ROHM GROUP
SCM GUIDELINES

April 2023 10th Edition

ROHM Co., Ltd.

I.   Introduction

The progress in globalization of corporate activities has made the supply chain diverse and complex, and the risks to the companies due to social problems and issues around the world have made business operations uncertain. As there are limits to the results that could be obtained from the CSR (Corporate Social Responsibility) activities by a single company, expanding them to the whole supply chain through the procurement sources is required, thereby contributing to the resolution of social issues.

Under such social environment, the ROHM Group has been working on the following 6 main CSR Procurement Activities:

① Conclusion of RBA-compliant "Basic Purchase Agreement"
② Issuance of "ROHM Group CSR Procurement Guidelines"
③ Holding of "CSR Procurement Promotion Briefing" at each Site
④ Implementation of "CSR Procurement Self-Assessment"
⑤ Implementation of "CSR Procurement Audit"
⑥ Implementation of "Export Control"

We will continue to conduct these activities as they evolve and develop in the future.

However, for further dissemination and penetration to the whole supply chain, the understanding, agreement and specific activities of our business partners are important more than ever. Motivated by transactions aimed at co-existence and co-prosperity with our business partners, ROHM Group will make efforts for steady dissemination and penetration of CSR procurement activities through sincere and courteous communication. We look forward to your continued understanding and cooperation.

ROHM Co., Ltd.
Procurement Division

II.   Company Mission / Management Policy

Company Mission

Quality is our top priority at all times.

Our objective is to contribute to the advancement and progress of our culture through a consistent supply, under all circumstances, of high quality products in large volumes to the global market.

Basic Management Policy

Secure reasonable profit through a concerted company-wide effort for a comprehensive quality assurance program.

Develop globally leading products by improving upon technologies held by each department for continued advancement of the company.

Maintain healthy and vigorous lifestyles and refine intellect and humanitarianism, hence contributing to society.

Search extensively for capable human resources and cultivate them as cornerstones for building long-term prosperity.

ROHM Group Sustainability Policy

We conduct business conscientiously, fairly, and transparently from a global perspective, strive to achieve the Sustainable Development Goals (SDGs), and contribute to sustainable progress of society based on our company policies such as our Company Mission and Basic Management Policy.

We also endeavor to establish good relationships with our stakeholders through interactive communication (as exemplified below), gain trust from society, and achieve continued growth of our company.

1. Customers

ROHM seeks to obtain customer satisfaction and confidence by continuing to supply high quality products and services in a timely and appropriate manner. ROHM is also open to customer feedback and suggestions, and will evaluate them internally. ROHM places the highest priority on the safety of its products and strives to disclose relevant information as necessary.

2. Business Partners

ROHM selects its business partners according to equitable and rational criteria. ROHM values the relationship with its business partners and conducts equal and fair transactions for mutual prosperity.

3. Employees

ROHM strives to ensure a safe and pleasant working environment, respect human values and individuality, and create a fair and appropriate workplace where each employee may demonstrate individual initiative.

4. Shareholders and Investors

ROHM seeks to continuously improve corporate value and secure appropriate profits in order to provide a steady return to both shareholders and investors. ROHM offers financial information in order to keep shareholders and investors actively informed.

5. Local Societies and Communities

ROHM works to deepen its relationship with different countries, societies, and communities, respect their cultures and customs, and develop together. ROHM conducts or supports activities for social contribution and arts and culture, and positively engages in the conservation of the global environment through its business activities.

ROHM Group Supply Chain Management Policy (1)

ROHM shall view its corporate activities from economic, environmental, and social perspectives, and work toward the development of both the company and society by conducting procurement and logistics activities in accordance with the following seven policies.

1. Mutual Reliability and Prosperity

Rohm will recognize Suppliers as important partners of the enterprise activities, and importantly have a reliable and cooperative relationship, so that Rohm is able to mutually aim at building up win-win relationship.

2. Fair and Equal Footing Trade

ROHM shall deal with Suppliers on a fair and equal footing with humility when purchasing materials, semi-finished products, equipment, and other items needed for business activities or when outsourcing import/export services and logistics services. ROHM shall never enforce unfair trading practices by abusing its superior position.

3. Fair Selection

ROHM shall open its doors globally to a broad range of Suppliers to assure equality of trading opportunities.

When selecting Suppliers, ROHM shall comprehensively consider a wide variety of aspects, including not only quality, technology, delivery, price, and support services, but also eagerness and systems to continuously improve their strengths and commitment to social responsibility in terms of ethics, respect for human rights, risk management, environmental conservation, occupational health and safety, and elimination of antisocial forces.

4. Proper evaluation and distribution for added value of product and service

Rohm shall conduct new products' development and cost reduction activities on the basis of strong partnership with Supplier. Also, Rohm shall promote proper evaluation and price for provided product and service through these activities.

ROHM Group Supply Chain Management Policy (2)

5. Promotion of Green Logistics
ROHM shall actively promote green logistics together with Suppliers and aim to build a triple-win relationship that benefits ROHM, its suppliers, and society. ROHM shall perform fair evaluations in these activities and never force Suppliers to unfairly shoulder associated costs.

6. CSR Procurement/Logistics
ROHM shall promote CSR procurement/logistics by disseminating it, while fostering the understanding of Suppliers, in accordance with the ROHM Group Supply Chain Management Guidelines.
ROHM shall also promote environment-friendly procurement in accordance with the Green Procurement Guideline.

7. Security Export Control
ROHM shall establish a clear control system for the export of technologies and goods regulated by national or regional laws and regulations and properly conduct export procedures.

ROHM Group Labor Policy (1)

"Respect for Humanity and Personality"

The ROHM Group will respect the humanity and personality of each employee, and ensure sound and stable lives of the Group's employees. In addition, the ROHM Group will comply with international standards of conduct and related laws and regulations of each country and region, and will encourage an open and comfortable office environment that respects cultural diversity, different customs, and other values.

1.Conduct guidelines: The ROHM Group will act as specified below in accordance with this Policy.

1.1 Maintenance and improvement of labor conditions: The ROHM Group will value the individuality of each and every employee. The Group aim to build diversified systems to handle personnel and employment as well as improve working conditions, in order for employees to feel affluent and comfortable.

1.2 Safe and comfortable office environment: The ROHM Group strives to secure a safe, healthy and comfortable working environment. In order to prevent work-related accidents, the Group will comply with relevant laws and regulations, and in line with international standards (ISO45001), make every effort to maintain occupational health and safety management programs. If any accident occurs in the workplace, the Group will promptly take appropriate measures, and strive to prevent the expansion and recurrence. In addition, the Group will not engage any employee under the minimum age provided for in international standards of conduct, and in related laws and regulations of each country and region, in jobs that endanger their health and safety.

1.3 Realization of work-life balance: The ROHM Group realizes that there are diverse working styles. The Group will support work-life balance and strive to maximize possibilities in promoting job satisfaction.

1.4 Respect for privacy: The ROHM Group will respect the privacy of individuals. The Group will pay close attention when dealing with personal data and ensure the appropriate management of it.

1.5 Respect for human rights and prohibition of discrimination: The ROHM Group will respect human rights and other rights of everyone. The Group will not allow discriminatory words, behavior, or treatment.

1.6 Understanding of diversity: The ROHM Group will strive to act in ways that respect the diversity of cultures, religions, customs, systems and other values of each country and region.

1.7 Humane treatment: The ROHM Group will work to prevent harassment and inhuman treatment in the workplace, including sexual harassment, physical or mental oppression, and verbal abuse, and will define disciplinary policies and procedures to eliminate the threat of the foregoing treatment and make those policies and procedures known to every employment.

ROHM Group Labor Policy (2)

1.8 Right to work: The ROHM Group will not employ any forced, bonded, or inhumane labor. All work will be voluntary, and the Group will allow employees to freely leave their job by offering to terminate their employment in accordance with the standards provided for by the relevant laws and regulations of each country and region. In addition, the Group will allow employees to leave the workplace during periods in which they do not engage in work in accordance with internal rules. As employment conditions, the Group will not require employees to surrender their identification card or pay unlawful fees, and will disclose any and all fees incurred by employees. The Group will work to notify employees of labor conditions in writing and verbally so that they are able to understand the contents thereof.

1.9 Prohibition of child labor: The ROHM Group will not employ any person under the minimum employment age provided for in international standards of conduct, and in related laws and regulations. The Group will establish a system to enable the use of job-training programs in compliance with laws and regulations. In addition, the Group will not engage employees under the age of eighteen (18) in jobs that endanger their health and safety.

1.10 Working hours: The ROHM Group will not require employees to work above and beyond the working hours provided for by international standards of conduct, and related laws and regulations, except in emergencies or unusual situations. Furthermore, the Group will strive to prevent overworking that impairs the physical or mental health of the employees, and allow them to have appropriate break time in accordance with related laws and regulations, as well as at least one day off per seven-day week.

1.11 Wages and benefits: The ROHM Group will pay wages and overtime allowances to employees without delay in compliance with international standards of conduct and related laws and regulations. The Group will communicate appropriately in writing the working hours, the basis for payment of overtime allowances, and other details to employees, and appropriately retain the records thereof including taxes, social insurance premiums, and other deductions. In addition, the Group will not deduct wages in excess of the basis provided for in related laws and regulations as a disciplinary measure.

1.12 Freedom of association: The ROHM Group will respect the employees' right of freedom of association as well as their right to join or not to join labor unions in accordance with international standards of conduct and related laws and regulations. In addition, the Group will work to provide opportunities for employees to have frank discussions with management about working conditions and management practices without fear of reprisal, intimidation, or harassment.

2. Management System: The ROHM Group will build a management system to observe this Policy and work on the continual improvement of this Policy. The management system will be designed to ensure compliance with applicable international standards of conduct, related laws and regulations, and customer requirements, and the identification and mitigation of operational risks related to this Policy.

ROHM Group Labor Policy (3)

2.1 Responsibility: The ROHM Group will operate the management system in accordance with this Policy approved by top management as provided for in in-house rules.

2.2 Identification of representative: The ROHM Group will identify an internal representative responsible for ensuring implementation of the management system and related items. The top management will review the status of the management system on a regular basis.

2.3 Legal and customer requirements: The ROHM Group will define the procedures for identifying, monitoring, and understanding international standards of conduct, related laws and regulations, and customer requirements.

2.4 Risk assessment and risk management: The ROHM Group will define the procedures for identifying risks involved in the Group's business activities, determining the relative significance of each risk, managing the identified risks, and ensuring regulatory compliance.

2.5 Improvement objectives: The ROHM Group will define improvement objectives and implementation plans, and periodically assess the achievement of those objectives in order to fulfill its social responsibilities.

2.6 Training: The ROHM Group will provide training to employees to implement this Policy and the improvement objectives, and to meet requirements in international standards of conduct and related laws and regulations, as well as customer requirements.

2.7 Communication to employees, etc.: The ROHM Group will define the procedures for communicating this Policy, improvement objectives, and the assessment of the achievement thereof to employees, suppliers, and customers in a clear and accurate way.

2.8 Participation of employees: The ROHM Group will define the procedures for assessing employee's understanding of matters provided for in this Policy and making sustained improvements to this Policy based on those assessment results.

2.9 Audits and assessments: The ROHM Group will conduct periodic self-assessments to ensure conformity with international standards of conduct, related laws and regulations, and customer requirements.

2.10 Corrective and preventive action: The ROHM Group will define procedures for correcting and preventing within an appropriate period of time the recurrence of defects/inadequacies detected in the course of internal or external audits.

2.11 Documentation and records: The ROHM Group will create and retain records related to the management system in accordance with international standards of conduct, related laws and regulations, and customer requirements.

2.12 Supplier responsibility: The ROHM Group will define procedures for communicating requirements provided for in this Policy to suppliers and monitoring the compliance of the suppliers with this Policy.

ROHM Group Occupational Health & Safety Policy

In accordance with the CSR policy, ROHM Group consider safety and health the top priority in our business activities, thereby proactively work to comfortable work environment without worries as well as preserve and promote our physical and mental health.

1. We comply with health and safety laws and their related regulations, other requirements, and our company's rules.
2. We prevent occupational accidents by implementing managerial measures based on the identification of hazard sources in our workplace and their severity via risk assessment.
3. We pursue highly-ranked awareness by systematic education, training, and other things concerning health and safety. Additionally we strive to prevent injuries, physical and mental illnesses by promoting the creation of a comfortable workplace through energized, voluntary activities.
4. We design and operate the occupational health and safety management system through consultation with our workers and their involvement in decision-making.
5. We carry out continuous improvement activities with full participation by setting the health and safety objectives and the action plan that are supported with adequate resources.

ROHM Group Environmental Policy

ROHM's everlasting conscientiousness to preserve the global environment contributes to the healthy existence of humanity and to the continued prosperity of the company.

1. Conserve energy by initiating innovative methods in all corporate activities.
2. Develop environmentally-conscious products that minimize the environmental burden by employing responsible processes throughout the life cycle of each product.
3. Give priority to the procurement of materials and products that have the least levels of adverse impact on the environment.
4. Promote effective utilization of resources and strive for the prevention of pollution and conservation of biodiversity toward the realization of a sustainable society.
5. Comply with international and national environmental laws and regional agreements and other customer requirements to which we have agreed.
6. Endeavor to train employees and encourage our constituents to actively care for their surroundings and the global environment.
7. Develop positive relationships with the community through contributions to the local environment and the proper disclosure of environmental data.
8. Continuously improve subjects by creating and carrying out the environmental objectives, and their action plans to enhance environmental performance.

ROHM Group Ethics Policy (1)

"Respect for International Standards, and Compliance with Laws, Business Ethics, and in-house rules"
The ROHM Group will conduct its business observing the laws, business ethics, and in-house rules in order to continue to gain the trust of various stakeholders as a company in compliance with the laws. The Group will also, in line with the globalization of business activities, respect international standards of conduct.

1. Conduct guidelines: The ROHM Group will act as specified below in accordance with this Policy.

1.1 Fair action: The ROHM Group will act with virtue and fairness based on good social sense. The ROHM Group will be fully conscious of its social responsibility, that the Group is a public entity of society, and with the awareness that each individual employee represents the Group.

1.2 Compliance with laws and business ethics: The ROHM Group will always conduct its business faithfully in strict compliance with the laws and business ethics. The Group will continuously work to collect, manage and understand the laws and regulations of each country that are relevant to its business. The Group will also introduce and organize in-house rules corresponding to related laws and regulations.

1.3 Prohibition of personal conflict of interest: The ROHM Group prohibits any conduct that causes or may cause a conflict of interest between the Group and relevant individuals.

1.4 Compliance hotline and whistle-blower protection: The ROHM Group will, by following the provisions of in-house rules, establish a contact point (e.g. compliance hotline) to which Group employees may report business activities that, they suspect, may be in violation of this Ethics Policy, related laws and regulations, or business ethics, or that are creating or may create a conflict of interest. Moreover, in case the violation or possible violation of the law is discovered, the ROHM Group will promptly correct the condition, plan for the prevention of recurrence (or occurrence), and will deal strictly with the act of violation. The Group will not tolerate any negative treatment against any person or group who refuses to engage in an act of violation or who reports an act of violation or possible violation on the grounds of such refusal or reporting.

1.5 Prevention of bribery: The ROHM Group will not, by following the provisions of in-house rules and agreeing with the importance and necessity of preventing corruption as dictated by international agreements and standards, engage in any form of bribery or action, which may be otherwise deemed as bribery or invite suspicion, to any country's governmental agency, to members in official positions, nor to politicians for the purpose of gaining improper benefit or advantage, in order to continue transparent and honest business activities.

1.6 Prohibition of excessive business entertainment: The ROHM Group will not, by following the provisions of in-house rules, provide gifts, meals or other channels of financial advantage to its customers or other business associates beyond the bounds of what is socially acceptable. Furthermore, the Group will establish clear policies and supervisory procedures in each country or region for dealing with offers of entertainment or gifts from its suppliers and will not accept anything which may result in personal profit.

1.7 Disclosure of information: The ROHM Group will disclose timely, fairly and actively its corporate information in accordance with both legal requirements and its company policies. This includes relevant information on company missions and policies, business activities and social contributions of the ROHM Group to its stakeholders.

ROHM Group Ethics Policy (2)

1.8 Intellectual property rights: The ROHM Group will strive to improve its own technology in every division. The Group will establish and accumulate the results of its development as its intellectual property, and utilize these effectively in growing its business. The Group will hold great value for intellectual property rights. As such, the Group will not use third parties' rights without their permission, nor abuse the Group's own rights.

1.9 Implementation of fair sales activities: In line with the globalization of business, the ROHM Group will observe the provisions of in-house rules and value free market competition and practice fair sales activities. The Group will pursue neither sales nor profit unless the group will comply with the law, social ethics, and contractual obligations. The Group will not violate any law, social ethics or contractual obligations nor engage in any unlawful or unethical conduct, such as anticompetitive behavior (cartel), collusive bidding, fictitious transactions, restraining of selling prices, etc. Moreover, the Group will comply with import/export laws and regulations in order to contribute to a peaceful and safe international community.

1.10 Fair and appropriate content: The ROHM Group will release fair and appropriate content in public relations activities based on accurate, fact-based information in accordance with applicable laws and regulations.

1.11 Conflict minerals: The ROHM Group will strive for the protection of human rights, as such, the Group will aim not to use conflict minerals as raw materials, that benefit armed groups in disputed regions whose activities are linked to human rights violations.

1.12 Management of Confidential and individual information: The ROHM Group will thoroughly and securely manage information acquired through its business activities including confidential information of the ROHM Group, third parties, and privacy information of individuals concerned, in accordance with the provisions of in-house rules.

1.13 Fair accounting and disclosure: The ROHM Group will appropriately record and report information based on fair accounting principles and facts. Accordingly, the Group will pay tax obligations in compliance with the applicable tax laws. The Group aim to pay attention to the interests of all stakeholders and hold in high esteem the other party's position. The Group's aim is to establish and foster the relationship of mutual trust through disclosure of information.

2.Management System: The ROHM Group shall build a management system to observe this Ethics Policy and work on the continual improvement of this Policy. The management system shall be designed to ensure compliance with applicable international standards of conduct and related laws and regulations, and the identification and mitigation of operational risks related to this Policy.

ROHM Group Ethics Policy (3)

2.1 Responsibility: The ROHM Group will operate the management system in accordance with the provisions of in-house rules and this Policy.

2.2 Identification of representative: The ROHM Group will identify an internal representative responsible for ensuring implementation of the management system and related items. The top management will review the status of the management system on a regular basis.

2.3 Legal and customer requirements: The ROHM Group will define the procedures for identifying, monitoring, and understanding international standards of conduct, related laws and regulations, and customer requirements.

2.4 Risk assessment and risk management: The ROHM Group will define the procedures for identifying risks involved in the Group's business activities, determining the relative significance of each risk, managing the identified risks, and ensuring regulatory compliance.

2.5 Improvement objectives: The ROHM Group will define improvement objectives and implementation plans, and periodically assess the achievement of those objectives in order to fulfill its social responsibilities.

2.6 Training: The ROHM Group will provide training to employees to achieve the improvement objectives and to meet the requirements of international standards of conduct and related laws and regulations in accordance with this Policy.

2.7 Communication to employees, etc.: The ROHM Group will define the procedures for communicating this Policy, improvement objectives, and the assessment of the achievement thereof to employees, suppliers, and customers in a clear and accurate way.

2.8 Participation of employees: The ROHM Group will define the procedures for assessing employee's understanding of matters provided for in this Policy and making sustained improvements to this Policy based on those assessment results.

2.9 Audits and assessments: The ROHM Group will conduct periodic self-assessments to ensure conformity with international standards of conduct, related laws and regulations, and customer requirements.

2.10 Corrective and preventive action: The ROHM Group will define procedures for correcting and preventing within an appropriate period of time the recurrence of defects/inadequacies detected in the course of internal or external audits.

2.11 Documentation and records: The ROHM Group will create and retain records related to the management system in accordance with the provisions of in-house rules and related regulations.

2.12 Supplier responsibility: The ROHM Group will define procedures for communicating requirements provided for in this Policy to suppliers and monitoring the compliance of the suppliers with this Policy.

Rohm Group Information Security Policy

1. Compliance

   The ROHM Group shall comply with domestic and international laws and regulations, codes, and contractual requirements concerning information security. The ROHM Group will establish internal regulations for information security that conform to these requirements and ensure that these regulations are observed.

2. Information security management system

   The ROHM Group will recognize information security measures as one of its priorities in management and business, establish an information security management system, and maintain and continuously improve organizational, personal, physical, and technical information security under the leadership of top management.

3. Protection of information assets

   The ROHM Group will appropriately protect the information assets it handles from threats to confidentiality, integrity, and availability, and take appropriate management measures.

4. Prevention of and response to incidents

   The ROHM Group will strive to prevent information security incidents and, in the event of an incident, quickly and appropriately take initial action to minimize the impact, followed by investigations to determine the cause and efforts to prevent a recurrence.

5. Education and training

   The ROHM Group will continuously educate and train its top management and employees on information security to increase their awareness of this area.

6. Assurance of information security throughout the supply chain

   The ROHM Group will work to maintain and improve information security throughout its supply chain, including suppliers and contractors.

III. ROHM Group Supply Chain Management Guidelines

ROHM Group Code of Conduct for Business Partners

Business partners must operate in compliance with each country's laws and regulations in all business activities. Business partners must not only comply with laws and regulations but also enhance their responsibilities and corporate ethics for society and environment based on the globally acknowledged higher standards.

⊙ Matters of request for the Guidelines in general are as follows:

(1) Business partners must understand that the ROHM Group shall promote its activities in accordance with the "RBA（Responsible Business Alliance）Code of Conduct," which is the CSR standard in the electronic industry, based on the "ROHM Group Sustainability Policy" and also strive to comply with it.

(2) Business partners must cooperate with self-assessment and CSR Procurement Audit conducted by the ROHM Group in order to verify the compliance status in the previous clause.

(3) Business partners must strive to improve the compliance status if the ROHM Group determines it rationally necessary based on the results of the self-assessment and CSR Procurement Audit.

(4) Business partners must notify the relevant buyer in the ROHM Group's Procurement Division if they are affected by a natural disaster, an information security accident, or a similar event that is likely to have an impact on the ROHM Group's business activities.

Since its founding, Rohm Group has practiced objectives and policies such as "Company Mission" and "Basic Management Policy" to contributing to sustainable development of society.

In recent years, stakeholders surrounding companies, including customers, do not make

product purchase decisions (company evaluation) simply based on whether quality is good, not yet "product quality" such as QCDS (= quality, cost, delivery, support), but also "management quality" which is CSR (= Corporate Social Responsibility),-there is an increasing tendency to comprehensively judge the purchase of products (evaluation of the company) in the form of "quality of the company". Throughout their supply chains, companies are expected to manage their business in the context of CSR, establish a CSR system, and contribute to society and sustainability.

Quality of the company

Product quality		Management quality
QCDS	+	CSR
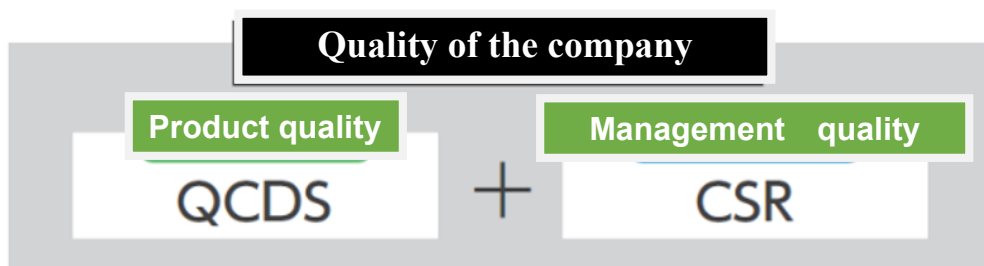
In Rohm Group, we would like you every partner can contribute to this idea and build a sustainability promotion system. For this purpose, I would like you practice the following contents ①～④.

* Sustainability refers to the ability of people, companies, society, or the global environment to be sustained into the future.

① Formulation and dissemination of company management policy (Sustainability policy)

The policy of sustainability, which indicates the direction of corporate quality of management, is determined by the management layer, and the content of the intention is to be educated to the employee, and it is required to be known by all means such as posting and distribution.

② Formulation and education of Sustainability Code of Conduct

In order to achieve Management policy (Sustainability policy), it is important to specify the guideline of action to describe the action that the employee should practice in detail of the item shown in the SCM guidelines, and to complete it by the education.

③ Construction and remotion of Sustainability Promotion System

To promote the sustainability, build an organization to promote the policy and grant responsibility and authority for each and every individual, It is necessary to build a system to practice and review based on the plan.

Participation and Implementation for social contribution

Coexistence with society and the region is indispensable in the sustainability of the enterprise. The contribution activity to society and the region can increase the existence value of the enterprise, and it also can lead to high evaluation.

（2）RBA Code of Conduct

The RBA (Responsible Business Alliance) Code of Conduct is a code established by an organization consisting mainly of manufacturers related to electronic devices, as well as automobiles, toys, airplanes, and IoT technology companies. The RBA Code of Conduct states that the working environment is safe and that workers are treated with respect and dignity in the electronics industry, or in industries where electronic devices are the main component, and in their supply chains, and to the environment. Along with our responsibilities, we have established standards for conducting business ethically. The Code of Conduct covers areas such as occupation, health and safety, environmental protection, and ethics and their management systems, and is the basis of Rohm Group SCM Guidelines.

Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards, as set out in the annex, were used as references in preparing the Code and may be a useful source of additional information.

The labor standards are:

① Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor; involuntary or exploitative prison labor; slavery or trafficking of persons shall not to be used. 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. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment 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 must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or 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 is not to 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. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety of young workers, including night shifts and overtime. Participant 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 law and regulations. Participant 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.

③ Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. 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. In compliance with local laws, 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. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation. 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 will be within the limits of the local law.

⑤ Humane Treatment

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

⑥ Non-Discrimination

Participants should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and 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. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

⑦ Freedom of Association

In conformance with local law, 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. 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

(4) Health and Safety

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

Recognized management systems such as ISO45001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.

The health and safety standards are:

① Occupational Safety

Worker potential for exposure to safety hazards (e.g. chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag out), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about the risks to them associated with these hazards. Eliminate or reduce the risk to pregnant women, women within one year after childbirth, and nursing period from high-risk working environment considering the risks. Appropriate procedures should also be followed, such as the inclusion of appropriate facilities for nursing mothers.

② Emergency Preparedness

Potential emergency situations and events are to 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, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities 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 are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and e) facilitate return of workers to work.

④ Management of occupational safety risks

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards.

⑤Ergonomics Management

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

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.

⑦ Inspection of chemicals

In using and purchasing chemicals, we must have a process to inspect and approve those substances. Also, for approved substances, a chemical list (chemical name, CAS No, use and storage location, quantity of hazardous substances, max. amount of storage permitted by law) that can explain these details shall be prepared and updated once a year.

⑧Chemical storage

When storing chemicals, they shall be stored in a container that is free from damage and leaks of materials suitable for the substance. In addition, if storing in containers where there is a risk of chemical spills, it shall not be stacked and shall be stored inside the secondary containment vessel (facility) that limits the spill area to prevent contamination of the surrounding area and the environment.

⑨Chemical hazard communication

The Material Safety Data Sheet (MSDS) or the Safety Data Sheet (SDS) shall be prepared in the mother language or understandable languages and shall be readily accessible to employees in areas where chemical substances are used. Containers for chemical substances are labeled with the names of their contents and GHS (Globally Harmonized System for Classification and Labeling Chemicals) labels in accordance with applicable laws and regulations.

⑩ Sanitation, Food and Housing

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

⑪ Health and Safety Communication

Participant 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. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise health and safety concerns without retaliation.

(5) Environmental

Participants recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

The environmental standards are :

① Environmental Permits and Reporting

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

② Pollution Prevention and Resource Reduction

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; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water fossil fuels, minerals and virgin forest products is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

③ Hazardous Substances

Chemical and other materials posing a hazard to humans or to the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

④ Solid Waste

Participant shall implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle solid waste (non-hazardous).

⑤ Air Emissions

Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Participant shall conduct routine monitoring of the performance of its air emission control systems.

⑥ Materials Restrictions

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

⑦　Water Management

Participant 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 is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Participant 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 are to establish a corporate-wide greenhouse gas reduction goal. Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal. Participants are to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

(6) Ethics

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

The ethics standards are:

① Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Participants shall maintain a zero tolerance policy that prohibits any and all forms of bribery, corruption, extortion, and embezzlement.

② No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to 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 should be transparently performed and accurately reflected on Participant's business books and records. Information regarding Participants' labor, health and safety, environmental practices, business activities, organizational structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions and practices in the supply chain is unacceptable.

④ Intellectual Property

Intellectual property rights are to 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 is to be safeguarded.

⑤ Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld.

⑥ Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers[1] are to be maintained unless prohibited by law. Participants should have a communicated process for these whistleblowers to be able to raise any concerns without fear of retaliation.

[1] 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, and gold 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.

⑧ Privacy

Participants are to be committed to protecting the reasonable privacy protection expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Participants are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

(7) Establishment of Crisis Management System

Business partners must establish a crisis management system and supply chain that are resistant to disasters and unforeseen circumstances in order to protect the lives and physical safety of their employees and ensure business continuation and stable supply of products.

The standards for crisis management system are as follows:

① BCP Formulation

The types and degree of risks that may affect the business continuation shall be defined and a business continuity plan (BCP) must be formulated.

② Establishment of Emergency Contact Network

An emergency contact network that includes your company's business partners must be established and maintained, to be able to minimize damages and take actions to ensure quick recovery.

③ Securing Multiple Production Bases or Alternative Production Base

Multiple production bases or an alternative production base must be secured on the assumption that your company's production base is hit by disaster.

④ Setting of Safety Inventory of Your Company's Products

Safety inventory of your company's products must be set and practiced to strive to minimize a supply risk on the assumption that your company's production base is hit by disaster.

⑤ Listing of Critical Raw Materials

For critical raw materials[2] necessary for production of your company's products, the business partners and production bases must be listed up and routinely reviewed.

Methods or means of procurement in case raw material supply is withheld must be in place.

[2]Critical raw materials refer to products that are supplied by one company and produced in one production base.

⑥ Promotion of BCP in Supply Chain

Dissemination and penetration of BCP to your company's business partners must be promoted in order to establish the crisis management system throughout the entire supply chain.

⑦ Threats on computer networks

Must appropriately manage and protect the information obtained through business activities, and recognize the laws, norms and standards for threats on computer networks and take steps to defend them.

⑧ Security trade management

Security trade management must be implemented in accordance with laws and regulations of the state and region.

(8) Information security

For companies and organizations, risk management for information security must be regarded as one of important management issues. In particular, dealing with important information such as personal information and customer information, is also a social responsibility for companies and organizations to protect them.

① Decision of Information security policy

Establish and practice official regulations of information security policy and information security management. In order to be effective for policies and regulations to make the content suitable for the situation of the organization. For the purpose it is important not to be a copy of the sample but to consider the business and the risk of the organization itself. In order to ensure the actual effect of the countermeasures, it is necessary to let all staffs know the specified regulations, and regularly confirm the compliance of the procedures. It is particularly important to modify the contents according to the needs.

② Confidentiality obligations of employees

Exchange agreements to employees (including dispatch) about their confidentiality obligations when they are employed or retirement to clarify the safety obligations on employment. When hiring and dismissing, let all employees swear to abide by the security obligations, and the confidentiality obligations after resigning. At the same time, notify the employment rules and service rules clearly to make the information security countermeasures effective. Especially when dismissing or changing jobs, it is also very important to ensure the return of borrowed assets and cancel the access authority granted.

③ Entry exit management

Define and implement security rules for various people who enter the building, such as customers, vendors, carriers, and cleaners. There are many information and related facilities in the building and office. It is necessary to carry out the rule based on situation of each risk and follow it to prevent the outsiders who have opportunity to touch these information and facilities,

④ Documents Media management

Important documents, Mobile PCs and storage media are properly managed. There are many accidents leaking information by documents and electronic storage media. It is necessary to appropriately manage documents and storage media with important information recorded, such as locking of storage cabinets, prohibition of printing output, and crushing of storage media. In addition, it is important to keep the office and the meeting room in order to avoid improper handling due to important documents are lost in other goods.

⑤ Application management of information system

The security measures necessary for the operation of the information system are being carried out. Information security measures necessary for the operation and management of information systems and communication networks include preparation of various procedure documents including matters necessary for securing security, implementation of operations according to rules such as procedure instructions, monitoring, acquisition and analysis of logs. It is also important to monitor the performance and capacity of the information system in order to operate the operating system stably.

⑥Antivirus

Antivirus programs (viruses, worms, Trojan horses, bottoms, spyware, etc.) are being taken. Antivirus programs include antivirus software to update the pattern files. In addition, it is important to carry out regular virus inspection and to know the treatment which should be taken when the problem arises.

⑦Vulnerability measures

Appropriate vulnerability measures are being made to the information systems introduced. The appropriate weakness measures include setting up security, such as regular availability of vulnerability information and threat information, unwanted service stops, patches (fixes), version control, configuration management, and change management.

⑧Loss and theft measures

When carrying out the storage medium and the data such as the mobile PC and the USB memory in the outside, the appropriate security measures assuming the theft and the loss are carried out. The location of storage media such as mobile PC and USB memory includes external public space, remote office, home etc. In outside, considering the high risk of theft and loss as compared with internal use, the provision of carrying out is examined, and the countermeasures such as strong authentication and encryption are examined.

⑨Managing user IDs

In order to limit access to information (data) and information systems, user ID management, user identification and authentication are properly performed. For proper user ID management, there are some improvements in the user ID rules, the deletion of unnecessary IDS by regular revision of the user ID, the restriction of the use of the common ID, the discovery and the identification of the ID which sets the privilege not originally necessary, and the simple password setting which is easy to be found .

⑩Managing access rights

The application of access rights to information (data), information systems, business applications, etc., and access control are appropriately performed. The appropriate access control can be set in advance, and the information system that can be accessed based on the policy is limited to the user, the limited functionality is available, and the user's access rights are reviewed.

⑪System Trouble Prevention

In order to maintain the minimum required service even if a system fails, a suitable countermeasure is taken in advance in the case where a failure occurs in the information system. It is no exaggeration to say that the biggest impact of an event affecting the availability of one of the important elements of information security is the failure of information systems related equipment. In order to satisfy the requirements of availability required for information systems, it is essential to incorporate appropriate fault prevention functions corresponding to requirements for availability in the information system.

(9) Management System

Participants shall adopt or establish a management system whose scope 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 should also facilitate continual improvement.

The management system should contain the following elements:

① Company Commitment

A corporate social and environmental responsibility policy statements affirming Participant's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

② Management Accountability and Responsibility

The Participant clearly identifies 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 system on a regular basis.

③ Legal and Customer Requirements

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

A process to identify the legal compliance, environmental, health and safety[3] and labor practice and ethics risks associated with Auditee's operations Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

[3] 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.

⑤ Improvement Objectives

Written performance objectives, targets and implementation plans to improve the Auditee's social performance, including a periodic assessment of Participant's performance in achieving those objectives.

⑥ Training

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

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

⑧ Worker Feedback, Participation and Grievance

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.

⑨ Audits and Assessments

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

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

⑪ Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

⑫ Supplier Responsibility

A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

(10) Logistics

Participants must build a supply chain in accordance with the following guidelines in order to constantly strive to continue business, stably supply products, reduce the environmental impacts of logistics, and improve the quality of logistics.

① Logistics

To ensure appropriate management in the three aspects of logistics—cost and productivity, quality and service, and distribution and delivery—, Participants are to evaluate their current situation against their objectives by using logistics management indicators (KPIs), visualize the process for achieving the objectives, and make improvements.

② Implementation of Security Export Control

Participants are to establish a clear control system for the export of technologies and goods regulated by national or regional laws and regulations and properly conduct export procedures.

③ Reduction of Environmental Impacts

Participants are to commit to reducing the emission of CO_2 and other greenhouse gases not only from their own production and transport but also from their entire supply chains.

④ Green Logistics

Participants are to apply this concept to organizational actions, human resources development, site-specific initiatives, and harmonious coexistence with communities by viewing logistics as an overall system for transporting goods rather than focusing only on the act of transporting itself.

Reference: The following standards were referred to when formulating the Guidelines. Please see these standards, etc., if you need further information.

International Labour Organization (ILO): Guidelines on Occupational Safety and Health Management Systems
http://www.ilo.org/global/publications/books/lang--en/index.htm
United Nations Global Compact
http://ungcjn.org/index.html
ISO26000
http://iso26000.jsa.or.jp/contents/
RBA Code of Conduct
http://www.responsiblebusiness.org/
JEITA (Japan Electronics and Information Technology Industries Association)
http://www.jeita.or.jp/
ISO14001/ISO45001
http://www.iso.org/home.html
IPA information processing promotion organization: Benchmark for information security
https://www.ipa.go.jp/security/benchmark/index.html

<h1>General Information on the Guidelines</h1>

1. We will never disclose the contents provided by our business partners to external parties.
2. As the contents of the Guidelines may change due to revisions in laws and regulations, company rules, etc., please check them on the website of ROHM Co., Ltd. as needed.
3. Please contact us at the following phone numbers if you have any questions about the Guidelines.

Inquiries about the contents of the Guidelines:

Procurement Division   Phone: +81-75-321-4786 E-mail: purchasing@rohm.co.jp
Sustainability Promotion Division   Phone: +81-75-321-1227 E-mail: csr@rohm.co.jp

<h2>Document history</h2>

Year	Month	Edition	Revision
2013	May	1st edition	Rev. 001
2015	July	2nd edition	Rev. 002
2016	June	3rd edition	Rev. 003
2017	July	4th edition	Rev. 004
2017	Dec.	5th edition	Rev. 005
2018	June	6th edition	Rev. 006
2020	April	7th edition	Rev. 007
2021	April	8th edition	Rev. 008
2022	June	9th edition	Rev. 009
2023	April	10th edition	Rev. 010

Revision history (Major changes)

Edition	Revised section	Description of change
3rd edition	Policies	・Additional labor policy ・Additional occupational health & safety policy ・Additional environmental policy ・Additional Ethics policy
4th edition	Policies	Revised ROHM Group Procurement policy
5th edition	Policies	Revised ROHM Group Environmental policy
6th edition	Overall	・Name change EICC→RBA ・Response to RBA6.0
7th edition	Policies Guidelines	・Revised ROHM Group Occupational Health & Safety Policy ・Revised ROHM Group CSR Procurement Guidelines (2)Health & safety
8th edition	Policies Guidelines	・Add Rohm group information security policy ・Add (1) about CSR promotion ・Add (2) RBA Code of Conduct ・Add (8) information security
9th edition	Overall Policies Guidelines	・Changed title: ROHM Group CSR Procurement Guidelines → ROHM Group Supply Chain Management Guidelines ・Revised ROHM Group CSR Policy and changed title to ROHM Group Sustainability Policy ・Revised ROHM Group Procurement Policy and changed title to ROHM Group Supply Chain Management Policy ・Revised ROHM Group Information Security Policy ・Reviewed and transformed "(1) CSR Promotion System" into "(1) Sustainability Promotion System" ・Revised "(6) Ethics" ・Add "(10) Logistics"
10th edition	Policies Guidelines Code of Conduct for Business Partners (4) Health and Safety (5) Environmental	・Revised Sustainability Policy ・Revised Labor Policy ・Revised Ethics Policy ・Add (4) ・Add encouragement to raise health and safety concerns in (11) ・Corrected wordings in (1) ・Add the management of ozone-depleting substances in (5)

	(6) Ethics	・Add the establishment of a greenhouse gas reduction goal in (8) ・Add due diligence in responsible sourcing of minerals in (7)