MAP Electronics Co., Ltd.

Business Partner Code of Conduct (Sustainability Guidelines)

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Introduction and Basic Policy

MAP Electronics Co., Ltd. (hereinafter “the Company”) aims to contribute to the development of a sustainable society through its business activities, including the import/export and sales of electronic components, design and development, and manufacturing outsourcing (EMS).

This Code has been specifically and rigorously developed and reorganized based on international guidelines (RBA Code of Conduct, ILO Core Labor Standards, UN Global Compact, UN Guiding Principles on Business and Human Rights, etc.), as well as the Company’s business activities and supply chain practices (component selection, procurement, selection of outsourcing partners, etc.).

This Code sets forth the standards of conduct that the Company and all Business Partners (including suppliers, manufacturing contractors, sales agents, and logistics/service cooperation companies; hereinafter “Partners”) shall jointly observe. Partners are requested to fully understand the intent of this Code and to not only implement it within their own organizations but also to disseminate it to and ensure compliance throughout their own supply chains (the Company’s secondary and subsequent Business Partners).

Chapter 1 Respect for Labor and Human Rights

1. Complete Elimination of Forced Labor and Protection of Foreign Workers

- All work shall be voluntary. Any form of forced labor, bonded labor (including debt bondage and forced savings), human trafficking, slave labor, and unlawful or involuntary prison labor is completely prohibited.
- To prevent discrimination and exploitation in the recruitment process, imposing any unreasonable fees on job applicants or workers—including recruitment fees, placement fees, medical fees, travel costs, training fees, or costs of work tools—is strictly prohibited. If it is found that workers have previously borne such costs, prompt reimbursement must be made.
- Prior to the commencement of formal employment (and before departure from the home country in the case of foreign workers), the terms and conditions of employment must be notified in writing in a language the worker understands (native language), and an employment contract must be concluded. Changes to conditions less favorable than those in the prior contract in the country of employment are not permitted.
- Confiscation, retention, or concealment of original passports, work permits, government-issued identification documents, etc., by the company or recruitment agencies is strictly prohibited. Workers’ reasonable freedom of movement, freedom to resign, and right to return home must not be obstructed. Upon termination of employment, return transportation or the cost thereof shall be provided as necessary.

2. Prohibition of Child Labor and Protection of Young Workers and Student Workers

- Child labor that does not meet local labor standards laws and international standards is strictly prohibited. The minimum age for employment shall not be lower than the highest of 15 years, the age of completion of compulsory education, or the local legal minimum age. Appropriate age verification processes shall be established.
- “Young workers” under the age of 18 shall be excluded from night work, overtime, or hazardous work that endangers life, health, or moral development (handling of dangerous substances, work at heights, operation of hazardous machinery, etc.).
- When employing student workers such as interns or apprentices, their rights shall be protected in accordance with applicable laws, and they shall be paid fair wages equivalent to those of regular workers performing the same or similar work.

3. Proper Management of Working Hours and Days Off

- Total weekly working hours, including overtime, shall be properly managed and corrected so as not to exceed the upper limits based on local laws. Except in emergencies or exceptional circumstances, a management system that does not allow weekly working hours including overtime to exceed 60 hours shall be maintained and recommended.
- Workers shall be provided with at least one day off in every seven-day period, and an environment shall be established that enables smooth acquisition of statutory paid leave, maternity/paternity leave, childcare leave, sick leave, etc.

4. Fair Payment of Wages and Allowances and Clear Disclosure

- Employees shall be paid appropriate base wages that fully exceed the statutory minimum wage prescribed by local law, as well as overtime allowances at the statutory premium rates, in full and without delay, by direct payment.
- Unfair wage deductions for the purpose of disciplinary action or as an example to others are prohibited. Clear pay statements in a language the worker can understand, showing working hours, amounts paid, and deductions, shall be provided by the payday.

5. Humane Treatment and Elimination of Harassment and Discrimination

- Mental or physical harassment (sexual harassment, power harassment, maternity harassment, etc.), corporal punishment, gender-based violence, verbal abuse, public humiliation, unjust intimidation, unnecessary interference in private life, and other inhumane acts are not tolerated in any form.
- In employment processes including recruitment, promotion, compensation, training opportunities, transfers, and dismissal, discrimination based on race, color, age, gender, sexual orientation, gender identity/expression, ethnicity, nationality, religion, creed, disability, marital status, pregnancy, union membership, political beliefs, military service experience, or any other unreasonable grounds is thoroughly eliminated. Unjust medical or physical examinations that could be abused for discriminatory purposes shall not be conducted.

6. Respect for Freedom of Association and the Right to Collective Bargaining

- In accordance with local laws, the rights of workers to form and join trade unions of their own choosing, to engage in collective bargaining, and to participate in peaceful assemblies shall be respected.
- Workers or their representatives shall not be subjected to discrimination, retaliation, intimidation, or harassment for engaging in labor-management negotiations or exercising their rights, and opportunities for sound communication with management shall be ensured.

Chapter 2 Ensuring Occupational Health and Safety

1. Workplace Safety and Protection of Equipment and Machinery

- Physical, electrical, and chemical hazards in the workplace shall be identified and assessed. Appropriate safety design, installation of interlocks, placement of shielding/isolation barriers, and thorough implementation of lockout/tagout procedures (locking of energy sources and display of operation prohibition) shall be carried out to prevent occupational accidents.
- Personal protective equipment necessary for safety (safety glasses, helmets, safety shoes, dust/gas masks, heat-resistant gloves, etc.) shall be provided at the employer's full expense and their use shall be mandatory.

2. Emergency Response and Recovery Plans

- Anticipating emergencies such as fire, explosion, earthquake, storm and flood damage, industrial accidents, and pandemics, evacuation routes and locations shall be clearly indicated, fire extinguishing, alarm, and exhaust systems shall be maintained, and practical evacuation drills for all employees shall be conducted regularly (at least once a year). Placement of items near exits is strictly prohibited.
- For rapid recovery and maintenance of supply in the event of an accident, emergency contact networks shall be established and business continuity plans (BCP) shall be formulated and operated.

3. Prevention of Occupational Accidents and Diseases and Industrial Hygiene Management

- The occurrence of occupational accidents and occupational diseases shall be classified, recorded, and analyzed, and root-cause investigation and fundamental recurrence prevention measures shall be implemented. Necessary treatment for injured workers, rapid emergency response, and organizational support for the return to work of those on leave shall be provided.
- Exposure to chemical substances, dust, organic solvents, noise, odors, radiation, etc., in the workplace shall be measured and managed and kept below allowable limits. Appropriate installation and maintenance of first-aid kits, implementation of regular health checkups, prevention of prolonged overwork, and mental health measures shall be promoted.

4. Reduction of Physical Strain and Consideration for Pregnant and Nursing Workers

- Physically demanding work such as repetitive lifting of heavy objects, excessively prolonged same postures, and vigorous movements shall be identified, and the introduction of assistive devices, job rotation (reassignment), and appropriate rest cycles shall be established.
- For pregnant workers and nursing mothers, restrictions on hazardous and harmful work shall be applied, and clean and safe dedicated spaces for milking and resting as well as consideration for working hours shall be provided.

5. Maintenance of Safety and Hygiene in Living Facilities

- The cleanliness and safety/hygiene of "cafeterias, dormitories/housing, toilets, washing facilities, and drinking water facilities" provided to employees shall be ensured. In particular, dormitories shall be equipped with sufficient privacy, storage for personal valuables, emergency exits, lighting and ventilation, and fire extinguishing equipment, and shall meet living standards.

6. Occupational Health and Safety Education and Communication

- Hazard information and occupational health and safety rules in the workplace shall be posted and communicated within facilities in a language workers can understand. Induction training and ongoing occupational health and safety training shall be conducted, and safety issues raised by workers shall be promptly corrected.

Chapter 3 Conservation of the Global Environment and Green Activities

1. Full Compliance with Environmental Laws and Regulations and Permits

- All environmental laws and regulations related to operations shall be complied with. Various environmental permits such as air and water discharge permits and waste treatment permits shall be obtained and maintained, and accurate reports to administrative authorities shall be submitted without delay.

2. Climate Change Measures, Decarbonization, and Energy Conservation

- Greenhouse gas (CO_2, etc.) emissions of the company shall be measured and understood. Through the introduction of energy-saving equipment, utilization of renewable energy, efficient logistics, etc., contributions shall be made to the prevention of global warming and the realization of a decarbonized society.

3. Management of Product Chemical Substances and Green Procurement

- To comply with product chemical substance regulations of various countries (RoHS Directive, REACH Regulation, TSCA, POPs Convention, etc.), green procurement of only components and raw materials with low environmental impact shall be thoroughly implemented in accordance with the Company's "Green Procurement Standards" and "Chemical Substance Management Rank Guidelines." The latest information such as Safety Data Sheets (SDS) shall be shared in a timely manner.

4. Resource Circulation, Water Risk, and Biodiversity Conservation

- Water conservation and wastewater management shall be properly carried out to reduce water risks. Waste generation shall be suppressed (3R: Reduce, Reuse, Recycle) and recycling promoted, and efforts shall be made to conserve biodiversity and protect the natural environment.

Chapter 4 Business Ethics and Fair Transactions

1. Complete Elimination of Corruption, Bribery, and Improper Benefits

- Providing or receiving entertainment, gifts, bribes, kickbacks, introduction fees, or any other economic benefits to government officials, public servants, politicians, or officers and employees of business partners for the purpose of obtaining or maintaining improper business advantages is completely prohibited.

2. Prevention of Conflicts of Interest and Separation of Public and Private

- Internal rules shall be established to prevent, identify, and correct situations of “conflict of interest” in which personal interests or the interests of relatives conflict with the interests of the company or the Company, and transparent business decision-making shall be conducted.

3. Prevention of Money Laundering

- No involvement in money laundering or terrorist financing or other financial misconduct shall occur. Transactions shall be conducted only with legitimate business partners engaged in lawful business activities in accordance with applicable laws.

4. Fair Competition and Prevention of Abuse of Superior Bargaining Position

- The antitrust and competition laws of each country shall be complied with. No involvement in cartels, bid-rigging, or exchange of information with competitors regarding prices, quantities, or sales territories shall occur. Misleading representations in products or advertisements or disparagement of other companies shall not be conducted.
- Using a “superior bargaining position” in transactions to force Partners or the Company’s own suppliers to accept unreasonable price reduction requests, unreasonable changes in terms, returns, or cost shifting is prohibited.

5. Complete Prevention of Insider Trading

- Insider trading based on unpublished “material non-public information” obtained in the course of transactions with the Company or other companies is strictly prohibited. Compliance shall also be thoroughly enforced among officers, employees, and subcontractors.

6. Proper Accounting, Accurate Financial Records, and Information Disclosure

- Accurate and clear financial records and books shall be maintained in accordance with generally accepted accounting principles. Business activities, labor, health and safety, environment, financial condition, and other management information shall be sincerely disclosed in accordance with laws and industry practices. False representations or data falsification shall not be tolerated in any form.

7. Respect for Intellectual Property Rights and Prevention of Misappropriation

- The patent rights, utility model rights, design rights, trademark rights, copyrights, and trade secrets (including know-how) of others shall be respected, and no unauthorized acquisition or infringement shall occur. Management measures shall be taken to prevent departing workers from taking out confidential information or intellectual property of customers or business partners.

8. Security Trade Control and Proper Customs Declaration

- Security trade controls under the Foreign Exchange and Foreign Trade Act and other applicable laws shall be complied with. Screening against sanction lists, determination of controlled goods and technologies, and necessary administrative license acquisition procedures shall be performed. Tariff classification, origin, value, etc., shall be correctly declared to customs.

9. Implementation of Responsible Minerals Sourcing (CAHRAs Response)

- A policy of non-involvement in the improper procurement of “conflict minerals” (3TG: tantalum, tin, tungsten, and gold, as well as cobalt, mica, etc.) that are sources of funding for serious human rights abuses, environmental destruction, and illegal armed groups in conflict-affected and high-risk areas (CAHRAs) shall be established. Continuous investigation and due diligence in accordance with the OECD Due Diligence Guidance shall be implemented.

Chapter 5 Asset and Information Security

1. Thorough Confidentiality and Appropriate Use of Confidential Information

- Confidential information of customers and business partners disclosed through transactions (technical data, drawings, price information, etc.) shall be strictly managed and shall not be disclosed or leaked to third parties without prior written permission. It shall be used only within the scope of the consented purpose.

2. Proper Management of Personal Information (Privacy)

- Personal information of employees, customers, business partner personnel, etc., shall be acquired, stored, used, and erased in accordance with data protection laws, and leakage or use for purposes other than those intended shall be completely prevented.

3. Thorough Implementation of Cybersecurity Measures

- In accordance with the “Information Security Standards for Business Partners,” protective measures against targeted email attacks and ransomware (OS updates, multi-factor authentication MFA, firewalls, backups, minimization of access privileges, etc.) shall be implemented. Regular security education and emergency response procedures in the event of an incident shall be established.

Chapter 6 Quality, Product Safety, 4M Change Management, and Business Continuity (BCP)

1. Establishment of a Robust Quality Management System

- An ISO 9001 or equivalent quality management system shall be established and operated, and continuous quality improvement and defect prevention shall be pursued.

2. Prior Approval of 4M (Change Point) Management and Product Information

- When changes occur in the 4Ms of manufacturing and development—Man (operator), Machine (equipment/molds), Method (process/conditions), and Material (components/raw materials)—the Company shall be notified in advance and written approval must be obtained. Accurate information regarding product specifications, quality, and handling methods shall be provided.

3. Compliance with Safety Standards and Ensuring Traceability

- Design and manufacturing shall meet the various safety standards of the target countries (Electrical Appliances and Materials Safety Act, UL, BSI, CSA, CCC, etc.). Traceability of manufacturing, inspection, and shipping shall be established so that causes can be promptly investigated and identified when problems occur.

4. Effective Business Continuity Plans (BCP) and End-of-Life (EOL) Management of Components

- In preparation for natural disasters and unforeseen circumstances, BCP measures such as supply chain tracing surveys, multi-sourcing (dual sourcing), and securing of safety stock shall be implemented.
- When discontinuing manufacture or ending production (EOL: End of Life) of delivered materials, written notice shall be given to the Company by the period agreed in advance (in principle, at least one year in advance), and alternative measures such as final purchases shall be taken.

Chapter 7 Social and Community Contribution and Exclusion of Anti-Social Forces

1. Contribution to Local and International Communities and Promotion of SDGs

- With awareness of the Sustainable Development Goals (SDGs), social contribution activities such as regional revitalization, nature conservation, educational support, and donation activities utilizing the company’s management resources shall be actively promoted.

2. Severance of Relations with Anti-Social Forces

- No relationships, transactions, or provision of benefits shall be conducted with anti-social forces such as organized crime groups, radical groups, or terrorist organizations, or with unreasonable demands. Inclusion of organized crime exclusion clauses in contracts is mandatory.

Chapter 8 CSR Management System and Deployment to the Supply Chain

1. Management Commitment and Accountability

- Senior management shall formulate and approve internal policies that meet the requirements of this Guideline and thoroughly communicate them to all employees. Responsible officers shall be appointed, and accountability for regularly reviewing the status of operations shall be assumed.

2. Risk Assessment, Education, and Documentation

- Risk assessments regarding the company's legal compliance, labor, health and safety, environment, and ethics shall be conducted regularly. CSR education shall be provided to managers and all workers, and records and documents of these operations shall be properly retained and maintained.

3. Reporting System (Helpline) and Protection of Whistleblowers

- An internal reporting channel shall be established so that employees can consult and report suspicions of violations of laws or this Code anonymously without fear of retaliation. The confidentiality and anonymity of reporters shall be strictly protected, and any disadvantageous treatment or retaliatory acts against reporters are strictly prohibited.

4. Deployment to the Company's Own Suppliers (Secondary and Subsequent Business Partners)

- Partners shall notify and disseminate the contents and requirements of this Guideline to their own suppliers (the Company's secondary and subsequent business partners, temporary staffing agencies, etc.) and shall confirm and manage corrective actions regarding their compliance status.

5. Evaluation, Self-Assessment, and Corrective Action Plans (CAP)

- The Company has the authority to request periodic submission of self-assessment sheets from Partners, conduct on-site audits, and hold interviews. When nonconformities are discovered, Partners shall immediately investigate the root causes, formulate a Corrective Action Plan (CAP), and complete improvements within the agreed period.
- In cases of intentional concealment of nonconformities, false reporting, inaction on corrective activities, or the occurrence of serious compliance violations such as "child labor, forced labor, serious environmental destruction, egregious corruption, or serious security violations," and where there is no prospect of improvement, the Company may immediately terminate the transaction contract.

[Regarding Revisions to This Code]

This Code will be periodically revised in response to changes in social conditions, legal amendments, and international norms. The latest version will be published on the Company's website.