Hamamatsu Photonics
Supply Chain Code of Conduct

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Hamamatsu Photonics K.K.

HAMAMATSU
PHOTON IS OUR BUSINESS

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Introduction

In recent years there has been a growing interest in social issues such as the environment, human rights, and fraud risks in supply chains. In addition, mitigating increasingly diverse and complex supply chain risks such as extreme weather conditions, natural disasters, infectious diseases, and raw material price fluctuations due to geopolitical influences occurring frequently in many parts of the world, is an urgent issue.

The Hamamatsu Photonics Group promotes procurement activities based on the "Hamamatsu Photonics Group Basic Sustainability Policy" (hereinafter referred to as 'sustainable procurement') to resolve these issues and realize a sustainable society. It has also formulated the "Hamamatsu Photonics Supply Chain Code of Conduct Version B," which we expect our suppliers to comply with.

This Code of Conduct is based on the "Hamamatsu Photonics Group Code of Conduct" and was prepared with reference to the Guidelines of the Japan Electronics and Information Technology Industries Association (JEITA).

We would ask our suppliers to understand its purpose and content, and cooperate with us in promoting sustainable procurement with Hamamatsu Photonics Group.

This Code of Conduct applies to suppliers, cooperating companies, subcontractors, and other business partners who provide products and services to the Group.

We also ask that our business partners understand and agree with the items outlined in this Code of Conduct and cooperate with our efforts to promote sustainable procurement.

Hamamatsu Photonics Group Basic Policy of Sustainability

1. We will strive to pursue the unknown and unexplored of light, and aim to establish new industries.
2. We will contribute to social and human development by offering safe and high-quality products and services with photonics technology.
3. We will ensure corporate ethics and foster the corporate culture that all employees conduct the right behaviors as members of society.
4. We will strictly abide by all relevant laws, regulations, and conventions, be they local, national, or international, in letter and in spirit.
5. We will conduct fair transactions, appropriately manage information, and prevent unauthorized access, information leakage, and unauthorized use.
6. We will provide appropriate and accurate information to our stakeholders in a timely manner.
7. We will conduct ecologically-sound and sustainable business activities, considering the environment and contributing to its preservation.
8. We will give consideration to people who are affected by our business activities, and respect human rights.
9. We will respect our employees, support their development, and provide a pleasant and safe work environment.
10. We will continue to serve as a philanthropic partner within our local communities.

Established as “Basic Policy of Sustainability”: October 22, 2021 (Resolution of the Board of Directors)
Revised: June 1, 2024 (Resolution of the Board of Directors)

Section1　Code of Conduct

1. Compliance with Laws and Regulations and Respect for International norms

Suppliers must comply with the applicable laws and regulations of their own country, and in the countries/regions in which they operate, and respect international norms.

2. Human Rights and Labor

Suppliers must respect workers' human rights by following international human rights standards, including the ILO core labor standards, and comply with relevant laws and regulations.

Refer to the “Hamamatsu Photonics Group Human Rights Policy” as part of its efforts to respect human rights.
https://www.hamamatsu.com/jp/en/our-company/sustainability/social/basic-stance-on-human-rights-and-labor.html

(2-1) Prohibiting Forced Labor

Suppliers must not use labor obtained by force, bonded, exploitative prison labor, slavery, human trafficking, etc. Companies must not force workers to provide work or service through force, fraud, or coercion and must keep the workers' right to terminate their employment.

(2-2) Prohibiting Child Labor and Respecting the Rights of Young Workers

Suppliers must not employ children under the minimum age for employment. Furthermore, suppliers must not allow young workers, below the age of 18, to perform hazardous work that is likely to jeopardize their health or safety, including night work or overtime.

(2-3) Control of Working Hours

Suppliers must not allow workers to exceed the maximum working hours set by local laws and regulations and appropriately manage working hours and days off, respecting international standards.

(2-4) Appropriate Wages and Allowances

Suppliers must comply with all applicable laws and regulations regarding work-related payments (including minimum wage, overtime payments, allowances, and deductions required by law). Furthermore, companies are expected to pay wages that allow workers to support their basic needs (a living wage).

(2-5) Prohibiting Inhumane Treatment

Suppliers must respect the human rights of workers. They must not subject them to inhumane treatment, such as mental and physical abuse, coercion, or harassment, as well as any other actions that may lead to such treatment.

Suppliers must also provide workers with facilities in dormitories for storing personal possessions and valuables, and personal space large enough to allow appropriate and

free access.

(2-6) Prohibiting Discrimination

Suppliers must not engage in any form of discrimination and harassment based on gender, age, nationality, race, color, ethnicity, religion, ideology, political opinion, belief, social status, disability, sexual orientation, or gender identity.

(2-7) Freedom of Association and Right to Collective Bargaining

Suppliers must respect workers' rights to organize, in compliance with international norms and local laws and regulations, to achieve labor-management consultations on working conditions and wage levels.

(2-8) Respect for Diversity

Suppliers must respect the basic human rights and diversity of their executives, workers, and other stakeholders.In addition, suppliers are expected to give due consideration, to the appropriate extent, to requests related to religious and ethnic customs, disabilities, etc.

(2-9) Consideration for Foreign Workers

Suppliers must comply with international norms, laws, and regulations regarding accepting and employing foreign workers and trainees, and ensure that they do not undermine basic human rights.

3. Health and Safety

In addition to complying with relevant laws and regulations, suppliers must consider standards such as ISO 45001 and ILO health and safety guidelines to minimize injury and illness in the workplace and maintain safe and healthy working conditions.

Refer to the “Hamamatsu Photonics Group Health and Safety Policy” and “Hamamatsu Photonics Group Health Management Policy” which promotes respect for health and safety and health management policies.
https://www.hamamatsu.com/jp/en/our-company/sustainability/social/occupational-health-and-safety.html
https://www.hamamatsu.com/jp/en/our-company/sustainability/social/health-management.html

(3-1) Occupational Safety

Suppliers must identify and assess risks to occupational safety and maintain safety through proper design, engineering, and administrative controls. Reasonable steps must also be taken to protect pregnant women and nursing mothers.

(3-2) Emergency Preparedness

Suppliers must identify the possibility of emergencies, such as natural disasters or accidents, that may adversely affect human life or safety, establish procedures in case of emergency to minimize harm to workers and property, install the required equipment, and conduct training and drills so that the required responses can be taken in case of emergency.

(3-3) Occupational Injury and Illness

Suppliers must identify, assess, record, and report occupational injuries and illnesses and implement appropriate countermeasures and corrective actions.

(3-4) Occupational Health

Suppliers must identify, assess and appropriately control the risk of workers being exposed to hazardous biological, chemical, or physical agents in the workplace.

(3-5) Physically Demanding Work

Suppliers must identify and assess worker exposure to physically demanding tasks and appropriately control the work to prevent occupational injury and illness.

(3-6) Machine Safeguarding

Suppliers must evaluate machinery used by workers for safety hazards and provide appropriate safeguarding.

(3-7) Health and Safety at Facilities

Suppliers must appropriately maintain the health and safety of facilities and accommodations provided to workers (such as dormitories, cafeterias, and toilets). Dormitories must also have an appropriate emergency egress.

(3-8) Health and Safety Communication

Suppliers must provide training on relevant health and safety information related to workplace hazards that workers may encounter or be exposed to. This training should be provided in languages and formats that workers can easily understand. A system for workers to give feedback on safety is also required.

(3-9) Worker Health Management

Suppliers must conduct appropriate health management for all employees.

4. Environment

Suppliers must actively address environmental problems such as resource depletion, climate change, and pollution, as well as regional environmental issues, considering the health and safety of their relevant local community.

Refer to the “Hamamatsu Photonics Group Environmental Policy” that promotes respect for the environmental policy.
https://www.hamamatsu.com/jp/en/our-company/sustainability/environment/environmental-management.html

(4-1) Environmental Permits and Reports

Suppliers must obtain the permits and approvals required to conduct business, register, and report in compliance with local laws and regulations.

(4-2) Reducing Energy Consumption and Greenhouse Gas Emissions

Suppliers must strive to improve energy efficiency, use renewable energy sources to achieve carbon neutrality, and continuously engage in activities to reduce energy consumption and greenhouse gas emissions.

(4-3) Air Emissions

Suppliers must comply with relevant laws and regulations and implement appropriate measures to reduce the emission of hazardous substances into the atmosphere.

(4-4) Water Management

Suppliers must comply with laws and regulations regarding water monitoring, use, and discharge. It is essential to conserve water whenever possible. Any wastewater must be tested, monitored, controlled, and treated before discharge or disposal. Additionally, sources of pollution that may contaminate water must be identified and managed appropriately.

(4-5) Resource Circulation and Waste Management

Suppliers must comply with laws and regulations and implement appropriate management to promote “Reduce, Reuse, Recycle” (3R) activities, ensure resource circulation, and minimize waste.

(4-6) Chemical Substance Management

Suppliers must comply with laws and regulations to identify, label, and manage chemical and other substances that pose a hazard to humans or the environment and conduct management to ensure the safe handling, transport, storage, use, recycling, reuse, or disposal of such substances.

(4-7) Managing Chemical Substances Contained in Products

Suppliers must comply with all laws, regulations, and customer requests applicable to the prohibition and restriction of specific substances contained in products.

(4-8) Biodiversity Protection

Suppliers are encouraged to consider biodiversity in their raw material procurement.

5. Fair Trade and Ethics

Suppliers must conduct business activities based on high ethical standards and in compliance with the law.

(5-1) Preventing corruption

Suppliers must not be involved in bribery, excessive gifts or entertainment, corruption, blackmail, or embezzlement in any form.

(5-2) Prohibiting Inappropriate Provision and Improper Benefit

Suppliers must not provide or accept any promises, propositions, or approvals in exchange for bribes or any other illicit or inappropriate benefit.

(5-3) Fair Information Disclosure

Suppliers must disclose non-financial information, including labor, health and safety, environmental activities, business activities, financial situation, and performance according to applicable laws, regulations, and industry practices. Falsification of records or the disclosure of false information is not allowed.

(5-4) Respecting Intellectual Property

Suppliers must respect intellectual property rights and protect intellectual property by

correctly transferring technology and expertise. Companies must also safeguard third parties' intellectual property, such as customers and suppliers.

(5-5) Conducting Fair Business

Suppliers must engage in fair business, competition, and advertising. They must also exclude antisocial forces in all aspects of their business activities.

(5-6) Protecting Whistleblowers

A whistleblower hotline should be established as a mechanism for the early detection and appropriate response to fraudulent activities. Suppliers must protect the confidentiality of information regarding whistleblowing and the anonymity of whistleblowers and avoid retaliation toward them.

(5-7) Responsible Minerals Procurement

Suppliers must exercise due diligence to ensure that the minerals such as tantalum, tin, tungsten, gold, and cobalt contained in their products do not cause or contribute to serious human rights abuses, environmental destruction, corruption, or disputes in conflict-affected and high-risk areas including the Democratic Republic of the Congo and neighboring countries.

Refer to the “Hamamatsu Photonics Group Responsible Minerals Sourcing Policy that promotes respect for Responsible Minerals Sourcing policy.
https://www.hamamatsu.com/jp/en/our-company/sustainability/social/initiatives-for-conflict-minerals.html

6. Quality and Safety

Suppliers must ensure safety and quality, and provide correct and accurate information on the products and services provided.

Refer to the “Hamamatsu Photonics Group Quality Policy” that promotes respect for the quality policy.
https://www.hamamatsu.com/jp/en/our-company/sustainability/quality-control.html

(6-1) Ensuring Product Safety

Suppliers must fulfill their responsibility as suppliers, by designing, manufacturing, and selling products that meet the safety standards stipulated by the laws and regulations of each country and ensure sufficient product safety.

(6-2) Quality Management

Suppliers must comply with their own quality standards and customer requirements, in addition to the laws and regulations applicable to the quality of products and services.

(6-3) Providing Accurate Information on Products and Services

Suppliers must provide accurate and non-misleading information about products and services.

7. Information Security

Suppliers must prevent confidential and personal information leaks, and enhance

information security.

(7-1) Defense from Cyber Attacks

Suppliers must implement protective measures against threats such as cyber-attacks and conduct management to prevent damage to the company and others.

(7-2) Protecting Personal Information

Suppliers must comply with relevant laws and regulations and appropriately manage and protect the personal information of suppliers, customers, consumers, and employees.

(7-3) Preventing Leaks of Confidential Information

Suppliers must properly manage and protect confidential information entrusted to them by themselves, customers, and third parties. They must strive to prevent unauthorized use or leakage of such information.

8. Business Continuity Planning

Suppliers must make preparations to ensure that they can quickly resume business activities, and fulfill their responsibility of supply if the company or a business partner becomes the victim of a large-scale natural disaster.

(8-1) Developing and Preparing a Business Continuity Plan

Suppliers must identify and assess risks to business continuity, examine their impact on the business, establish preparatory measures required in the medium to long term, and develop a business continuity plan (BCP) that indicates the status of those initiatives.

9. Other

(9-1) Contribution to society and local communities

As a member of society, suppliers must make efforts to contribute to the development of international and local communities.

Section2 Establishing a Management System

A Establishing a Management System

Suppliers must establish a management system to comply with the code of conduct in Section 1.

B Supplier Management

Suppliers must establish a process for communicating the requirements of the Code of Conduct in Section 1 to suppliers and for monitoring supplier compliance.

C Proper Import/Export Control

Suppliers must maintain a clear management system and conduct appropriate procedures for importing and exporting technologies and goods regulated by law.

D. Establishing a Grievance Mechanism

Suppliers must establish a grievance mechanism that can be used by stakeholders including workers and suppliers, for the early detection and appropriate response to misconduct within the company and throughout the supply chain.

E Disclosing the Activities

Suppliers must disclose information regarding their actions according to this Code of Conduct, and relevant laws and regulations.

＜Reference＞

In developing this Code of Conduct, reference is made to the following standards.

International Bill of Human Rights
https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights

ILO※1 International Labour Standards
https://www.ilo.org/international-labour-standards

UN Guiding Principles on Business and Human Rights
https://www2.ohchr.org/english/bodies/hrcouncil/docs/17session/A.HRC.17.31_en.pdf

United Nations Global Compact
https://unglobalcompact.org/

SDGs※2
https://www.un.org/sustainabledevelopment/sustainable-development-goals/

RBA※3 Code of Conduct
https://www.responsiblebusiness.org/code-of-conduct/

Guidelines for Responsible Corporate Behavior" of the Japan Electronics and Information Technology Industries Association (JEITA)
https://www.jeita.or.jp/english/

OECD※4 Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
https://www.oecd.org/daf/inv/mne/mining.htm

RMI※5
https://www.responsiblemineralsinitiative.org/

Hamamatsu Photonics Group Sustainability
https://www.hamamatsu.com/jp/en/our-company/sustainability.html

※1 ILO : International Labour Organization
※2 SDGs : Sustainable Development Goals
※3 RBA : Responsible Business Alliance
※4 OECD : Organisation for Economic Co-operation and Development
※5 RMI : Responsible Minerals Initiative

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