

Nippon Micrometal Corporation Group Sustainability Code of Conduct

1. Purpose

Nippon Micrometal Corporation Group (the "Our Group") pursue the highest standards of product quality and do our best to ensure that the business activities of Our Group and our supply chain bring sustainable value to workers, the environment and business.

To achieve this goal, we shall establish Our Group's sustainability code of conduct based on the Responsible Business Alliance (the "RBA") Code of Conduct, which is a key sustainability standard in the electronics supply chain.

2. Scope

All team members of Our Group are required to act in accordance with this Code of Conduct.

3. Relationship with Stakeholders

We conduct Our Group's business activities in accordance with this Code of Conduct to earn the trust of our stakeholders, including customers, business partners, employees, shareholders, investors, and the communities in which we operate.

4. Code of Conduct

A Labor

We comply with RBA Labor standards, the local labor laws and customer requirements

A-1 Prohibition of Forced Labor

We only hire voluntary applicants. We do not hire forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons. Thus, we provide employment contract (written in the language workers can understand) to all workers. There is no unreasonable restriction on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities.

A-2 Young Workers

Child labor is not permitted in any stage of manufacturing and we only hire workers aged 15 years old or above. "Young Workers (workers under the age of 18)" are not permitted to perform work under the condition that is likely to jeopardize their health or safety, including night shifts and overtime.

A-3 Working Hours

Working hours do not exceed 60 hours per week for all workers and workers are allowed at least one day off every work week.

A-4 Wages and Benefits

We comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers can receive equal pay for equal work and qualification. Deductions from wages as a disciplinary measure are not permitted.



A-5 Non-Discrimination/Non-Harassment/Humane Treatment

Harsh and inhumane treatment to the workers is not permitted. We do not engage in discrimination and harassment based on their race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices. We provide with reasonable accommodation for religious practices and disability.

A-6 Freedom of Association and Collective Bargaining

We respect the right of all workers and/or their representatives to openly communicate and share their ideas and concerns with the management working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with these principles, we respect the rights to form, join or refrain from association, collective bargaining and peaceful assembly, and confirm these policies and procedures between workers and management.

B Health and Safety

We comply with RBA Health and Safety Standards, the local laws and the customer requirements.

B-1 Occupational Health and Safety

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are identified and assessed, mitigated by removal or replacement of hazard, engineering countermeasure, or managing countermeasure (single or combined). Where hazards cannot be adequately controlled by these means, workers are provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.

B-2 Emergency Preparedness

Potential emergency situations and events are identified and assessed, and their impact minimized by implementing emergency plans and response procedures (including emergency reporting, employee notification and evacuation procedures, worker training, and drills).

B-3 Occupational Injury and Illness

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness. Workers are allowed to remove themselves from workplaces that objectively considered to be in imminent harm, and not return until the situation is mitigated, without fear of retaliation.

B-4 Industrial Hygiene

Potential hazards (chemical, biological, and physical) are eliminated or controlled through proper design, engineering and administrative controls.



B-5 Physically Demanding Work

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 are identified, evaluated and controlled.

B-6 Machine Safeguarding

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

B-7 Sanitation, Food, and Housing

Workers are provided with access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities for the workers. As well as, we provide employee lounge for resting area.

B-8 Health and Safety Communication

We 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. Health and safety related information is clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter.

C Environment

We comply with RBA environmental standards, the local laws, international standards (e.g. ISO 14001) and the customer requirements

C-1 Environmental Permits and Reporting

We ensure that 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 followed.

C-2 Pollution Prevention and Resource Reduction

We ensure that emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; or by other means such as adjusting production, maintenance, and facility processes.

C-3 Hazardous Substances

Chemicals and other materials posing a hazard to human or the environment are identified, labeled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

C-4 Solid Waste

We implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data are tracked and documented.



C-5 Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are characterized, routinely monitored, controlled, and treated as required prior to discharge. We conduct routine monitoring of the performance of its air emission control systems.

C-6 Materials Restrictions

We comply with all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

C-7 Water Management

We implement a water management program that documents, characterizes, and monitors water sources, use and discharge; we seek opportunities to conserve water; and control channels of contamination.

C-8 Energy Consumption and Greenhouse Gas Emissions

We establish and report against an absolute corporate-wide greenhouse gas reduction goal. We take action to ensure that energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions are tracked, documented, and publicly reported. We comply with the cost- effective methods to improve energy efficiency and to minimize the energy consumption and greenhouse gas emissions.

D Ethics

We comply with RBA ethics standards, the local laws and the customer requirements.

D-1 Business Integrity

We have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion, embezzlement and acts of conflict of interest to be held the highest standards of business integrity.

D-2 No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. We have a monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

D-3 Disclosure of Information

We comply with all business dealings, transparently performed and are accurately reflected on Company's business books and records, including but not limited to the Company's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance.

D-4 Intellectual Property

We respect and protect the Intellectual property rights; transfer of technology and know- how ; customer and supplier information is safeguarded.



D-5 Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are upheld.

D-6 Protection of Identity and Non-Retaliation

We have maintained programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers, unless prohibited by law.

D-7 Responsible Sourcing of Minerals

We adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold, and cobalt in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

D-8 Privacy

We provide the standard to protect the reasonable privacy, applicable to all employees, customers, suppliers, service providers, and everyone we do business with. We comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

E Management Systems

We comply with RBA Management System standards, the local laws, international standards (e.g. ISO9001, IATF16949, ISO14001) and the customer requirements.

E-1 Company Commitment

A corporate social and environmental responsibility policy statements affirming Our Group's commitment to due diligence and continual improvement, is endorsed by executive management, made public and posted in the facility in the local language.

E-2 Management Accountability and Responsibility

Senior management review the status of the management system on a regular basis ensuring its implementation.

E-3 Legal and Customer Requirements

We adopt and establish a process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

E-4 Risk Assessment and Risk Management

We have a process to identify the environmental, health and safety and labor practice and ethics risks associated with Our Group's operations.

E-5 Improvement Objectives

We have a defined procedure to ensure the objectives, targets and implementation plans and those improvements are periodically assessed.

E-6 Training

We provide programs for training managers and workers to implement Our Group's policies, procedures and improvement objectives and to meet applicable legal and regulatory



requirements.

E-7 Communication

We have a process for communicating clear and accurate information about Our Group's policies, practices, expectations and performance to workers, suppliers and customers.

E-8 Worker Feedback, Participation and Grievance

We have ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.

E-9 Audits and Assessments

We implement periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

E-10 Corrective Action Process

We have a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

E-11 Documentation and Records

We have a policy in creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

E-12 Supplier Responsibility

We have a process to communicate the Code requirements to suppliers and to monitor supplier compliance to the Code.

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