

# Rigaku CSR Procurement Guideline

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RIGAKU HOLDINGS CORPORATION

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## Introduction

The Rigaku group of companies actively collaborates with business partners with the goal of achieving the sustainable society based on our corporate philosophy: to contribute to the enhancement of humanity through scientific and technological development.

Sustainable business should be built on foundations of corporate social responsibility and social credibility. At Rigaku group, we seek to build a sustainable supply chain in order to grow our business while fulfilling our social responsibilities. We will achieve this by working with partners who conduct their business in a socially responsible manner.

We have created this “Rigaku CSR Procurement Guideline” in order to clarify our position, and translate our thinking on social responsibility into a reality throughout our supply chain. This Guideline applies to the activities of both Rigaku group and of our business partners and supply chain participants, whom we expect to be aware of the contents of this Guideline and to proactively promote the socially responsible activities outlined.

## Procurement Policy

### 1. Practicing socially responsible procurement

We comply with legal and social norms, and promote sustainable and environmentally-friendly procurement.

### 2. Fair and just trade

We carry out our procurement based on fair, just and honest business relationships.

### 3. Partnership

We seek to build cooperative and trusting relationships with partners to promote our mutual sustainability and prosperity.

### 4. Alignment of our needs with suppliers' interests

We require the maintenance of appropriate levels of quality, competitive pricing, and on-time delivery.

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# 1. Legal Compliance and Respect for international norms

Comply with laws and regulations applicable in its own country and in countries/regions where business is done, as well as respecting international codes of conduct. This includes (but is not limited to):

- Laws and regulations: Each country/region's antitrust laws, commercial laws, subcontractor laws, foreign exchange laws, personal information protection laws, copyright laws, environmental protection laws, labor laws, etc.
- International code of conduct: "Guiding Principles on Business and Human Rights" endorsed by United Nations, "SDGs (Sustainable Development Goals)," "OECD Guidelines for Multinational Enterprises," "ILO MNE (Multinational Enterprises) Declaration," etc.

## 2. Human Rights and Labour

Comply with related laws and regulations as well as referring to international human rights standards, including the ILO Core Labor Standards to respect for human rights of workers. This is applied to all workers, such as direct employees, contract employees, temporary employees, foreign workers, and students.

Please also refer to the "Rigaku Group of Companies Human Rights Policy," which you can find on our web site.

### **(2-1) Prohibition of forced labour**

Any use of forced, bonded, inhumane prison, slave, and/or human trafficking labor is strictly prohibited. Forced employment is not acceptable, and workers' right to leave a job or terminate employment of their own free will should be protected.

### **(2-2) Prohibition of child labour and consideration for young workers**

Children below the minimum working age should not be employed. Young workers under eighteen years old should not be assigned to dangerous work such as night shift or overtime work, which may damage their health or safety.

### **(2-3) Consideration for working hours**

Workers should not work beyond the limitations defined by laws and regulations of the regions where they work. Working time and holidays should be managed properly based on international norms.

### **(2-4) Adequate wages and allowances**

Comply with all laws and regulations related to payment of workers (including minimum wage, overtime pay, and allowances or payroll deductions that are legally mandated). It is desirable to consider payment of a standard wage which can cover the costs necessary for a decent life (living wages)

### **(2-5) Prohibition of inhumane treatment**

Respect the human rights of workers. Any inhumane treatment of workers, such as mental/physical abuse, enforcement, harassment, and similar possible acts, are strictly prohibited. In addition, facilities for storing

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personal belongings or valuable items and reasonably accessible personal space should be provided.

#### **(2-6) Prohibition of discrimination**

Discrimination and harassment are strictly prohibited. Workers' requests related to religious customs should be considered to the extent appropriate.

#### **(2-7) Freedom of association, collective bargaining rights**

Workers' right to organize should be respected as a means of enabling employee - employer dialogue on matters such as working environment or wage level, while complying with local laws and regulations.

### **3. Safety and Health**

Take appropriate measures to minimize workers' injuries or mental/physical illness and prepare a safe and hygienic working environment while complying with related laws and regulations and paying attention to ILO safety and health guidelines.

#### **(3-1) Occupational Safety**

Ensure safety with the appropriate design or technical/management practices by specifying and assessing safety risks in the workplace and carrying out risk elimination and preventive maintenance. In addition, reasonable accommodations should be made for pregnant workers and workers in lactation period.

- Risks for occupational safety include: Physical contact with chemicals, electricity and other energy sources, fire, falling.
- Reasonable accommodation for pregnant workers include: avoid heavy lifting, exposure to infection, exposure to toxic material, work in unreasonable/hard posture.
- Reasonable accommodation for workers in lactation period include: appropriate rest and place for breast-feeding.

#### **(3-2) Emergency Preparedness**

To prepare for emergency such as disasters/accidents which risk damage to human life/body safety, it's necessary to specify the risks, and assess feasibility to take emergency measures which minimize the damage to workers and assets.

- Emergency measures include: Reporting of emergencies, notice to workers, clear evacuation procedures, installation of evacuation facilities, recognizable/unobstructed exits, appropriate exit facilities, stockpiling emergency medical supplies, installation of fire detectors, installation of fire extinguishers/fire doors/sprinklers, detection systems, securing external communication, maintenance of an up-to-date recovery plan, evacuation drills.

#### **(3-3) Industrial accidents and diseases**

Specify, assess, record and report the situation of industrial accidents/diseases and take appropriate/corrective measures.

- Appropriate measures include: Encouragement of reporting by workers, categorization or record of disas-

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ters/diseases, providing treatment as needed, investigation of disasters/diseases, execution of corrective measures to eliminate the causes, system or measures to support workers returning to work.

### **(3-4) Industrial hygiene**

Specify and assess the risks which workers are exposed to from toxic materials with biological/chemical/physical effects and manage them accordingly.

- Toxic materials include: Poisonous material, radiation, materials which cause chronic diseases (lead, asbestos, etc), etc. They might exist in the form of smoke, fume, mist, powder, dust, etc. Besides, significant noise or unpleasant odors are considered to be harmful to the human body.
- Appropriate management includes: Establishment and promotion of management standard, appropriate education/training, provision of appropriate personal protective equipment.

### **(3-5) Consideration when working with physical loads**

Specify and assess the work with physical loads and manage it accordingly to avoid industrial accidents/diseases.

- Work with physical load: manual handling of raw materials, manual carrying of heavy objects, as well as heavy assembly work, long-time repetitive/continuous work such as data entry, long-time work in an unnatural posture, etc.
- Appropriate management: Maintenance of working environment, regular breaks, provision of assistive device, sharing and cooperation among several workers, etc.

### **(3-6) Safety measures for machinery**

Assess machinery which workers use at work to check for safety risks and take appropriate safety measures.

- Safety measures: Introduction of safety mechanisms (fail-safe, interlock, etc.), installation of safety device or defensive barrier, regular check and maintenance of machinery, etc.

### **(3-7) Health and safety of facilities**

Ensure the health and safety of facilities provided for workers' life (dormitory, cafeteria, restroom, etc. ) appropriately. The appropriate emergency exit should be prepared in the dormitory.

### **(3-8) Communication for health and safety**

Provide the appropriate education and training of health and safety in the language and a way which workers can understand. The system to get feedback on safety from workers should also be prepared.

### **(3-9) Healthcare for workers**

All workers' healthcare should be managed appropriately.

- Appropriate healthcare management: health check, mental healthcare, etc.

## **4. Environment**

Work proactively on global environmental concerns such as resource depletion, climate change and environmen-

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tal pollution, and focus on the local environmental concerns to secure health and safety of people in the surrounding area.

#### **(4-1) Environmental permits and reporting**

Obtain permits and approvals necessary for business and register, report, assign administrator, etc. based on laws and regulations of the business location.

- For example, the Japanese Waste Management and Public Cleansing Act, Act on the Rational Use of Energy, Air Pollution Control Act, etc. oblige us to assign a certified person responsible
- There is an obligation to assign responsible person for handling poisonous and deleterious substances, specified chemical substances, hazardous substances, etc. depending on the chemical substances in use for the business.
- There is also an obligation to conduct environmental assessment, obtain administrative permits and approvals related to hazardous substances facilities, prepare specified facilities (based on Air Pollution Control Act, etc.), give a regular report of waste generation (based on Waste Management and Public cleaning Act) and energy consumption (based on Act on the rational Use of Energy), etc. depending on the type of business and the facility's location.

#### **(4-2) Reducing energy consumption and greenhouse gas emissions**

Work to improve energy efficiency and reduce energy consumption and greenhouse gas emissions continuously.

- There are many kinds of greenhouse gas and the United Nations Framework Convention on Climate Change designates seven substances (carbon dioxide, methane, dinitrogen monoxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride) as greenhouse gas.
- Set an independent goal for reducing CO2 and other applicable greenhouse gas (including regulatory obligations such as report based on Japanese Act on Promotion of Global Warming Countermeasures) continuously, make a plan, and ensure implementation of the plan.

#### **(4-3) Emissions to atmosphere**

Comply with related laws and regulations and take measures to reduce emission of harmful materials to the atmosphere.

#### **(4-4) Water management**

Comply with laws and regulations, monitor sources, usage, and discharge of water used, and save water. All wastewater should be characterized, monitored, controlled, and treated before discharging or discarding as necessary. It's also necessary to identify the contaminant sources which can cause water pollution and control them accordingly.

#### **(4-5) Effective use of resources and waste control**

Comply with laws and regulations and perform appropriate control to promote reduce, reuse, and recycle, seek to use resources effectively, and minimize the waste generation.

#### **(4-6) Chemical substances management**

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Comply with laws and regulations and identify, show, and manage the chemical substances or the other substances which pose a risk to human body or environment, and make sure to manage them to be handled safely, moved, kept, recycled, or reused, and discarded.

- Laws and regulations: In Japan, Act on the Regulation of Manufacture and Evaluation of Chemical Substances, PRTR (Pollutant Release and Transfer Register), Industrial Safety and Health Act, Fire Service Act, Poisonous and Deleterious Substances Control Act, etc.

#### **(4-7) Control of chemical substances contained in products**

Comply with all laws and regulations applied to the ban or restriction on use of certain materials contained in products and customer request.

- For example, if a customer exports products to EU, the business partner should provide necessary information with the customer based on the EU laws and regulations, such as RoHS Directive, REACH Regulation, etc., which applies to the products that the customer exports.
- Added, mixed, or attached substances in a production process should also be taken account of. (Please refer to “Rigaku Green Procurement Guideline” on the separate sheet as well.)

## **5. Fair Trade/Ethics**

Comply with laws and regulations and also conduct business based on a high sense of ethics.

People working in management positions should set a good example and encourage all employees to conduct business with high ethical standards and gain stakeholders’ trust.

#### **(5-1) Anti-Corruption**

Develop policies which prohibit any bribery, unreasonable gifts and entertainment, corruption, blackmail, and appropriation, and train employees appropriately. Any kind of bribery, corruption, blackmail, appropriation, etc. are strictly prohibited.

#### **(5-2) Ban on improper sharing or receipt of profit**

Any bribery, improper profit sharing with antisocial forces, insider trading, and any other promise, offer, and approval as a way to gain unfair or improper profit should not be provided, condoned, or allowed.

#### **(5-3) Adequate disclosure**

Disclose information about labour, health and safety, environmental activities, business activities, organization, structure, financial condition, and performance based on the applicable laws and regulations and standard practices of the industry. Any falsification of record or false disclosure is not allowed.

#### **(5-4) Respect for intellectual property**

Respect intellectual property and maintain, manage, and preserve its own intellectual property. When technology or know-how is transferred, its own intellectual property should be protected. The intellectual property of third parties such as customers, suppliers, etc. should also be protected.



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- Intellectual property: Information which has property value that is the result of intellectual creativity, including intellectual property right, trade secret, technical know-how, etc.

#### **(5-5) Conducting fair business**

Fair business, competition, and advertisement should be conducted.

- Comply with laws related to fair trade including the Japanese Act against Delay in Payment of Subcontract Proceeds, etc. to Subcontractors. Any illegal activities such as anti-competitive agreements including cartels, unfair trade practices, misleading representations, etc. are strictly prohibited.

#### **(5-6) Protecting informants**

In the event of receiving reports of its own or its supply chain's unethical activity, protect confidentiality and the informants' anonymity in order to prevent retaliation against informants.

#### **(5-7) Responsible mineral procurement**

Establish a policy for responsible mineral procurement and conduct due diligence to check that minerals contained in products from areas of civil war or high risk areas, such as tantalum, tin, tungsten, gold, cobalt, etc. do not cause or contribute to serious infringements of human rights, child labour, environmental damage, corruption, conflicts, etc.

(Please refer also to "Rigaku Responsible Mineral Procurement Policy" on our web site)

## **6. Quality and Safety**

Assure the safety and quality of products and service, and provide accurate information.

#### **(6-1) Safety assurance of products**

Confirm that products meet safety standards specified in each country's laws, and they are designed, produced, and sold with appropriate safety in fulfillment of responsibility as the supplier.

- Each country's law: Electrical Appliances and Materials Safety Act in Japan, Consumer Product Safety Act in Japan, UL standards abroad, etc.
- Assuring the product safety: It's necessary to manage traceability (material/process recording) and ensure that problems are handled quickly, if they occur, to be solved and prevent similar problems.

#### **(6-2) Quality assurance**

Comply with not only all laws and regulations applied to the quality of products and service but also its own quality standards and customers' requirements. The appropriate system or management system for them should also be established.

#### **(6-3) Providing accurate product/service information**

Provide customers or consumers with accurate and non-misleading information about products and service.

- False information or falsified information should not be provided.

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## 7. Information Security

Take measures to prevent the leakage of confidential information or private data and seek to enhance information security.

### (7-1) Preventing cyber attacks

Take defensive measures against threats such as cyber-attacks so as to avoid causing damages to us and others.

- Defensive measures: Establishing the preventive measures against information leakage by cyber-attacks, system disruption, etc., and backup of important data, duplicated server or data center, etc. to recover quickly in case of cyber-attacks.

### (7-2) Protecting private data

Comply with related laws and regulations and manage/protect all private data of suppliers, customers, consumers, employees, etc. appropriately.

- Appropriate management: Establishing and implementing overall management system about private data

### (7-3) Preventing leakage of confidential information

Manage/protect not only its own confidential information but also confidential information received from customers or third parties appropriately.

- Appropriate management: Establishing and implementing an overall management system for confidential information

## 8. Business Continuity Plan

Make necessary preparations to resume productive activities and fulfil responsibilities as a supplier as soon as possible, in case of large-scale natural disasters, etc.

### (8-1) Developing business continuity plan

Identify/assess risks which might disturb business continuity and establish a Business Continuity Plan (BCP) which sets out the potential impact on business, necessary precautions in the medium to long term, and the status of the counter-measures.

- BCP: Business Continuity Plan: The plan prepared in advance to resume productive activities as soon as

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possible to fulfill responsibility of supply, in case that itself or business partners suffer damage (power failure, water outage, traffic disturbance, system failure, etc.) in the event of large-scale natural disasters (earthquake, tsunami, flood, heavy rain, heavy snow, tornado, etc.), accidents (fire, explosion, etc.), diseases such as widespread epidemic/infection, or terrorism or riots.

<Reference> This guideline refers to the following materials.

- RBA Code of Conduct  
[https://www.responsiblebusiness.org/media/docs/RBACodeofConduct7.0\\_Japanese.pdf](https://www.responsiblebusiness.org/media/docs/RBACodeofConduct7.0_Japanese.pdf)
- JEITA “Responsible Business Conduct Guidelines”  
<https://www.jeita.or.jp/cgi-bin/public/detail.cgi?id=769&cateid=1>

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