

COMSYS Group
Guidelines for Sustainability in Supply Chain

1.0
December 2024

Revision history

Revision	Date	Description
1.0	December, 2024	Initial release

Introduction

In recent years, companies are increasingly expected to address social issues such as human rights and labor, safety and health, global environmental conservation, information security, and disasters, in order to contribute to the development of a sustainable society. Moreover, it has become standard practice to implement these measures not only as individual companies but also in collaboration with suppliers. In this context, under our management philosophy, the COMSYS Group is promoting various initiatives to contribute to the realization of the society aimed at by the SDGs through our business, and to achieve sustainable growth as a company. Additionally, to work together with our suppliers, we have established the "COMSYS Group Guidelines for Sustainability in Supply Chain" based on our "COMSYS Group Basic Procurement Policy."

By working together based on these guidelines, we aim to achieve a sustainable supply chain and, ultimately, a sustainable society.

[COMSYS Group Basic Procurement Policy]

Introduction

The COMSYS Group (hereinafter referred to as "we") recognizes that fulfilling corporate responsibilities such as compliance with laws and regulations, environmental protection, human rights, quality, health and safety, and information security requires efforts not only within our group but throughout the entire supply chain. Based on this understanding, we have formulated the "COMSYS Group Basic Procurement Policy" (hereinafter referred to as "this policy"). We strive to build strong partnerships with our suppliers and, through collaboration, establish a sustainable supply chain while engaging in responsible procurement activities.

1. Fair and Impartial Transactions

The selection of suppliers will be conducted fairly and impartially, evaluating comprehensively based on the quality, reliability, delivery time, and price of materials and services, as well as the financial stability of the suppliers.

[COMSYS Group Basic Procurement Policy]**2. Compliance with Laws and Social Norms**

We comply with domestic and international laws and social norms related to business activities, engage in sound and fair procurement activities, and do not partake in any fraudulent activities.

3. Environmental Consideration

We actively work to preserve the environment and reduce environmental impact throughout the entire supply chain, contributing to the creation of a sustainable society.

4. Consideration for Human Rights and Labor Environment

We respect the human rights and diversity of all individuals throughout the supply chain, ensuring the prohibition of discrimination, various forms of harassment, child labor, and forced labor. We also strive to create a healthy workplace environment by managing appropriate wages, working hours, holidays, and vacation.

5. Ensuring Quality and Safety

To maintain and improve the quality of products provided to our customers and ensure safety, we strive to establish and enhance quality and safety assurance systems, adhering to the following:

- (1) Establishing systems to guarantee quality and safety.
- (2) Efforts to maintain and improve quality and safety.
- (3) Striving for business improvement and cost reduction.

6. Ensuring Health and Safety

We ensure workplace safety and health, prevent occupational accidents, and conduct procurement activities with a focus on health and safety.

7. Building Good Partnerships with Suppliers

Based on mutual trust, we aim to improve each other's technical capabilities and work towards building strong partnerships. We do not engage in providing or receiving inappropriate benefits using business positions. We strictly refuse any inappropriate benefits from suppliers.

[COMSYS Group Basic Procurement Policy]**8. Protection of Information Security**

We manage and protect confidential information and personal information appropriately to prevent leakage and strengthen information security. Confidential information obtained through transactions will not be disclosed to third parties without the supplier's consent.

9. Stable Supply and Disaster Response

We maintain a BCP (Business Continuity Plan) system during normal times and contribute to swift recovery during disasters. Additionally, we strive to establish a stable and flexible supply system to ensure continuous product supply to customers and respond to demand fluctuations.

10. Requests to Our Suppliers

We ask our suppliers to understand the purpose and content of this policy and cooperate with us throughout the entire supply chain, including partner companies.

These guidelines describe matters that each company comprising our supply chain should actively address in order to realize a sustainable society. In these guidelines, the term “suppliers” refers to any business entity that provides products, people, or services to COMSYS Group. Requirements described in these guidelines apply to all suppliers with whom we have direct transactions. Additionally, we ask all suppliers with whom we have direct transactions to communicate the contents of these guidelines and encourage compliance with them among their upstream suppliers in the supply chain.

COMSYS Group may conduct audits to confirm that all suppliers are implementing the matters requested of them as described in these guidelines. To that end, COMSYS Group may require suppliers to disclose necessary information. We ask that suppliers guarantee the accuracy and completeness of such information, and to provide it without delay. When actions or events that do not satisfy the matters described in these guidelines are identified through an audit or the like, COMSYS Group will request all suppliers to make improvements. If no improvements are made, then we will take appropriate measures, including canceling transactions. We ask our suppliers to understand and support COMSYS Group Basic Procurement Policy and sustainable supply chain initiatives, as well as cooperate with active promotion of these guidelines.

December 2024

COMSYS Holdings Corporation, Management Planning Department,
Sustainability Promotion Office

Contents

Requests to Suppliers (Code of Conduct)

Common Matters 8

1. Build management systems
2. Establishment of a Whistleblowing Hotline
3. Publicize and disclose the status of initiatives related to these guidelines

I Human Rights and Labor11

1. Prohibit forced labor
2. Prohibit inhumane treatment
3. Prohibit child labor and make considerations for young workers
4. Prohibit discrimination
5. Proper wages and allowances
6. Regulate working hours
7. Respect the right to freedom of association and collective bargaining
8. Implement human rights due diligence in the supply chain
9. Promotion of Technology Based on High Ethical Standards

II Occupational Health and Safety17

1. Occupational Safety
2. Apply safety measures for equipment and instruments
3. Promote hygiene in the workplace
4. Apply appropriate measures for occupational injuries and illnesses
5. Prepare for and respond to emergencies
6. Consider physical workload
7. Promote safety and hygiene in company facilities
8. Conduct health maintenance programs for employees
9. Communicate about safety and hygiene

III. Environment22

1. Obtain environmental permits and report to the government
2. Manage chemical substances contained in products
3. Manage chemical substances
4. Minimize environmental pollution (wastewater, sludge, exhaust, noise, vibration, etc.)
5. Reduce energy consumption and greenhouse gas emissions
6. Reduce environmental burden by implementing product assessment

7. Effectively use resources and manage waste
8. Conserve biodiversity
9. Implement environmental investigations in the supply chain

IV. Fair Trade & Ethics27

1. Prevent corruption and illegal political contributions, prohibit improperly providing or receiving benefits
2. Prohibit abuse of dominant bargaining position
3. Execute business fairly
4. Respect intellectual property
5. Appropriately manage imports and exports
6. Prevent improper acts
7. Responsibly procure minerals and carry out due diligence

V Product Quality and Safety Product Quality and Safety30

1. Ensure product safety
2. Provide accurate product and service information

VI Information Security31

1. Provide products and services that take into consideration security and privacy
2. Prevent the leaking of confidential information
3. Protect personal information
4. Take countermeasures against cyber attacks on one's own company
5. Respond to security incidents

VII Formulate business continuity plans34

Miscellaneous

Requests to Suppliers (Code of Conduct)

Common Matters

(Common – I) Build management systems

✓ **Suppliers shall build a management system to achieve each of the matters in these guidelines.**

To build a management system refers to build a system for continuous improvement through PDCA (Plan-Do-Check-Action), with regard to policy compliance, implementation systems, corrective actions, and stakeholder engagement. This does not aim for or mean obtaining certification. Below are some things to bear in mind when building a management system.

- ✓ Are you complying with laws, regulations and customer requirements related to business and products?
- ✓ Are the contents described in these guidelines included?
- ✓ Are you identifying and mitigating risks related to contents described in these guidelines?
- ✓ By doing so, can you expect continuously make improvements?

In addition, a management system includes:

- ✓ Corporate commitment
- ✓ Accountability and responsibility of top management
- ✓ Legal requirements and customer requirements
- ✓ Due diligence
- ✓ Risk identification and risk management
- ✓ Improvement goals
- ✓ Education and training
- ✓ Communication
- ✓ Worker feedback, participation, lodging complaints
- ✓ Assessment and audit of identified risks
- ✓ Corrective action processes
- ✓ Documentation and recording

The following typical management systems exist for each individual matter.

< Occupational Health and Safety >

- ✓ ILO Guidelines on Occupational Safety and Health Management Systems, OHSAS 18001, ISO 45001, etc.

< Environment >

- ✓ ISO 14001, EMAS, Eco Action 21, Eco Stage, etc.

< Product Quality and Safety >

- ✓ ISO 9000 Family, IATF 16949, ISO 13485, etc.

< Information Security >

- ✓ ISO/IEC 27001, ISO 20243, SOC 2, IEC 62443, security-related NIST documents, etc.

< Business Continuity Plans >

- ✓ ISO 22301, etc.

(Common – 2) Establishment of a Whistleblowing Hotline

- **In addition to risk management required for complying with these guidelines, suppliers shall establish an Establishment of a Whistleblowing Hotline for processing complaints from stakeholders, including employees and suppliers, and shall address issues through a continuous process.**
- **Suppliers shall make known the Establishment of a Whistleblowing Hotline, which is accessible to employees and stakeholders.**
- **Suppliers shall protect the confidentiality of information related to whistleblower reports, as well as the anonymity of whistleblowers.**
- **Suppliers shall protect whistleblowers from disadvantageous treatment by companies or individuals in retaliation for whistleblowing.**

Establishment of a Whistleblowing Hotline is a mechanism with which relevant parties can report on and urge corrections be made regarding any actions that are suspected of violating these guidelines. When lodging a complaint through the whistleblowing hotline, it must be possible to do so anonymously. In this process, whistleblowers must not be treated disadvantageously. For example, this includes use of comment boxes, telephone, email, or a whistleblowing service using an external organization, etc.

Disadvantageous treatment refers to any act that harms the working environment, including harassment, as well as changes to working conditions, such as unfair personnel evaluation, compensation, dismissal, and reassignment.

(Common – 3) Publicize and disclose the status of initiatives related to these guidelines

- **Suppliers shall make public or disclose information on initiative status, business activities, organizational structure, financial status, and business performance related to these guidelines, according to applicable laws, regulations, and industry practices. Even if this information is not made public, suppliers shall disclose it to COMSYS Group as necessary.**
- **Suppliers shall make public and disclose as much information as possible concerning environmental conservation activities. Even if this information is not made public, suppliers shall disclose it to COMSYS Group as necessary.**
- **When actions or events that do not satisfy the matters described in these guidelines have occurred or are identified, suppliers shall independently disclose this information to COMSYS Group, without waiting for it to be requested by COMSYS Group.**
- **Suppliers shall not falsify records or disclose false information.**

I Human Rights and Labor

(I-1) Prohibit forced labor

- Suppliers shall not use labor obtained by refers to of coercion, detention, inhumane prison labor, slavery, or human trafficking.
- Suppliers shall protect the right of all workers to leave their positions or terminate their employment, and shall not force them to work.
- Suppliers shall not transport, conceal, recruit, transfer, or hire people by refers to of intimidation, coercion, abduction, or fraud.
- Suppliers shall not exploit workers by charging them fees for employment. Furthermore, suppliers shall not force workers to do labor by using such fees as debt.
- When recruiting foreign workers, suppliers shall provide them with employment contracts that describe employment conditions in languages they can understand before they leave their home countries. Suppliers shall not interfere with foreign workers' use of their own government issued identification cards, passports, visas, work permits, or immigration permits (unless the law requires non-workers to hold such documents) by refers to such as concealment or confiscation. Furthermore, suppliers shall not impose unreasonable restrictions on workers entering or exiting facilities or moving around inside facilities.

Force labor refers to labor done by a person under threat of punishment and against their free will (involuntarily).

(I-2) Prohibit inhumane treatment

- Suppliers shall respect the human rights of workers, and shall not subject them to inhumane treatment, such as mental or physical abuse, coercion, harassment, or any acts that could potentially be inhumane treatment.
- Suppliers shall ensure equipment for storing personal belongings and valuables, as well as adequate personal space for proper entry and exit of facilities.
- Suppliers shall formulate disciplinary policies for relevant parties, and procedures for responding to incidents. Simultaneously, suppliers shall establish an internal whistleblowing system (complaint processing mechanism), notify workers of its existence, and operate this system in order to track the actual status of inhumane treatment.

Mental abuse refers to harming the mental or emotional wellbeing of others by inflicting psychological violence on them, such as by harassing them, ignoring them, or using language that hurts their self-esteem.

Physical abuse refers to physical violence or work in harsh physical environments.

Coercion refers to forcing someone to do overtime work or commit acts they do not want to do, such as by threatening them.

Harassment refers to making someone uncomfortable by annoying or bullying them, and includes sexual harassment, power harassment, maternity harassment, etc. Specifically, it refers to sexually inappropriate behavior, sexual abuse, corporal punishment, mental or physical oppression, verbal abuse, and denial of equipment for basic physical comfort (furniture, etc.).

(I-3) Prohibit child labor and make considerations for young workers

- **Suppliers shall not employ children who are under the minimum working age.**
- **Suppliers shall not make young workers under the age of 18 to do dangerous work which could harm their health or safety, such as night shifts or overtime work.**
- **If child labor is identified, suppliers shall provide improvement plans or programs to provide support.**

Child labor can harm the intellectual, physical, social, or moral development of young people depending on the characteristics and execution of the labor.

Specifically, it refers to activities or work that impair children's educational opportunities and healthy growth by making it impossible for them to attend school, forcing them to drop out of school, or forcing them to both work and study. According to the ILO Minimum Age Convention, 1973 (No. 138), the minimum age for employment or engagement in work must not be lower than the age at which compulsory education is completed, and in any case it may not be lower than 15 years (the minimum working age may be set to 14 years, in a transitional period in developing countries where economic and educational institutions are underdeveloped). The age at which young people can engage in work also differs depending on the type of work. With regard to hazardous work, all countries must set a minimum working age of 18 years. However, children may engage in such work from the age of 16 years under the following conditions.

- ✓ Negotiations have been held in advance between domestic labor and management organizations, the safety, health, and morals of children are adequately protected, AND workers have received adequate and specific education or vocational training in the field they will work in.

Hazardous work refers to the following categories of work.

- ✓ Work which exposes children to physical, psychological, or sexual abuse
- ✓ Work done underground, underwater, or in dangerous high places or cramped places
- ✓ Work done using dangerous machines, equipment, or tools, as well as work that involves manually handling or transporting heavy objects
- ✓ Work done in unhealthy environments (for example, environments that expose children to dangerous substances, factors, processes, or even temperatures, noise levels, or vibrations that could harm their health)
- ✓ Work in particularly hard conditions, such as long hours, night work, or work where children are wrongfully constrained to the user's premises

(I-4) Prohibit discrimination

- **With respect to wages, promotions, compensation, recruitment, and employment practices, suppliers shall not commit acts that could possibly discriminate based on race, skin color, age, sex, sexual orientation, gender identity or gender expression, ethnicity or nationality, disability, pregnancy, religion, political party membership or political opinion, membership in a labor union, military experience, protected genetic information, or marriage history.**
- **Suppliers shall make appropriate consideration for requests from workers regarding religious customs, so long as they do not interfere with public welfare or conventional wisdom.**
- **Suppliers shall ensure that health checkups and pregnancy tests do not**
- **undermine equal opportunity or fairness in treatment.**
- **Suppliers shall make appropriate consideration for issues unique to each**
- **country or region, such as the Burakumin issue in Japan.**

(I-5) Proper wages and allowances

- **Suppliers shall comply with all applicable legislation regarding compensation (including minimum wage, overtime pay, and legally mandated allowances and wage reductions) paid to workers. Also, suppliers shall make consideration for paying wages at a level that can cover the necessities of life (living wage).**

The minimum wage refers to the lowest wage specified in each country's wage related laws. This must be paid to workers at the appropriate timing without delay, based on the laws of each country.

Living wage refers to a wage level that meets the needs of workers and their families, enables them to have a social life, and gives them dignity, in accordance with international standards.

Improper wage reduction refers to wage reductions that violate labor related laws. However, this does not include non-payment of wages equivalent to scheduled hours not worked because a worker arrived late or was absent.

When paying compensation, suppliers shall also provide pay slips showing information that enables workers to confirm that their payment is correct.

(I-6) Regulate working hours

- **Suppliers must not allow workers to work beyond limits defined by legislation in the area where they work, and shall appropriately manage the working hours and holidays of workers with consideration for international standards.**
- **Suppliers shall strive to ensure that working hours do not result in excessive work, even if they are within the working hours defined by law.**
- **Suppliers shall respect the will of workers when implementing overtime work, and shall pay them compensation for overtime work according to local laws.**

Appropriate management refers to the following.

- ✓ Scheduled working days per year shall not exceed the legal limit
- ✓ Working hours per week including overtime (but excluding disasters and other unavoidable emergencies and crises) shall not exceed the legal limit
- ✓ Suppliers shall grant workers the right to annual paid leave, maternity leave, and childcare leave
- ✓ Suppliers shall grant break time as defined by law
- ✓ Suppliers shall conduct physical and mental health examinations in order to protect the health of workers

Suppliers must grant working hours, holidays, and breaks to workers appropriately based on the legislation of each country. Suppliers also need to make consideration for international standards. For example, under ILO Hours of Work (Industry) Convention, 1919 (No. 1) and Hours of Work (Commerce and Offices) Convention, 1930 (No. 30), which are both international standards, weekly working hours are defined as not exceeding 48 hours per week including overtimes, except in the event of emergencies or crises. Also, in ILO Weekly Rest (Industry) Convention, 1921 (No. 14) and Weekly Rest (Commerce and Offices) Convention, 1957 (No. 106), it is stipulated that a minimum of 1 day (24 hours or more) of holidays be given for every 7 days of work (that is to say, workers must not work for more than 6 days consecutively). Furthermore, the ILO Reduction of Hours of Work Recommendation, 1962 (No. 116), which was issued as a social standard aimed at achieving the FortyHour Week Convention, 1935 (No. 47), has been adopted. Some industry standards limit working hours, including overtime, to 60 hours per week.

(I-7) Respect the right to freedom of association and collective bargaining

- **Suppliers shall comply with local legislation, and respect workers' rights to organize as a refers to of realizing labor-management negotiation regarding the working environment and wage levels.**
- **Suppliers shall respect the rights of all workers to form or join the labor union of their choice. Simultaneously, suppliers shall respect the right of workers who do not participate in or else withhold from such activities.**

(I-8) Implement human rights due diligence in the supply chain

- **Suppliers that supply raw materials and parts or provide services shall conduct human rights due diligence as necessary in order to check that there are no violations of this item.**

Suppliers with whom COMSYS Group has direct transactions have a responsibility towards the suppliers that constitute their upstream supply chain to convey the requirements of these guidelines and urge compliance with regard to human rights issues, as well as check compliance status, including whether or not there are any violations (In this Guidelines, "the suppliers that constitute their upstream supply chain" means your company's supplier and subcontractors).

"OECD Due Diligence Guidance for Responsible Business Conduct" recommends that companies conduct risk-based due diligence to avoid and address negative impacts in their businesses and supply chains.

(I-9) Promotion of Technology Based on High Ethical Standards

- **New technologies such as artificial intelligence (AI) must comply with applicable laws and regulations, be responsible for protecting and managing data with respect for human rights, consideration for nature, and be used appropriately.**
- **In particular, the following points should be kept in mind when using these technologies for transactions with the COMSYS Group.**
 - ✓ Check the extent of negative effects such as unfair discrimination arising from algorithm, data bias, and take appropriate action.
 - ✓ As much as possible, efforts should be made to present the basis of the judgment that led to the output of the results of the AI judgment.
 - ✓ Ensure that data used for learning such as AI is obtained by appropriate means

In using artificial intelligence (AI) and other new technologies, the symbiosis between humans and nature must be preserved. To this end, it is necessary to pursue research and development, utilization and social implementation of these new technologies with high ethical standards.

II Occupational Health and Safety

(II-1) Occupational Safety

- **Suppliers shall comply with the legislation of each country regarding occupational safety, identify risks to occupational safety, and ensure safety using appropriate refers to including design, technology, and management. In particular, suppliers shall make reasonable consideration for pregnant women and lactating mothers.**
- **Suppliers shall provide workers with training on health and safety in the workplace.**
- **Suppliers shall prohibit work under the influence of illegal or controlled drugs.**

Occupational safety risk refers to the potential risk of accidents or health problems occurring during work due to electricity or other energy, fire, vehicles and moving objects, floors that are easy to slip or trip on, and falling objects. Appropriate design, technology, and management measures include the following examples.

- ✓ Monitoring danger spots with sensors
- ✓ Lockout by locking power sources supplied to machines and devices
- ✓ Tag out that clearly indicates prohibition of operation of energy lockout device while power sources are locked out
- ✓ Provision of protective equipment such as protective goggles, hard hats, and gloves

Reasonable considerations for pregnant women and lactating mothers include the following examples.

- ✓ Lifting and moving heavy objects
- ✓ Exposure to infectious diseases
- ✓ Exposure to lead
- ✓ Exposure to toxic chemicals
- ✓ Work in stressful or straining postures
- ✓ Exposure to radioactive materials
- ✓ Threats of violence
- ✓ Long hours of work
- ✓ Extremely high temperatures
- ✓ Excessive noise

When a worker must breastfeed a child they are raising within 1 year after birth, it is preferable to take measures such as providing adequate breaks for breastfeeding or milk pumping and a safe, clean place out of sight from coworkers and the general public.

(II-2) Apply safety measures for equipment and instruments

- **Suppliers shall evaluate machinery and equipment used by workers in the course of work regarding safety risks, and implement appropriate safety measures.**

Appropriate safety measures refers to management to prevent accidents and health problems which occur during work, including the following measures.

- ✓ Adoption of safety mechanisms including fail-safe, fool-proof, inter-lock, tag out, etc.
- ✓ Installation of safety devices and protection walls
- ✓ Regular inspection and maintenance of machinery

(II-3) Promote hygiene in the workplace

- **Suppliers shall identify and evaluate the risk that workers will be exposed to harmful biological, chemical, or physical effects in their workplace, and manage them appropriately.**

Substances with harmful effects include those that are poisonous, radioactive, or cause chronic diseases (lead, asbestos, etc.). They can also be founded in the form of soot, steam, mist, dust, etc.

Also, if there is significant noise or foul odors, it will be considered harmful to the human body.

Appropriate management refers to, for example, the following actions.

- ✓ Establishment and operation of management standards
- ✓ Appropriate education and training for workers
- ✓ Providing appropriate personal protective equipment

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

- **Suppliers shall identify, evaluate, record, and report on the status of occupational injuries and illnesses, and take appropriate countermeasures and corrective measures.**

Appropriate measures refers to, for example, systems and measures that make the following possible.

- ✓ Promotion of whistleblowing by workers
- ✓ Classification and recording of injuries and illnesses
- ✓ Provision of treatment as necessary
- ✓ Investigation of injuries and illnesses
- ✓ Execution of corrective countermeasures to eliminate causes
- ✓ Promotion of workers returning to the work place

Also, the following actions are included as appropriate countermeasures.

- ✓ Implementation of necessary procedures for administration according to the stipulations of laws
- ✓ Enrollment in worker's accident insurance

(II-5) Prepare for and respond to emergencies

- **In preparation for emergencies including disasters and accidents that harm human lives or physical safety, suppliers shall identify potential occurrence of such emergencies. Suppliers shall also create a course of action for response to emergencies that minimizes damage to workers and assets, and install necessary equipment, as well as provide education and training so that workers can take action in the event of a disaster.**

Report the details of occupational accidents and illnesses that occur in the course of the COMSYS Group's business operations and for which the COMSYS Group is legally, morally or ethically responsible.

Emergency response countermeasures refers to, for example, reporting of emergencies, notification to workers, clarification of evacuation methods, installation of evacuation facilities, easily understood and obstacle free exits, appropriate egress equipment, stockpiling of emergency medical supplies, installation of fire extinguishers, fire doors, and fire sprinklers, securing refers to of communication with the outside, and formulation of restoration plans.

It is also necessary for suppliers to spread information thoroughly in the workplace, which includes the following actions.

- ✓ Implementation of emergency response education for workers (including evacuation drills)
- ✓ Storing and posting emergency response procedure manuals in places that are easily accessible in the workplace

(II-6) Consider physical workload

- **Suppliers shall identify and evaluate work that is physically taxing, and shall do appropriate management so that it does not lead to occupational injuries or illnesses.**

Physically taxing work includes the following examples.

- ✓ Handling raw materials in manual labor
- ✓ Heavy labor such as manually transporting heavy loads
- ✓ Long hours of repetitive work or continuous work, such as data entry, or assembly work that requires strength
- ✓ Work in an unnatural posture for long hours

Proper management includes the following examples.

- ✓ Development of work environments based on ergonomics
- ✓ Regular short breaks
- ✓ Provision of working aids
- ✓ Division of labor and cooperation among multiple workers

Appropriate management also includes developing a surrounding environment so that people can move correctly and efficiently, making consideration for how to reduce accidents and mistakes. Ergonomics refers to the field of research for designing objects and environments so that humans can use them with the most natural movements and conditions possible, and making use of these in actual design. This also includes adjusting surrounding environments so that people can move correctly and efficiently, so as to reduce accidents and mistakes.

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

- **Suppliers shall ensure appropriate safety and hygiene at facilities provided for daily living of workers (company housing, dormitories, cafeterias, toilets, etc.).**
- **Suppliers shall secure appropriate emergency exits in company housing and dormitories.**

To ensure safety and hygiene, suppliers must maintain the cleanliness and hygiene of company facilities, and pay special attention to the following points.

- ✓ Drinking water: Water quality inspections in compliance with legislation, etc.
- ✓ Hygienic provision of meals: Health examinations for cooks, proper temperature control of food, etc.
- ✓ Toilets: Provision of an adequate number of clean toilet facilities for the number of people
- ✓ Company housing and dormitories: Fire countermeasures, adequate space in rooms, ventilation, temperature control, proper lighting, etc.

(II-8) Conduct health maintenance programs for employees

- **Suppliers shall conduct appropriate health maintenance programs for all employees.**

Appropriate health management programs mean programs for prevention and early detection of illnesses among employees by conducting medical examinations at least at the level stipulated by the law. This includes adequate consideration for prevention of health problems due to overwork, as well as mental health care.

(II-9) Communicate about safety and hygiene

- **Suppliers shall use languages and methods that workers can understand to provide appropriate education and training on safety and hygiene information, with regard to various occupational dangers that workers may incur.**
- **Suppliers shall create mechanisms for workers to give feedback about safety.**
- **Suppliers shall clearly post safety and hygiene related information inside facilities, or place it in locations that workers can identify and access, and in languages that workers can understand.**
- **Suppliers shall provide education and training to all workers before they start work, and on a regular basis after they start work.**
- **Suppliers shall create a mechanism for workers to raise concerns regarding safety.**

Education and training items include the following examples.

- ✓ Correct use of personal protective equipment
- ✓ Response to emergencies
- ✓ Safe operation of machinery
- ✓ Preparation before entering harmful environments

III Environment

(III-1) Obtain environmental permits and report to the government

- **Suppliers shall obtain permits and approval, as well as register and report as necessary for their business, in accordance with legislation of the location of their business.**

Permits stipulated by legislation include the following examples.

- ✓ Permits concerning waste disposal
- ✓ Permits concerning prevention of air pollution

Also, depending on the chemical substances used in their business, it may be necessary for suppliers to obtain permits for handling and management of poisonous substances, deleterious substances, specified chemical substances, and dangerous substances. Also, depending on their business content and locations it may be necessary for suppliers to obtain government permits for environmental impact assessment and facilities that handle hazardous materials.

(III-2) Manage chemical substances contained in products

- **Suppliers shall comply with all applicable legislation, as well as customer requirements related to prohibition or restrictions on the use of specified substances contained in products.**

Suppliers must comply with the legislation of the country that products are made for, with regard to substances contained in those products. Also, suppliers must take responsibility for parts embedded in final products, and companies in the upstream supply chain must provide information required by companies in the downstream supply chain (In this Guidelines, "companies in the upstream supply chain" means your company's suppliers and subcontractors, and "companies in the downstream supply chain" means those with whom they provide products and services.).

(III-3) Manage chemical substances

- **Suppliers shall comply with the legislation of their respective countries to identify, label, and manage chemicals and other substances which pose a danger to human health and the environment, and manage said substances in order to ensure the safe handling, transportation, storage, use, recycling or reuse, and disposal thereof.**

(III-4) Minimize environmental pollution (wastewater, sludge, exhaust, noise, vibration, etc.)

- **Suppliers shall comply with the legislation of the country they are in with regard to wastewater, sludge, exhaust, noise, vibration, and other pollution, and make additional improvements based on voluntary standards as needed.**
- **For wastewater management, suppliers shall monitor the source, use, and discharge of water, in order to conserve and reuse water. Also, before discharging or disposing of all wastewater, suppliers shall identify characteristics, monitor, control, and treat wastewater as necessary. Furthermore, suppliers shall identify sources of pollution that can cause water pollution, and manage them appropriately.**
- **For sludge management, suppliers shall reduce sludge emissions and implement appropriate sludge treatment or sludge recycling.**
- **For exhaust management, suppliers shall take appropriate measures to reduce the emission of toxic substances into the atmosphere.**
- **For noise and vibration management, suppliers shall strive to protect the living environment by suppressing noise and vibrations.**

Voluntary standards refers to having targets for reducing one's environmental burden beyond the level stipulated by laws, etc. This of course includes preventing the occurrence of pollution, as well as activities that further reduce one's environmental burden, such as improving methods for monitoring, controlling, and treating wastewater, sludge, exhaust, noise, and vibration, as well as reducing the amount of leakage and emissions thereof.

In wastewater management, the following examples are part of management of wastewater pollutant pathways.

- ✓ Ensuring there is no stagnant water or oil puddles near rainwater drain pipes
- ✓ Installing shut-off valves and faucets to stop the leakage and outflow of tap water or sewage due to factory disasters or natural disasters.

In sludge management, appropriate treatment of sludge includes, for example, reducing the volume of sludge by concentrating, dehydrating, or incinerating it. In exhaust management, toxic substances released into the atmosphere include volatile organic compounds, aerosol sprays, corrosive substances, fine particles, ozone-depleting substances, and by-products of combustion. Suppliers must analyze and monitor these substances before discharging them, and only discharge these substances after implementing necessary management or measures based on the results of analysis and monitoring. Countermeasures against the emission of toxic substances into the atmosphere include the following examples.

- ✓ Handling of discharged substances and regular monitoring of treatment system performance

(III-5) Reduce energy consumption and greenhouse gas emissions

- **Suppliers shall strive to improve their energy efficiency, and endeavor towards continuous activities to reduce energy consumption and greenhouse gas emissions.**
- **Suppliers shall use renewable energy as much as possible.**

In 1997, the Kyoto Protocol was adopted at the 3rd Session of the Conference of the Parties to the United Nations Framework Convention on Climate Change (COP3). It set numerical goals for reducing emissions of 6 greenhouse gases: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorinated compounds (PFCs), and sulfur hexafluoride (SF₆). In 2015, the Paris Agreement was adopted at COP21 with the aim of solving the global issue of climate change. As a long-term goal shared by the whole world, it includes an agreement to keep the global average temperature rise from the level before the Industrial Revolution well below 2° C, and pursue efforts to keep the rise down to 1.5° C. It also includes an agreement for the latter half of the century to achieve an equilibrium between the amount of greenhouse gas emissions from anthropogenic sources and the amount of greenhouse gases removed by sinks (that is, to achieve carbon neutrality). At COP26 in 2021, it was reaffirmed that the long-term global goal is to keep the global average temperature rise from the level before the Industrial Revolution well below 2° C, and pursue efforts to keep the rise down to 1.5° C. In order to achieve these agreements and goals, it is crucial for all companies in the entire supply chain to be aware of them and work towards them, not only within each company, but also with suppliers and stakeholders upstream and downstream of each company (In this Guidelines, “suppliers upstream” means your company’s suppliers and subcontractors, and “suppliers downstream” means those with whom your company provide products and services).

The following are examples of frameworks in which each company voluntarily sets its own goals and conducts its own efforts to reduce greenhouse gas emissions.

- ✓ Science Based Targets (SBT), an international climate change initiative
- ✓ RE100, a corporate alliance aimed at covering electricity used in one’s own business with 100% renewable electricity

(III-6) Reduce environmental burden by implementing product assessment

- **Suppliers shall independently work on implementing product assessment, as well as design and manufacturing to reduce their impact on the environment.**

Product assessment includes the following examples.

- ✓ Assessment of materials (selection of easily recycled materials, reducing use of toxic substances, etc.)
- ✓ Assessment of design (energy conservation, weight reduction, useful life extension, etc.)
- ✓ Assessment of labeling (clearly stating material names, etc.)
- ✓ Assessment of packaging materials
- ✓ Assessment of recycling and disposal

(III-7) Effectively use resources and manage waste

- **Suppliers shall promote reduction, reuse, and recycling, try to make effective use of resources, and keep generation of waste to a minimum by complying with legislation, as well as doing appropriate management.**
- **Even when disposing of substances that have not been identified as toxic, suppliers shall strive to reduce waste by taking a systematic approach to identify and manage waste, then dispose of or recycle it responsibly.**
- **Suppliers shall take measures to avoid wasting natural resources (water, fossil fuels, minerals, old growth forests, etc.) by complying with the legislation in the location of their business, and by minimizing the disposal of substances.**
- **Suppliers shall ascertain the waste generated by their business activities, and reduce it as much as possible, as well as reuse and recycle this waste. Suppliers shall also strive to ascertain the methods of disposals (material recycling, thermal recycling, final disposal method, etc.) and the recycling rate.**

Means of execution include the following examples.

- ✓ Changing production equipment at the source
- ✓ Substituting materials
- ✓ Reusing resources
- ✓ Recycling

It is crucial that suppliers set goals and act independently, in order to comply with legislation.

We also recommend that suppliers do not use or reuse disposable plastics, and do use compostable materials.

(III-8) Conserve biodiversity

- Suppliers shall make consideration for biodiversity conservation, and work with stakeholders (employees, local governments, experts including NGOs, etc.) to do ecological conservation and rare animal and plant conservation activities, both inside and outside their business premises.
- Suppliers shall strive to minimize damage to local water resources.

(III-9) Implement environmental investigations in the supply chain

- If there are concerns about violations of the law or serious environmental destruction with regard to suppliers that supply raw materials and parts and the suppliers or provide services, then suppliers shall conduct investigations and take appropriate corrective measures and preventive measures.

IV Fair Trade & Ethics

(IV-1) Prevent corruption and illegal political contributions, prohibit improperly providing or receiving benefits

- **Suppliers shall establish and continuously comply with a policy that prohibits all bribery, excessive gifts and entertainment, corruption and illegal political donations, extortion, and embezzlement.**
- **Suppliers shall not provide or accept bribes or other promises, offers, or approvals as means of gaining undue or improper benefits.**
- **Suppliers shall provide appropriate education and training to employees, in order to ensure continuous compliance.**
- **Suppliers shall take measures to prevent money laundering.**

Bribery refers to providing money, entertainment, gifts, or other benefits and conveniences to civil servants and equivalent people (hereinafter referred to as "civil servants, etc.") in pursuit of some kind of business favors, such as receiving permits, acquiring or maintaining transactions, obtaining non-public information, etc.

Bribery also includes providing entertainment and gifts that go beyond social courtesies to civil servants, etc., even when not pursuing business favors. Illegal political donations include, for example, making political donations in pursuit of some kind of business favors, such as receiving permits, acquiring or maintaining transactions, obtaining non-public information, etc. It also refers to making political donations that do not follow formal procedures.

(IV-2) Prohibit abuse of dominant bargaining position

- **Suppliers shall not create disadvantages for other suppliers by abusing a dominant bargaining position.**

Abuse of dominant bargaining position refers to taking advantage of a dominant position as a buyer or outsourcer, for example, by the following actions.

- ✓ Unilaterally determining or changing trade conditions with suppliers, etc.
- ✓ Imposing unreasonable demands or obligations

Suppliers are required to fairly and faithfully conduct procurement transactions based on contracts, in order to prevent abuse of dominant bargaining position. In countries with legislation relating to abuse of dominant bargaining position, suppliers are required to comply with relevant laws.

(IV-3) Execute business fairly

- **Suppliers shall comply with laws regarding fair competition and fair transactions established in each country or region, and shall not engage in illicit acts including agreements to restrict competition such as cartels, as well as unfair transaction methods and improper advertising.**
- **Suppliers shall eliminate forces that threaten the order and safety of civil society, and shall comply with laws, ordinances, and all other social norms.**

Fair advertising refers to advertising which does not have an improper purpose or provide false information. Furthermore, it refers to not making expressions that mislead consumers or customers, and making considerations to not include content that slanders or infringes upon the rights of other companies or individuals.

(IV-4) Respect intellectual property

- **Suppliers shall respect intellectual property rights, and shall transfer technology and know-how in a manner which protects intellectual property.**
- **Suppliers shall protect the intellectual property of third parties such as customers and suppliers.**

Intellectual property refers to intellectual property rights, as well as know-how of trade secrets and technologies, etc. Intellectual property rights are rights protected by law, including patent rights, utility model right, design rights, trademark rights, copyrights, and so on.

(IV-5) Appropriately manage imports and exports

- **Suppliers shall understand and comply with various legislation in each country regarding import and export of technologies and goods. To that end, suppliers shall develop a clear management system, and do appropriate import and export procedures.**

Technologies and goods regulated by law include parts, products, technologies, facilities, and software for which export is regulated by legislation based on international agreements (such as the Wassenaar Arrangement). Exports may require specific procedures, such as acquiring permission from governmental regulatory authorities.

(IV-6) Prevent improper acts

- **Suppliers shall conduct activities to prevent improper acts.**

Activities to prevent improper acts refers to educating and enlightening employees, as well as creating a rich communication environment in the workplace.

(IV-7) Responsibly procure minerals and carry out due diligence

- **Suppliers shall carry out due diligence to ensure that minerals contained in the products they manufacture, such as tantalum, tin, tungsten, and gold, do not cause or contribute to serious human rights violations, environmental destruction, corruption, conflict, or other such problems in conflict areas and high-risk areas.**

It is said that some minerals produced in conflict areas are potentially a source of funds for militants who commit inhumane acts and thereby promote conflicts, or cause human rights violations.

In order to fulfill corporate social responsibilities in procurement activities, COMSYS Group will work with suppliers to ensure the transparency of the supply chain. Furthermore, with respect for the spirit of the "Dodd-Frank Wall Street Reform and Consumer Protection Act" signed into law in the USA in July 2010, we will promote initiatives to eliminate the use of conflict minerals, which are a source of funds for militants.

Even in areas where there are conflicts, some minerals are not a source of funds for militants, so we will work to prevent militants from using those minerals.

The internationally recognized "OECD Due Diligence Guidance for Responsible Supply Chains" gives the following five steps for due diligence regarding responsible mineral procurement.

Step 1: Establish strong company management systems

Step 2: Identify and assess risks in the supply chain

Step 3: Design and implement a strategy to respond to identified risks

Step 4: Carry out independent third-party audits of smelter/refiner's due diligence practices

Step 5: Report annually on supply chain due diligence

V Product Quality and Safety

(V-1) Ensure product safety

- **Suppliers shall meet safety standards defined by laws and regulations of each country for products, and shall fulfill responsibilities as a supplier by designing, manufacturing, and selling products in a manner that ensures adequate product safety.**

Examples of Japanese laws on product safety include the Electrical Appliance and Material Safety Law, the Consumer Products Safety Law, and the Household Goods Labeling Law. Japanese safety standards are defined in detailed regulations, JIS, etc. Foreign safety standards include UL (USA), BSI (UK), and CSA (Canada). Effective ways of ensuring product safety include management such as traceability (history of materials, parts, processes, etc.) and prompt responses to solving problems.

(V-2) Provide accurate product and service information

- **Suppliers shall provide accurate information about products and services that is not misleading.**
- **Suppliers shall not provide falsified or manipulated information.**

Accurate information that is not misleading includes the following examples.

- ✓ The specifications, quality, and handling methods for products and services shall be accurate.
- ✓ Information substances contained in the materials and parts used in products shall be accurate.

VI Information Security

(VI-1) Provide products and services that take into consideration security and privacy

- **Suppliers shall design products or services to provide data with confidentiality, authenticity, integrity, and availability.**
- **When developing products or services, suppliers shall develop and implement policies and procedures to prevent products or services from having backdoors, malware, or malicious code.**
- **Suppliers shall provide support necessary according to risk, such as providing security patches during the support period.**

Suppliers must provide data confidentiality, authenticity, integrity, and availability in order for products or services to have consideration for security and privacy. When developing a product or service, it is crucial for suppliers to develop and implement policies and procedures that do not allow for backdoors, malware, or malicious code to be included in the product or service. It is effective to conduct regular security scans, tests, and fixes on products, services, and the infrastructure they rely on, as well as to prepare processes to ensure that products and services are authentic and verifiable.

It is critical that product or service providers offer guidelines for secure configuration, operation and use. Furthermore, it is important for providers to offer contact information, security advice, vulnerability management, and security patches according to risk during the support period. As a prerequisite for this, it is effective to appropriately implement asset management, vulnerability management, and modification management policies, which can reduce risk to the service environment.

(VI-2) Prevent the leaking of confidential information

- **Suppliers shall build mechanisms and management systems (including setting information management levels, as well as conducting employee education and training) in order to appropriately manage and protect not only their own company's confidential information, but also that received from customers and third parties.**

Confidential information usually is any information disclosed with a document, etc. (including electromagnetic or optically recorded data information) that is agreed to be confidential, or disclosed verbally after having been notified of its confidentiality. Appropriate management refers to building and operating general management mechanisms for confidential information, preparing norms and policies that workers should comply with, as well as planning, implementation (access management with ID of an appropriate level, etc.), auditing, and revision according to those norms and policies.

Appropriate protections refers to preventing unauthorized or improper acquisition, utilization, disclosure, or leaking of sensitive information throughout the entire data life cycle. It is necessary to implement data protection by such means as appropriate encryption. It is also critical to properly manage entry and exit to facilities, so as to prevent unauthorized physical access.

(VI-3) Protect personal information

- **Suppliers are required to comply with the relevant legislation in each country in order to appropriately manage and protect all personal information of suppliers, customers, consumers, employees, etc.**

Personal information is any information about existing individuals, which can be used to identify a specific person, such as their name, birth date, and other descriptive information. It also includes information that can be easily checked against other information to identify a specific person.

Appropriate management refers to building and operating general management mechanisms for personal information. This includes preparing norms and policies that workers should comply with, as well as planning, implementation, auditing, and revision according to those norms and policies.

Appropriate protection refers to not improperly or unfairly obtaining, utilizing, disclosing, or leaking personal information.

(VI-4) Take countermeasures against cyber attacks on one's own company

- **Suppliers shall take measures take countermeasures (identification, defense, detection, response, recovery) against the threat of cyber attacks on their own company's information systems, networks, products, and services, and do management so that their own company or other parties do not suffer damages.**
- **Suppliers shall establish and implement security policies that comply with international standards.**

Cyber attacks refer to acts that cause damage such as leaking trade secrets or personal information, customer information, business partner information, and confidential information, or the encryption of important files, by such means as malware infections through targeted emails or misleading users to malicious websites.

It is necessary to prevent trouble such as information being leaked or manipulated or information systems going down due to cyber attacks. The attacker may expand the scope of their attack to other targets using customer information or business partner information they have obtained, so the damage is not limited to one's own company.

Devices targeted for cyber attacks have are extending beyond conventional PCs and servers to include devices in industrial systems and the IoT (Internet of Things), so it is possible to take countermeasures with these devices as well. It is also crucial to formulate plans for quick recovery in the event of a cyber attack.

Countermeasures include backing up important data and securing redundant servers and data centers.

For suppliers who have contracts with cloud services, it is also important to confirm that such plans have been formulated and are feasible from the contract conditions.

(VI-5) Respond to security incidents

- **In the event of a security incident, suppliers shall promptly contact stakeholders, identify the cause of the incident, prevent damage from spreading, and take countermeasures to prevent recurrence.**
- **Suppliers shall promptly notify COMSYS Group in the event of a security incident involving products and services they provide to COMSYS Group or work outsourced to them by COMSYS Group, or if there is suspicion that such an event has occurred.**
- **Suppliers shall report the cause of events, the result of their response, and recurrence prevention measures upon request from COMSYS Group.**

VII Formulate business continuity plans

- **Suppliers shall make appropriate preparations so that they can resume operation as soon as possible and strive to minimize the impact on the supply chain in the event of a situation that has a major impact on business continuity. Such situations include large-scale natural disasters (earthquakes, tsunamis, floods, heavy rain, heavy snow, tornadoes) and resulting power outages, water supply failure, traffic obstacles, accidents (fires, explosions), as well as epidemics of infectious or contagious diseases, terrorist attacks and riots, cyber attacks, or drastic changes in the balance of supply of and demand for raw materials or parts.**
- **Suppliers shall ascertain the impact on delivery dates in the event of a disaster, and strive to develop means of contact so they can quickly contact stakeholders including customers.**

As a precautionary countermeasure, it is critical to have a local restoration strategy, concerning how to protect, mitigate, and restore individual elements of a production base against possible damage. It is also crucial to secure alternative means of production, assuming that recovery from damage caused by a disaster may take a long time. It is effective to prepare a manual for rapid recovery of business according to contents described in a business continuity plan, and continuously educate and train employees so that they can respond to actual disasters when the business actually has stopped.

Miscellaneous

- These guidelines will be revised as necessary, according to changes in societal conditions and newfound knowledge.

【Inquiries】

COMSYS Holdings Corporation Management Planning Department
Sustainability Promotion Office
comsys-sustainability.tokyo@comsys.co.jp