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follow the higher standard. Where they are in conflict, we respect national law, while seeking to respect the principles of internationally recognized human rights.

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next tier suppliers to acknowledge and implement the Code.

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Fundamentally adopting the Code is the understanding that a business in all of its activities, must operate in full compliance with the laws, rules, and regulations of the countries in which it operates. The Code also encourages Suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics. In no case can complying with the Code

age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Supplier shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry level workers performing equal or similar tasks. If child labor is identified, assistance/remediation shall be provided.

CE & L\$ Working Hours

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

Ct ¼/¿ Y Wages and Benefits

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Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to



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verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.

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Treatment

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Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with these principles, suppliers shall respect the right of all workers to form and join trade unions of their own choosing to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

B. • ç > ¹ ~ HEALTH AND SAFETY

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Suppliers recognize that in addition to minimizing the incidence of work related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health management system were used as references in preparing the Code and may be useful sources of additional information.

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The health and safety standards are:

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Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles and fall hazards,

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j f Æ » Æ PhysicallyDemandingWork

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Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

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

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

• ç > 1 ~"IFJ HealthandSafetyCommunication

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

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All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

N´Lb"" ¼8²4ÖCt\$À Pollution Prevention and Resource Reduction

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Emission and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practice such as adding pollution control equipment; modifying production, maintenance and facility processes or by other means. The use of natural resources including water, fossil fuels, minerals, and virgin forest products, shall be conserved by shall shall



recyclesolidwaste(non hazardous)Wastedata shallbe trackedand documented.

ï"D Â n Air Emissions

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Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable



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disposal.Suppliersshall conduct routine monitoring of the

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Legal and Customer Requirements

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Suppliers shall adopt or establish a process to

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Suppliers shall adopt or establish a process to

the legal compliance environmental, health and safety,

practice and ethics

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of severe human

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associated Participant's operations. Suppliers shall determine the

significance of associated

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1. Communication

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

2. Worker/Stakeholder Engagement and Access to Remedy

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

3. Audits and Assessments

Supplier shall conduct periodic self evaluation to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

4. Corrective Action Process

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

5. Documentation and Records



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

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