the content of this Guideline. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the your company operations and products; (b) conformance with this Guideline; and (c) identification and mitigation of operational risks related to this Guideline. It should also facilitate continual improvement.

The management system should contain the following elements:

① Company Commitment

Policies must be developed and published regarding corporate human rights, health and safety, environment and ethics that are endorsed by senior management and that affirm the company's commitment to due diligence and continuous improvement practices.

These must be communicated in a language understood by employees and by any available means.

② Management Accountability and Responsibility

Clearly identify senior executives and company representatives responsible for ensuring implementation of the management system and related programs.
Senior management should periodically review the status of the management system.

③ Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Guideline.

④ Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety[3] and labor practice and ethics risks associated with Auditee'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.
[3] Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

⑤Improvement Objectives

Documented performance goals, objectives, and implementation plans should be developed to improve social, environmental, and health and safety performance (including periodic evaluation of performance in meeting such goals).

⑥Training

Programs for training managers and workers to implement Your company policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

⑦Communication

A process for communicating clear and accurate information about Your company policies, practices, expectations and performance to workers, suppliers and customers.

⑧ Worker/stakeholder Engagement and Access To Remedy

Where relevant or necessary to the practices and conditions described in these Guidelines, a process for ongoing two-way communication with workers, their representatives, and other stakeholders must be established. A safe environment is required where complaints and feedback can be provided without fear of retaliation or retribution to obtain feedback on the practices and conditions set forth in these Guidelines and to facilitate continuous improvement.

⑨Audits and Assessments

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

⑩Corrective Action Process

A process for timely correction of non-conformance identified by internal or external assessments, inspections, investigations and reviews.

⑪Documentation 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.

⑫Supplier Responsibility

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

(9) Logistics

Your company must build a supply chain in accordance with the following guidelines in order to constantly strive to continue business, stably supply products, reduce the environmental impacts of logistics, and improve the quality of logistics.

① Logistics Quality

To ensure appropriate management in the three aspects of logistics—cost and productivity, quality and service, and distribution and delivery—, Your company is to evaluate their current situation against their objectives by using logistics management indicators (KPIs), visualize the process for achieving the objectives, and make improvements.

② Implementation of Security Export Control

Your company is to 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.

③ Reduction of Environmental Impacts

Your company is to commit to reducing the emission of CO_2 and other greenhouse gases not only from their own production and transport but also from their entire supply chains.

④ Green Logistics

Your company is to apply this concept to organizational actions, human resources development, site-specific initiatives, and harmonious coexistence with communities by viewing logistics as an overall system for transporting goods rather than focusing only on the act of transporting itself.

To continue sound corporate activities free from fraud and Quality Compliance by acting honestly and fairly, It is necessary to establish a system that enables compliance with the following.

※"quality compliance" means to quality norms related to products and services. It also refers to the adherence to promises made to customers and compliance with laws, regulations, and quality norms, the violation of which constitutes a " quality compliance violation".

① Resources

It is necessary aiming to create a work environment that ensures Quality Compliance.
（Example）Provide appropriate personnel, make appropriate investments such as mechanization, and ensure that there is no shortage of personnel.

② Competence

It is necessary have a physical and human structure in which unqualified personnel are unable to take charge.
（Example）As an example, a system for ID recognition has been introduced so that only skilled personnel and qualified personnel can take charge of inspections, etc. They are putting a brake on double-checks, etc.

③ Awareness

It is necessary to make them aware that quality compliance is of paramount importance
（Example）Workshops on quality compliance are held and discussions are held between employees.

④ Communications

Internal openness is improved and information on quality irregularities is not covered up.
（Example）A consultation office has been set up and a person in charge has been appointed to facilitate the collection of internal feedback.

⑤ Monitoring

It is necessary to also cover quality compliance audits.
（Example）Inspections are carried out by management and the other sections internal audits to ensure that the predetermined actions are carried out as specified.

⑥ Data management

It is necessary to create a physical and personnel system that prevents falsification of inspection and measurement data.
（Example）The system is designed so that there is no room for falsification so that the inspection and measurement results are directly converted into data and input into the information system.

Reference: The following standards were referred to when formulating the Guidelines. Please see these standards, etc., if you need further information.

International Labour Organization (ILO): Guidelines on Occupational Safety and Health Management Systems

http://www.ilo.org/global/publications/books/lang--en/index.htm

United Nations Global Compact

http://ungcjn.org/index.html

ISO26000

http://iso26000.jsa.or.jp/contents/

RBA Code of Conduct

http://www.responsiblebusiness.org/

JEITA (Japan Electronics and Information Technology Industries Association)

http://www.jeita.or.jp/

ISO14001/ISO45001

http://www.iso.org/home.html

IPA information processing promotion organization: Benchmark for information security

https://www.ipa.go.jp/security/benchmark/index.html

General Information on the Guidelines

1. We will never disclose the contents provided by our business partners to external parties.
2. As the contents of the Guidelines may change due to revisions in laws and regulations, company rules, etc., please check them on the website of ROHM Co., Ltd. as needed.
3. Please contact us at the following phone numbers if you have any questions about the Guidelines.

Inquiries about the contents of the Guidelines:

Procurement Division	Phone: +81-75-321-4786
Sustainability Promotion Division	E-mail: csr@rohm.co.jp

Document history

Year	Month	Edition	Revision
2013	May	1st edition	Rev. 001
2015	July	2nd edition	Rev. 002
2016	June	3rd edition	Rev. 003
2017	July	4th edition	Rev. 004
2017	Dec.	5th edition	Rev. 005
2018	June	6th edition	Rev. 006
2020	April	7th edition	Rev. 007
2021	April	8th edition	Rev. 008
2022	June	9th edition	Rev. 009
2023	April	10th edition	Rev. 010
2024	April	11th edition	Rev. 011
2025	April	12th edition	Rev. 012

Revision history (Major changes)(1)

Edition	Revised section	Description of change
3rd edition	Policies	・Additional labor policy ・Additional occupational health & safety policy ・Additional environmental policy ・Additional Ethics policy
4th edition	Policies	Revised ROHM Group Procurement policy
5th edition	Policies	Revised ROHM Group Environmental policy
6th edition	Overall	・Name change EICC→RBA ・Response to RBA6.0
7th edition	Policies Guidelines	・Revised ROHM Group Occupational Health & Safety Policy ・Revised ROHM Group CSR Procurement Guidelines (2)Health & safety
8th edition	Policies Guidelines	・Add Rohm group information security policy ・Add (1) about CSR promotion ・Add (2) RBA Code of Conduct ・Add (8) information security
9th edition	Overall Policies Guidelines	・Changed title: ROHM Group CSR Procurement Guidelines → ROHM Group Supply Chain Management Guidelines ・Revised ROHM Group CSR Policy and changed title to ROHM Group Sustainability Policy ・Revised ROHM Group Procurement Policy and changed title to ROHM Group Supply Chain Management Policy ・Revised ROHM Group Information Security Policy ・Reviewed and transformed "(1) CSR Promotion System" into "(1) Sustainability Promotion System" ・Revised "(6) Ethics" ・Add "(10) Logistics"
10th edition	Policies Guidelines Code of Conduct for Business Partners (4) Health and Safety (5) Environmental (6) Ethics	・Revised Sustainability Policy ・Revised Labor Policy ・Revised Ethics Policy ・Add (4) ・Add encouragement to raise health and safety concerns in (11) ・Corrected wordings in (1) ・Add the management of ozone-depleting substances in (5) ・Add the establishment of a greenhouse gas reduction goal in (8) ・Add due diligence in responsible sourcing of minerals in (7)

Revision history (Major changes)(2)

Edition	Revised section	Description of change
11th edition	Policies Guidelines (2)Labor (4)Environmental (6)Ethics (7) Information security (10)Quality Compliance	・ROHM Group Human Rights Policy (added)) ・ROHM Group Risk Management and Business Continuity Policy (added) ・ROHM Group Quality Compliance Conduct Guidelines(added) ① Prohibition of Forced Labor ② Young Workers ③ Working Hours ④ Wages and Benefits ⑤ Non-Discrimination/Non-Harassment/Humane Treatment ⑥ Freedom of Association and Collective Bargaining ⑧Energy Consumption and Greenhouse Gas Emissions ⑦ Responsible Sourcing of Minerals　　Added Cobalt ⑦Vulnerability measures ⑩Managing access rights ⑫Response to incidents and accidents Added
12th edition	ROHM Group Supply Chain Management Policy 6. CSR Procurement/Logistics ROHM Group Labor Policy　1.6 Understanding of diversity: (8) Management system ① Corporate commitment ⑧ Worker/stakeholder involvement and access to remedy (7) Information security	Delete a sentence due to the abolition of the "Green Procurement Guidelines" Added consideration for people with disabilities Compliance → Due diligence Responsibility to the social environment → Human rights, health and safety, environment and ethics Declaration of policy → Formulation and publication of policy (Addition) Communication to employees Addition of stakeholders to the scope of grievance handling Grievance handling mechanism → Two-way communication process (Addition) Creation of an environment without fear of retaliation Addition of ISO27001 item numbers related to each item