

 CORPORATE POLICY Proprietary Document			Document Name KAVX Supplier Code of Conduct and Sustainability Policy	Changes from Last Revision Replacing MC-PO-003, updated to current template, updated document name and number. Updated document owner. Updated Content to reflect requirements of European Supply Chain Due Diligence Acts
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I. PURPOSE

- A. KYOCERA AVX Components Corporation (KAVX) considers a strong relationship with our suppliers to be key in ensuring our mutual success. This Supplier Code of Conduct & Sustainability Policy lists our expectations of our supply partners that should be followed in their own business practices. KAVX expects its supply partners to share in its commitment to ethics, integrity, and social responsibility.

II. SCOPE

- A. This policy applies to all business partners of KAVX.

III. RELEVANT DOCUMENTS

- A. NA

IV. DEFINITIONS

- A. NA

V. POLICY

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Supplier Code of Conduct and Sustainability Policy

Kyocera AVX Components Corporation (hereinafter also referred to as “we or KAVX”) is a leading global manufacturer & supplier of advanced electronic components and innovative sensor, control, connectors and antenna solutions.

We acknowledge our commitment to sustainable development and strive to instill confidence in our organization by upholding principles of honesty, respect, and tolerance. Our optimal outcomes are attained through purposeful, transparent, and equitable engagement with our business partners and clients.

In its Code of Conduct, the KAVX has committed to complying with applicable law as well as basic rules and principles, thus providing its employees with a binding framework for their professional conduct.

KYOCERA AVX Component Corporation (KAVX) considers a strong relationship with our suppliers to be key in ensuring our mutual success. This Supplier Code of Conduct & Sustainability Policy lists our expectations of our supply partners that should be followed in their own business practices. KAVX expects its supply partners to share in its commitment to ethics, integrity, and social responsibility.

For the KAVX, compliance with the requirements and expectations formulated below is a prerequisite for successful cooperation.

Additionally, this Supplier Code of Conduct outlines the essential standards of diligence expected from business partners when engaging in transactions with any company affiliated with KAVX.

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1. Ethics and Equality

We consider equality, equal opportunities, respect, and tolerance as fundamental values in our interactions with each other, business partners, and customers. We expect the same from our business partners, who must not tolerate discrimination or harassment based on factors such as gender, religion, sexual orientation, age, race, or nationality. They are also responsible for ensuring equal professional opportunities based on individual abilities and qualifications and addressing discriminatory behavior when necessary.

2. Human rights and environmental protection - Due diligence in the supply chain

2.1 General

KAVX prioritizes human rights, expecting business partners to align with the principles of the Universal Declaration of Human Rights and the European Convention on Human Rights. Environmental protection is another key focus, involving emissions reduction, clear communication of our environmental policy, and ecological criteria in supplier assessments. Sustainability requires compliance with legal standards, responsible packaging, and the use of non-harmful substances, in line with regulations like the REACH Regulation (EC) 1907/2006

2.2 Compliance with human rights and environmental due diligence under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG)

Business partners must not violate the obligations outlined in sections 2.3 and 2.4 (hereinafter referred to as “human rights and environmental due diligence obligations”). Business partners shall ensure that their direct and indirect suppliers also do not violate human rights or environmental due diligence obligations.

2.2.1 Conducting risk assessments in accordance with section 5 of the German Supply Chain Due Diligence Act (LkSG)

Business partners must assess their own risks, as per section 5 of the German Supply Chain Due Diligence Act (LkSG), identifying human rights and environmental concerns in their operations and those of their suppliers. KAVX also conducts risk assessments under section 5 of the LkSG. Business partners must provide KAVX with requested information for risk assessments, which are performed annually and, if needed, on an ad hoc basis. As part of these assessments, business partners must allow KAVX employees or approved third parties to visit and inspect their facilities when necessary.

2.2.2 Preventive Measures in the Business Operations of the Business Partner

If, during the risk assessment outlined in section 2.2.1, a business partner identifies a risk within their own organization, they must promptly and proactively implement suitable preventive measures. Similarly, if KAVX identifies a risk within its own risk assessment concerning the business partner's organization, the business partner is obligated to implement appropriate preventive measures upon KAVX's request.

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2.2.3 Remedial Measures in case of violations of human rights and environmental due diligence obligations in the business operations of the business partner

If a business partner becomes aware of a violation of human rights or environmental due diligence obligations within its own operations, or if such a violation is imminent, they are obligated to promptly inform KAVX. Furthermore, they must take appropriate corrective measures to prevent, halt, or minimize the extent of the violation without undue delay. The business partner should also provide evidence of the actions taken to address the issue.

In cases where the violation cannot be resolved promptly, the business partner is required to develop and implement a comprehensive plan to cease or mitigate the violation, and this plan must include a specific timeline. The effectiveness of the measures taken in accordance with this section (2.2.3) should be reviewed annually and as needed, with updates made promptly when necessary. The business partner must inform KAVX of any updates without delay.

Failure to comply with these obligations may lead to KAVX suspending the business relationship until compliance is achieved. In cases of severe violations where the plan to address them is unsuccessful, KAVX reserves the right, in addition to the aforementioned measures, to permanently terminate the business relationship. However, such termination will only be considered if no less severe alternatives are available to address the violation.

2.2.4 Addressing and Corrective Actions in the Supplier's Supply Chain

The business partner must share information necessary for risk assessments of their suppliers, following section 5 of the LkSG. They should also ensure their suppliers allow inspections by KAVX or its representatives.

If there are indications of human rights or environmental violations by suppliers, the business partner must act proactively. This includes inspections, either by their own team or KAVX's upon request, with evidence provided to KAVX.

If a violation is confirmed or anticipated, the business partner must report it, collaborate with the supplier to create a plan for resolution, and share it with KAVX. Procedures in section 2.2.3 apply, and evidence of remedial actions must be given to KAVX promptly.

2.2.5 Establishment of a Complaints Procedure

The business partner is required to establish a suitable complaint procedure within its organization. This procedure should allow individuals to report human rights and environmental risks, as well as any breaches of human rights or environmental due diligence obligations resulting from economic activities within the business partner's own operations or those of their immediate suppliers. The complaint procedure should meet the following criteria:

- Confirmation of receipt: The reporting person should receive confirmation that their report has been received.

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- Dialogue: The responsible individuals should engage in discussions with the reporting person regarding the matter.
- Transparency: The business partner must make clear and easily understandable information about the accessibility, responsibility, and execution of the complaint procedure available to the public in an appropriate manner.
- Accessibility and Confidentiality: The complaint procedure should be accessible to potential stakeholders, guarantee the confidentiality of the reporter's identity, and ensure protection against discrimination or retaliation as a result of making a complaint.

Furthermore, the business partner must ensure that its immediate and indirect suppliers also establish their own complaint mechanisms that meet these requirements.

2.3 Human Rights Due Diligence Obligations

2.3.1 Prohibition of Child Labor/Employment

Employing children who are of compulsory school age, as defined by the local employment laws and are under-aged according to the country of operation, is strictly prohibited.

We unequivocally prohibit child labor in strict accordance with the International Labour Organization (ILO) conventions. At KAVX, we are committed to upholding the principles set forth by the ILO, ensuring that no child below the legal age for employment, as defined by national and international laws, is engaged in any form of labor within our organization or supply chain. We prioritize the welfare and development of children, and our policies and practices are aligned with international standards to safeguard their rights and well-being. We expect our business partners to follow the same. Violations of child labor laws will be met with swift corrective action, as we remain dedicated to fostering an ethical and responsible work environment.

2.3.2 Prohibition of Modern forms of slavery

The workplace strictly prohibits all instances of forced labor, slavery, slavery-like practices, serfdom, or any other forms of control or oppression, including severe economic or sexual exploitation and degradation. Furthermore, it is forbidden to retain employees' identity documents, limit their freedom of movement, or employ intimidation and threats against them.

2.3.3 Minimum standards for workplace safety

Workplace safety obligations, as mandated by the local employment laws, must be adhered to as a minimum standard. Comprehensive measures should be implemented to mitigate the risk of accidents and work-related health hazards.

2.3.4 Freedom of association

Employees' right to freedom of association must be respected and upheld. This includes their right to form, join, and be members of a union without encountering unjust discrimination or retaliation. It also encompasses

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the right to engage in collective bargaining and participate in strikes, all in accordance with the local employment laws.

In instances where free unions are typically prohibited within a state, the business should explore alternative avenues that do not violate the ban on union formation under the applicable national law at the place of employment. For instance, this can involve establishing works councils or alternative mechanisms for employee participation.

2.3.5 Prohibition of discrimination in employment

Discrimination against employees in the workplace is strictly prohibited. This prohibition encompasses any form of unequal treatment based on factors such as national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion, or belief, unless such differentiation is justified by the specific requirements of the job.

2.3.6 Fair Wages and availability of social security benefits

Employees are entitled to receive a fair wage, which should be no less than the minimum wage established by the relevant legal regulations and any other criteria determined by the local employment laws. The wage should also consider the cost of living for employees and their families in the local area, as well as the availability of local social security benefits.

2.3.7 Prohibition of causing certain environmental impacts

Prohibited actions include causing harm to land, water, air, or noise pollution, excessive water usage affecting essential resources like food production and clean water access, and actions that harm people's health. It is also forbidden to illegally evict or unlawfully deprive individuals of land, forests, and water resources essential for their livelihood.

2.4 Environmental Due Diligence Obligations

2.4.1 Protection against emissions of hazardous substances

To safeguard the environment and human well-being, the following actions are prohibited:

- Manufacturing products containing mercury, as per Article 4, paragraph 1 and Annex A, Part I of the Minamata Convention on Mercury dated October 10, 2013.
- Using mercury and mercury compounds in manufacturing processes, following the withdrawal date specified for respective products and processes in the Convention, as per Article 5, paragraph 2 and Annex B, Part I of the Minamata Convention.
- Mishandling mercury waste, contrary to the provisions outlined in Article 11, paragraph 3 of the Minamata Convention.

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Furthermore, chemicals and other persistent organic pollutants must always be managed, labeled, stored, collected, and disposed of in compliance with the relevant laws, especially those stemming from the Stockholm Convention on Persistent Organic Pollutants dated May 23, 2001 (POPs Convention), and its related regulations. Adherence to the production and usage bans on chemicals outlined in Annex A of the POPs Convention is imperative. When dealing with, collecting, storing, and disposing of chemical waste, one must always adhere to the pertinent laws.

2.4.2 Cross-border waste shipment

The following actions are strictly forbidden:

Exporting hazardous and other waste, as defined by the Basel Convention of March 22, 1989, and Regulation (EC) No. 1013/2006 across borders is prohibited if:

- The importing country is not a party to the Basel Convention.
- The importing country has not granted written consent for the specific import or has enacted a ban.
- There is a reasonable belief that the waste will not be managed in an environmentally responsible manner, either within the importing country or elsewhere.

It is also forbidden to send waste from states listed in Annex VII of the Basel Convention to states not listed in the Annex.

Importing hazardous waste and other waste (as defined above) from a state that is not a party to the Basel Convention is strictly prohibited.

3. Responsible Sourcing of Materials and Product Sustainability

KAVX is a leader in the industry, committed to economic, environmental, and social justice, and dedicated to sustainable development. As part of this commitment, KAVX has embraced the principles outlined in the Responsible Business Alliance (RBA) Code of Conduct.

KAVX's unwavering dedication extends to the responsible sourcing of minerals, including tantalum, tin, tungsten, and gold (collectively known as "conflict minerals"). It is our firm commitment that these minerals, present in our products, shall not in any way directly or indirectly finance or support armed groups implicated in human rights violations within the Democratic Republic of the Congo or its neighboring regions or any other regions in the world.

In pursuit of this objective, KAVX has established and will uphold transparent and responsible supply chains, not limited to just these "3TG" materials. We prioritize ethical and sustainable mineral sourcing practices that safeguard human rights across our global supply chain.

To ensure compliance with these principles, KAVX will diligently assess all relevant suppliers in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. You can find our comprehensive policy document here: <https://www.kyocera-avx.com/docs/corporate/Responsible-Minerals-Sourcing-Policy.pdf>

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Under this policy, KAVX mandates that all suppliers dealing with any of the aforementioned materials adhere to the following requirements:

1. Develop and furnish a Responsible Minerals Sourcing Policy, accessible via their website or upon request by KAVX.
2. Establish a robust due diligence program aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
3. Identify all smelters and refiners involved in the sourcing of "3TG" minerals, as well as other minerals of concern within their supply chain, and ensure their participation in the Responsible Mineral Initiative's ("RMI") Responsible Mineral Assurance Process.
4. Provide completed RMI Conflict Mineral Reporting Templates at least annually and upon request from KAVX directly or through a designated third-party partner.
5. Ensure all smelters and refiners conform to the relevant Responsible Mineral Assurance Process Standards or are actively pursuing such designation.
6. Timely communication of any changes in smelter and refinery information.
7. Removal of high-risk smelters and refiners as identified by KAVX.
8. Proactive updates to KAVX whenever changes occur in information included in their RMI Conflict Mineral Reporting Template or other applicable reporting templates.
9. Grant KAVX, with reasonable prior notice, the authority to audit supplier's documentation pertaining to responsible mineral sourcing due diligence.

We are committed to the highest standards of ethical and responsible business practices, and through these measures, we aim to ensure the integrity of our supply chain while upholding human rights and sustainability principles.

4. Legal Compliance

KAVX is committed to complying with all applicable legal requirements. Supply partners are expected to comply both in letter and spirit with all applicable laws, rules and regulations in the cities, states, and countries in which they operate. This includes, without limitation, that all purchased materials used in manufacturing of goods satisfy current governmental and safety constraints on restricted, toxic, and hazardous materials, as well as environmental, electrical, and electromagnetic considerations applicable to the country of manufacture and sale. Requests for RoHS, REACH, SCIP, IMDS or FMD information as well as all quality or safety related documentation must be fulfilled in a timely manner.

Suppliers must comply without fail with all applicable import and export control laws, including sanctions, embargoes and other laws, regulations, government orders and policies of the United States of America, of member States of the European Union, and any other relevant country that control the transmission or shipment of goods, technology, and payments. Supplier must not violate and will not cause KAVX to violate any Export Control Laws (e.g., by transshipping goods through, or supplying goods at any level of the supply chain from sanctioned countries).

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5. Free and fair competition

Our business partners are committed to fair competition and compliance with antitrust and competition laws. They will not engage in any agreements or practices that restrict or distort competition, such as price-fixing or market division with competitors. Appropriate preventive measures will be taken.

6. Responsible conduct and avoidance of conflicts of interest

Our business partners make decisions founded on objective and transparent factors, ensuring that the choices of their employees are not influenced by personal or financial interests. They actively strive to prevent any perception of such conflicts of interest.

7. Anti-money laundering

Money laundering involves the introduction of illegally obtained funds or assets into the legitimate economy while concealing their origin. Our business partners are committed to preventing money laundering by implementing suitable measures and processes that comply with relevant legal and regulatory mandates. They continuously assess and analyze the associated risks.

8. Prohibition of corruption

KAVX has a zero-tolerance policy for corruption and firmly opposes offering improper benefits through bribery. We also expect the same from our business partners. They should not provide any gifts or promises to third parties that could be seen as an attempt to influence decisions. If our business partners engage in such activities with us, it may lead to the immediate termination of our business relationship, depending on the circumstances.

9. Quality

The quality of our work and products is a fundamental pillar of KAVX's success. We anticipate that our business partners share the same commitment to achieving the highest quality as their objective and standard for their own endeavors. They should implement measures to uphold and continually enhance this quality.

10. Product Safety

As a leading global manufacturer and supplier of advanced electronic components, innovative sensors, controls, connectors, and antenna solutions, the quality of our products is vital to our success. We expect our business partners to share this commitment, ensuring that their products not only meet all legal requirements but also do not pose any health or safety risks.

To achieve this, they should establish and maintain the highest quality and safety standards, continually verifying their compliance. If our business partners become aware of any products that might pose risks or safety concerns, they must take immediate action and promptly inform KAVX of any relevant issues.

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Additionally, they should consistently and responsibly implement statutory labeling requirements, such as CE labels.

11. Intellectual Property

Intellectual property holds significant importance for KAVX. We require our business partners to demonstrate respect for the protected rights of competitors, our own business partners, and third parties. They are responsible for safeguarding trade and business secrets, ensuring they are not divulged or utilized without proper authorization for their personal benefit.

12. Data Protection

Personal data is subject to strict legal regulations, such as the European General Data Protection Regulation. Our business partners are responsible for safeguarding personal data through appropriate measures. They must respect the privacy of third parties and handle their personal data with the utmost confidentiality.

13. Compliance, Processes, Reporting and Documentation

Compliance with the requirements in this Code is crucial for maintaining our business relationship with KAVX. Business partners must document their compliance measures. Any violations may result in necessary actions, including legal measures. To prevent violations, business partners establish internal processes and may create their own code of conduct. They are also responsible for ensuring compliance across the supply chain with the principles and requirements outlined here, while specific obligations from section 2 remain in effect.

14. Kyocera AVX Components Corporation Whistleblower system

KAVX has established an internal whistleblower system, which is accessible to our business partners. If business partners suspect a violation of legal obligations within KAVX, they can report it through the KAVX whistleblower system, available at <https://www.kyocera-avx.com/contact-us/reporting-misconduct/>.

Furthermore, if business partners have reason to believe that they, or their suppliers, have breached this Supplier Code of Conduct, they are obligated to promptly report it to KAVX. Such reports will be handled with due consideration for the legitimate interests of the business partner (or its supplier), data protection regulations, the rights of the business partner's employees, and the protection of trade secrets.

VI. RECORDS

A. NA

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