

## JCET Supplier Code of Conduct

### 1.0 Introduction

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JCET Group Co., Ltd. and its affiliates (collectively referred to as "JCET") is a company with a strong commitment to sustainability. We encourage our suppliers, based on shared values and principles, to join us in advancing this commitment, working together to promote responsible performance in corporate governance, social responsibility, and environmental stewardship, and to jointly build a sustainable supply chain.

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JCET pursues mutually beneficial relationships with its suppliers and contractors ("Suppliers") and seeks to award business to those Suppliers that are committed to acting fairly and with integrity towards their stakeholders, to observing the applicable rules of law, and to supporting and respecting internationally proclaimed human rights.

JCET is committed to ensuring that working conditions in JCET's supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible.

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The Code embodies the principles outlined in the Responsible Business Alliance Code of Conduct. JCET is committed to supporting the rights and well-being of workers and communities worldwide affected by the global electronics supply chain.

UNGC ILO

This Code is established based on relevant laws and regulations, the conventions of the International Labor Organization (ILO), and with reference to the relevant principles of the United Nations Global Compact (UNGC), the UN Guiding Principles on Business and Human Rights, and other related initiatives. It is designed to provide clear requirements and serve as a basis for assessing suppliers' compliance with this Code.

JCET suppliers shall comply with the requirements in this Code and require their own suppliers to do the same. JCET may visit (and/or have external monitors visit) Supplier facilities to assess compliance with this Code. Violation of this Code may result in an immediate termination of the relationship with JCET. Additionally, any such violation may result in legal action.

## **2.0 Standards for Labor and Human Rights**

JCET is committed to upholding the human rights of workers and bears the responsibility to conduct due diligence, treating 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 labor standards are as follows:

### **2.1 Prohibition of Forced Labor**

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Forced labor in any form, including but not limited to debt bondage (using debt as a tool for confinement and exploitation), indentured labor, involuntary or exploitative prison labor, slavery, or trafficking in persons, shall not be 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 a language understood by the worker that contains a description of terms and conditions of employment. Foreign migrant worker must receive their employment contract 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 and penalty if reasonable notice is given, which shall be clearly stated in worker's employment contracts. Suppliers shall maintain documentation on all leaving workers. Suppliers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate employees' identity or immigration documents, such as government-issued identification, passports or work permits. Notwithstanding the foregoing, suppliers can only hold documentation if necessary to comply with the local law. Workers shall not be required to pay employers' agents or sub-agents recruitment fees or other related costs.

Suppliers shall monitor and screen their suppliers and sub-tier suppliers for risk of forced labor used in goods mined, produced, or manufactured wholly or in part with forced labor. Suppliers shall undertake adequate due diligence measures in their supply chain to investigate any indications of forced labor and mitigate such risk. Suppliers shall share with JCET any unmitigated forced labor risks pertaining to the items supplied to JCET without delay and shall make available to JCET any due diligence findings pertaining to forced labor, upon request. If forced labor in the JCET supply chain is found, JCET will investigate and t

working hours do not exceed the statutory limit set by local law, and remuneration for overtime work is paid as required by relevant regulations.

## 2.4 Wages and Benefits

JCET recognizes the importance of all workers to earn a living wage. 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. Suppliers shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. Suppliers shall pay workers in a timely manner. 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.

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, or physical exams that could be used in a discriminatory way. This was drafted in consideration of the ILO Discrimination (Employment and Occupation) Convention (No. 111)

## **2.6 Freedom of Association and Collective Bargaining**

Respect the right to life and protect freedom of speech and expression.

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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, suppliers 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. Supplier shall respect – within the framework of laws, regulations, and prevailing labor relations and employment practices – the right of its employees to be represented by labor unions and other employee organizations. Supplier will engage in negotiations, either on its own behalf or through employers' associations, with a view to reaching agreement on employment conditions.

## **2.7 Diversity**

JCET furthers innovation and accelerates growth by fostering inclusive teams of

diverse employees and recognizes that teams' varied backgrounds, experiences, and ideas are critical to JCET's success. Suppliers (agents or recruitment companies) engaged by JCET in recruiting employees for JCET shall therefore make every effort to present a diverse list of candidates for each position, without regard to race, gender, age, or other factors unrelated to their ability to perform in the position. Suppliers will document their efforts and provide evidence to JCET upon JCET's request.

### **3.0 Standards for Health and Safety**

JCET recognizes that in addition to minimizing the incidence of work related injury and illness, a safe and healthy working environment enhances the quality of products and services, the consistency of production, and worker retention and morale. JCET also recognizes that ongoing worker participation and education are essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are as follows

#### **3.1 Occupational Health and Safety**

Worker potential for exposure to potential health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards) shall be identified, assessed, and 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 that could be hazardous to them or their child and providing reasonable accommodations for nursing mothers. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

#### **3.2 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 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.

### **3.3 Occupational Injury and Illness**

Procedures and systems shall be in place to prevent, manage, track, and report occupational injury and illness including provisions to encourage workers to report, classify and record injuries and illnesses, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Suppliers shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

### **3.4 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. Suppliers shall provide workers with safe and healthy working environments, which shall be maintained through the ongoing, systematic monitoring of workers' health and working environments. Suppliers shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed by occupational exposures.

Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

### **3.5 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.

### **3.6 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.

### **3.7 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 Supplier 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, adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space as well as reasonable entry and exit privileges

### **3.8 Health and Safety Communication**

Supplier 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, including Safety Data Sheets, and warnings shall be clearly posted in the facility or placed in a location identifiable and



recycling or other means. Suppliers should establish a biodiversity policy and consider the potential impacts of their operations on biodiversity that could negatively impact fragile habitats, ecosystems, endangered species and forests.

### 4.3 Hazardous Substances

Chemicals, wastes, and other materials posing a hazard to humans or the environment shall be identified, stored, handled, and disposed of in accordance with applicable laws and regulations.

Packaging. Upon JCET's request, the Supplier shall provide JCET with full material content information declaration using the Material Safety Data Sheets, Material Composition Declaration or other reasonable methods and update regularly.

Compliance with laws and regulations includes but not limit to:

RoHS

The EU and China's Restriction of Hazardous Substances Directive (RoHS),

REACH

The Registration, Evaluation, Authorization and Restriction of Chemicals (REACH),

WEEE

The Waste Electrical and Electronic Equipment Directive (WEEE),

ELV

The EU End-of-Life Vehicles Directive (ELV),

Other relevant applicable laws and regulations and standard requirements in the countries and regions where JCET operates.

ISO/IEC 17025

RoHS

In accordance with JCET's requirements, the audited party shall actively cooperate to provide additional compliance evidence in the form of annual update test reports issued by third-party laboratories or testing institutions accredited to ISO/IEC 17025, covering RoHS, halogens, antimony and other related hazardous substances.

#### **4.7 Water Management**

Supplier 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 by applicable laws and regulations 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.

#### **4.8 Energy Consumption and Greenhouse Gas Emissions**

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

## **5.0 Standards for Business Ethics**

Suppliers shall be committed to the highest standards of ethical conduct when dealing with workers, suppliers, and customers.

### **5.1 Business Integrity**

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

### **5.2 No Improper Advantage and Conflict of Interest**

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. Suppliers shall take appropriate steps to ensure that the conduct of itself and its employees do not place JCET nor its employees in a position where there is or may be a conflict, or a potential conflict of interest. Such a conflict of interest would arise when the Supplier and/or its employees were to offer or provide any tangible personal benefit, gain improper advantage or improperly impact JCET and/or its employee's ability to make a sound, impartial or objective decision on behalf of JCET or where an JCET employee has an interest in the Supplier's business. Supplier further agrees to disclose to JCET once it becomes aware of an actual or potential conflict.

### **5.3 Disclosure of Information**

All business dealings shall be transparently performed and accurately reflected on Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, or 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.

### **5.4 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; customer and supplier information shall be safeguarded.

### **5.5 Fair Business, Advertising and Competition**

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

### **5.6 Protection of Identity and Non-Retaliation**

Suppliers shall maintain programs to ensure the confidentiality, anonymity and protection of supplier and worker whistleblowers, unless prohibited by law. Supplier shall prohibit retaliation against workers who participate in whistleblowing in good faith or who refuse an order that is in violation of the JCET Supplier Code of Conduct. Suppliers shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations. Supplier shall have a formal communication program to ensure that every employee is fully informed of and understands the policy of non-retaliation.

### **5.7 Responsible Sourcing of Minerals**

OECD

1755

Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody for the tantalum, tin, tungsten, gold, cobalt, mica and other relevant mineral materials used 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 (CAHRAs) or an equivalent and recognized due diligence framework. Suppliers shall conduct annual updates on the due diligence of the source and chain of custody of these minerals by using RMI Conflict Minerals Reporting Template, Extended Minerals Reporting Template or other report in conformance with the IPC-1755 Conflict Minerals Data Exchange standard, and shall make their due diligence measures available to JCET in a timely manner upon JCET's request.

## 5.8 Privacy

Suppliers shall commit to protecting the reasonable privacy expectations for personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## 6.0 Standards for Management System

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- (b)
- (c)

### 6.1 Company Commitment

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

### 6.2 Management Accountability and Responsibility

Supplier 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.

### **6.3 Legal and JCET Requirements**

Suppliers shall have a process to identify, monitor, and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

### **6.4 Risk Assessment and Risk Management**

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

### **6.5 Improvement Objectives**

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

### **6.6 Training and Competencies**

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

## **6.7 Communication**

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

## **6.8 / Worker/Stakeholder Engagement and Access to Remedy**

Supplier 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 Supplier Code of Conduct, and foster continuous improvement. Workers shall be given a safe environment to provide grievances and feedback without fear of reprisal or retaliation.

## **6.9 Audits and Assessments**

Suppliers shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements relating to social and environmental responsibility.

## **6.10 Corrective Action Process**

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

## **6.11 Documentation and Records**

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

## **6.12 Supplier Responsibility**

Suppliers shall establish a process to communicate the JCET Supplier Code of Conduct or comparable requirements to their own, next-tier suppliers and to monitor