

NGK Group

Supplier Code of Conduct

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NGK INSULATORS, Ltd.

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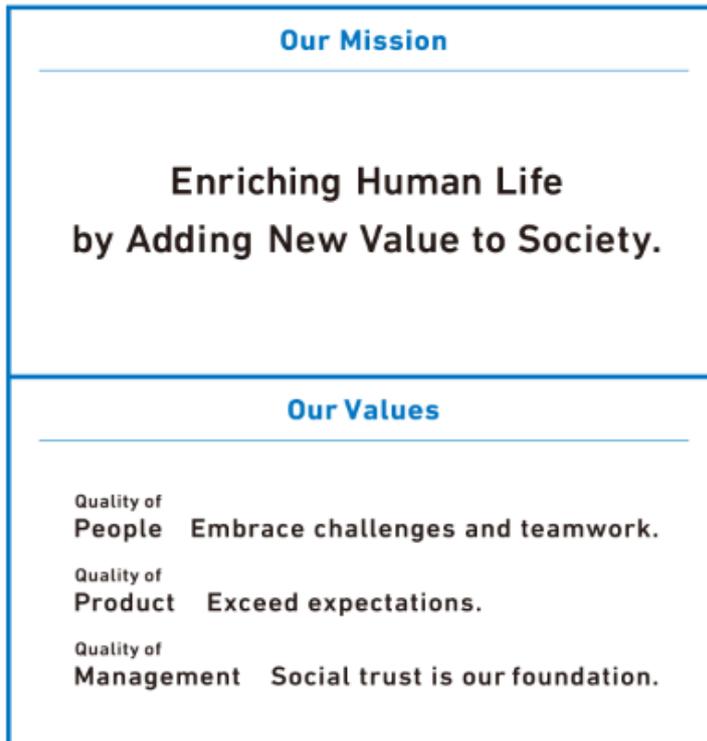
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Introduction

The NGK Group raises creating new value through products that contribute to a better society as its corporate philosophy.

NGK Group Philosophy



The diagram is a rectangular box with a blue border, divided into two horizontal sections. The top section is titled "Our Mission" in blue text, followed by a horizontal line and the mission statement: "Enriching Human Life by Adding New Value to Society." in bold black text. The bottom section is titled "Our Values" in blue text, followed by a horizontal line and three value statements, each with a "Quality of" label in small grey text: "Quality of People Embrace challenges and teamwork.", "Quality of Product Exceed expectations.", and "Quality of Management Social trust is our foundation." in bold black text.

Our Mission

**Enriching Human Life
by Adding New Value to Society.**

Our Values

Quality of **People** Embrace challenges and teamwork.

Quality of **Product** Exceed expectations.

Quality of **Management** Social trust is our foundation.

As social issues have diversified in recent times and the globalization of supply chains has progressed, corporate responsibility for the environment and society has expanded more and more, and increased in importance. The NGK Group is strengthening its initiatives for sustainable procurement to meet the growing demands of society and fulfill its social responsibility in procurement activities. As part of this, the NGK Group revised its previous “Basic Purchasing Policy” in January 2024 and newly established the NGK Group Procurement Policy. Continuing to place the concepts of Relationship with Society, Open and Fair and Partnership at the core of our procurement activities, we have stated clearly in this policy our specific initiatives for the environment and society.

In addition, the NGK Group established NGK Group's Supply-Chain CSR Guideline in 2011, asked all suppliers to put them into practice and subsequently worked on the realization of sustainable procurement throughout the supply chain. We have revised these guidelines several times to this point, but renewed their content comprehensively recently based also on

international standards and norms to newly establish the guidelines as the NGK Group Supplier Code of Conduct. We would like to ask all suppliers again to understand the content and purpose of this Code of Conduct, consent to it, and put it into practice. At the same time, we ask that you similarly inform your own suppliers and ask them to put it into practice, too.

Please note that we may confirm the initiatives of our suppliers through documents, visits, etc. Please cooperate if we do so.

The NGK Group intends to work hand-in-hand with our suppliers, our important partners, for the realization of a sustainable society. We appreciate your continued understanding and cooperation.

NGK Group Procurement Policy

1. Basic Approach

With “relationship with society”, “open and fair,” and “partnership” at the core of its procurement activities, the NGK Group aims for mutual prosperity based on mutual trust with suppliers through open, fair, and equitable procurement practices that not only comply with laws but also take into consideration global environmental conservation, respect for human rights, and the working environment.

Through these series of actions and activities, we will promote sustainable procurement and provide valuable products and services to society as a whole.

2. Applicable Laws and Regulations

The NGK Group complies with the laws and regulations of the respective countries or regions in which it conducts its procurement activities.

3. Scope

This policy applies to the procurement practices of all officers and employees of the NGK Group. The NGK Group also requires its suppliers to comply with this policy and its objectives.

4. Priority Initiatives

The NGK Group will

- Comply with necessary laws, regulations and international norms, and conduct procurement activities that meet the demands of society as a whole, including respect for human rights, environmental conservation, and coexistence with regional communities.
- Offer open entry opportunities to all suppliers, regardless of location, size, or business track record.
- Select suppliers fairly and impartially, considering aspects such as quality, technology, price, delivery time, and ESG factors.
- Build respectful and equal relationships with all suppliers, as they are important partners in creating market value together.
- Make every effort to seek and achieve procurement activities throughout the supply chain that are in line with our Group’s policies, guidelines, and norms.
- Pursue responsible raw material procurement throughout the supply chain, conducting procurement activities that take into account the impact on regional communities, including avoiding the use of conflict minerals; and
- Strive to conserve the global environment and biodiversity by introducing clean energy and reducing greenhouse gas emissions throughout the supply chain.

5. Correction and Improvement

If a violation of this policy or priority initiatives arises in our procurement activities through the NGK Group or its suppliers, or if concerns about such a violation become apparent, we will work with the relevant parties to correct and improve the situation appropriately and effectively.

NGK Group Supplier Code of Conduct

Purpose

- For the NGK Group to promote sustainable procurement so that we can realize a sustainable society, initiatives throughout the supply chain as a whole are essential. Suppliers are asked to understand and comply with this Code of Conduct, which is based on international norms and guidelines.

Scope of Application

- Suppliers are asked to undertake initiatives not only within their own companies, but also throughout their supply chains as a whole.
- The term “worker” in this Code of Conduct includes all workers, regular full-time employees, dispatched employees, contract employees, temporary employees, foreign workers and so on.
- The term “supplier” in this Code of Conduct refers to any business operator who supplies goods or services.

e.g.: Supply of products, parts, materials, fuel, etc.

Provision of services such as the dispatch of personnel, cleaning, security, cafeteria, etc.

Related Norms and Policies

- This Code of Conduct has been established in accordance with the following norms, policies, etc., or their purpose. We ask all suppliers to promote their initiatives while making reference to these documents.
 - United Nations Universal Declaration of Human Rights
 - ILO International Labor Standards
 - United Nations Global Compact
 - Responsible Business Alliance Code of Conduct
 - Drive Sustainability, Automotive Industry Guiding Principles
 - Japan Electronics and Information Technology Industries Association (JEITA) Responsible Business Conduct Guidelines

NGK Group Guidelines, Codes and Policies

- NGK Group Corporate Business Principles, NGK Group Code of Conduct
- NGK Group Human Rights Policy
- NGK Group Environmental Policy
- NGK Group Anti-corruption Policy

1. Compliance with Laws and Regulations and Respect for International Norms

Suppliers must not only comply with the laws and regulations applicable in each country and region, but also respect international norms.

2. Human Rights and Labor

Supplier shall comply not only with human rights-related laws and regulations in each country and region, but also with international human rights norms, respect the human rights of workers, local communities and other stakeholders, and respect diversity.

2-1 Prohibition of Forced Labor

- Suppliers shall not use forced labor, bonded labor (including debt bondage), inhumane prison labor, or labor based on slavery or trafficking of persons. This includes transporting, concealing, recruiting, transferring or receiving persons using threats, force, coercion, abduction or fraud for labor or services.
- Suppliers shall not impose unreasonable restrictions on entering or exiting workplaces, dormitories, etc., and other movement within facilities.
- Suppliers shall provide all workers with a written employment agreement including the terms and conditions of employment in a language the worker can understand prior to the official agreement.
- Workers must be able to leave work freely by providing the notice stipulated in their contracts.
- Suppliers shall not conceal, confiscate or destroy workers' government-issued identification, passports, visas, work permits, etc. Suppliers may keep these documents only if required by law.
- Suppliers shall not make workers pay recruitment fees to temporary staffing agencies, etc. If any such fees are found to have been paid by workers, those fees shall be repaid to the worker.

2-2 Prohibition of Child Labor, Consideration for Young Workers

- Suppliers shall not allow children under the minimum working age for employment stipulated in national and regional laws and regulations to work. In addition, young workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

2-3 Prohibition of Inhumane Treatment

- Suppliers shall respect workers' human rights and shall not engage in inhumane

treatment such as mental or physical abuse, coercion or harassment, or other acts with that kind of potential.

- Suppliers shall establish and operate disciplinary policies and procedures for these acts, and communicate them to workers.
- If inhumane acts do occur, suppliers shall provide prompt relief to victims.

2-4 Prohibition of Discrimination

- Suppliers shall not engage in any discrimination in hiring, promotions, wages, education, etc., based on race, color, age, gender, sexual orientation and gender identity, ethnicity, national origin, disability, pregnancy, religion, political affiliation, union membership, military service, genetic information, marital status, etc.
- Suppliers shall give appropriate consideration to workers' religious practices and people with disabilities.
- Suppliers shall not perform medical or physical examinations on workers or candidates for employment that could be used in a discriminatory manner.

2-5 Appropriate Wages

- Suppliers shall comply with all applicable national and regional wage laws regarding minimum wages, overtime hours and legally mandated benefits. In addition, suppliers shall give consideration to the payment of wages at a level that enables a decent standard of living for workers and their families (living wage).
- Suppliers shall pay all workers equal pay for equal work and qualifications.
- Suppliers shall not reduce wages as a disciplinary measure. However, this is permitted in cases where reductions in wages for disciplinary reasons are recognized under local law and have been agreed to under a freely negotiated collective bargaining agreement.
- Suppliers shall provide workers with a timely wage statement stating sufficient information for workers to be able to confirm their wages are accurate for the work they performed during the pay period.

2-6 Consideration of Working Hours

- Suppliers shall not allow workers to work in excess of the maximum working hours set under national or regional law. In addition, suppliers shall manage workers' working hours and days off appropriately.
- Workers shall be allowed at least one day off every seven days.

[Commentary]

“Manage appropriately” means the following.

- Annual working days shall not exceed the maximum set by law.

- Weekly work hours including overtime shall not exceed the maximum set by law (excluding unavoidable times of disaster or emergency).
- Workers shall be allowed the right to paid annual leave, maternity leave, and childcare leave as stipulated by the law.
- Workers shall be allowed the break time stipulated by the law.
- Physical and mental health checks shall be conducted to ensure the health of workers.

2-7 Freedom of Association and the Right to Collective Bargaining

- Suppliers shall respect workers' rights to freedom of association and collective bargaining in accordance with national and regional laws and regulations.
- Suppliers shall not engage in discrimination, retaliation, intimidation or harassment of workers or their representatives.
- Suppliers shall provide opportunities for workers or their representatives to communicate with management regarding working conditions and management practices.

2-8 Prohibition of Forced Eviction and Dispossession in Land Use

- In acquiring, developing or otherwise using land, forest or water resources in association with business activities, suppliers shall not violate the rights of indigenous peoples or other concerned parties by forcibly evicting people or expropriating those resources.

2-9 Prohibition of the Inappropriate Use of Private or Public Security Forces

- Suppliers shall not possess or use security forces that may lead to violations of human rights.

3. Health and Safety

Suppliers shall comply with national and regional laws and regulations related to health and safety to minimize injury and illness to workers, and make efforts to create safe and sanitary work environments.

3-1 Occupational Health and Safety

- Suppliers shall identify and assess risks regarding occupational safety and ensure safety through proper design, engineering and administrative controls.
- Suppliers shall give reasonable consideration to the elimination or reduction of occupational health and safety risks and work assignments for pregnant women and nursing mothers.

[Commentary]

- Examples of workplace safety risks
 - Chemical substances, electricity or other energy sources, fire, organisms, vehicles or moving objects, floors that are slippery or prone to tripping, falling objects, etc.
- Example safety measures
 - Suppliers shall promote such measures systematically.
 - Identify and assess safety hazards, including their risk of occurrence
 - Design appropriate workplaces that eliminate safety hazards and consider preventive maintenance
 - Implement safety communication
- Appropriate design, engineering and administrative controls
 - This refers to the elimination or reduction of risks through hierarchical control based on the above.
 - Elimination of risk factors or substitution to safer options
 - Engineering control (such as monitoring dangerous places using sensors and shutting down the power source of machinery or equipment (lock out))
 - Administrative control (such as signs indicating prohibition of energy shutdown equipment operation during shutting down of the power source (tag out))
 - Providing personal protective equipment (safety gear such as protective goggles, helmets, and gloves)

3-2 Emergency Preparedness

- After identifying emergency situations such as disasters and accidents that may endanger human life and physical safety, as well as the potential for them, suppliers shall prepare action procedures for times of emergency measures, install required equipment, etc., and provide training so that action can be taken in the event of a disaster.
- In addition to informing workers in the workplace, suppliers shall implement emergency response training for workers (including evacuation drills), prepare emergency response procedures, and store or post them in easily accessible locations in the workplace.

[Commentary]

Examples of emergency measures

Reporting at times of emergency, notification of workers, clarification of evacuation methods, installation of evacuation facilities, clear and unobstructed exits, appropriate exit facilities, stockpiles of emergency medical supplies, installation of fire alarm systems, fire extinguishing equipment, fire doors and sprinklers, ensuring of means of external communication, development of recovery plans, etc.

3-3 Occupational Injury and Illness

- Suppliers shall grasp the state of injuries and illness due to occupational accidents, and implement appropriate countermeasures.

[Commentary]

Examples of appropriate measures

Reporting by workers, classification and recording of injuries and illness, provision of treatment as required, corrective actions taken based on investigation of the cause, and support for workers to return to work

3-4 Industrial Hygiene

- Suppliers shall grasp harmful chemical, biological and physical effects on workers, and take appropriate measures to control the health of workers.

[Commentary]

- Examples of harmful effects

- Toxic substances, radiation, or substances that cause chronic disease (lead, asbestos, etc.)

These substances may exist in smoke, steam, mist, or dust form.

- Noise and odors (if significantly strong)

- Examples of appropriate control

Establishment and implementation of management standards, and provision of appropriate training and personal protective equipment to workers.

3-5 Consideration for Physically Demanding Work

- Suppliers shall identify and implement appropriate control over the safety risks of physically demanding tasks.

[Commentary]

- Examples of physically demanding tasks

Carrying heavy objects, prolonged standing, assembly work requiring strength, working in unnatural positions for long periods of time, etc.

- Examples of appropriate control

Maintenance of the work environment, regular breaks, provision of work aids, sharing the workload among multiple workers, etc.

3-6 Machine Safeguarding

- Suppliers shall assess machinery and equipment for safety risks and implement appropriate safety measures.

[Commentary]

Examples of appropriate safety measures

- Adoption of safety mechanisms such as failsafe, foolproof, and interlocks
- Installation of safety devices, protective walls, etc.
- Implementation of regular inspections and maintenance of machinery and equipment, etc.

3-7 Health and Safety at Facility

- Suppliers shall ensure the health and safety of facilities provided for workers.

[Commentary]

Examples of ensuring health and safety.

- Drinking water: water quality testing in compliance with laws and regulations, safe drinking water (water servers, etc.)
- Provision of hygienic meals: cooks' clothing and health checks, pest control, proper temperature control of food, certification of cafeteria business, etc.
- Toilets: clean toilet facilities in sufficient number for the number of people, provision of toilet paper, etc.
- Dormitories: fire prevention measures, emergency exits, secure storage facilities for personal belongings, adequate room size, ventilation, temperature control, appropriate lighting, etc.

3-8 Health and Safety Communication

- Suppliers shall provide workers with workplace health and safety information and training on workplace hazards that workers may be exposed to in a language that workers can understand.
- Suppliers shall post health and safety related information clearly within the facility or place it in a location that workers can access easily.
- Suppliers shall provide training to all workers prior to the beginning of work and regularly thereafter.
- A system that enables workers to provide feedback on health and safety is also required.

[Commentary]

- Examples of workplace hazards

Machinery, electricity, chemicals, fire, physical hazards, etc.

- Examples of training

Correct use of personal protective equipment, emergency response measures, safe operation of machinery, preparations before entering hazardous environments, etc.

3-9 Worker Health Management

- Suppliers shall implement appropriate health management for all workers.
- Suppliers shall implement health checks, etc., based on national and regional laws and regulations to prevent illness in workers or prevent it at an early stage.
- Suppliers shall also give sufficient consideration to the prevention of health problems due to overwork and mental health.

4. Environment

Suppliers shall work on the realization of carbon neutrality, recycling-oriented society, and harmony with nature, and reduce the environmental impact of business activities to realize a sustainable society.

4-1 Environmental Permits and Reporting

- Suppliers shall obtain, keep current, register and report upon all required environmental permits and licenses in accordance with national and regional laws and regulations.

4-2 Reduction of Greenhouse Gas Emissions

- Suppliers shall strive for the improvement of energy efficiency and make efforts continuously so that energy consumption and greenhouse gas (GHG) emissions are minimized. In addition, suppliers shall make efforts to expand their use of renewable energy.
- Suppliers should set GHG reduction targets and make efforts to control and record emissions.

[Commentary]

- Improving energy efficiency involves minimizing energy consumption and related Scope 1 and Scope 2 emissions, and suppliers must track and document energy efficiency at each facility or business site. In addition, the tracking and management of Scope 3 GHG emissions is also desirable.
- Scope 1 GHG emissions are direct emissions by a company, Scope 2 GHG emissions are indirect emissions associated with the use of electricity, heat and steam provided by other companies, and Scope 3 emissions are indirect emissions apart from Scope 1 and Scope 2 in the supply chain overall (raw materials, delivery, use and disposal of products sold, etc.).

4-3 Effective Use of Resources and Waste Management

- Suppliers shall use resources effectively and minimize the generation of waste by promoting reduce, reuse, recycle and the circular economy in compliance with national and regional laws and regulations.
- Even if disposing of materials that have not been identified as hazardous, suppliers shall

identify and manage waste and implement responsible disposal or recycling.

4-4 Air Emissions

- Suppliers shall comply with national and regional laws and regulations and implement appropriate measures for reducing the emission of hazardous substances into the atmosphere.
- Suppliers shall analyze and monitor hazardous substances prior to their emission and implement the required controls and treatments based on the results.

4-5 Water Management

- Suppliers shall strive for water management including the conservation of water resources and the reduction of water consumption in compliance with national and regional laws and regulations.
- Suppliers shall analyze and monitor all wastewater prior to its emission or disposal and implement the required controls and treatments based on the results.
- Sources of pollution that may cause water pollution shall also be identified and appropriate measures shall be taken.

4-6 Soil Management

- Suppliers shall strive for the prevention of soil contamination and land subsidence in compliance with national and regional laws and regulations.
- Suppliers shall analyze and monitor substances that cause soil contamination prior to their emission or disposal and implement the required controls and treatments based on the results.

4-7 Management of Hazardous Substances

- Chemicals and other substances that are harmful to humans and the environment shall be identified, controlled appropriately through labelling, handled safely, moved, stored, used, reused, recycled and disposed of in compliance with national and regional laws and regulations.

4-8 Management of Chemical Substances Contained in Products

- Suppliers shall comply with applicable national and regional laws and regulations and customer requirements regarding the prohibition or restriction of use of specific substances included in products or used in manufacturing processes (including labeling for recycling and disposal).

4-9 Conservation of Biodiversity

- Suppliers shall reduce the environmental impact of business activities on the ecosystem and work on the conservation and restoration of biodiversity.

4-10 Environmental Management Systems

- Suppliers shall build a company-wide environmental management system and strive for its continuous operation and improvement.

4-11 Animal Welfare

- Suppliers shall give consideration based on the concept of animal welfare in business activities.

5. Fairness and Ethics

Suppliers shall comply with national and regional laws and regulations, respect culture, history, etc., and engage in business activities sincerely and with high ethical standards.

5-1 Anti-Corruption

- Suppliers shall not engage in bribery, embezzlement, breach of trust, conflict of interest, insider trading, money laundering, obstruction of justice, etc.
- Suppliers must formulate policies, establish monitoring and recording procedures and carry out training for continuous and certain compliance.

5-2 Prohibition of Inappropriate Provision and Improper Benefit

- Suppliers shall not give or receive any benefit to obtain an unfair or inappropriate advantage. In addition, suppliers shall not take advantage of their position in a transaction to cause an unfair disadvantage in light of normal business practices.

5-3 Protection of Intellectual Property

- Suppliers shall respect and protect intellectual property rights. The transfer of technology and know-how shall be done in compliance with national and regional laws and regulations.
- Suppliers shall take the necessary and appropriate steps to eliminate fake/counterfeit goods.

5-4 Appropriate Disclosure of Information

- Suppliers shall record accurately the information required by society and disclose it at the appropriate time in accordance with national and regional laws and regulations.

- In addition, suppliers shall report promptly to customers and other stakeholders as required if they discover a violation of the law or this Code of Conduct in their own operations or supply chain.
- Suppliers shall not falsify record or disclose false information.

5-5 Fair Business, Advertising and Competition

- Suppliers shall conduct fair business, advertising and competition in their business activities.
- Suppliers shall comply with the fair trade laws of each country and region, engage in fair and free competition, and shall not engage in cartels or other acts that are suspected of falling under such acts.
- Suppliers shall not issue advertising that differs from the truth, etc.

5-6 Appropriate Import/Export Controls

- Suppliers shall implement appropriate imports and exports in compliance with national and regional laws and regulations, and internal regulations.
- Suppliers shall follow appropriate export procedures when exporting goods, technology, etc., regulated under international frameworks, the laws and regulations of each country and region, etc.

5-7 Establishment of a Reporting System

- Suppliers shall establish systems that enable workers, suppliers and others to report misconduct and human rights problems.
- Suppliers shall establish systems that ensure the anonymity of whistleblowers and prevent retaliation or unfavorable treatment because of reporting.

5-8 Dealing with Antisocial Forces

- Suppliers shall stand firm against antisocial forces and have no involvement with them.

5-9 Responsible Sourcing of Minerals

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

6. Quality and Safety

Suppliers shall strive for the provision of safe, secure and accurate information to customers, including contractors and subcontractors, and other stakeholders as required through compliance with national and regional laws and regulations and major international frameworks and norms applicable to the quality and safety of products and services, and adherence to quality standards, specifications and customer requirements.

6-1 Maintenance and Improvement of Quality

- We recommend the operation of a quality management system applied to the quality of products and services.

6-2 Ensuring Safety

- Suppliers shall ensure the safety of product design and manufacturing, construction and commissioned services.

6-3 Information Provision

- Suppliers shall contact us immediately if they anticipate that they will be unable to or will find it difficult to comply with applicable national and regional laws and regulations, the main international frameworks and norms, or adhere to quality standards and specifications or customer requirements.
- If quality or safety problems occur, suppliers must report promptly and disclose information as requested (traceability, etc.) and contact the competent authorities.
- Suppliers shall give advance notice of any changes in specifications or processes, or the discontinuation of supply.

7. Information Security

Suppliers shall manage and protect appropriately the personal information of customers, third parties, and employees, as well as any confidential information received, and strengthen information security.

Suppliers shall take defensive measures against cyber-attacks and manage systems so that damage does not occur to their own company or other companies.

If an information security problem occurs, suppliers shall report to stakeholders as needed and strive to minimize the damage.

8. Business Continuity Planning (BCP)

In readiness for the case where it becomes difficult to provide products or services due to a major natural disaster, etc., suppliers shall prepare appropriately so impacts on the supply chain are minimized based on the formulation of a business continuity plan, etc.

[Commentary]

Risks that may hinder business continuity include large-scale natural disasters (earthquakes, tsunamis, floods, torrential rain, heavy snowfall, tornadoes, etc.) and associated power outages, traffic injuries, accidents (fire, explosions, etc.), spread of disease (widespread epidemics, infectious diseases, etc.).

9.Cooperation with the Region and Community

Suppliers shall work positively and continuously on activities that contribute to international and regional society through our business activities and various other activities towards the realization of a sustainable society.

10.Management Systems

Suppliers shall establish and manage management systems including the following items for the promotion and continuous improvement of this Code of Conduct.

Based on the content and purpose of this Code, suppliers shall not only promote it themselves, but also make their supply chain as a whole aware of it and request their compliance.

10-1 Company Commitment

- Suppliers shall establish due diligence and continuous improvement policy statements regarding their social and environmental responsibilities, endorsed by top management, written in a language that workers can understand and made known to all workers by posting notices in facilities, etc.

10-2 Management Accountability

- Suppliers shall clearly identify the state of operation of management systems and the executive level in charge, and conduct reviews on a regular basis.

10-3 Legal and Customer Requirements

- Suppliers shall establish systems to identify and manage applicable laws, regulations, etc., including the requirements of this Code of Conduct, as well as customer requirements.

10-4 Risk Assessment and Risk Management

- Suppliers shall establish systems to identify risks related to this Code of Conduct and manage identified risks appropriately.

10-5 Improvement Objectives

- Suppliers shall formulate improvement objectives and implementation plans in the social, environmental and other aspects, and carry out activities.

10-6 Training

- Suppliers shall provide training to managers and workers for them to carry out activities based on policies and improvement objectives.

10-7 Communication

- Suppliers shall establish systems to communicate the company's policies, initiatives and other information to workers, suppliers and customers.

10-8 Feedback from Workers and Other Stakeholders

- Suppliers shall establish systems to assess the level of understanding of communication with workers and other stakeholders, obtain opinions and other feedback, and make continuous improvements.
- Suppliers shall establish systems for workers not to be subject to retaliation or disadvantageous treatment in expressing their opinions.

10-9 Audits and Assessments

- Suppliers shall implement assessments regularly to ensure conformity with laws, regulations and customer requirements.

10-10 Corrective Action Process

- Suppliers shall implement corrective actions for nonconformities found by internal and external assessments, surveys and audits.

10-11 Documentation and Records

- Suppliers shall prepare and store records and documentation on the operation of management systems.

10-12 Supplier Responsibility

- Suppliers shall communicate the requirements of this Code of Conduct to suppliers, and establish systems to confirm compliance with this Code of Conduct.