

矽品精密工業股份有限公司

供應商行為準則

矽品精密工業股份有限公司及其子公司致力落實企業社會環境責任，以確保確誠信穩健經營、勞工權益、工作健康安全、永續環境資源及推動社會公益。我們將責任商業聯盟 (Responsible Business Alliance, RBA) 行為準則作為企業社會責任之管理基準，故訂定供應商行為準則(以下稱「本準則」)為遵循依據，要求供應商共同遵守。

本準則由五個部分組成。第一、二及三部分分別概述勞工、健康與安全，以及環境永續的標準；第四部分概述有關商業道德的標準；第五部分概述能夠貫徹本準則的合宜管理體系所需的要素。

一、 勞工

供應商應根據國際社會公認的準則，承諾維護勞工的人權，並尊重他們。這適用於所有勞工，包括臨時工、移民工、學生工、合約勞工、直接僱員以及任何其他類型的勞工。本準則起草時參考了前述所列出的公認標準，而這些標準都是具有參考價值的額外資訊來源。勞工標準：

1. 禁止強迫勞動：

不允許任何形式的強迫勞動，包括但不限於債役(包括抵債)或契約奴工、非自願或剝削性監獄勞工、奴役或人口販運。這包括為了得到勞工或服務而使用恐嚇、強逼、威脅、綁架或詐騙手段運送、窩藏、招募、調配或接收勞工。除了禁止對勞工出入工作場所作出不合理限制外，也不應無理地約束勞工在工作場所內行動的自由，包括勞工宿舍或生活住所。在招聘程序中，必須為所有勞工提供其母語或勞工可以理解的語言之書面僱傭協議，並且在協議中載明僱傭條件。必須在外籍移工離開原本的國家前，為其提供僱傭協議，而在其抵達接收國家後，該僱傭協議不得有任何替換或更改，除非有關更改是為了符合當地法律的要求並提供相同或更佳條件。所有工作應當是自願的，若發出合理通知，勞工擁有隨時自由離職或終止僱傭關係的權利，且如果勞工按照僱傭協議給予合理的通知，則有權終止僱傭關係而不受懲罰。供應商應保存所有離職員工的文件。供應商、仲介人及二級仲介人不得扣留或以其他方式毀壞、隱藏、沒收勞工的身份證或出入境證件(如政府頒發的身份證明、護照或工作許可證)，供應商只能在法律許可的情況下才可依法扣留文件，就算是在此情況下，任何時候也不可拒絕勞工取用其文件。供應商或仲介人不得要求勞工繳付仲介人或二級仲介人的招聘費用或其他與其聘用相關費用。若發現勞工已支付任何該等費用，該等費用須償還予勞工。

2. 青年勞工：

不得在任何製造工序中使用童工。「童工」指僱傭任何未滿 16 歲、或未達強迫教育年齡、或該國家/地區最低就業年齡的人士(三項中取其指定年齡最大的一項)。未滿 18 歲的勞工(青年勞工)不得從事可能會危及他們健康或安全的工作，包括夜間值勤或加班。供應商應當透過適當地保管學生記錄、嚴格審核教育合作夥伴和按照適用的法律法規保障學生的權利，從而確保對學生工的管理得當。供應商應採取適當的機制核實勞工的年齡。供應商應當為所有學生工提供適當的支援和訓練。如果沒有當地法律的規管，學生工、實習生和學徒的薪資水平應最少與從事相同或相似工作的其他入門級員工相等。如果發現僱用

童工，供應商應提供立即的協助及補救措施。

3. 工時：

工作時數不應超過當地法律規定的最大限度。此外，每週的工作時數不應超過 60 小時(包括加班)，緊急或特殊情況除外。任何加班必須是出於自願性，每七天應當允許勞工至少休息一天。

4. 工資與福利：

支付給勞工的工資應當符合所有相關的薪酬法律，包括有關最低工資、加班和法定福利的法律。所有員工應同工同酬、同值同酬。勞工的加班工資應高於常規時薪水準。禁止以扣除工資作為紀律處分的手段。在每個支薪週期，應及時為勞工提供簡明的工資單據，內含充足的資料證實支付給勞工的薪酬準確無誤。必須按照當地法律聘用臨時工、派遣工和外包工人。

5. 反歧視/反騷擾/人道待遇：

供應商應承諾提供一個無騷擾以及無非法歧視的工作場所，並應避免苛刻或非人道地對待員工，包括暴力、性暴力、性騷擾、性侵犯、體罰、心理或生理壓迫、欺凌、公開羞辱或口頭辱罵；也不得威脅進行任何此類行為。供應商不得因人種、膚色、年齡、性別、性傾向、性別認同或表現、種族或民族、殘疾、懷孕、信仰、政治立場、團體背景、退伍軍人身份、受保護的基因資訊或婚姻狀況等在招聘及實際工作中歧視或騷擾員工，例如因此而影響工資、晉升、獎勵和接受培訓機會等。有關的紀律政策及程序必須有清晰的定義，並向員工清楚地傳達。應為員工提供適當的場所進行宗教活動和殘疾便利設施。此外，不得讓員工或準員工接受帶有歧視性的醫學檢驗(包括驗孕或處女檢驗)或身體檢查。本準則根據《國際勞工組織(就業和職業)歧視公約》(111 號)草擬。

6. 結社自由和集體談判：

員工與管理層之間的開放式溝通和直接接觸，是解決工作場所和薪酬問題最有效的方法。員工和/或他們的代表應當能夠在不用擔心歧視、報復、威脅或騷擾的情況下，公開地就工作條件和管理方法與管理層溝通以及分享其想法和憂慮。根據這些原則，供應商應當尊重所有員工自行組織和參加他們所選擇的工會、集體談判和參加和平集會的權利，同時也應尊重員工不參加這類活動的權利。如果結社自由和集體談判的權利受到適用法律法規的限制，員工應被允許選擇並加入替代合法形式的員工代表。

二、 健康與安全

供應商應意識到，除了盡量減少與工作相關的傷病發生率外，安全、健康的工作環境有助提高產品和服務的質素、生產的穩定性以及員工的忠誠度和士氣。供應商也應意識到持續地增強對員工的投入和員工教育是辨識和解決工作場所內健康與安全問題的關鍵。安全與健康標準：

1. 職業健康與安全

供應商應透過分級控制原則，識別、評估和減輕工作場所的健康及安全危害(如化學、電力和其他能源、火災、運載工具和跌倒危險或事故)，以免危及員工。若無法透過上述方法有效控制危險源，應為員工提供適當的、保養良好的個人防護裝備以及有關這些危險事故和相關風險的教材。亦必須採取促進性別平等的措施，例如不讓孕婦和哺乳期婦女處於可能對其或其胎兒構成危險的工作條件，以及為哺乳期女性提供合理的哺乳場所。

2. 應急準備：

應確認和評估潛在的緊急情況和事件，並透過實施應急方案和應變程序來將其影響降到最低，包括：緊急報告、員工通告和疏散計劃、員工培訓和演習。應急演習必須最少每年進行一次，或按當地法律要求進行，取較嚴格者。應急計劃亦應包括適當的消防偵測和滅火設備、暢通無阻的緊急出口、充足的逃生出口設施、應急人員的聯絡資料和復原計劃。這些方案和程序應著重盡量減低對生命、環境和財產的危害。

3. 工傷和職業病：

應當制定程序和體系來預防、管理、追蹤和報告工傷和職業病，包括以下規定：鼓勵員工報告；歸類和記錄工傷和職業病案例；提供必要的治療；調查案例並執行糾正措施以杜絕其根源；協助員工返回工作崗位。供應商應允許員工遠離立即發生的危害，在情況緩解前不需返回工作，亦不必擔心遭受報復。

4. 工業衛生：

應當根據管控層級識別、評估並控制因接觸化學、生物以及物理危害因子給員工帶來的影響。當無法充分控制危害時，應免費提供員工使用適當的、維護良好的個人防護裝備。供應商應提供安全、健康的工作環境，並通過持續的系統性監控員工健康和工作環境來維護。供應商應提供職業健康監測，定期評估員工的健康是否因暴露於危害的工作場所而受到傷害。防護職業健康計劃須持續進行，並包括與暴露於工作場所危害有關之風險的教材。

5. 體力勞動工作：

應當識別、評估並控制從事體力勞動工作給員工帶來的危害，包括以人力搬運物料或重複提舉重物、長時間站立和高度重複性或高強度的組裝工作。

6. 機器防護：

應當評估生產設備或其他類型機器的安全潛在危險。為預防機器對員工可能造成的傷害，應當提供和正確地維護物理防護裝置、連鎖裝置以及屏障。

7. 公共衛生和食宿：

應當為員工提供乾淨的洗手間設施、清潔的飲用水、以及衛生的煮食用具、食物儲存設施和餐具。供應商或勞工仲介人提供的員工宿舍應當保持乾淨、安全，並提供適當的緊急出口、洗浴熱水、充足的照明和充足的通風設備、獨立安全的場所以供儲存個人和貴重物品，以及適當且出入方便的私人空間。

8. 健康與安全溝通：

供應商應當為員工提供以其所講語言或其能夠理解之語言進行適當的職業健康和安資料和訓練，以鑑別員工面對的所有工作場所危險情況，包括但不限於機械、電力、化學、火災和物理危害。在工作場所的醒目處張貼健康與安全相關資料，或將有關資料放在員工可識別並可取用的位置。健康資料和培訓應包括有關人口統計的特定風險內容，例如性別和年齡(如適用)。應在開始工作之前及在職定期訓練所有員工。應鼓勵員工提出任何健康和安全方面的疑慮，確保他們不會受到報復。

三、 環境永續

供應商應認同環境保護責任是生產世界級產品不可或缺的一部份。供應商應辨識在製造作業過程中對環境的衝擊，並盡量減少該過程對社區、環境和自然資源造成的不良影響，同時保障公眾的健康和安全。環境標準：

1. 環境許可和報告：

應獲取所有必需的環境許可證(如排放監控)、批准和登記文件，亦要對之進行維護並時常更新，以及遵守許可證的操作和報告要求。

2. 預防污染和資源保護

應在源頭或透過實踐(如增設污染控制設備、改良生產、維修和設施程序或其他方法)

盡量減少排出或杜絕排放污染物以及產生廢棄物。應節約和實踐(如改良生產、維修和設施程序、替換材料、再利用、節約、回收或其他方法)節約自然資源(包括水、化石燃料、礦物和原始森林產品)的消耗。

3. 有害物質：

應當識別、標籤和管理對人類或環境造成危害的化學物質、廢棄物及其他物質，從而確保這些物質得以安全地處理、運送、儲存、使用、回收或再利用及棄置。應加以追蹤與記錄有害事業廢棄物數據。

4. 固體廢棄物：

供應商應實施系統性的措施來識別、管理、減少和負責任地棄置或回收固體廢棄物(無害的)。應加以追蹤與記錄一般事業廢棄物數據。

5. 廢氣排放：

在排放營運過程中產生的揮發性有機化學物質、氣霧劑、腐蝕性物質、微粒、破壞臭氧層物質以及燃燒副產品前，應當按照要求對其進行分類、例行監測、控制和處理。應依照《蒙特利爾議定書》和適用的法規來有效管理耗損臭氧層的物質。供應商也應當對廢氣排放管制系統的性能進行例行監測。

6. 材料限制：

供應商應當遵守所有適用法律法規和矽品及其客戶之要求，禁止或限制在產品和製造過程中納入特定物質(包括回收和棄置標籤)。

7. 水資源管理：

供應商應當實施用水管理計劃，以記錄、分類和監測水資源、使用和排放；尋求機會節約用水；以及控制污染渠道。所有污水在排放或棄置前，應當按照要求對其進行分類、監測、控制和處理。供應商應當對污水處理和控制系統的性能進行例行監測，以確保達致最佳性能和符合法規要求。

8. 能源消耗和溫室氣體排放：

供應商應建立全公司的溫室氣體絕對減量目標並作出報告。應追蹤、記錄和公開報告能源消耗以及所有範疇 1、範疇 2 和重要類別之範疇 3 的溫室氣體排放量。供應商應當找到方法來改善能源利用效率，並盡量減少能源消耗和溫室氣體排放。

四、道德

為履行社會責任並在市場上取得成功，供應商及其代理商必須謹守最高的道德標準，包括：

1. 誠信經營：

在所有商業互動關係中都應謹守最高的誠信標準。供應商應採取零容忍政策來禁止任何形式的賄賂、貪污、敲詐勒索和挪用公款。

2. 無不正當收益：

不得承諾、提供、批准、給予或收受賄賂或其他形式的不正當收益。此禁令包括承諾、提供、批准、給予或收受任何有價之物（無論是直接還是透過第三方間接地進行），以期獲得或保留業務、將業務轉讓他人或獲取不正當收益。應推行監控、記錄留存以及強制執程序以確保符合反腐敗法的要求。

3. 資訊公開：

所有的業務來往應具透明度，並準確地記錄在供應商的賬簿和商業記錄上。應當按照適用法規和普遍的行業慣例公開有關參與勞工、健康與安全、環保活動、商業活動、組織架構、財務狀況和業績的資料。不得偽造記錄或虛報供應鏈的狀況或慣例。

4. 智慧財產權：

應當尊重智慧財產權。技術和專門技術(know-how)的轉移應以保護智慧財產權的方式進行，並應保護矽品及其客戶和供應商的資料。

5. 公平交易、廣告和競爭：

應遵守公平交易、廣告和競爭的標準。禁止聯合壟斷、價格共謀、不實廣告或任何不正當競爭行為。

6. 身份保護及防止報復：

除非受法律禁止，供應商應當制定程序來保護檢舉者(包括其供應商和員工等任何揭露公司員工、主管或公務員和政府機構的不正當行為者)，並確保其身份的機密性和匿名性。供應商也應制定溝通程序，讓員工可以表達他們的疑慮，而不用害怕遭到報復。

7. 負責任地採購礦物：

供應商應就其製造的產品成份中鈹、錫、鎢、金及鈷的來源及供應鏈，採納政策並進行盡職調查，以合理保證其來源與經濟合作暨發展組織(Organizing Co-operating and Development, OECD)關於對出自衝突影響及高風險區域之礦石實施負責任供應鏈的指引，或同等及認可的盡職調查框架一致。

8. 隱私：

承諾合理地保護任何與其有業務來往者(包括其供應商、矽品及其客戶、消費者和員工)的個人資料和隱私。供應商應當在收集、儲存、處理、傳播和分享個人資料時遵守隱私和資訊安全法律及監管要求。

五、 管理體系

供應商應採用或建立範圍與本準則內容相關的管理體系。在設計該管理體系時，應確保：(a)符合與供應商營運和產品相關的適用法律法規、矽品及其客戶之要求；(b)符合本準則；以及(c)識別並減輕與本準則有關的經營風險。管理體系也應當推動持續改進。該管理體系應包含以下要素：

1. 公司的承諾

供應商應制定人權、健康和 safety、環境和道德政策，並由管理層聲明供應商承諾執行盡職調查和持續改善。政策聲明應公開，並透過無障礙管道以員工理解的語言傳達予員工。

2. 管理職責與責任

供應商應明確指定高級主管和公司代表來負責保證管理體系和相關計劃的實施。高級管理層應定期檢查管理體系的運作情況。

3. 法律和客戶要求

供應商應採用或制定程序識別、監控並理解適用的法律法規和矽品及其客戶之要求(包括本準則的要求)。

4. 風險評估和風險管理

供應商應採用或制定程序識別與供應商經營相關的法遵、環境、健康與安全、勞工活動及道德風險，包括與營運相關的人權和環境影響風險。供應商應評定每項風險的級別，實施適當的程序和實質管制來控制已識別的風險和確保合規。生產區域、倉庫和儲存設施、廠房/工作場所支援設備、實驗室和測試區域、衛生設施（浴室）、廚房/食堂和員工

住房/宿舍都應納入環境健康與安全風險評估的範圍內。

5. 改進目標

供應商應制定書面績效目標、指標和實施計劃來提高供應商的社會、環境、健康及安全績效，包括對供應商為達成這些目標所取得的成效進行定期審核。

6. 培訓

供應商應為管理層及員工制定培訓計劃，從而實施供應商的政策、程序及改進目標，同時滿足適用之法律法規的要求。

7. 溝通

供應商應制定程序將其政策、實踐、預期和績效清晰準確地傳達給員工、其供應商和矽品及其客戶。

8. 員工/利害關係人的參與和補救措施

供應商應建立與員工、員工代表以及其他相關或必要的利害關係人進行持續雙向溝通的流程。該流程旨在取得有關本準則涵蓋之營運實務與條件的意見，並促進持續改善。必須為員工提供一個安全的環境，讓其安心地提出申訴和意見而不必擔心受到報復。

9. 審核與評估

供應商應定期進行自我評估，從而確保符合法律法規的要求、本準則內容以及矽品合約中與社會與環境責任相關之要求。

10. 糾正措施

供應商應制定程序以確保能及時糾正在內外部的評估、檢查、調查和審核中所發現的不足之處。

11. 文檔和記錄

供應商應建立並保留文檔和記錄，從而確保符合法規與公司的要求，同時應保障隱私的機密性。

12. 供應商的責任

供應商應制定程序來將本準則的要求傳達給其供應商，並監管其供應商對本準則的遵行情況。

Siliconware Precision Industries Co., Ltd.

SUPPLIER CODE OF CONDUCT

SPIL and its subsidiaries promoted the realization of corporate social responsibility, and in order to ensure business integrity, corporate governance, and concern for employee, green enterprise and social participation. Also, SPIL introduced RBA(Responsible Business Alliance) to be the standard for internal management. Therefore, this Supplier Code of Conduct (hereinafter referred to as "the Code") is based on the basis for compliance and we require Suppliers' business conduct to strictly comply with this Code.

The Code is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Sustainable Environment, respectively. Section D outline standards relating to business ethics; Section E outlines the elements of an acceptable system to manage conformity to this Code.

A. LABOR

Suppliers should be 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 foregoing, were used as references in preparing this Code and may be useful sources 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 must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. Supplier shall maintain documentation on all leaving workers. Suppliers, their agents and sub-agent's 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, supplier can only hold documentation if necessary to comply with the local law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

(2) Young Workers

Child labor is not to be used in any stage of manufacturing. The term "Child" refers to any

person under the age of 16, 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. Supplier shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Supplier shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Suppliers 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, the prompt assistance and remediation shall be provided by Suppliers.

(3) Working Hours

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

(4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal jobs 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.

(5) Non-Discrimination /Non-Harassment /Humane Treatment

Suppliers 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).

(6) Freedom 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, Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. 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.

B. HEALTH AND SAFETY

Suppliers recognize that in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy working environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. The health and safety standards are as follows:

(1) Occupational Health and Safety

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards ,etc.) shall be identified and assessed, mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these

hazards. Gender-responsive measures shall be taken, such as not having pregnant woman and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.

(2) Emergency Preparedness

Potential emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills.

Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

(3) Occupational Injury and Illness

Procedures and systems shall be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatments, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Supplier shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

(4) Industrial Hygiene

Worker exposure to chemical, biological and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Supplier shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. Supplier shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. The protective occupational health programs shall be ongoing and include educational materials about risks associated with exposure to workplace hazards.

(5) Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material

handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks shall be identified, evaluated and controlled.

(6) Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

(7) Sanitation, Food, and Housing

Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Suppliers or a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, and adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

(8) Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

C. SUSTAINABLE ENVIRONMENT

Suppliers recognize that environmental responsibility is integral to producing world-class products. Suppliers shall identify the environmental impacts and minimize adverse effects on the community, environment and natural resources within their manufacturing operations, while safeguarding the health and safety of the public. The environmental standards are as follows:

(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 shall be followed.

(2) Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste shall 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, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

(3) Hazardous Substance

Chemicals, waste and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.

(4) Solid waste

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

(5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled and treated as required prior to discharge. Ozone-depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

(6) Materials Restrictions

Suppliers shall adhere to all applicable laws, regulations and SPIL's and its customers' requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

(7) Water Management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and

controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Supplier shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

(8) Energy Consumption and Greenhouse Gas Emissions

Suppliers shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. Suppliers shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

D. ETHIC

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

(1) Business Integrity

The highest standards of integrity shall be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

(2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage 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 the Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or 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 SPIL, SPIL's customer and supplier information is to be safeguarded.

(5) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld to prohibit cartels, collusion, untruth advertising, and other anti-trust acts.

(6) Protection of Identity and Non-Retaliation

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

(7) Responsible Sourcing of Minerals

Suppliers shall 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 Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

(8) Privacy

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

E. MANAGEMENT SYSTEMS

Suppliers shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and SPIL's and its customers' requirements related to the Suppliers' operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. The management system shall contain the following elements:

(1) Company Commitment

Supplier shall establish human rights, health and safety, environmental and ethics policy statements affirming Supplier's commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.

(2) Management Accountability and Responsibility

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

(3) Legal and Customer Requirements

Supplier shall adopt or establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

(4) Risk Assessment and Risk Management

Supplier shall adopt or establish a process to identify the legal compliance, environmental, health and safety (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) and labor practice and ethics risks, including the risks of human rights and environmental impacts, associated with Supplier's operations. Supplier shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

(5) Improvement Objectives

Supplier shall establish written performance objectives, targets and implementation plans to improve the Suppliers' social, environmental and health and safety performance, including a periodic assessment of Suppliers' performance in achieving those objectives.

(6) Training

Supplier shall establish programs for training managers and workers to implement Suppliers' policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

(7) Communication

Supplier shall establish process for communicating clear and accurate information about Suppliers' policies, practices, expectations and performance to workers, suppliers, and customers.

(8) Worker/Stakeholder Engagement and Access To Remedy

Supplier shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

(9) Audits and Assessments

Supplier shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Code and SPIL's contractual requirements related to social and environmental responsibility.

(10) Corrective Action Process

Supplier shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

(11) Documentation and Records

Supplier shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

(12) Supplier Responsibility

Suppliers shall establish a process to communicate Code requirements to their suppliers and to monitor their suppliers' compliance with the Code.