

THE DOWA GROUP
CSR PROCUREMENT GUIDELINE

VERSION 1.3

APRIL 2020

DOWA

TABLE OF CONTENTS

I . To Our Suppliers 2

II . DOWA Group CSR Procurement Policy 3

III . DOWA Supplier Code of Conduct 5

 (1) Legal Compliance and Fair Trade 5

 (2) Optimal Quality and Fair Price..... 6

 (3) Establishing a Stable Supply System..... 6

 (4) Sustainability 6

 1) Human rights and labor 6

 2) Occupational health and safety 8

 3) Environmental conservation 9

 4) Contribution to society and local communities 11

 (5) Information Protection..... 11

 (6) Management System..... 11

IV . Compliance with “DOWA Supplier Code of Conduct” 13

V . DOWA Group Responsible Minerals Procurement Policy 14

I. TO OUR SUPPLIERS

Following our corporate philosophy—“By deploying business on Earth, we seek to contribute to high standards of living and the emergence of a resource-recycling society,” —“the DOWA Group carries out its corporate social responsibilities (CSR) by implementing CSR activities based on the “DOWA Group CSR Policy”.

Demand is increasing to promote CSR activities throughout the entire supply chain associated with a series of business processes from procurement of raw materials to development, production, sales, and services. This demand in the society has also become part of the procurement activities of corporations, and is expected to grow even stronger. Under these circumstances, the DOWA Group developed and released the DOWA Group CSR Procurement Policy in FY2013. Furthermore, realizing the need to seek understanding and cooperation from our suppliers, our valued business partners, to promote CSR activities throughout the entire supply chain, we have formulated this DOWA Group Supply Chain CSR Procurement Guideline (“the Guideline”).

Also, the DOWA Group, as a member of the global supply chain, have added the “DOWA Group Responsible Minerals Procurement Policy” to the Guideline in March 2019.

This Guideline summarizes the basic principles we would like to share with our suppliers when promoting CSR. We ask our suppliers to work hard in hand with us in following the Guideline to further strengthen CSR activities throughout the supply chain. Thank you for your understanding.

April 2020

DOWA Management Service Procurement Group,
CSR Department, DOWA Holdings Co., Ltd.

II. DOWA GROUP CSR PROCUREMENT POLICY

We, the DOWA Group, try to deepen the understanding of business partners in our CSR procurement policy and disseminate our policy. When we select our partners, we consider Q (Quality), C (Cost) and D (Delivery), as well as S (Sustainability (*1)), which represent the initiatives taken to carry out CSR activities, including environmental protection and respect for human rights. With this in mind, we evaluate and select partners in a fair, impartial, and comprehensive manner.

We work to build mutually dependable relationships with our partners and aim to achieve mutual prosperity as partners by creating excellent products that effectively meet the diverse needs of customers.

1. LEGAL COMPLIANCE AND FAIR TRADE

We consider not only legal compliance but also fairness and impartiality as top priorities, and engage in fair trade with our partners. We ask all our partners to comply with all relevant laws, regulations, and social norms prior to trading with us.

2. OPTIMAL QUALITY AND FAIR PRICE

We ensure the quality required by our customers and provide products at fair prices in collaboration with our partners. We ask our partners to put a quality assurance system in place and provide us with materials and services at competitive prices in the market.

3. ESTABLISHING A STABLE SUPPLY SYSTEM

We are preparing Business Continuity Plans (BCP) at each business entity within the DOWA Group, to ensure stable supplies of products to our customers, even in an emergency. To ensure timely delivery, we ask our partners to put in place a system to stably supply materials and services, and to exercise risk management for emergencies.

4. SUSTAINABILITY (*1)

We recycle resources based on the 3R's (Reduce, Reuse and Recycle) (*2) to contribute to a sustainable society and promote purchases of resources and materials that impose a smaller environmental burden (Green Procurement.) We ask our partners to ensure environmental conservation, respect for human rights, and workplace health and safety. Also, to prevent being complicit in human rights abuse or injustice, we ask our partners to understand the "DOWA Group Responsible Minerals Procurement Policy "and take action in accordance to its policies.

When we select our partners, we place value on a management system that can continuously improves sustainability.

5. INFORMATION PROTECTION

We do not disclose confidential information of our partners to third parties without permission. We ask our partners to keep confidential and personal information obtained in the course of business with the DOWA Group in strict confidence, and not to disclose such information to in-house and external third parties without our permission.

6. CSR PROCUREMENT GUIDELINE

We promote procurement based on the DOWA Group's CSR Procurement Guideline. We ask our partners to implement CSR procurement as a part of our supply chain, notify relevant parties of this policy to deepen their understanding, and obtain their cooperation.

III. DOWA SUPPLIER CODE OF CONDUCT

(1) Legal Compliance and Fair Trade

(i) Prohibition of corruption, bribery, etc.

- All transactions shall be carried out transparently and in good faith, and recorded accurately in accounting ledgers.
- We shall have no involvement whatsoever in corruption, bribery, extortion, or embezzlement.
- We shall take surveillance and corrective measures to ensure compliance with laws and regulations on preventing corruption.

(ii) Preventing abuse of superior bargaining position

Superior bargaining position as a purchaser shall not be abused to cause any disadvantage to suppliers.

(iii) Unfair profits

No acts shall be taken whatsoever to gain unfair profits through corruption or other means.

(iv) Fair business, advertising, competition

- Efforts shall be made to maintain fair levels of business, advertising, and competition.
- We shall take appropriate measures to protect customer information.

(v) Provision of accurate information on products and services

Accurate information on products and services shall be provided to partners (suppliers and customers).

(vi) Intellectual property rights

Intellectual property rights are to be respected. We shall execute any transfer of technology or know-how while ensuring protection of their intellectual property rights.

(vii) Appropriate export management

A clear management system shall be put in place for the export and import of technologies and goods subject to regulations.

(viii) Information disclosure

- We shall disclose information on business activities, financial standing, performance, etc. in accordance with applicable regulations and industrial practices.
- There shall be no manipulation of records or falsification of reports whatsoever.

(ix) Prevention and early detection of unfair acts

Steps shall be taken to prevent unfair acts. We shall put in place a system to promote early detection and responses against any unfair practices.

(x) Protection of whistleblowers

We shall preserve the confidentiality of any whistleblowing partners or workers, and shall protect such whistleblowers.

(xi) Responsible procurement of minerals

- Minerals (tin, tantalum, tungsten ,gold and silver) that could be a source of funds for organizations linked to risks such as infringement of human rights, supply of funds to terrorists, money laundering and corruption, or to other forms of misconduct in conflict-affected and high-risk areas shall not be used as raw materials.
- Due diligence (*3) shall be conducted for all suppliers of materials containing gold, silver and materials containing tin[†] and perform risk assessment proportionate to the identified risk. [†]*Excludes recycled tin materials
- In response to requests from partners, means for researching suppliers of materials shall be disclosed.

(xii) Prohibition of retaliation

We shall provide a mechanism for workers to report workplace grievances without any fear of retaliation.

(2) Optimal Quality and Fair Price

(i) Ensuring product safety

We shall ensure that products which supplier is responsible for designing satisfy the safety standards set forth in laws and regulations of each relevant country.

(ii) Quality management system

We shall seek to promote the establishment of a quality management system.

(3) Establishing a Stable Supply System

(i) Ensuring timely deliveries

We shall offer stable supplies of raw materials, facilities, and services at all times, and meet delivery deadlines.

(ii) Formulation of Business Continuity Plan (BCP)

We shall seek to promote the formulation of a BCP, in order to maintain a stable supply system even under unforeseeable circumstances.

(4) Sustainability (*1)

1) Human rights and labor

(i) Freely chosen employment

- Forced, bonded, or indentured labor, involuntary prison labor, slavery, or trafficking of persons shall not be undertaken.
 - Workers shall be free to leave employment at any time.
 - Workers shall not be required to surrender any government-issued identification, passports, or work permits as a condition of employment.
- (ii) Humane treatment
- There is to be no harsh and inhumane treatment whatsoever, including any sexual harassment and power harassment.
 - We shall clearly define the disciplinary policies and procedures regarding such inappropriate acts and shall be communicated to workers.
- (iii) Prohibition of child labor
- Child labor is not to be applied.
- (The term “child” refers to a person under the age of 15 (or 14) where the law of the country permits) or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is older.)
- Workers under the age of 18 shall not be employed with work that is likely to jeopardize the health or safety of young workers.
- (iv) Non-discrimination
- We shall take effort to commit to a workforce that is free from harassment and unlawful discrimination.
 - In recruitment and employment practices, there is to be no discrimination based on race, skin color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, or marital status.
 - Workers or applicants shall not be subjected to health examinations and medical tests purposed for any discrimination.
- (v) Wages and benefits
- We shall pay salary to workers in compliance with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.
 - Workers shall be paid for overtime labor in compliance with local laws, which include the minimum wage, overtime labor and legal payment.
 - The basis on which workers are paid is to be provided in a timely manner through a pay stub or similar documentation.
- (vi) Working hours
- We shall take effort to ensure that weekly working hours do not exceed the legal ceiling under local laws and regulations.
 - We shall ensure that weekly working hours do not exceed 60 hours, including overtime, except in emergency or unusual situations.
 - Workers shall be allowed at least one day off a week.

- In addition to managing weekly working hours, we and our suppliers shall take effort to exercise proper management over working hours on the whole using a compensation day off or flextime system.

(vii) Freedom of association

- We shall respect the rights of workers to associate freely, join labor unions, stage a protest, or participate in workers' councils.
- Workers shall be able to communicate openly with management regarding working conditions and management practices without threat of reprisal, intimidation, or harassment.

2) Occupational health and safety

(i) Safety measures for machines and equipment

We shall assess risks associated with production and other machinery and equipment, and take safety measures such as adopting safety devices and interlocks.

(ii) Workplace safety and hygiene

- Acknowledging that "safety takes priority over all business activities," all workers shall carry out their respective roles and work and try to secure safety in the workplace.
- A system shall be put in place whereby workers are able to promptly and actively report potential risks in workplaces through "*Hiyari-Hatto* (close call)" activities and risk assessments.
- We shall manage potential risks by implementing preventive measures, safety measures and training, and adopting proper designs and technologies and means of control.
- When potential risks cannot be adequately controlled, we shall provide workers with appropriate protective gear to complement safety.
- Workers shall not be disciplined for raising safety concerns and we shall encourage workers who have contributed to enhancing safety in a workplace such as by giving awards.

(iii) Industrial hygiene

- We shall identify and evaluate the status of workers' exposure to chemical, biological, and physical factors, and properly manage conditions.
- Engineering and administrative controls shall be used to control overexposure.
- When exposure risk cannot be adequately controlled, workers' health is to be protected with appropriate personal protective gear, etc.

(iv) Occupational injury and illness

- We shall take effort to put in place procedures and systems to prevent, manage, track, and report occupational injury and illness.

(Encourage workers to report, classify, and record injuries and illnesses; provide necessary medical treatment, investigate and implement corrective actions; and facilitate the return of workers to work, etc.)

(v) Emergency preparedness

- Potential emergency situations and events are to be identified and assessed in advance.
- To minimize the impact of emergency situations, efforts shall be made to perform and put in place appropriate measures, including emergency reporting, worker notification, evacuation method, training, automatic fire detectors, fire extinguishing systems, and proper emergency exits.

(vi) Physically demanding work

We shall properly identify and assess risks associated with physically demanding tasks, including manual material handling, lifting heavy objects, prolonged standing, and highly demanding assembly tasks, and manage risks so that such tasks do not lead to injury or illness.

(vii) Sanitation facilities, food, and housing

- Workers are to be provided with clean sanitation facilities and safe drinking water.
- We shall make efforts to store emergency food supplies
- Employee dormitory facilities shall provide users with a clean, safe environment, emergency exits, hot water for bath or shower, proper temperature control and air conditioning facilities, and a personal space with an appropriate entrance.

(viii) Management of worker health

- We shall provide all workers with appropriate health management programs.
- We shall support workers to maintain good health by offering welfare benefits and other programs.

3) Environmental conservation

(i) Regulations on substances in products

- We shall respect all applicable laws, regulations, and customer requirements regarding prohibition and restriction of specific substances, including labeling for recycling and disposal.
- We shall aspire to comply with RoHS directive (*4) and REACH regulations (*5) even outside of applicable EU regions.

(ii) Hazardous materials

We shall identify hazardous chemical substances emitted into the environment and ensure safe handling, transfer, storage, and use, as well as promote 3R (*2) and appropriate treatment.

(iii) Environmental management system

We shall develop and operate an environmental management system.

(iv) Resource saving and energy saving

- Efforts shall be made to improve production, maintenance, and facility operation processes and promote substitution, conservation, and 3R (*2) of materials, in order to save resources and energy.
- We shall try to reduce and eliminate as much as possible waste regarding all resources, including water and energy, and aspire for zero waste.

(v) Wastewater

- Wastewater generated from corporate activities and waste treatment facilities is to be categorized, monitored, controlled, and treated as required by relevant laws and regulations of the local country prior to discharge or disposal.
- If necessary, We shall make effort to reinforce voluntary management by adopting additional standards and reducing the burden on public water.

(vi) Waste

- We shall be responsible for waste generated from their corporate activities by exercising appropriate management or outsourcing treatment to external service companies in compliance with relevant laws and regulations of the local country.
- Efforts shall be made to ensure appropriate waste treatment by performing onsite checks of the service provider to which the waste treatment process is outsourced and taking other steps.
- We shall continuously reduce waste by setting voluntary targets to restrict the generation of waste and reduce landfill waste.

(vii) Air emissions

- VOC (*6), aerosols, corrosives, particulates, ozone depleting chemicals, and combustion by-products generated from conducting business are to be categorized, monitored, controlled, and treated as required prior to discharge.
- If necessary, We shall make effort to reinforce voluntary management by adopting additional standards to reduce atmospheric burdens.

(viii) Environmental permits and reporting

- In accordance with the relevant laws and regulations of the local country, necessary approvals and permits from the authorities shall be obtained.
- We shall submit a management report to the authorities without delay if they so request.

(ix) Greenhouse gas reduction

We shall endeavor to define voluntary targets for reducing greenhouse gases and implement continuous activities for their reduction.

(x) Disclosure of environmental conservation initiatives

We shall disclose, when necessary, the results of environmental activities such as nature conservation and reducing environmental burden.

4) Contributions to society and local communities

We shall endeavor to voluntarily engage in activities that contribute to the development of international and local communities.

(5) Information Protection

(i) Defense against threats on computer networks

We shall implement defensive measures against threats on computer networks to avoid damage to itself and other parties.

(ii) Protection of personal information

- Personal information of partners, customers, consumers, workers, and all other business-related parties shall be protected.
- Compliance with laws and regulations concerning privacy and information security shall be ensured when collecting, storing, processing, transferring, and sharing personal information.

(iii) Preventing leakage of confidential information of customers and third parties

Confidential information obtained from customers and third parties shall be appropriately managed and protected.

(6) Management System

(i) Company commitment (*7)

A corporate social and environmental responsibility policy statement affirming commitment to compliance and continual improvement shall be declared.

(ii) Management accountability and responsibility (*8)

- We shall clearly identify company representative(s) in charge of ensuring operation and implementation of the management system and associated plans.
- The management system shall be periodically evaluated.

(iii) Legal and customer requirements

A process to identify, monitor, and understand applicable laws and regulations, rules and customer requirements, including requirements in this Guideline shall be constructed and executed.

(iv) Risk assessment and risk management

- Risks associated with environment, occupational safety and health, labor practices, and ethics in business activities are to be specified.
- We shall judge the relative significance of each of those risks, manage specified risks, and ensure legal compliance.

(v) Improvement objectives

- To improve initiatives for carrying out social and environmental responsibility, objectives and actions plans shall be clarified.
- The performance in achieving those objectives shall be periodically assessed.

(vi) Training

Programs for training managers and workers shall be conducted to implement policies, procedures, and improvement targets, and meet applicable legal and regulatory requirements.

(vii) Communication

Information concerning management policy, implementation, expectations, and initiatives shall be communicated to workers, partners, and customers in an accurate and easy-to-understand manner.

(viii) Worker feedback and participation

Processes to identify, monitor, and understand applicable laws, regulations, rules, and requirements of customers, including requirements in this Guideline, shall be constructed and implemented.

(ix) Audits and assessments

Periodic self-evaluations to confirm compliance with legal and regulatory requirements, conditions in this Guideline, and customer requirements related to social and environmental responsibility shall be performed.

(x) Corrective action process

Deficiencies and weaknesses identified in internal and external assessments, inspections, and examinations shall be appropriately corrected within the set time frame.

(xi) Documentation and records

We shall create and maintain documents and records to ensure regulatory compliance and conformity with company requirements along with appropriate confidentiality to protect personal information.

(xii) Suppliers' responsibilities

We shall have a process to communicate requirements provided in this Guideline to partners and to monitor compliance by partners.

IV. COMPLIANCE WITH “DOWA SUPPLIER CODE OF CONDUCT”

This Guideline aims to promote CSR management through cooperation between the DOWA Group and suppliers by presenting matters that we would like our suppliers to pursue jointly with us from the perspective of CSR based on the DOWA Group CSR Procurement Policy.

- This Guideline defines standards to ensure that the environment in which our suppliers’ operations are safe, that workers are treated with respect and dignity, and that business activities are environmentally responsible and conducted ethically.
- Fundamental to adopting this Guideline is the understanding that suppliers, in all of their business activities, must operate in full compliance with the laws, rules, and regulations of the countries in which they operate.
- This Guideline clearly encourages suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility.
- Suppliers must regard this Guideline as a total supply chain initiative. Suppliers shall also pass on and require its secondary and tertiary suppliers to implement this Guideline.

We would greatly appreciate your cooperation in promoting CSR activities throughout the entire supply chain.

V . DOWA GROUP RESPONSIBLE MINERALS PROCUREMENT POLICY

In order to establish a responsible supply chain in line with its corporate philosophy, the policy of the DOWA Group is to refrain from using as raw materials minerals (tantalum, tungsten, gold, tin, and silver) that could be a source of funds for organizations linked to risks such as infringement of human rights, supply of funds to terrorists, money laundering and corruption, or to other forms of misconduct in conflict-affected and high-risk areas.

1. General Provisions

1. The DOWA Group will not directly or indirectly contribute to the mining, trading, handling, and export of minerals (tantalum, tungsten, gold, tin, and silver) that could be a source of funds for organizations linked to risks such as infringement of human rights, supply of funds to terrorists, money laundering and corruption, or to other forms of misconduct in conflict-affected and high-risk areas.

This includes specifically:

■ Serious abuses associated with the extraction, transport or trade of minerals:

- Any conditions of torture, cruel, inhuman and degrading treatment
- Any conditions of forced or compulsory labor
- The worst conditions of child labor
- Other gross human rights violations and abuses such as widespread sexual violence
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

■ Direct or indirect support to non-state armed groups

■ Direct or indirect support to public or private security forces that are conducting illegal activities

■ Bribery and fraudulent misrepresentation of the origin of minerals

- Money laundering
- Non-payment of taxes, fees and royalties to governments

2. The DOWA Group will perform risk management in the procurement of raw materials and immediately discontinue transactions when it is judged that minerals (tantalum, tungsten, gold, tin, and silver) could be a source of funds for organizations linked to risks such as infringement of human rights, supply of funds to terrorists, money laundering and corruption, or to other forms of misconduct in conflict-affected and high-risk areas.

3. The DOWA Group will engage independent third-party auditors on a regular basis to review the smelting, refining and recycling of gold, tin, and silver.

2. Management System and Responsibility

1. The headquarters of the DOWA Group will deal with the procurement of mineral materials used by the Group's smelting and refining divisions and recycling divisions, supplying materials to the smelters and refineries and the recycling plants that they manage. The Resource Development & Raw Materials Department at DOWA METALS & MINING CO., LTD. and the Recycling Business Unit at DOWA ECO-SYSTEM CO., LTD. will control the procurement of materials.
2. The headquarters of the DOWA Group or the manufacturing subsidiaries themselves will be responsible for the proper procurement of mineral materials used by the Group's manufacturing subsidiaries, supplying materials to the manufacturing subsidiaries that they manage. The Metal-processing Division at DOWA METALTECH CO., LTD., DOWA HIGHTECH CO., LTD., DOWA SEMICONDUCTOR AKITA CO., LTD. and other DOWA Group subsidiaries will control the procurement of materials.
3. The DOWA Group will appoint a manager with responsibility for ensuring compliance with the Responsible Minerals Procurement Policy. The manager with responsibility for the responsible procurement of minerals will oversee the whole management system and assume the authority and responsibility stipulated in the control manual.

3. Judgment Criteria for Material Procurement from High-risk Countries

The DOWA Group considers the material procurement of tantalum, tungsten, gold, tin and silver from conflict-affected and high-risk areas that could be a source of funds for organizations linked to risks such as infringement of human rights, supply of funds to terrorists, money laundering and corruption, or to other forms of misconduct to be high-risk material procurement.

4. Operation of the Conflict Minerals Management System

(1) Due Diligence relating to Material Suppliers

- The DOWA Group will implement due diligence for all suppliers of materials containing gold, silver, and tin*, and perform risk assessment proportionate to the identified risk. The DOWA Group will discontinue transactions that the manager with responsibility for the control of conflict minerals deems to be high risk.

*Excludes recycled tin materials

(2) Monitoring of Transactions

1) Materials Received at Smelters and Refineries

- Smelters and refineries will check materials received for to ensure the actual goods are those described in transaction information at the time of procurement and report the findings on non-conformance to the division in charge at headquarters.

- The DOWA Group will conduct regular internal audits to ensure due diligence of suppliers is executed properly. The DOWA Group will engage independent third-party auditors to perform audits regarding gold, tin and silver materials.

2) Materials Received at Recycling Plants

- Recycling plants will check with the supplier to confirm that the recycled materials received (recycled materials or scrap) have lost their original function or are no longer required and report the findings to the division in charge at headquarters.

3) Materials Received at Manufacturing Subsidiaries

- Manufacturing subsidiaries will check materials to ensure the actual goods are those described in transaction information at the time of procurement and report the findings on non-conformance to the division in charge at headquarters.
- The DOWA Group will conduct internal audits on a regular basis to ensure whether due diligence for suppliers is executed properly.

(3) Training

- The DOWA Group will provide the necessary education and training for headquarters divisions, smelters and refineries, recycling plants and manufacturing subsidiaries on a regular basis to conduct their operations in conformance with the responsible procurement policy.

(4) Retention of Records

- The manager will stipulate the records that must be retained concerning the responsible procurement of minerals, establish the period of retention and manage the records.

***1 Sustainability**

- Sustainability refers to the permanence of environmental, social, and economic paths in harmony to achieve sustainable development, which is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
- Source: Based on the concept of Sustainable Development presented in "Our Common Future," a report issued by the United Nations World Commission on Environment and Development (Brundtland Commission) in 1987.

***2 3R (Reduce, Reuse, Recycle)**

- Reduce: To cut the amount of materials used and generation of waste in the manufacturing of products.
- Reuse: To repeatedly make use of a used product, its components, and packing material.
- Recycle: To use waste as raw materials or source of energy.

***3 Due diligence: To objectively identify potential risks of a company to society and take steps to mitigate adverse impacts.**

***4 RoHS directive (Restriction of the use of certain Hazardous Substances in electrical and electronic equipment Directive):**

- EU legislation restricting the use of specified hazardous substances in electrical and electronic equipment to minimize the risk of damaging the environment and harming human health.
(It is spreading to regions outside the EU and similar regulations are being enforced in other countries.)
- Six substances subject to restriction:
lead (Pb), mercury (Hg), cadmium (Cd), hexavalent chromium (Cr6+), polybrominated biphenyls (PBB), polybrominated diphenyl ether (PBDE)

<Compliance determination>

Cadmium: Less than 100 ppm

Lead, mercury, hexavalent chromium, polybrominated biphenyls and polybrominated diphenyl ether: Less than 1,000 ppm

(Exceptions apply to products and components from which removal of substances is technically difficult.)

***5 REACH Regulation (Registration Evaluation Authorization and Restriction of Chemicals):**

- Regulation on registration, evaluation, authorization, and restriction of chemicals enforced in the European Union (EU).
- Applicable to chemical substances produced or imported into the EU in quantities over 1 ton per business operator, regardless of whether the substances are new or existing.
- Applicable to substances on their own, those in preparation, and in molding.

*6 VOC: Volatile Organic Compounds

*7 Company commitment: Promise(s) involving a company's responsibility

*8 Accountability and Responsibility:

- Accountability: Duty to report. It is the concept of having the duty to properly report the contents, results, etc. of activities to all stakeholders.
- Responsibility: Duty, obligation. Being responsible for the contents, results, etc. of activities.

Guidelines and documents used as reference:

- United Nations “Global Compact”
- Responsible Business Alliance (RBA) Code of Conduct
EICC (Electronic Industry Citizenship Coalition) Becomes RBA (Responsible Business Alliance) in October 2017
- Japan Electronics and Information Technology Industries Association (JEITA) “Supply-Chain CSR Deployment Guidebook”
- London Bullion Market Association (LBMA) “LBMA Responsible Gold Guidance”, “LBMA Responsible Silver Guidance”

Document history

- First Edition - Released in March 2015
- Version 1.1 – Released in February 2018 with revisions to RBA
- Version 1.2 – Released in March 2019 with revisions to DOWA Group Responsible Minerals Procurement Policy
- Version 1.3 – Released in April 2020 with revisions to the change of the internal department

CONTACT REGARDING THE GUIDELINE

DOWA Holdings Co., Ltd.

22F, Akihabara UDX Building, 4-14-1, Sotokanda, Chiyoda-ku, Tokyo 101-0021, Japan

CSR Department

Telephone: +813-6847-7016

FAX: +813-6847-1272

E-mail: info_dowa@dowa.co.jp