

# Shin-Etsu Group CSR Procurement Guidelines

Shin-Etsu Chemical Co., Ltd. Purchasing and Procurement Department

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### Introduction

We appreciate the daily cooperation of our business partners.

In recent years, as you are aware, the global society has been witnessing greater interest in "Corporate Social Responsibility (CSR)". It is argued, in the face of cross border stretch of corporate supply chains in line with globalized business activities, how to construct good relations between corporates and their stakeholders. Under such circumstances, social and market requirements towards corporate business operations have been expanding to include activities of related supply chains, let alone those of its own.

As a corporate group trusted by society, Shin-Etsu Group in all of our group activities always sets safety and the environment our utmost priority. We are also focusing on contributing to the conservation of the global environment through our key materials products and technologies. In addition, Shin-Etsu Group supports and participates in the United Nations Global Compact and proactively engage ourselves in CSR activities.

We have summarized the Guidelines to share the understanding and promote activities with our supply chains entirely, which seems effective, even in our procurement, to construct a sustainable society. The Guidelines aim to promote CSR activities together with our business partners by further promoting activities to their upstream suppliers, as well as to let our business partners know and understand Shin-Etsu Group's CSR activities. We would update the Guidelines, on a timely manner, to reflect the requirements of international society that change as time flows.

> Shin-Etsu Chemical Co., Ltd. Purchasing and Procurement Department



### Shin-Etsu Group's CSR

As life in society has become more complex and more diverse in recent years, the social responsibilities of corporates have grown. In order to achieve our Business Principle "to strictly comply with all laws and regulation, conduct fair business practices and contribute to people's daily lives as well as to the advance of industry and society by creating value through the provision of key materials and technologies", we have been engaged with a number of activities. Legal compliance and fair business practices as the basis of all the activities, we have, within the Group, repeatedly conducted studies concerning the most effective ways to fulfil our corporate social responsibilities and we have officially decided to once again clearly specify these important issues as our Key ESG Issues. The Group has set a goal to "contribute to the future of the Earth" by meeting the social needs, contributing to the problem solution with technologies and products and accomplishing social responsibilities, while working on these Key ESG issues.



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### Shin-Etsu Group's Procurement

Since its foundation, Shin-Etsu Group has contributed to quality enhancement, lighter / smaller goods and cost reduction in many industrial fields, through material development and stable supply of products. In order for Shin-Etsu Group to further contribute to people's lives and society as a world leading material manufacturer, we think it important for our business partners to stably supply superior quality products with fair price. We always take into consideration safety and environmental protection, reduced resource use and energy saving, at the same time, and make a point of doing fair and just procurement, complying with laws and regulations regarding reduced resource use and energy saving.

In purchasing and procurement activities, based on this philosophy, we have established the following basic procurement policies and disseminated them both inside and outside the company.

### Shin-Etsu Group's Procurement Policy

Shin-Etsu Group commits to conducting their corporate activities in a law-abiding spirit, carrying out their corporate activities in a fair manner and contributing to society as well as to dedicate itself to help create a richer life for society through putting priority on protecting the environment from a global point of view. From this perspective, the Shin-Etsu Group in its purchase and procurement activities also endeavors to carry out fair and objective business activities by widely disseminating information about the following principles of its basic procurement policy throughout the Group and among its business partners.

#### 1. Compliance with Laws and Regulations

Shin-Etsu Group has elected compliance with laws and regulations as the most important of its management objectives and conducts its corporate activities making each and every staff member fully aware of corporate social responsibilities and they carry out their business activities in strict conformity with the law, business ethics and the various rules and regulations of the Company. In its purchase and procurement activities, the Group acts in good faith and in a fair manner, and does not practice favoritism, nor make improper demands. In addition, based on mutual trust, not only between the Group and the business partners that the Group directly procures from, but also with vendors in the linked supply chain, all those companies involved carry out their business activities in strict accordance with the principal labor standards of International Labor Organization (ILO), any laws and regulations related to protection of the environment and rules and regulations concerning business transactions, including those of small- and medium-size enterprises (SMEs).

#### 2. Promotion of corporate social responsibility

The Company places primary importance on corporate social responsibility (CSR) activities and strongly emphasizes compliance management. For the promotion of CSR, the cooperation of all the Company's suppliers is essential, and we ask you to comply with the Company's CSR policies in the areas listed below. At the same time, we will strive to maintain mutual trust and close, friendly relationships.



- (1) Strive to strengthen and promote conformance with social norms, business ethics and laws.
- (2) Place first priority on assuring safety, protection against disasters and effective environmental management (i.e. REACH regulation, ISO 14001 standard, etc.), cooperate in "Green" environmentally friendly purchasing and procurement activities, and at the same time, each person should have a clear consciousness of the importance of these issues.
- (3) Strive for accurate and impartial disclosure of information and assuring the delivery of safe and reliable products and taking speedy measures to deal with various contingencies.
- (4) Respect human rights and prohibit any unfair discrimination. Observe the labor standards of the International Labor Organization (ILO) and prevent unfair labor practices.
- (5) Protect against the disclosure of classified information, personal confidentiality and respect intellectual property rights.
- (6) Biodiversity preservation.
- (7) Avoid the purchase of Minerals that are clearly involved in conflicts and human rights infringement in conflict-affected and high-risk areas (CAHRA).

#### 3. Selection of vendors

The Company follows an open-door policy regarding its transactions and globally seeks suppliers based on open, fair, impartial and equal-opportunity principles, both within the Company and with outside suppliers, comprehensively taking into consideration of the following

- (1) Globally competitive in product quality, price, delivery time and supply stability
- (2) Objective standards such as suppliers' management stability, reliability and technological abilities.
- (3) Matters raised in the promotion of corporate social responsibility.

Based on these rational considerations, the Company selects suppliers.

#### Meeting the needs of the suppliers, conducting performance reviews 4.

The Company provides suppliers with the essential information necessary for transactions and also cooperates with suppliers' VA and VE improvement activities as well as in activities related to the maintenance and improvement of product quality. The Company also routinely or as necessary promotes evaluation and review of suppliers' performance in areas that reflect on the Company's basic procurement policy and "Green" procurement standards.



## For Our Business Partners - From Shin-Etsu Group -

Below are the items of CSR procurement promotion, with which Shin-Etsu Group complies and, at the same time, the Group asks its business partners to comply with. We expect our business partners to use this to deepen the understanding of Shin-Etsu Group, together with the Shin-Etsu Group's Basic Procurement Policy.

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#### 0. Respect for Human Rights

#### 0-1. Non-Discrimination

- Discrimination in recruiting and hiring is to be eliminated and an endeavor is to be made to realize equal opportunities and fairness.
  - \* Discrimination consists of differentiating individuals in the occasions of employment, promotion, remuneration and opportunities to have training.

#### Examples of Classes Prone to Discrimination

age, gender, race, credo, religion, social status, nationality, ethnic group, pregnancy, marital status, political affiliation, sexual orientation, gender identity and expression, mental disability, union membership, covered veteran status, HIV/hepatitis infection, genetic information

- Employees or applicants are not to be subject to a medical test which could be used for • discriminatory purposes.
- Reasonable accommodation for workers' religious practices is provided.

#### 0-2. Freely Chosen Employment

Any type of forced labor is not to be used.

| Forced Labor : All kinds of labor that are NOT based on free will, including; |   |  |
|---|---|--|
| 1   | Bonded or indentured labor that results in restrictions on freedom of resignation   |  |
| 2   | Forced labor as a result of trafficking of persons  |  |
| 3   | Inhumane prison labor in a harsh work environment   |  |
| 4   | Requiring workers to pay excessive recruitment fees or other related fees for their employment.   |  |
| 5   | Denial of workers' right to freely terminate their employment   |  |
| 6   | Provision of workers with an employment agreement containing a description of terms and conditions of employment which is not in their native language. Substitution or change(s) in the employment agreement upon arrival in the receiving country that is unfavorable to workers. |  |
| 7   | Employers' holding employees' identity documents, such as government-issued identification, passports or work permits   |  |
| 8   | Imposition of unreasonable restrictions on workers' freedom of entering or exiting their workplaces and dormitories   |  |
| 9   | Involuntary or exploitative prison labor  |  |
|   |   |  |

\* Related Law: UK Modern Slavery Act 2015

Include policies and procedures in the contract to prevent labor agencies and contractors from using forced labor.

#### 0-3. Humane Treatment

Workers' human rights are to be respected. Harsh and inhumane treatment including various types of harassment which impair individuals' dignity, abuse and discrimination based on gender is to be prohibited.



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#### 0-4. Workers' Rights

- Workers' freedom of association is respected based on the laws and regulations of the countries and regions.
  - \* This refers to the right to form and administer an organization to realize labor-management consultations such as the working environment, working conditions and wage levels.
- Workers' rights to collective bargaining are respected based on the laws and regulations of the countries and regions.
  - \* Collective bargaining refers to a process or an activity with which workers voluntarily discuss and negotiate with management regarding labor-management relations, especially working conditions, adjustment of relations between the management and the workers/organization, and so forth.
  - \* Participants in collective bargaining include not only works themselves but also representatives appointed by the trade unions and workers.

#### 0-5. Prevention of Child Labor and Protection of Young Workers

- Child labor is not to be used. (See below)
- Young workers shall be protected in accordance with laws and regulations in each country/region. (See below)

| Article                        | Age  | Requirements   |
|--------------------------------|--|--|
| Prevention of<br>Child Labor   | <ul> <li>Under the age of 15</li> <li>Under the minimum age for<br/>employment in the relevant<br/>country/region</li> <li>Age to terminate the compulsory<br/>education in the relevant<br/>country/region</li> </ul> | Persons less than the highest<br>age of these three (left) shall<br>not be employed.                                       |
| Protection of<br>Young Workers | Those who are less than 18 years old and not "children"  | Protection shall be provided<br>in accordance with law (they<br>shall not be engaged with<br>dangerous or left-over work). |

#### 0-6. Working Hours

- The number of working days in a year is not to exceed the limit mandated by laws and regulation in the relevant country/region.
- Hours worked in a workweek, including overtime, do not exceed the legal limit (except in emergency and unusual situations).
- Workers receive at least one day off every seven days.
- Workers are allowed paid annual leave mandated by laws and regulations in the relevant country/region.

#### 0-7. Worker Health and Safety

Safe and sanitary facilities (dormitories, canteens, toilets etc.) are to be provided to workers ٠ for their daily lives.



| Exam | Examples of Facilities Provided to Workers                                       |  |  |
|------|--|--|--|
| 1    | Toilet facilities, drinking fountains, canteens provided at their workplaces     |  |  |
| 2    | Dormitories and canteens provided outside their workplaces                       |  |  |
| Exam | Examples of Health and Safety  |  |  |
| 1    | Clean and sanitary facility/dormitory  |  |  |
| 2    | Facility/dormitories are provided with appropriate emergency egress and          |  |  |
| 2    | adequate fire protection measures.   |  |  |
| 3    | Clean eating facilities where food prepared and stored in a sanitary environment |  |  |
| 3    | is provided.   |  |  |
| 4    | Provision of safe potable water  |  |  |
| 5    | Dormitory with reasonable personal space   |  |  |
| 6    | Hot water for bathing and showering  |  |  |
| 7    | Individual lockers for private secured storage                                   |  |  |
| 8    | Facility/dormitories are provided with adequate lighting, heat and ventilation.  |  |  |

- Hazards of worker exposure to biological/chemical agents, high noise and odors harmful to human beings in the work place are to be identified and evaluated and appropriate controls are to be taken to cope with them.
  - \* Harmful chemical substances to human bodies are as follows; smoke, vapor, mist, dust, toxic substances, radiation, substances triggering chronic disease (lead, asbestos). Noise and odor also apply when considerable.
- Worker exposure to the hazards of **physically demanding tasks** is to be identified, evaluated and controlled.
- Appropriate medical examinations are to be provided for all workers. In addition, from the perspective of maternal protection, assessment of any workplace health and safety risks for pregnant woman and nursing mothers is to be conducted and take reasonable measures to minimize the risk identified.
  - \* For workers' health, medical checks shall be done as the laws and regulation of each country/region stipulate.
  - \* Health and safety measures for pregnant women and nursing mothers include restricting employment to hazardous work, provide a place and reasonable break time for a worker to express breast milk for her nursing child after the child's birth.

#### 0-8. Wages and Benefits

- Compensation paid to workers is to be complied with applicable wage laws, including those relating to minimum wages.
- Laws and regulations related to benefits in the relevant country/region are to be complied with.
- Wages are not deducted or reduced for inappropriate reasons.
  - \* "Inappropriate deduction of wages" means deduction of wages that are not in conformity with labor related laws and regulations in the relevant country/region.
- Workers are provided with an accurate and understandable wage statement.
- Wages are to be paid periodically at least once a month on a set day without delay.



#### **Compliance with Laws & Regulations** 1.

#### 1-1. Prohibition of Abusive Use of Superior Positions

- Laws and regulations applied in each country/region, regarding the prohibition of abusive use of superior positions, shall be abided by.
- Based on contracts, business partners shall do fair and just business with integrity. They are requested not to impose any unreasonable demands and duties on their suppliers, using the position as buyers and clients, such as one-sided decision of business conditions with them.
- Based on contracts, business partners shall do fair and just business with integrity. They are requested **not to impose any unreasonable demands and duties** on their suppliers, using the position as buyers and clients, such as one-sided decision of business conditions with them.

| Examples of abusive use of superior positions |   |  |
|---|---|--|
| 1   | Refusal of goods reception from suppliers |  |
| 2   | Returning received goods to suppliers     |  |
| 3   | Delaying payment of contract amount       |  |
| 4   | Discounting payment of contract amount    |  |

Business partners are requested not to ask their suppliers and logistics companies to dispatch staffs and pay compensation for cooperation.

#### 1-2. Prohibition of Insider Trading

Business partners are requested not to do any insider trading in which, based on undisclosed important information on clients' business, business partners buy/sell shares of those clients.

#### **1-3.** Ensuring Anti-corruption

- Business partners are requested not to receive or provide any arrangements, gifts and money with public servants, clients and suppliers, aiming to obtain and/or maintain undue interests and favoured treatment.
- Establish a management system and specific procedures to ensure anti-corruption. Also comply with laws and regulations related to anti-corruption in the countries/regions where business activities are conducted through continuous monitoring and internal audits.

#### 1-4. Compliance with Competition Law

Business partners are requested to comply with the laws and regulations applied in each country/region regarding business competition. They are also requested to take measures to prevent cartels, such as consultation/limitation on price among competitors, market division, limited production, and prearranged bidding, from happening.



#### 1-5. Prevention of Unfair Competition

- Business partners are requested not to illegally obtain, use and disclose business secrets of other companies, in the purpose of obtaining illegal interests and/or damaging the owner of the secrets. Confidentiality clauses shall be abided by.
- Business partners shall not make confusions by using the identical or resembling expression with that of well-known products of other companies, such as name, corporate name, trademark and other expressions.
- Business partners are requested not to transfer, loan, exhibit, export and import products that are the imitation of goods made by other companies (less than three years since initially sold).
- Business partners shall prevent own technologies and know-hows leaks in the form of documents and electric media. Confidentiality contract shall be concluded with suppliers.

#### 1-6. Breaking off all Contacts with Antisocial Forces

Business partners are requested neither to have any relations with, including the one ٠ on business, nor to finance antisocial forces that negatively affect social order and healthy business activities.

#### 1-7. Compliance with Import/Export Laws and Regulations

Business partners are requested, in regard to exporting technologies and goods subject to legal restrictions, to create a clear control program to make exporting procedures in an appropriate manner.



#### 2-1. Fair Business

- In order to attain social responsibility and continue business, business partners are requested to manage their business in healthy and fair manner and to disclose appropriate information in a timely manner.
  - \* Information regarding labor, health and safety, environmental practices, business activities, financial situation and performance is to be disclosed in accordance with applicable laws and regulations and prevailing industry practices. Reporting errors, falsification of records or misrepresentation is unacceptable.

#### 2-2. Workplace Safety

- Business partners are requested to identify and evaluate risks on occupational safety and assure safety through hierarchy of controls.
  - \* Hierarchy of Controls (see figure below): Measures are taken from the top of the hierarchical structure: highly effective as a countermeasure for worker exposure. (Elimination => Substitution => Engineering Controls => Administrative Controls => Personal Protective Equipment)

| Examples of Potential Occupational Risks   | Examples of Safety Measures   |
|--|---|
| Chemical substances, electricity and<br>other energy, fire, vehicles,<br>slippery/tripping floors, danger to fall,<br>etc. | <ul> <li>change to a process that eliminates potentially dangerous operations</li> <li>lockout/tag out machine/equipment</li> <li>put safety labels in front of dangerous zones (e.g. No Entry)</li> </ul>  |
| Concept of Hierarchy of Controls  Elimi- nation Effective Least Effective Personal Protective Equipment                    | <ul> <li>provide appropriate, well-maintained personal protective equipment, such as protective glasses, safety helmets, gloves, etc.</li> <li>health and safety related information should be communicated to workers/employees via posted signs in a language the worker can understand.</li> <li>safety education is conducted regularly before and after work using training materials on the risks of hazard sources in a language that workers can understand.</li> <li>Establish mechanisms and opportunities for workers to raise safety concerns.</li> </ul> |

#### Business partners shall take safety measures for production facilities and machines used.

- \* Appropriate maintenance shall be done, through means such as safety devices, fail safes, fool proofs, interlocks and protective walls, etc., in the face of possible danger existence in which workers get injured with facility machines.
- Business partners shall understand the situation of occupational accident and diseases, and take appropriate measures.
  - e.g. encouraging workers to report the situation, categorizing and recording the accidents/ diseases, providing necessary medical treatment, surveying the accidents/diseases, taking corrective actions, encouraging workers to return to workforce, etc.



Business partners are requested to assume emergency/possible emergency cases, and to prepare emergency action plans with emergency manuals.

- Emergency action plans can include the following: reporting of emergency case, notification to workers, clarification of evacuation method, ensuring easy evacuation in an emergency (readily accessible to emergency exits without obstacles), emergency drills and setting of appropriate fire detectors and extinguishers, establishing evacuation facilities, preparing first-aid kits and recovery plans, etc.
- Business partners are requested to notify workers of correct handling method of chemical substances in a language the workers can understand.
- Business partners are requested to assure the safety in logistics process of products and take appropriate measures in case of accident, as well as to reduce environmental impact in logistics.

#### 2-3. Environmental Protection

- Business partners are requested to establish and operate environment management system (EMS)
  - \* EMS: a set of management structure to promote environment protection activities, based on PDCA cycle.
- Business partners shall apply, register and report environmental permits required in laws and regulations in each country/region, and submit management report to the authority.

\* Environmental permits, approvals registrations and licenses e.g. Air emissions, Wastewater discharge, Hazardous materials storage, use and disposal, Disposal of waste

- For the prevention of climate change, business partners are requested to set voluntary goals for GHG (greenhouse gas) reductions, make plans and surely execute them, aiming for continuous reduction of GHG.
  - \* Among existing GHGs, CO<sub>2</sub>, methane, dinitrogen monoxide, HFC, PFC, and SF<sub>6</sub> are designated in Kyoto Protocol.
- Business partners are requested to comply with the laws and regulations in each country/region regarding air pollutants, and to exhaust them after proper processing and management. The exhaust gas should be regularly monitored.
- Wastes that poses dangers to the human body and the environment is to be identified and shall be appropriately categorized, labelled, stored, managed, transferred and processed, in accordance with the laws and regulations in each country/region.
- Waste water, generated in the process of manufacturing and water discharge, shall be discharged after proper processing and managing to meet the legal standards of water discharge. The situation of waste water processing should be monitored daily.
- A systematic approach to prevent contaminated discharges and spills through storm drains from contaminating public water system such as sea, lakes, rivers etc. is to be implemented.
- Business partners are requested to promote **reduction of resource use, energy saving**, controlled amount of wastes generated, reuse, recycling (3Rs), for environmental protection and prevention of contamination.



#### 2-4. Promotion of Green Procurement

Business partners are requested to procure environmentally-friendly goods and services.

|  | Purchase of environmentally-friendly office supplies, such as copy |
|--|--|
| Examples of green  | papers, uniforms and office utilities.                             |
| procurement Procurement of environmentally-friendly raw materials, sub-materials |  |
|  | parts and machines, used in factories.                             |

Complying with the laws and regulations in each country/region regarding restricted chemical substances, business partners are requested to reduce environmental impacts, by taking environmental aspects into consideration from designing stage and promoting disuse of substances with high environmental impacts.

#### 2-5. Safety and Reliability of Delivered Goods

- Business partners are requested to precisely disclose the information of substances contained in parts used in products.
- In designing products, business partners are requested to secure sufficient product safety and to sell them in consideration of product liability. Safety standards stipulated in laws and regulations in each country/region have to be met.
- Quality assurance of products includes traceability management, such as recording raw materials, parts and process, and prompt action towards problem solutions.
- Business partners are requested to comply with laws and regulations in each country/region regarding the prohibition and/or restriction of chemical substances contained in products, and to meet the customer requirements.

#### 2-6. IT Information Security, Confidentiality and Privacy

- Business partners are requested to take protective measures against threats in PCs and online (illegal access and virus), and to manage not to damage the concerned parties.
- Business partners are requested to specify, appropriately manage and protect the confidential information, such as management/business information and technological secrets.
- Business partners are requested to appropriately manage and protect the personal information of all those concerned in business, such as suppliers, customers, consumers and workers. Personal information shall not illegally and unduly be obtained, used, disclosed and leaked.

#### 2-7. Intellectual Property

- Business partners shall respect all intellectual property rights (patent rights, utility model rights, design rights, trademark rights, copyrights, trade secrets etc.) and shall not commit fraudulent procurement, unauthorized use or infringement of intellectual property rights of third parties.
- Business partners shall protect the intellectual property rights when transferring technologies/know-hows.



#### 2-8. Protection of Whistleblowers and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of your business partners and their employee whistleblowers shall be maintained. Business partners shall have a communicated process for their own personnel as well as for their suppliers to be able to raise any concerns without fear of retaliation.

#### 2-9. Responsible Sourcing of Minerals

- Business partners shall have a policy to reasonably assure that they will not procure Minerals that are clearly involved in conflicts and human rights abuses in conflict areas and high risk areas (CAHRA), exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.
  - \* Related Regulation: Dodd-Frank Wall Street Reform and Consumer Protection Act.

#### 2-10. Conservation of Natural Resources

- Business partners are requested to understand the negative impact of business activities on **biodiversity**, and to preserve it through reducing environmental impact.
- Setting voluntary goals on prevention of water pollution, water saving and recycling, business partners shall proactively develop activities for water resource conservation.
- For mineral resources, fossil fuels and other scarce and non-renewable resources, shall promote reduction of usage, recovery/recycling and the use of renewable resources.
- In procurement of wood/wood-made products, paper and pulps, business partners shall consider the conservation of biodiversity, and make efforts to procure them from suppliers with forest certification.

| Forest Certification: A set of schemes run by private sectors in which third party |  |  |  |
|--|--|--|--|
| organizations  | organizations certify the appropriate management of forests and categorize woods yielded |  |  |
| from such for  | from such forests. This enables consumers to select and purchase these woods.            |  |  |
| PEFC   | Programme for the Endorsement of Forest Certification Schemed                            |  |  |
| FSC  | FSC Forest Stewardship Council   |  |  |
| SGEC   | Sustainable Green Ecosystem Council  |  |  |

In procurement of palm oil, business partners shall consider the conservation of biodiversity, and make efforts to procure certified and traceable one with consideration of sustainability.

| Palm Oil Certification Schemes |   |  |
|--------------------------------|---|--|
| RSPO                           | Roundtable on Sustainable Palm Oil (given to products using certified oil)    |  |
| Green Palm                     | Green Palm sustainability   |  |
| Green Faim                     | (given to products that purchase certificate, instead of using certified oil) |  |

#### 2-11. Community Involvement

Business partners are expected to engage themselves with activities that contribute to the development of international/regional communities.



#### 3-1. Assessment & Improvement of Business Activities

Business partners shall establish management systems to promote business activities in the field of human rights, labor, occupational safety, environmental preservation, and business ethics which include specification of business risks and measures against them, checking and improvement systems of business activities.

| Examples of management systems              |                                      |
|---|--------------------------------------|
| Human Rights & Labor                        | SA8000                               |
| Occupational Safety                         | OHSAS18001/ISO45001                  |
| Environment                                 | ISO14001                             |
| Information Security                        | ISO27001                             |
| Natural Disasters and Accidents, Infectious |                                      |
| Diseases, Dysfunction of Infrastructure &   | Business Continuity Management (BCM) |
| Internet Systems                            |                                      |

#### 3-2. Inner and Outer Communication & Information Disclosure

Business partners shall establish the process through which they communicate and disclose information on CSR policy, implementation method, expectations and targets, to stakeholders such as workers, suppliers and customers.

#### 3-3. Internal Training

In order to understand their own CSR policies, to implement the targets and to obtain knowledge and skills to meet the requirement of laws and regulations in each country/region, business partners shall regularly hold in-house training for those in managerial positions and workers.

#### **3-4.** Audit and Corrective Action Process

- Regular internal audit shall be done to confirm the compliance with CSR-related laws and regulations in each country/region, articles in the guidelines and customer requests.
- The corrective process shall be established in which necessary correction is made, in a timely manner, for flaws and defects found as a result of internal/external CSR evaluation, checks, surveys and reviews.

#### 3-5. Business Continuity

Business Continuity Plan (BCP) shall be made, which, in the face of emergencies such as natural disasters, fires and terrorist attacks, would minimize the damage of business assets, enable core business operations' continuity and early recovery. Examples of BCP include diversified suppliers of raw materials used in your own factories, and diversified manufacture/assembly factories internally.



| Examples of Business Continuity Measures |   |  |
|--|---|--|
| Dusiness Continuity                      | Establish a Business Continuity Plan (BCP) for the purpose of           |  |
| Business Continuity                      | continuing business in the event of unexpected events such as           |  |
| Management                               | natural disasters and accidents and obtain management's approval.       |  |
| and                                      | Clarify important operations for resuming production and delivery.      |  |
| Business Continuity<br>Plan              | Set target recovery time for each critical task required to resume      |  |
| FIGII                                    | production and delivery.  |  |
|  | Maintain production elements such as equipment, information             |  |
|  | infrastructure and goods necessary for resuming production and          |  |
| Boowery Moosures                         | delivery as well as a contact list for repairers for each equipment.    |  |
| Recovery Measures                        | Replicate absolutely essential information systems and data             |  |
|  | essential for recovery such as earthquake resistance/disaster           |  |
|  | mitigation measures and in-house power generation.                      |  |
|  | Distribute production sites for the same product even during normal     |  |
|  | times.  |  |
|  | For products that do not have decentralized production bases,           |  |
|  | prepare for production bases that can be temporarily replaced as        |  |
|  | substitutes in the event of an emergency.                               |  |
|  | Assuming that the base responsible for the central function such as     |  |
|  | the head office is damaged, establish a mechanism to replace with       |  |
|  | a base that does not suffer from damage at the same time.               |  |
|  | Secure enough stock to supply products to customers before              |  |
| Alternative Measures                     | recovery. Also regularly review the appropriate product inventory.      |  |
|  | Identify important purchases that can interfere with delivery to        |  |
|  | customers and develop action plans in the event of supplier outage.     |  |
|  | Even if an important supplier is suspended, secure an alternative       |  |
|  | production base or substitute of the supplier.                          |  |
|  | Organize problems in switching from normal to alternative products,     |  |
|  | and promote in-house and customer certification.                        |  |
|  | Understand the normal transportation route for delivery to              |  |
|  | customers and supply to the company, and plan countermeasures           |  |
|  | in case the route is interrupted.                                       |  |
|  | Identify the important next tier suppliers (direct business partners)   |  |
| External                                 | for business continuity and grasp locations of factories, sales offices |  |
| Communications                           | etc.  |  |
| Communications                           | Requests the next tier suppliers (direct business partners) to grasp    |  |
|  | locations of their next tier suppliers.                                 |  |

### 3-6. Supply Chain Management

- The contents of the Guidelines shall be made known internally and externally to obtain understanding.
- Business partners shall regularly evaluate their suppliers in terms of the implementation of requirements of the Guidelines.



## **References**

The following standards were used in preparing the Guidelines and may be a useful source of additional information.

- Shin-Etsu Group's Philosophy and Basic ESG Policy https://www.shinetsu.co.jp/en/sustainability/esg\_management/
- Shin-Etsu Group's Human Rights Policy https://www.shinetsu.co.jp/en/sustainability/esg\_employ/human-rights/

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

- ILO Code of Practice in Safety and Health <u>https://www.ilo.org/global/topics/safety-and-health-at-work/normative-instruments/code-of-practice/lang--</u> en/index.htm
- ILO International Labor Standards http://www.ilo.org/global/standards/lang--en/index.htm
- UK Modern Slavery Act https://www.legislation.gov.uk/ukpga/2015/30/contents
- OECD Guidelines for Multinational Enterprises

http://mneguidelines.oecd.org/annualreportsontheguidelines.htm

- United Nations Convention against Corruption https://www.unodc.org/unodc/en/treaties/CAC/
- Universal Declaration of Human Rights https://www.un.org/en/universal-declaration-human-rights/

ISO26000 http://www.iso.org/iso/home/standards/iso26000.htm

RBA Code of Conduct http://www.responsiblebusiness.org/code-of-conduct/

Dodd-Frank Wall Street Reform and Consumer Protection Act

https://www.investor.gov/introduction-investing/investing-basics/role-sec/laws-govern-securitiesindustry#df2010

- ISO 14001 http://www.iso.org/iso/iso14000
- SA 8000 https://sa-intl.org/programs/sa8000/
- SAI http://www.sa-intl.org/
- Ethical Trading Initiative www.ethicaltrade.org/
- ISO45001 https://www.iso.org/iso-45001-occupational-health-and-safety.html

JEITA Supply-chain CSR Promotion Guidebook (only in Japanese) http://home.jeita.or.jp/ecb/csr/



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