

# **MinebeaMitsumi**

*Passion to Create Value through **Difference***

## **Supplier Code of Conduct**

MinebeaMitsumi Europe





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We, the European MinebeaMitsumi companies, (“MinebeaMitsumi”), in compliance with the MinebeaMitsumi Group principles and procedures, have engaged in a corporate social responsibility (CSR) process in line with the principles of the United Nations Global Compact. We are also guided by the Automotive Industry Guiding Principles of Drive Sustainability, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles of Business and Human Rights, the UN International Bill of Human Rights, the International Labour Organisation’s (“ILO”) eight fundamental conventions and the UN Children’s Rights and Business Principles.

This process aims to respond to the legitimate human, environmental and economic concerns of MinebeaMitsumi. In this respect, MinebeaMitsumi has instituted a sustainable development initiative within its organizations.

On a global standpoint, MinebeaMitsumi has opted permanently to conduct and develop its business in compliance with:

- all laws and regulations applicable in the countries where MinebeaMitsumi business is conducted, irrespective of whether said laws and regulations are national or transnational;
- specific requirements laid down by MinebeaMitsumi under the MinebeaMitsumi Group Code of Conduct, CSR Procurement Guidelines and other Group regulations and procedures, in particular concerning certain activities not subject to specific laws or regulations.

MinebeaMitsumi Group Code of Conduct and guidelines are not simply a declaration of intent; they represent an actual and integral part of MinebeaMitsumi’s regulatory system.

**In addition to its own commitments, MinebeaMitsumi intends to contribute to the promotion and upholding of all these principles by focussing its procurement policy on partners which are also aware of their responsibilities.**

As a result, we will pay particular attention to investment levels and compliance with these principles when selecting our suppliers.

We request from all of our suppliers to understand and to act in accordance with MinebeaMitsumi’s approach and expect from our suppliers (i) that they participate in this initiative regarding to their own environmental, social and economic concerns and (ii) cascade similar expectations through their own supply chain.

This Supplier Code of Conduct is an integral part of the contract between MinebeaMitsumi and its suppliers. In the event of failure to comply and/or of any breach of the requirements therewith, MinebeaMitsumi may consider taking action against its partners including, in certain cases, the breaking-off of business relations and termination of the contracts in force at that time.

# BASIC POLICY



## 1. BASIC POLICY

### (a) Compliance with national or transnational legislation and regulations

The supplier undertakes to carry-on and to develop its business activities in compliance with the national and transnational legislation and regulations, applicable in the countries in which it carries-on such activities and deliver its products, and with the specific recommendations laid-down by the MinebeaMitsumi Group in its Code of Conduct. The products themselves shall meet these requirements.

### (b) Respect for internationally-proclaimed fundamental rights

The supplier undertakes to respect, and promote, the fundamental rights set forth in the Universal Declaration of Human Rights, the UN Global Compact, the UN Guiding Principles of Business and Human Rights, the UN International Bill of Human Right, the International Labour Organisation's (ILO) eight fundamental conventions and the UN Children's Rights and Business Principles, the dignity and value of the human person, employees' privacy and equality of rights between women and men.

The supplier shall not allow any harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees, nor shall the threat of any such treatment be allowed.



# HUMAN RIGHTS & LABOUR



## 2. HUMAN RIGHTS & LABOUR

### (a) Elimination of all forms of forced and compulsory labour

By recognising the principle of free-choice of labour, the supplier hereby provides the assurance that its company does not, and shall never, use any form of modern slavery, forced, compulsory, indentured or involuntary and inhumane prison labour. The supplier must take all reasonable measures to ensure that its employees understand perfectly the terms of their employment contract.

### (b) Effective abolition of child labour

The supplier undertakes not to employ, in any way whatsoever, persons under the minimum age required for work i.e. suppliers will not employ children under 16 years old of age. In this respect, the supplier undertakes to imperatively comply with all national standards relating to child labour and to strictly comply with the provisions of the ILO Convention no. 138 on child labour for children aged between 15 and 18. Employees under the age of 18 shall not perform hazardous work and may be restricted from night work with consideration given to educational needs.

### (c) Elimination of discrimination in respect of employment and occupation

The supplier undertakes not to discriminate in any form, in particular on the grounds of origin, parentage, wealth, philosophical beliefs, gender, sexual orientation, age, family status, genetic characteristics, the belonging, or non-belonging, whether actual or supposed, to an ethnic group, nation or race, political opinions, trade union activities, religious beliefs, physical appearance, health problems or physical handicaps, whether real or potential, pregnancy and given name.

At any time during the professional relationship and, in particular, in the areas such as recruitment or access to an in-company placement or training period, the exercising of disciplinary authority, remuneration, training, reclassification, classification, professional advancement, transfers and contract-renewal, harassment or discrimination of any kind will not be tolerated. In addition, employees or potential employees should not be subjected to medical tests that could be used in a discriminatory way, unless a certain state of health is required to perform the job and the applicant has been duly informed beforehand.

The supplier shall offer equal pay for equal work performed under similar conditions. It also must promote diversity and job opportunities for disabled.

### (d) Remuneration

The supplier complies with national legislation and the Collective Bargaining Agreements as regards including but not limited to minimum remuneration, overtime hours, and legally mandated benefits. Any disciplinary wage deductions are to conform to applicable law and regulation.

Moreover, the supplier recognises the principle of equal remuneration and, in particular, the rules of ILO Convention no. 100 on equal remuneration for men and women workers (for work of equal value).

The basis on which employees are paid shall be clearly communicated to them in a timely manner.

#### (e) Working hours

The supplier strictly complies with working hours, rest-time and periodic leave under conditions which are at least as favourable for its staff as those laid-down by national legislation or by the Collective Bargaining Agreements.

#### (f) Freedom of association and the effective recognition of the right to collective bargaining

The supplier shall comply with applicable laws and regulation and hereby confirms that it respects freedom of association and that it recognises the right to collective bargaining.

The supplier also undertakes to provide trade union members and delegates with protection in respect of problems which they may face owing to their commitments, and to combat all forms of discrimination against them.

#### (g) Respect for health and safety in the workplace

The supplier undertakes to ensure that each work position is perfectly compliant with legislative provisions and/or provisions set forth in Collective Bargaining Agreements as regards health, safety and ergonomics.

As one of MinebeaMitsumi's targets is to ensure zero industrial accidents, the MinebeaMitsumi Group's policy in this respect necessarily involves a contribution from all its partners. In this respect, the supplier will provide clean, healthy and safe environments for its employees. The supplier will have safety procedures for its employees in order to ensure zero workplace safety incidents.



# ENVIRONMENT & SUSTAINABLE DEVELOPMENT



### 3. ENVIRONMENT AND SUSTAINABLE DEVELOPMENT

The supplier recognizes that environmental responsibility is integral to producing world class products, and any adverse effects on the environment and natural resources arising from operations, shall be minimized while safeguarding the health and safety of the public.

The supplier adheres to the following standards regarding the environment:

#### (a) Product Content Restrictions

All products shall adhere to applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances, including labelling laws and regulations for recycling and disposal.

#### (b) Chemical and Hazardous Materials

Chemical and other materials posing a hazard if released to the environment shall be identified and managed to ensure their safe handling, movement, storage, recycling or reuse, and disposal. Also reduction of such chemicals and materials shall be planned.

#### (c) Wastewater and Solid Waste

Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities shall be monitored, controlled, and treated as required by applicable law and regulation.

#### (d) Air Emissions

In particular Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations shall be characterized, monitored, controlled, and treated as required by applicable law and regulation. Also reduction of such chemicals and materials shall be planned.

#### (e) Environmental Permits and Reporting

All environmental permits and registrations required by applicable law and regulation shall be obtained, maintained, and kept current. The operational and reporting requirements of all permits and registrations shall be followed.

#### (f) Pollution Prevention and Resource Reduction

Waste of all types, including water, noise and energy, are to be reduced or eliminated to the extent practicable at the source or by practices such as modifying production, maintenance, and facility processes, materials substitution, conservation, recycling, and or reusing materials.

#### (g) Decarbonisation

In order to achieve the decarbonisation targets, suppliers should monitor their GHG emissions, ensure energy efficiency and use energy from renewable sources if possible.

#### (h) Biodiversity, Water and Soil

Furthermore water consumption should be managed, water & soil quality, animal welfare and biodiversity must be considered and the supplier shall meet the requirement of the Regulation (EU) 2023/1115 on deforestation-free-products with the constant view of limiting biodiversity loss.



# ETHICS & BUSINESS PRACTICE





## 4. ETHICS AND BUSINESS PRACTICE

### (a) Anti-corruption/ Anti-bribery and Ethical behaviour

We request our suppliers to uphold the highest standards of ethics when performing their activities and in their business relationship.

The supplier undertakes to prevent and, where applicable, to take action against, all forms of fraud, corruption, embezzlement, money laundering and bribery which includes giving or receiving anything of value to influence negotiations or any other dealings with governments and government officials, customers or any other third party.

The supplier respects the principles of fair business and loyalty vis-à-vis its partners: customers and its own suppliers.

The supplier shall ensure that it avoids any form of conflict of interest and operates honestly and ethically throughout the supply chain and in accordance with applicable laws, including those laws pertaining to anti-competitive business practices, export control and economic sanctions and financial responsibility.

### (b) Rights of Minorities and indigenous people

The supplier shall be aware of and ensure that its activities are carried out in compliance with applicable local, national and international regulations and without affecting the rights of the local population, minorities and indigenous people, in particular concerning the land, deforestation, access to water and resources management.

The supplier shall respect the principle of the 'UN Declaration on the Rights of Indigenous Peoples' and not participate in unlawful land eviction and/or deforestation and shall take specific care in the regions affected by water scarcity or biodiversity loss.

### (c) Responsible Mineral Procurement

To ensure a responsible mineral procurement, the supplier shall promote initiatives toward the non-use of tantalum, tin, tungsten and gold and other minerals such as cobalt that are originated in conflict-affected areas and high-risk areas where instability of political situation, collapse of social infrastructure, and/or violence have been widespread (hereinafter collectively referred to as the "Region") and that are involved in or affecting/affected by conflicts and corporate social responsibility.

### (d) Data privacy, Confidentiality and Information security

In case the supplier has access to any personal data within the framework of its commercial relationship with MinebeaMitsumi, the supplier is requested to observe all applicable laws and regulations on data protection and privacy. In particular, the supplier shall only process personal data as required by and in compliance with its contractual obligations and take appropriate measures to protect said personal data from misuse.

Suppliers shall protect the confidentiality and integrity of the MinebeaMitsumi and MinebeaMitsumi Group information and take all appropriate measures.

Suppliers shall follow international best practices for cybersecurity, including monitoring processes to protect MinebeaMitsumi and MinebeaMitsumi Group information from cyber-attacks, or cyber-incidents.

#### (e) Protection of Intellectual Property

Respect of intellectual Property rights including no counterfeit parts and implement proper measures to protect others' intellectual property rights. To protect those rights, also pay full attention to transferring and handling its own or others' technologies or know-how.

#### (f) Response to anti-social forces

The supplier shall have no relation with antisocial forces that may or will pose a threat to the public order and/or safety. At the same time, regarding unreasonable demands, if any, from such forces, without making compromises, shall cooperate with external specialized institutions, including police and lawyers, and deal with such demands in a resolute attitude.

The conflicts and corporate social responsibility refer to:

- Human rights, in particular violations associated with mining, transporting, and dealing of minerals (e.g. forced labour, child labour, human trafficking, abuses and other inhumane acts);
- Direct or indirect support to armed groups;
- Illegal activities conducted by public or private security forces (e.g. illegal imposition of taxes and extortion of money in their jurisdictions); and
- Bribery, false statement about where minerals are sourced from, money laundering and unpaid taxes, charges and mining royalties.

#### (g) Management System

MinebeaMitsumi is expecting its suppliers to establish and maintain adequate management systems to oversee all elements of this Supplier Code of Conduct, in proportion to the size, complexity and risk environment of the supplier's business.

# COMPLIANCE HOTLINE



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## 5. COMPLIANCE HOTLINE

In the event of specific indications of potential misconduct by employees of MinebeaMitsumi, or of the business partner or its business partners in the context of collaboration with MinebeaMitsumi, all stakeholders have the possibility to report such misconduct to the Compliance Hotline (Whistleblower System):

**<https://www.minebeamitsumi.eu/en/whistleblowersystem>**

The suppliers should provide their employees with unhindered access to the Whistleblower System implemented by MinebeaMitsumi and not perform any actions that obstruct, block or impede access. The suppliers undertake to contractually pass-on the obligations referred to in the preceding sentence to their employees and to ensure, to the extent possible and reasonable, that the obligations are passed on in the supply chain.

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In the event of specific indications of potential misconduct by employees of Minebea AccessSolutions (MAE), or of the business partner or its business partners in the context of collaboration with MAE, MAE offers all stakeholders the possibility to report such misconduct to the MAE Compliance Hot Line System (Whistleblower System):

**E-mail: [compliance-officer.groups@minebeamitsumi.eu](mailto:compliance-officer.groups@minebeamitsumi.eu)**  
**Phone: + 33 (0) 06 66 07 38 82**

The suppliers should provide their employees with unhindered access to the Whistleblower System implemented by MAE and not perform any actions that obstruct, block or impede access. The suppliers undertake to contractually pass-on the obligations referred to in the preceding sentence to their employees and to ensure, to the extent possible and reasonable, that the obligations are passed on in the supply chain.

## SUPPLIER'S COMMITMENTS

The supplier hereby acknowledges that it has familiarised itself with all of MinebeaMitsumi's requirements, including those stipulated in this "Supplier Code of Conduct" as regards corporate and environmental responsibility and undertakes to comply herewith.

The supplier is aware that a breach of these principles will be considered as a material breach of the contract(s) between MinebeaMitsumi and the supplier that shall have consequences which may even cause the immediate termination of the contract(s) and the cessation of business relations under the applicable General Terms of Purchase.

Moreover, MinebeaMitsumi expects and requests its suppliers to make the same commitments with their own suppliers.

In addition, the supplier confirms that it does not recognize any breach of above by itself or by its supply chain. In case it recognizes any breach of above by itself or by its supply chain, the supplier will report it to MinebeaMitsumi immediately and cure or rectify such breach by itself or by its supply chain. Finally, the supplier accepts that MinebeaMitsumi may verify actual compliance with these principles by conducting audits of the various sites, or even by using questionnaires.

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Company's Name

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Name, Title and Signature of Representative

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Date

**MinebeaMitsumi**  
*Passion to Create Value through Difference*

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