



## **FineToday Group Supplier Code of Conduct**

### Foreword

Recent years have seen increasingly serious social and environmental issues, and companies have been under strong pressure to not only comply with the laws and regulations of each country but also to respect international conventions and rules. Moreover, they are expected to make a strong commitment to realizing a sustainable society together with the suppliers that form their supply chain.

The FineToday Group will strive to provide products and services that offer peace of mind and safety to customers and that are friendly to both society and the environment, while also conducting its business operations in a sincere manner as it endeavors to help achieve a sustainable society.

### I . Applicable Scope

Suppliers who are engaged in transactions with the FineToday Group are requested to comply with this Code.

In addition, suppliers are also expected to require their subcontractors who are involved in business related to the FineToday Group to comply with the same standards as those set forth herein. In the course of complying with this Code, we may collaborate, etc. with subcontractors as necessary.

### II . Operation

The FineToday Group selects suppliers who will comply with the matters set forth in this Code. Even after transactions commence, the FineToday Group will determine whether to continue doing business with suppliers based partly on the compliance with this Code. If you have any questions or doubts regarding this Code, please contact the relevant department for further inquiries or to report the issue.

### III. Inspection

Upon receiving a request from the FineToday Group, suppliers shall answer questionnaire surveys, accept on-site inspections, submit related materials and records, and otherwise meet the FineToday Group's requests, so as to enable the FineToday Group to confirm compliance with this Code.

#### IV. Reporting of Violations / Corrective Measures

When a supplier becomes aware of any violation of this Code (including becoming aware of the possibility thereof: the same shall apply hereinafter in this Article), it shall immediately inform the FineToday Group thereof. If any violation is acknowledged, the supplier must formulate a plan to correct such violation and undertake suitable corrective measures, as well as report the status of such correction to the FineToday Group on each occasion. An agreement entered into with the FineToday Group may be cancelled depending on the nature of the violation.

#### V. Content Updates, etc.

When revising the content of this Code as needed in light of changes to legal regulations in the countries concerned, trends in international organizations, or other factors, updates will be based on the results of negotiations with cooperating businesses.

### **Main Requests**

#### [ I ] Legal Compliance

Suppliers shall comply with all applicable laws and regulations of the countries and territories in which they conduct their business operations. Suppliers shall strive to comply with industry standards and international standards\* regarding fair business operations, human rights, labor, and the environment.

\*The OECD Guidelines for Multinational Enterprises, the fundamental provisions of the ILO Conventions, the United Nations Global Compact 10 Principles, the United Nations Declaration on the Rights of Indigenous Peoples, the United Nations Guiding Principles on Business and Human Rights, ISO 26000 (Corporate Social Responsibility), etc.

#### [ II ] Anti-Corruption

##### 1 . Prohibition of Bribery and Corruption

Suppliers shall not pay or receive any bribes, kickbacks, illegal gratuities, etc., to or from any administrations, officials, or business partners, including, without limitation, the FineToday Group. In addition, suppliers shall not make any facilitation payments (i.e., the payment of a small amount of money, not based on applicable laws and regulations, in order to expedite administrative procedures such as customs clearance or visa acquisition).

##### 2 . Prohibition of Unfair Provision of Gifts and Entertainment

Suppliers shall not provide or receive gifts or entertainment in an unfair manner or in a manner that may cause suspicion regarding fairness, to and from administrations, officials, or business partners,

including, without limitation, the FineToday Group, for the purpose of influencing contracts or the contents of transactions, either directly or through a mediator.

### 3 . Prohibition of Improper Transactions

Suppliers shall not engage in private monopolies, cartels, or other undue restrictions on trade, or any other acts which may hinder free and fair competition.

### 4 . Information Security, Protection of Intellectual Property, Confidential Information, and Personal Information

Suppliers shall not infringe upon any intellectual property rights of the FineToday Group or any third party.

In addition, suppliers shall establish a proper information security environment, and shall appropriately protect and shall not use for any improper purposes, confidential information (including insider information and business secrets) and personal information (including that of customers and employees) which are handled by the suppliers themselves or the FineToday Group.

### 5 . Publication of Information

If a supplier becomes aware of any events which raise doubts as to the quality, safety, efficacy, etc., of the supplier's products or services, the supplier shall promptly disclose appropriate and sufficient information thereon to the FineToday Group.

## III Respect for Human Rights

### 1 . Prohibition of Discrimination

Suppliers shall not discriminate in any way against their employees in hiring practices or treatment in relation to remuneration, promotion, termination of employment, etc., on any basis, including, without limitation, race, skin color, gender, age, language, financial status, nationality, national origin, religion, ethnic or social origin, membership or non-membership of a labor union, political or other opinion, beliefs, disability, marital status, health conditions, pregnancy, sexual orientation, and gender identity.

### 2 . Prohibition of Abuse and Harassment

Suppliers shall respect the human rights of their employees and shall not inflict abuse, corporal punishment, psychological, physical, or sexual harassment or other forms of intimidation thereon.

### 3 . Prohibition of Forced Labor and Human Trafficking

Suppliers shall not be involved, in any way, in any forced labor, including labor under conditions of slavery, labor with physical or psychological constraint, and human trafficking.

### 4 . Prohibition of Child Labor

Suppliers shall not, as a firm principle, employ children who have not yet the age of (i) 15 years of age; or (ii) the age for completing compulsory education; or (iii) the minimum working age stipulated in local laws or regulations, whichever age is highest.

### 5 . Compliance with Labor-Related Laws and Regulations

Suppliers shall comply with all applicable labor-related laws and regulations of the countries and territories in which suppliers conduct their business operations.

Suppliers shall pay wages in an amount equal to or greater than the minimum wage stipulated by local laws or regulations. In this regard, suppliers shall take into consideration the wage level to ensure that the wages paid will be at a level necessary for employees and their family members to live with human dignity. In addition, suppliers shall pay overtime allowance and other allowances, etc., in accordance with the laws and regulations of each country and territory. Suppliers shall properly manage the total working hours, days off, and leave of employees so that such working hours will not exceed the maximum limits stipulated by applicable laws and regulations of each country and territory. Suppliers shall also execute employment agreements with workers in writing, which will set forth the conditions for their employment, as well as confirm that all workers are aware of their legal rights and obligations.

### 6 . Freedom of Association and Collective Bargaining

Suppliers shall respect the right of their employees to form a labor union, to join or not join a labor union, and to engage in collective bargaining with suppliers, and shall not discriminate against their employees based on the exercise of such rights.

### 7 . Respect for the Rights of Indigenous People

Suppliers shall respect the land rights, culture, custom, and religion of indigenous people and shall conduct their business operations based on such respect. Suppliers shall respect the traditional knowledge and the rights in relation to genetic resources of indigenous people, and shall strive not to exploit the interests of indigenous people in a one-sided manner.

## 8 . Migrant Workers

Suppliers shall treat migrant workers in the same capacity as local workers. In addition, suppliers shall treat foreign workers and migrant workers in a just manner, and provide such workers with transparent employment conditions as well as good working and living conditions.

## IV Safe and Healthy Working Environment

### 1. Safe and Healthy Facilities

Suppliers shall design and construct facilities that take into account the health and safety of their employees, and shall maintain the safety of their facilities through regular checks of and repairs on the structural integrity of the facilities.

### 2 . Prevention of Workplace Injuries and Illnesses

In regard to physically severe labor, the handling of hazardous substances and chemicals, and inherently risky labor, such as the use of production machinery, suppliers shall adopt procedures to enable the avoidance of any risks to the extent possible, and shall provide their employees with necessary protective wear, as well as education on safety measures in advance, in order to prevent the occurrence of workplace injuries and illnesses.

### 3 . Disaster Prevention Measures

As part of their disaster prevention measures, and in preparation for emergencies such as fire and natural disasters, suppliers shall secure fire prevention measures and emergency routes at facilities and installations, and ensure that their employees are thoroughly informed of the same.

## V Protection of the Environment

Suppliers shall comply with all environment-related laws and regulations applicable to the countries and territories where suppliers conduct their business operations.

Suppliers shall recognize the importance of protecting the environment throughout the entire product life-cycle, including matters relating to raw materials and products, matters relating to manufacturing, and matters relating to phases of use. Suppliers shall also strive to manage their business in a manner that takes the environment into consideration, and shall take a precautionary approach toward resource efficiency, preventing pollution, reducing greenhouse gas emissions, and conserving biodiversity.

## VI Quality Assurance and Securing Traceability

Suppliers shall provide products and services that satisfy the quality and safety standards set forth in all laws and regulations of the countries and territories in which suppliers conduct their business operations, as well as comply with the contracts entered into with the FineToday Group, and shall strive to grasp the origins of raw materials used for the products which are to be delivered to the FineToday Group.

#### VII Measures

Suppliers shall accept whistle-blowing and complaints from their employees, shall make sure to protect their employees from possible retaliation from the suppliers and persons against whom the relevant whistle-blowing was done, and shall take appropriate measures to rectify the status and conditions against which such complaints are made, while always considering the privacy of whistle-blowers.

#### VIII Subcontractors' Compliance with this Code

Suppliers shall request their subcontractors involved in any business related to the FineToday Group to comply with the same standards as those set forth herein. If the FineToday Group deems it necessary, suppliers shall confirm their subcontractors' compliance herewith and report the same to the FineToday Group.