



# WEEN Supplier Code of Conduct

WEEN Semiconductors ("WEEN") is a company with a strong commitment to social responsibility. We believe as a sustainable company, we need our suppliers to join us in this commitment, based on a shared set of values and principles.

WEEN pursues mutually beneficial relationships with its suppliers and contractors ("Suppliers") and seeks to award business to those Suppliers that are committed to acting fairly and with integrity towards their stakeholders, to observing the applicable rules of law, and to supporting and respecting internationally proclaimed human rights.

WEEN is committed to ensuring that working conditions in WEEN's supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible.

WEEN's Suppliers will commit, in all of their activities, to operate in full compliance with the laws, rules, and regulations of the countries in which they operate. Beyond this, WEEN's Suppliers will comply with the WEEN Supplier Code of Conduct ("Code") using the management systems described in this document.

The WEEN Supplier Code of Conduct is based upon the WEEN Code of Conduct. In some places, the WEEN Supplier Code of Conduct is more detailed than the WEEN Code of Conduct, since other WEEN standards have been added to provide clarity and to incorporate the possibility to assess Supplier's compliance with the Code.

The WEEN Supplier Code of Conduct draws on internationally recognized standards to advance social and environmental responsibility. WEEN may visit (and/or have external monitors visit) Supplier facilities to assess compliance with this Code. Violation of this Code may result in an immediate termination of the relationship with WEEN Supplier. Additionally, any such violation may result in legal action.

The Code uses the structure and contains language from the Electronic Industry Citizenship Coalition® (EICC®) Code of Conduct, version 4.0.

Recognized standards, such as the Universal Declaration of Human Rights (UDHR), standards issued by organizations such as the International Labour Organization (ILO), Social Accountability International (SAI), and the Ethical Trading Initiative (ETI), have been used as references in preparing this Code and may be useful sources of additional information (see Section 7). WEEN extends the Code by maintaining a series of detailed Standards that clarify our expectations for compliance.

The WEEN Supplier Code of Conduct is not intended to create new and additional third party rights, including for employees.

## Standards for Labor and Human Rights

Suppliers are committed to upholding the human rights of workers and to treating them with dignity and respect as understood by the international community. This applies to all workers, including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are as follows:

### **Freely Chosen Employment and Prevention of Involuntary Labor and Human Trafficking**

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Suppliers shall ensure that third-party agencies providing workers are compliant with the provisions of the Code and the laws of the sending and receiving countries, whichever is more stringent in their protection of workers. Suppliers shall ensure that contracts for both direct and contract workers clearly convey the conditions of employment in a language understood by the worker. Where workers are required to pay a fee in connection with obtaining employment, Suppliers shall be responsible for payment of all fees and expenses. Such fees and

expenses include, but are not limited to expenses associated with recruitment, processing, or placement of both direct and contract workers.

### **Child Labor Avoidance**

Child labor is not allowed in any stage of manufacturing. The term “child” refers to any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greater. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers.

### **Working Hours**

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Work weeks are not to exceed the maximum set by local law. Further, a work week shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days. All overtime shall be voluntary.

### **Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. Suppliers shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. Suppliers shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.

### **Humane Treatment**

There is to be no harsh or inhumane treatment of workers including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

### **Non-Discrimination**

Suppliers shall be committed to a workforce free of harassment and discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, or marital

status in hiring or employment practices such as promotions, rewards, or access to training. In addition, workers or potential workers shall not be subjected to medical tests that could be used in a discriminatory way.

### **Freedom of Association and Collective Bargaining**

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labor unions, seek representation, or join workers' councils in accordance with local laws shall be respected. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment.

Supplier shall respect – within the framework of laws, regulations, and prevailing labor relations and employment practices – the right of its employees to be represented by labor unions and other employee organizations. Supplier will engage in negotiations, either on its own behalf or through employers' associations, with a view to reaching agreement on employment conditions.

### **Diversity**

WEEN is committed to diversity in its workforce because we are a global organization, born of a global community, diverse in professional discipline, nationality, gender, race, culture, ethnicity, language, age, religion, and sexual orientation. We seek those differences and seize the opportunities that our great diversity offers in achieving our goals. Suppliers (agents or search companies) engaged by WEEN in recruiting employees for WEEN shall therefore make every effort to present a diverse list of candidates for each position, without regard to race, gender, age, or other factors unrelated to their ability to perform in the position. These Suppliers will document their efforts and provide evidence to WEEN upon WEEN's request.

## Standards for Health and Safety

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, the consistency of production, and worker retention and morale. Suppliers also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are as follows:

### **Occupational Safety**

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) is to be controlled through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tag-out), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Workers shall not be disciplined for raising safety concerns, and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

### **Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimized, by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.

### **Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track, and report occupational injury and illness including provisions to encourage workers to report, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate return of workers to work.

### **Industrial Hygiene**

Suppliers shall identify, evaluate, and control worker exposure to hazardous chemical, biological, and physical agents. Suppliers must eliminate chemical hazards where possible. Where chemical hazards cannot be eliminated, Suppliers shall provide appropriate engineering controls such as closed systems and ventilation. Where appropriate engineering controls are not possible, Suppliers shall establish appropriate administrative controls such as safe work procedures. In

all cases, Suppliers shall provide workers with appropriate, well-maintained, personal protective equipment.

#### **Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks -- including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks -- is to be identified, evaluated, and controlled.

#### **Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

#### **Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. Worker dormitories, provided by the Supplier or a labor agent, are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, together with reasonable personal space as well as reasonable entry and exit privileges.

#### **Health and Safety Communication**

In order to foster a safe work environment, Suppliers shall provide workers with appropriate workplace health and safety information and training, including clearly written health and safety information and warnings, in the primary language of the workers. Suppliers shall post, in the primary language of its workers, Material Safety Data Sheets for any hazardous or toxic substances used in the workplace, and shall properly train workers who will come into contact with such substances in the workplace.

#### **Worker Health and Safety Committees**

Suppliers are encouraged to initiate and support worker health and safety committees to enhance ongoing health and safety education and to encourage worker input regarding health and safety issues in the workplace.

## **Standards for Environment**

Suppliers recognize that environmental responsibility is integral to

producing world-class products. In manufacturing operations, adverse effects on the community, the environment, and natural resources are to be minimized while safeguarding the health and safety of the public.

The environmental standards are as follows:

#### **Environmental Permits and Reporting**

All required environmental permits, approvals, and registrations are to be obtained, maintained, and kept current, and their operational and reporting requirements are to be followed.

#### **Pollution Prevention and Resource Reduction**

Suppliers must endeavor to reduce or eliminate solid waste, wastewater, and air emissions -- including energy-related indirect air emissions -- by implementing appropriate conservation measures in their production, maintenance, and facilities processes, and by recycling, reusing, or substituting materials.

#### **Hazardous Substances**

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

#### **Wastewater and Solid Waste**

Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities are to be characterized, monitored, controlled, and treated as required by applicable laws and regulations prior to discharge or disposal. Suppliers shall take appropriate precautions to prevent contamination of storm water runoff from their facilities.

#### **Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations are to be characterized, monitored, controlled, and treated as required by applicable laws and regulations prior to discharge.

#### **Product Content Restrictions**

Suppliers shall comply with any applicable law or regulation prohibiting or restricting the use or handling of specific substances. To ensure safe handling, movement, storage, recycling, reuse, and disposal, Suppliers shall identify and manage substances that pose a hazard if released to the environment and shall comply with applicable labeling laws and regulations for recycling.

Additionally, Suppliers engaged in the manufacturing of materials that will be part of WEEN's end products and Suppliers engaged in the

manufacturing of WEEN branded-products shall comply with the most recent version of WEEN's List of Hazardous Substances in Products and Packaging (NX3-00119). Upon WEEN's request, the Supplier shall provide WEEN with full material content information using the WEEN Material Declaration Form (NX5-00071) and/or Material Safety Data Sheets.

WEEN requires Suppliers of product related materials to provide evidence of compliance with the European Union's Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS) at least once a year. Evidence is required in the form of test reports. These tests shall be executed according to the IEC62321 standard and performed by a third-party laboratory certified to ISO/IEC 17025. For selected material groups, additional evidence may be required, such as halogen content to show compliance with the WEEN "Dark Green" requirements or the EU packaging and packaging waste directive.

#### **Certification**

Suppliers engaged in the manufacture of materials that will be part of WEEN's end products and Suppliers engaged in the manufacture of WEEN-branded products shall have ISO14001 certification (or comparable), or a plan to become certified. Alternatively, Supplier must provide documented objective evidence of an operational environmental management system and demonstrate equivalency.

## **Standards for Business Ethics**

Suppliers must be committed to the highest standards of ethical conduct when dealing with workers, suppliers, and customers.

#### **Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a "zero tolerance" policy to prohibit any and all forms of bribery, corruption, extortion, or embezzlement (including promising, offering, giving, or accepting any bribes). All business dealings shall be transparently performed and accurately reflected in Supplier's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

#### **No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.



**Disclosure of Information**

Information regarding business activities, structure, financial situation, or performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.

**Intellectual Property**

Intellectual property rights are to be respected, and the transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

**Fair Business, Advertising and Competition**

Standards of fair business, advertising, and competition are to be upheld. Appropriate means to safeguard customer information must be available.

**Protection of Identity**

Programs that ensure the confidentiality and protection of supplier and employee will be maintained.

**Responsible Sourcing of Minerals, Conflict Minerals**

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold (3TG minerals) in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of Congo or an adjoining country. Suppliers shall exercise due-diligence on the source and chain of custody of these minerals and shall make their due diligence measures available to WEEN upon WEEN's request.

**Privacy**

Suppliers are committed to protecting the reasonable privacy expectations for personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, or shared.

**Whistleblower Protection and Anonymous Complaints**

Suppliers shall create programs to ensure the protection of Supplier and worker whistleblower confidentiality and shall prohibit retaliation against workers who participate in such programs in good faith or refuse an order that is in violation of the WEEN Supplier Code of Conduct. Suppliers shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local

laws and regulations. Supplier shall have a formal communication program to ensure that every employee is fully informed of and understands the policy of non-retaliation.

## Standards for Management System

Suppliers shall adopt or establish a management system that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations, and customer requirements related to the Supplier's operations and products; (b) conformance to this Code; and (c) identification and mitigation of operational risks related to this Code. It shall also facilitate continual improvement.

The management system shall contain the following elements:

### **Company Commitment**

Suppliers shall have corporate social and environmental responsibility policy statements, affirming Supplier's commitment to compliance and continual improvement, and endorsed by executive management.

### **Management Accountability and Responsibility**

Supplier shall clearly identify company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

### **Legal and Customer Requirements**

Suppliers shall have a process to identify, monitor, and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

### **Risk Assessment and Risk Management**

Suppliers shall have a process to identify the environmental, health and safety, and labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

### **Improvement Objectives**

Suppliers shall have written performance objectives, targets, and implementation plans to improve the Supplier's social and

environmental performance, including a periodic assessment of Supplier's performance in achieving those objectives.

**Training**

Suppliers shall have programs for training managers and workers to implement Supplier's policies, procedures, and improvement objectives, and to meet applicable legal and regulatory requirements.

**Communication**

Suppliers shall have a process for communicating clear and accurate information about Supplier's policies, practices, expectations, and performance to workers, suppliers, and customers.

**Worker Feedback and Participation**

Supplier shall have ongoing processes to assess employees' understanding of and to obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

**Audits and Assessments**

Suppliers shall perform periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements relating to social and environmental responsibility.

**Corrective Action Process**

Suppliers shall have a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

**Documentation and Records**

Suppliers shall have and maintain documents and records to ensure regulatory compliance with and conformity to its requirements along with appropriate confidentiality to protect privacy.

**Supplier Responsibility**

Suppliers shall have a process to communicate WEEN Supplier Code of Conduct (or comparable) requirements to their own, next-tier suppliers and to monitor supplier compliance to the requirements.

## References

The following standards have been used in preparing this Code and may be useful sources of additional information.

Dodd-Frank Wall Street Reform and Consumer Protection Act

<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>

Eco Management & Audit System

[www.quality.co.uk/emas.htm](http://www.quality.co.uk/emas.htm)

EICC and GeSI Extractives and Conflict Minerals Resources

[www.eicc.info/Extractives.shtml](http://www.eicc.info/Extractives.shtml)

Electronic Industry Citizenship Coalition Code of Conduct

[www.eicc.info/eicc\\_code.shtml](http://www.eicc.info/eicc_code.shtml)

Ethical Trading Initiative

[www.ethicaltrade.org/](http://www.ethicaltrade.org/)

ILO Code of Practice in Safety and Health

[www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf](http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf)

ILO International Labor Standards

[www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm](http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm)

ISO 14001

[www.iso.org](http://www.iso.org)

National Fire Protection Agency

[www.nfpa.org/catalog/home/AboutNFPA/index.asp](http://www.nfpa.org/catalog/home/AboutNFPA/index.asp)

OECD Due Diligence Guidance

[http://www.oecd.org/document/36/0,3746,en\\_2649\\_34889\\_443079\\_40\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/36/0,3746,en_2649_34889_443079_40_1_1_1_1,00.html)

OECD Guidelines for Multinational Enterprises

[www.oecd.org](http://www.oecd.org)

OHSAS 18001

[www.bsi-global.com/index.xalter](http://www.bsi-global.com/index.xalter)

SA 8000

[www.cepaa.org](http://www.cepaa.org)

SAI

[www.sa-intl.org](http://www.sa-intl.org)

Universal Declaration of Human Rights

[www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)

United Nations Convention Against Corruption

[www.unodc.org/unodc/en/crime\\_convention\\_corruption.html](http://www.unodc.org/unodc/en/crime_convention_corruption.html)

United Nations Global Compact

[www.unglobalcompact.org](http://www.unglobalcompact.org)

UN Norms on the Responsibilities of Transnational Corporations and  
Other Business Enterprises with Regard to Human Rights

[www.ohchr.org](http://www.ohchr.org)