

# Epson Group Supplier Guidelines

Ver. 8.0



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## 1. Preface

Epson believes that to achieve the goals stated in its Management Philosophy, its suppliers must understand the Management Philosophy and comply with the Epson Supplier Code of Conduct. We aspire to be an indispensable company, one that seeks to build mutually beneficial relationships with all our business partners, including suppliers, by asking them to uphold the highest standards of integrity and ethics while, at the same time, respecting their autonomy and independence.

Epson established the Epson Group Procurement Guidelines (now called the Epson Supplier Guidelines) in 2005 to gain an understanding of Epson's procurement activity policy and cooperation in promoting CSR activities. The Supplier Guidelines stipulate basic transaction requirements in terms of quality (Q), price (C), and delivery time (D), trade management and security measures in the supply chain reflecting the demands of the international community, and CSR requirements in terms of labor, health and safety, the environment, and ethics. We aim to continue to promote business activities in compliance with these requirements with our business partners.

The United Nations Guiding Principles on Business and Human Rights and the Sustainable Development Goals (SDGs) are two of the international agendas that set forth requirements for addressing the world's issues. These requirements extend not only to Epson but also to the entire supply chain. Epson is striving to enhance CSR in its supply chains. As part of this effort, we have joined the Responsible Business Alliance (RBA), an alliance of corporations primarily in the electronics industry. As a member, we endorse the RBA's code of conduct and its mission of promoting responsible supply chains.

We ask that you review and understand the spirit of these guidelines and that you agree to implement and act in accordance with them. We also ask that you communicate the Epson Group Supplier Guidelines to your own suppliers.

Epson does not depend on entertainment and gifts to facilitate business. Believing that building transparent relationships fosters mutual trust and prosperity, we decline all gifts and offers of entertainment from existing and potential suppliers. Please understand that Epson is committed to engaging in fair and impartial business practices and does not engage in reciprocal dealing.

For more information about Epson's Supply Chain CSR activities, please refer to:

<https://corporate.epson/en/sustainability/supply-chain/>

## 2. Epson's Philosophical Framework

### Purpose

"Our philosophy of efficient, compact and precise innovation enriches lives and helps create a better world."

### Management Philosophy

Epson aspires to be an indispensable company, trusted throughout the world for our commitment to openness, customer satisfaction and sustainability.

We respect individuality while promoting teamwork, and are committed to delivering unique value through innovative and creative solutions.

### Principles of Corporate Behavior

Principle 1: Pursuing customer satisfaction

Principle 2: Preserving the natural environment

Principle 3: Fostering diverse values and teamwork

Principle 4: Creating a safe, healthy, and fair work environment in which human rights are respected

Principle 5: Ensuring effective governance and compliance

Principle 6: Ensuring the security of people, assets, and Information

Principle 7: Working with business partners for mutual benefit

Principle 8: Prospering with the Community

Principle 9: Initiating honest dialogue with our stakeholders

Closing: The spirit of "integrity and effort" and "creativity and challenge"

[Principles of Corporate Behavior | Philosophy | Epson](#)

## 3. Epson Group Basic Procurement Policy

- 1) With high ethical standards and a social conscience, we and our suppliers engage in procurement activities that comply with international rules and with the laws and regulations of all nations, fulfilling our social responsibilities, including those related to human rights and the environment.
- 2) We build sustainable supply chains by forging partnerships of mutual trust with our suppliers based on fairness and mutual benefit.
- 3) We work with our suppliers to stabilize and optimize quality, prices, and delivery times to deliver products and services of value to our customers.

#### 4. Expectations for Suppliers

In addition to concluding transaction agreements with suppliers, Epson expects them to meet the requirements outlined below. In these guidelines, all suppliers are referred to as "suppliers," and those who deliver raw materials, parts, or finished goods (referred to collectively as "products" hereafter) to Epson are referred to as "production material suppliers."

- 1) Observing laws, regulations, and social norms  
We ask suppliers to conduct all business activities in accordance with the laws, regulations, and generally accepted standards of the countries in which they operate. In addition to complying with applicable laws, we ask that they comply with the Responsible Business Alliance (RBA) Code of Conduct, an internationally recognized set of standards for corporate social responsibility, regardless of the country or region in which they are located.
- 2) Maintaining appropriate quality  
The quality of products that suppliers deliver to Epson affects the performance of Epson products and, in some cases, can produce serious defects. Therefore, we ask suppliers to establish and operate a quality assurance system that is in line with separately presented quality assurance standards.
- 3) Maintaining cost-competitiveness  
We ask suppliers to offer competitive market pricing while actively and continuously streamlining operations and reducing costs. Epson will not demand unlawful or unreasonable cost reductions or discounts.
- 4) Maintaining on-time delivery  
We ask suppliers to closely communicate with Epson to strictly manage delivery schedules (deliveries), endeavor to stabilize supply, and meet their delivery commitments.
- 5) Sourcing minerals responsibly  
We ask suppliers to establish and carry out product-related supply chain surveys and answer Epson's surveys to prevent the use of high-risk minerals that are associated with human rights violations, armed conflicts, and environmental destruction.
- 6) Mitigating environmental impacts
  - A. We ask suppliers to make efforts to reduce greenhouse gas emissions, recycle resources, manage water resources, manage chemical substances, preserve biodiversity, and take other actions deemed necessary to address environmental issues. We also ask them to answer Epson's surveys.
  - B. Production material suppliers are asked to establish a system for tracking and managing chemical substances in products, agree to the latest revision of the Epson Group Green Purchasing Standard for Production Materials, and deliver products that satisfy the standard. Refer to this website for details:  
<https://corporate.epson/en/sustainability/supply-chain/green-purchasing/>
  - C. We ask suppliers to comply with environmental laws and regulations and conduct business operations in an environmentally considerate manner at their factories and other facilities.
- 7) Information security and cyber security  
We ask suppliers and their subcontractors who use information systems in their operations to

implement technological and organizational measures to defend against computer network security threats (e.g., unauthorized access, malware, and targeted attacks). We ask them to build systems for pinpointing the scope of damage from actual attacks, initiating actions to prevent harm from spreading, and promptly investigating measures to prevent future incidents. This includes readying plans and schemes for restoring IT systems that have been harmed by a cyberattack that has brought operations to a halt.

If suppliers are asked by Epson to preserve the secrecy of information that Epson provides under a non-disclosure agreement or other arrangement, we ask them to abide by the terms therein as they apply to the information (including goods) that Epson asked to be kept secret as well as to information (including goods) created using that information.

8) Management of borrowed assets

We ask suppliers to observe applicable agreements and laws when borrowing and using Epson assets in production. We ask them to take appropriate care of borrowed assets so that they are in a normal, usable condition at all times. We ask them to promptly respond to requests from Epson for proof of receipt, requests to conduct an inventory, and requests to conduct on-site inspections of usage conditions.

9) Business continuity management (BCM)

We ask suppliers to fulfill their supply obligations by preventing or limiting supply disruptions. We ask suppliers to build a BCM system and have in place a multifaceted action plan (a business continuity plan [BCP]) for continuing business operations to minimize business losses and damage in the event of an accident, disaster, emerging infectious disease, or other emergencies.

10) International trade control

When importing or exporting goods, providing technology, or engaging in international brokered transactions, we ask suppliers to comply with export control laws and regulations of the country of residence. Moreover, we ask them to not engage in conduct that violates U.S. Export Administration Regulations when subject to the extraterritorial application of these regulations. When importing goods, we ask them to observe the customs laws of the country of residence and pay the appropriate tariffs, consumption taxes, and other duties.

To enable Epson to sell Epson products globally, we ask suppliers to comply with applicable international laws and regulations when selling products to Epson and provide the necessary information to enable Epson to comply with all laws in the places where Epson products are sold. Applicable laws include, but are not limited to, export control laws, international trade regulations, and environmental or other product regulations.

11) International trade control-related security and correct shipping management

We ask suppliers to ensure security in international trade control and correctly manage shipping.

- A. Area security: Control employee and visitor access to the premises of shipping centers and lock buildings and facilities.
- B. Goods security: Prevent unauthorized persons from accessing goods for import/export and prevent unidentified goods from being mixed in with the goods for import/export throughout storage and shipping operations.
- C. Personnel security: Employ workers whose identity has been verified.
- D. Shipping management: Verify that actual goods and their accompanying documentation match.

E. Shipping management: Verify that actual goods and their export paperwork match.

12) Respect for human rights

We ask suppliers to commit to respecting human rights by observing the labor standards set forth in the Epson Supplier Code of Conduct (RBA Code of Conduct), as well as by respecting the rights of indigenous peoples and migrant workers.

**5. Evaluation and Survey Program**

Epson evaluates both direct and indirect materials suppliers based on a comprehensive supplier evaluation program. The program consists of multiple evaluations. The primary components are an indirect evaluation, which is based on information from a third-party credit investigation, and a direct evaluation (periodic evaluation), which is a self-check that suppliers do to evaluate their own QCD and other performance metrics.

Epson assesses supplier compliance with the Epson Supplier Guidelines, shares issues with suppliers, and works jointly with suppliers to make improvements. Epson decides which suppliers to evaluate based on the size and nature of transactions.

Suppliers are typically evaluated or surveyed by using one or a combination of the following methods: "self-assessment questionnaire (checklist)", "interview", "on-site verification", or "third-party audit". Suppliers are asked to promptly take actions to implement "suggestions for improvement" made based on evaluation or survey results. Depending on the situation, Epson may provide assistance. If a supplier does not implement suggested improvements, does not correct issues after a certain period of time, or does not cooperate with an evaluation or survey, Epson will consider terminating the business relationship.

Evaluation Program

<b>Credit assessment by a credit investigation service</b> Evaluation items: Credit score, business history, capital composition, size, financial position, financing situation, management, etc.
<b>Periodic evaluation</b> <b>(a self-assessment that is focused primarily on a supplier's QCDEMS level)</b> Evaluation items: Quality control (Q), cost management (C), delivery management (D), environmental management (E), management (M) and information security (S)
<b>Detailed CSR evaluation</b> <b>(a self-assessment of adherence to the Epson Supplier Code of Conduct)</b> Evaluation items: Labor (human rights), health and safety, environment, ethics, and management systems
<b>Evaluation of emergency response capabilities</b> <b>(a self-assessment of the ability to respond to a natural disaster, fire, or other emergency)</b> Evaluation items: Management attitudes, risk countermeasures, and ability to respond to emergencies, recover from disasters, continue supplying goods, maintain procurement, manage inventory, etc.
<b>Safety management evaluation (a self-assessment and an evaluation by Epson of readiness to respond to fires, disasters, and other risks that materialize)</b> Evaluation items: Management of electrical hazards, hazardous materials, fire prevention, etc.

## Survey Program

<b>Survey on substances in products</b> Survey items: Agreement to comply with the Epson Group Green Purchasing Standard for Production Materials (latest revision), maintenance or construction of a product substance assurance system, information about substances in products, etc.
<b>Environmental impact survey</b> Survey items: Amounts of environmental resources used, GHG emissions, emissions reduction rate, efforts to reduce environmental impacts, etc.
<b>Responsible minerals survey</b> Survey items: Supply chain surveys regarding 3TG, cobalt, and other metals and minerals used, as well as supplier policies and initiatives, etc.

## 6. Whistleblowing Systems

We take compliance seriously and provide compliance hotlines that we encourage suppliers to use to report or discuss ethical or compliance concerns. Reports can be made anonymously, and whistleblowers shall be protected, including by strictly handling their personal data and prohibiting any form of retaliation.

- 1) Suppliers can use the hotlines to report:
  - Violations or potential violations of law, internationally recognized human rights codes, or the Epson Supplier Code of Conduct (in the areas of human rights, health and safety, environment, and ethics)
  - Proposals and grievances relating to health and safety
  - Matters related to conflict minerals surveys
  - etc.
- 2) Whistleblowing system for suppliers  
<https://corporate.epson/en/sustainability/supply-chain/communication/>
- 3) Other reporting channels  
Epson provides compliance hotlines for suppliers, but suppliers may use other internal or external reporting mechanisms if they wish to do so.

## 7. Epson Supplier Code of Conduct (RBA Code of Conduct)

As a member of the Responsible Business Alliance, Epson commits to operating in compliance with the RBA Code of Conduct and asks all its suppliers to do so as well.

The Epson Supplier Code of Conduct, which is part of the Epson Supplier Guidelines, is based on the RBA Code of Conduct. It specifies supply chain requirements in the areas of labor, health and safety, environment, ethics, and management systems. The RBA requires compliance with local laws and with RBA requirements and standards when they are stricter than local laws. This guarantees a certain level of performance regardless of the legal requirements and standards of the countries and regions in which suppliers are located, and regardless of their local labor practices.

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





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## RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT

The Responsible Business Alliance (RBA) Code of Conduct establishes standards to ensure that working conditions in supply chains are safe, and that business is conducted responsibly, ethically, and with respect for human rights and the environment.

The Code may be voluntarily adopted by any business and subsequently applied by that business to its direct and indirect supply chain and subcontractors, including providers of contract labor.

To adopt the Code and become a participant (“Participant”), a business shall declare its support for the Code and conduct due diligence in line with the Code and its standards through the establishment of an effective management system.

Participants must regard the Code as a total supply chain initiative. At a minimum, Participants shall also require their next tier suppliers to acknowledge and implement the Code.

Fundamental to adopting the Code is the understanding that a business, in all of its activities, must operate in full compliance with applicable laws, rules, and regulations<sup>1</sup>. In alignment with internationally recognized standards as listed under the References of this document, and drawing upon best practices in global supply chains, elements of this Code may go beyond legal compliance in order to advance social and environmental responsibility and business ethics. In no case can complying with the Code violate applicable laws. If, however, there are differing standards between the RBA Code and applicable laws, the RBA defines conformance as meeting the strictest requirements.

The provisions of this Code are derived from and respect internationally recognized standards including:

- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Fundamental Conventions
- UN Universal Declaration of Human

Rights The Code is made up of five sections:

- Sections [A](#), [B](#), and [C](#): Standards for Labor, Health and Safety, and the Environment, respectively.
- Section [D](#): Standards relating to business ethics.
- Section [E](#): Elements of an acceptable system to manage conformity to this Code.

The RBA is committed to obtaining regular input from stakeholders in the continued development and implementation of the Code of Conduct.

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<sup>1</sup> The Code is not intended to create new and additional third-party rights, including for workers.



## A. LABOR

Participants commit to respect the human rights of workers, and to treat them with dignity. This applies to direct and indirect suppliers, as well as all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are as follows:

### 1) Prohibition of Forced Labor

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a language the worker can understand, that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. Participants shall maintain documentation on all leaving workers. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Notwithstanding the foregoing, employers can only hold documentation if necessary to comply with the local law. In this case, at no time shall workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

### 2) Young Workers

Child labor shall not be used in any stage of manufacturing. The term "child" refers to any person under the 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. Participants 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. Participants 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. Participants 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.



### 3) Working Hours

Working hours shall not exceed the maximum set by local law. Further, a workweek 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.

### 4) Wages and Benefits

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

### 5) Non-Discrimination/Non-Harassment/Humane Treatment

Participants shall commit to a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Companies shall not engage in discrimination or harassment based on 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 such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111).

### 6) Freedom of Association and Collective Bargaining

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, participants 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. HEALTH AND SAFETY

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

The health and safety standards are as follows:

### 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.) shall be identified and assessed, mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be 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.

### 2) Emergency Preparedness

Potential emergency situations and events shall be 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.

Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

### 3) Occupational Injury and Illness

Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illnesses, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

Participants shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

### 4) Industrial Hygiene

Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Participants shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. Participants shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational



materials about the risks associated with exposure to workplace hazards.

#### 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 shall be identified, evaluated, and controlled.

#### 6) Machine Safeguarding

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.

#### 7) Sanitation, Food, and Housing

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 Participant 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.

#### 8) Health and Safety Communication

Participants 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. Training 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.



## C. ENVIRONMENT

Across all business functions, Participants recognize that environmental responsibility is integral to producing world-class products. Participants shall identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources, while safeguarding the health and safety of the public.

The environmental standards are as follows:

### 1) Environmental Permits and Reporting

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

### 2) Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices 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 practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

### 3) Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.

### 4) Solid Waste

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

### 5) Air Emissions

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 regulations. Participants shall conduct routine monitoring of the performance of its air emission control systems.

### 6) Materials Restrictions

Participants shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.



## 7) Water Management

Participants shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Participants shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

## 8) Energy Consumption and Greenhouse Gas Emissions

Participants shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. Participants shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.



## D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Participants and their agents shall uphold the highest standards of ethics including the following:

### 1) Business Integrity

The highest standards of integrity shall be upheld in all business interactions. Participants shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

### 2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti- corruption laws.

### 3) Disclosure of Information

All business dealings shall be transparently performed and accurately reflected on the Participant's business books and records. Information regarding participant's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

### 4) Intellectual Property

Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

### 5) Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition shall be upheld.

### 6) Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers<sup>2</sup> shall be maintained, unless prohibited by law. Participants shall have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

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<sup>2</sup> Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.





## 7) Responsible Sourcing of Minerals

Participants shall 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 Organisation 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.

## 8) Privacy

Participants shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees.

Participants shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.



## E. MANAGEMENT SYSTEMS

Participants shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It shall also facilitate continual improvement.

The management system shall contain the following elements:

### 1) Company Commitment

Participants shall establish human rights, health and safety, environmental and ethics policy statements affirming Participant's commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels..

### 2) Management Accountability and Responsibility

Participants shall clearly identify senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

### 3) Legal and Customer Requirements

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

### 4) Risk Assessment and Risk Management

Participants shall adopt or establish a process to identify the legal compliance, environmental, health and safety<sup>3</sup>, labor practice and ethics risks, including the risks of severe human rights and environmental impacts, associated with Participant's operations. Participants shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

### 5) Improvement Objectives

Participants shall establish written performance objectives, targets and implementation plans to improve the Participant's social, environmental, and health and safety performance, including a periodic assessment of Participant's performance in achieving those objectives.

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<sup>3</sup> Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.



#### 6) Training

Participants shall establish programs for training managers and workers to implement Participant's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

#### 7) Communication

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

#### 8) Worker/Stakeholder Engagement and Access To Remedy

Participants 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.

#### 9) Audits and Assessments

Participants shall conduct 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.

#### 10) Corrective Action Process

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

#### 11) Documentation and Records

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

#### 12) Supplier Responsibility

Participants shall establish a process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.



## REFERENCES

The following references were used in preparing this Code and may be useful sources of additional information. The following references may or may not be endorsed by each Participant:

### Standards and Conventions:

- [ILO Fundamental Conventions](#)
  - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87)
  - Right to Organise and Collective Bargaining Convention, 1949 (No.98)
  - Forced Labour Convention, 1930 (No.29)
  - Abolition of Forced Labour Convention, 1957 (No.105)
  - Minimum Age Convention, 1973 (No.138)
  - Worst Forms of Child Labour Convention, 1999 (No.182)
  - Equal Remuneration Convention, 1999 (No.100)
  - Discrimination (Employment and Occupation) Convention, 1958 (No.111)
  - Occupational Safety and Health Convention, 1981 (No.155), and the Promotional Framework, 2006 (No.187)
- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [United Nations \(UN\) Guiding Principles on Business and Human Rights](#)
- [Universal Declaration of Human Rights](#)
- [United Nations Convention Against Corruption](#)
- [United Nations Convention on the Rights of the Child](#)
- [United Nations Convention on the Elimination of All Forms of Discrimination Against Women](#)
- [United Nations Global Compact](#)



**Other Useful References:**

- [Dodd-Frank Wall Street Reform and Consumer Protection Act](#)
- [Eco Management & Audit System](#)
- [Ethical Trading Initiative](#)
- [ILO Code of Practice in Safety and Health](#)
- ISO 14001 and related standards – Environmental management
- ISO 45001:2018 - Occupational health and safety management systems
- [National Fire Protection Association](#)
- Social Accountability International (SAI)
  - SA 8000
- [United States Federal Acquisition Regulation](#)



## DOCUMENT HISTORY

Version 1.0 – Released October 2004.

Version 1.1 – Released May 2005. Converted document to RBA format, minor page layout revisions; no content changes.

Version 2.0 – Released October 2005 with revisions to multiple provisions.

Version 3.0 – Released June 2009 with revisions to multiple provisions.

Version 4.0 – Released April 2012 with revisions to multiple provisions.

Version 5.0 – Released November 2014 with revisions to multiple provisions.

Version 5.1 – Released March 2015 with revision to A1 to take effect January 1, 2016.

Version 6.0 – Released January 2018 with revisions to multiple provisions.

Version 7.0 – Released January 2021 with revisions to multiple provisions.

Version 8.0 – Released January 2024 with revisions to multiple provisions.

The RBA Code of Conduct was initially developed by a number of companies engaged in the manufacture of electronics products between June and October 2004. Companies are invited and encouraged to adopt this Code. You may obtain additional information from:

<https://www.responsiblebusiness.org>

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Seiko Epson Corporation

