

YKK EMEA Group / PARTNERS' CODE OF CONDUCT

YKK EMEA Group (hereinafter “YKK”) has always been committed to developing its activities in accordance with the highest ethical and governance standards, and the principles of corporate sustainability.

The YKK EMEA Group Partners' Code of Conduct (hereinafter “Code of Conduct”) defines the ethical and governance principles required by YKK of its partners and specifies YKK's expectations toward its partners: manufacturers, sub-contractors, suppliers, and distributors (hereinafter together referred to as “Partners”), on ethical, social, environmental and governance grounds.

YKK expects from its Partners respect for / compliance with the principles listed in this Code of Conduct.

YKK PHILOSOPHY CYCLE OF GOODNESS

“No one prospers without rendering benefit to others.”

An enterprise is an important member of society, and as such, it must coexist with other elements of society. Its value will be recognized by the benefits it shares with society.

Tadao Yoshida, YKK's founder, carefully considered this need for mutual prosperity as he planned his business endeavors. He determined that contributions to society could best be achieved by the continual creation of value through innovative ideas and inventions. The resulting business expansion would bring prosperity to consumers and trading partners, thus benefiting all society.

For example, if a more efficient machine can be developed, productivity will be enhanced; or, if the material loss rate can be reduced, lower cost in the final product will be attained while making the best use of limited resources.

Also, Tadao Yoshida felt strongly that the fruits of these innovative ideas must not be retained by any individual. Instead, they should be distributed widely to society, thereby circulating the benefits. In this way, one can prosper while making a contribution to the enrichment of all humankind. Tadao Yoshida called this the *Cycle of Goodness*, and he made this idea his fundamental philosophy of business. We retain this concept as the ongoing business philosophy of YKK.

■ **YKK MANAGEMENT PRINCIPLE**

“YKK seeks corporate value of higher significance.”



Seeking corporate value of higher significance,
YKK will pursue innovative quality in the **seven** areas above.

In order to maintain our employees', our customers' and society's trust, YKK Group will continue to enhance the value of our products, technology and management. To make decisions in our business and management activities, we rely on fairness as our guide.

YKK EMEA Group / PARTNERS' CODE OF CONDUCT

I. Compliance with Laws and Regulations

Partners must take whatever steps are necessary to fully comply with all laws and regulations that apply to conducting business activities.

Partners must comply with any and all contracts to be made and entered into between the Partner and YKK.

Partners must take necessary measures to prevent fraudulent actions, and develop a system for discovering such fraudulent actions early and taking necessary measures against them.

II. Company Property including Confidential Information

Partners must, in an ethical and efficient matter, utilise and protect their own assets and information, as well as YKK's confidential information.

Partners must not infringe any and all intellectual property rights of others.

Partners must construct a defense system against dangers on computer networks, and adequately operate the system not to cause damage to third parties and YKK.

Partners must construct a management system for personal information and confidential information, and adequately operate the system to prevent such information from being disclosed improperly.

III. Privacy and Employee Confidentiality

Partners pledge to comply with data protection obligations. Access to personal data is strictly limited to authorised employees who have a business reason for processing the data. Those with access to personal data must only use it for the purpose for which it was collected and must adhere to high standards of confidentiality. Personal data must be accurate and kept up to date. YKK uses accounting and administration systems hosted on systems outside of the EEA. Partners agree that permission has been obtained for any personal information provided to or held by YKK to be stored, controlled and processed on these systems for purposes related to YKK Group's business relationships with partners.

IV. Harmony with the Environment and Sustainability

Striving to be environmentally friendly, Partners pledge that they will address and promote harmony with the environment, strives to develop and sell products intended to maintain a sustainable use of resources, as the highest priority of their business activities and continuously endeavour to effectively use resources and energy with the aim of reducing waste and emissions harmful to the environment. Partners acknowledge the significance of environmental activities and the high priority in

which they are regarded within our business activities. Partners must comply with applicable environmental laws and regulations, including with respect to:

- waste disposal;
- storage and marking of hazardous materials;
- implement circular economy principles in accordance with applicable EU regulation throughout Partners' product lifecycle, from design to end-of-life management and recyclability;
- set science-based targets for reducing greenhouse gas emissions in line with the Paris Climate Agreement goals;
- conduct lifecycle assessments of their products to identify and mitigate environmental impacts of Partners' products across the supply chain (value chain);
- implement water stewardship practices, including water efficiency measures and responsible wastewater management;
- conduct comprehensive environmental due diligence, including regular environmental impact assessments, and to implementing measures to prevent, mitigate and remediate any adverse environmental impacts resulting from their operations.
- adhere to applicable regulations on deforestation, to prevent products linked to forest degradation from entering commercial markets.

V. Health and Safety

Partners pledge that they will make the utmost effort to remove any items or practices in the workplace, which are harmful or dangerous, and to maintain and increase the physical and mental well-being of all employees. They pledge to use their best efforts to accomplish these goals. They must comply with all applicable laws related to health and safety.

Partners must install firefighting equipment in workplaces and secure escape routes.

Partners must implement thorough fire and disaster prevention measures, always giving first priority to human life.

Partners must provide their employees with adequate lighting, temperature control and ventilation in workplaces, and prevent noise therein.

Partners must provide free for their employees with equipment for securing their safety and health of their employees in workplaces, and work to prevent the occurrence of workplace accidents.

Partners who supply chemicals and dyes will sign health and safety declarations confirming that formulations supplied to the facility are compliant with the relevant buyers' or YKK's own Restricted Substances Lists or equivalent.

VI. Products

Partners highly value the trust that YKK has placed in their business, and pledge to continue providing products and services with the highest commitment to quality. They must comply with all applicable laws related to product safety.

Partners must provide customers (including YKK) and consumers with accurate information relating to their products and services.

Where relevant, Partners warrant to YKK that the products they deliver to YKK, to the best of their knowledge and understanding, do not contain any minerals produced in conflict zones (meaning minerals mined in conditions of armed conflict and human rights abuses, for example tin ore, tungsten ore or gold from ongoing conflict zones such as in Democratic Republic of Congo).

Partners commit to transparency in their supply chains (value chains), including the sourcing of raw materials, and will conduct supply chain due diligence to ensure responsible and sustainable sourcing practices and environmental, social and governance – ESG practices, as well as complying with all applicable trade control regulations.

Where relevant, Partners must develop a clear system for controlling export of technologies and articles regulated by laws and regulations, and carry out adequate export procedures.

Partners commit to eco-design principles in accordance with applicable EU regulation in product development, ensuring that products are designed for energy efficiency, resource conservation and minimal environmental impact throughout their lifecycle.

Partners will provide clear and standardised product information to YKK, including energy labels where applicable, to enable informed decision-making on environmental performance.

Partners will implement measures to reduce packaging waste, including the use of recyclable or compostable materials and minimise single-use plastics in packaging.

Partners commit to extending the lifespan of products through design for reparability, availability of spare parts and provision of repair information.

Partners will establish systems for the collection, sorting and recycling of their products at end-of-life, as applicable and in compliance with relevant EU waste management regulation.

Where relevant, Partners will comply with substance restrictions and information requirements under the EU's Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation and other applicable chemical regulations.

VII. Human Rights and Employee Rights

Partners respect the human rights, individuality and the personality of all individuals including Partners' employees, suppliers' employees and customers' (including YKK's employees) in all their operations, in every country and region in which their operations reside.

Partners must take whatever steps are necessary to eliminate any sort of violence, or other forms of intimidation in the workplace.

Partners will respect the rights of employees to associate, organise and bargain collectively in accordance with local laws.

Employment of all persons must be voluntary and the use of any forced or involuntary labour or slavery is prohibited.

Employees will be paid at least the minimum wage set by local laws or regulations.

Partners must pay their employees increased wages at the rates specified in applicable laws and regulations for their work exceeding the statutory working hours. Partners must not cause their employees in principle to work in excess of maximum working hours if specified by applicable laws and regulations, and Partners must provide their employees with at least one day off for every seven days.

Child labour is prohibited. Partners will comply with all local laws and regulations with regards to minimum working age and maximum working hours. If, despite all diligence in complying with law and regulation by the Partner, any underage worker is nevertheless discovered to be working directly or indirectly for the Partner in supply of services to YKK for whatever reason, the Partner will immediately upon discovery implement remedial action by ceasing further work by such underage worker, and assisting in remedying the underage worker's circumstances by referring the matter to local governmental social or child services for support and care.

Partners must conduct comprehensive social and governance due diligence to identify actual and potential adverse impacts on human rights throughout their supply chain (value chain) and Partners should implement measures to prevent, mitigate and remediate any actual or potential adverse impacts on human rights they identify throughout their supply chain (value chain).

Partners commit to providing safe and healthy working conditions, including adequate occupational health and safety measures, and to continuously improving these conditions.

Partners commit to implementing transparent and fair remuneration policies, including measures to address pay inequalities.

VIII. Relationship with Business Partners and Government Agencies

Partners will take whatever steps are necessary to ensure they conduct business transactions in a fair and equitable manner. Partners must take whatever steps are necessary to fully comply with all applicable competition laws which apply to all their business activities, in order to continue to maintain fair and equitable dealings in the marketplace.

Partners will require their suppliers to comply with the principles contained in the Code of Conduct.

Partners will take whatever steps are necessary to undertake lawful and appropriate conduct and continue to develop fair and good faith relationships with all relevant government agencies.

Partners will not engage in the giving or receiving of bribes or other illicit payments or improper benefits intended to achieve a business or personal advantage or a financial gain and will avoid any actual or apparent conflicts of interests.

Partners and their affiliates must not be current YKK employees or family members thereof. Where there are any such relationships, prior written approval from the Board of Directors of YKK's EMEA Group head-quarters entity is required before a Partner may engage commercially with any YKK EMEA Group entity. Partners must avoid all actual or potential conflicts of interest and will not use their business relationship with YKK for fraudulent or otherwise unlawful personal gain. Partners must promptly disclose to YKK any circumstances (including conflicts of interest) that could compromise fair business decisions.

Partners will establish and maintain effective mechanisms at the operational level for individuals and communities who may be adversely impacted by their operations to be able to report grievances and have them resolved. These mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and aim to effectively and fairly resolve any grievances that are reported.

IX. Workplace Dignity and Respect

Partners acknowledge that bringing together and supporting employees from different backgrounds, perspectives and cultures helps create a dynamic business. Partners pledge to provide equal opportunities for all their current and former employees and job applicants who will receive fair treatment regardless of age, race, religion or belief, colour, nationality, ethnic or national origin, sex, marital status or disability. Partners will work to ensure that all relationships in the workplace are free from discrimination, bias and harassment.

Employment agency Partners must:

- hold and maintain valid and current licences in accordance with local law to provide employment agency services in the supply of agency workers for working for YKK and will supply copies to YKK on demand;
- not supply agency workers to a YKK facility unless or until an employment agency contract is signed between the facility and the employment agency Partner;
- not charge agency workers fees or require agency workers to make any other cost outlay (e.g. purchase of their own safety equipment) as a condition of being placed as an agency worker with YKK.

YKK commits to providing agency workers with levels of labour protection, wages, training and opportunities equal to direct employees of YKK and employment agency Partners must commit to achieving this.

X. Audits

Partners agree to always cooperate with YKK or their representatives' access to all places of business and all records and personal documentation at all times, with or without notice, to ensure compliance with these standards. Sufficient documentation to allow YKK to monitor compliance will also be maintained.

Partners understand that should they be found not to be complying with these principles, YKK itself may be in jeopardy of losing its customers and therefore YKK may terminate any contracts that are currently in place and will compensate YKK for any loss or damages this may cause.

XI. Anti- Corruption and Bribery Policy

Partners commit to complying with the core principles of applicable Anti-bribery laws which include but are not limited to: prohibiting the offering, promising, giving, or accepting of any form of bribe, strictly adhering to all applicable anti-bribery and anti-corruption laws; maintaining accurate financial records; and promptly reporting any suspected bribery activities. Partners will procure that all Partner employees or contractors supplying services to YKK will be made aware of these core principles and their obligation to comply with them. Partners will promptly submit responses to YKK's due diligence questionnaires submitted by YKK to the Partner for the purposes of YKK creating an external audit report verifying Partner's compliance with this provision and the core principles of applicable Anti-bribery laws. Partners will also, where requested by YKK, submit to a due diligence audit by YKK or its authorised representatives of the Partner's operations, premises, suppliers, accounts and records, practices and procedures upon reasonable notice.

XII. Criminal Organisations, Anti-Money Laundering Compliance

YKK has a zero tolerance to crime and criminal enterprises, crime syndicates, and other criminal organizations, and are committed to preventing crime and ensuring that such criminal organisations are not able to form relationships with any part of

YKK. Partners warrant to YKK that they do not have any relationship whatsoever with any such criminal organisations and must commit to the same zero tolerance toward crime and organised crime as YKK.

Partners must comply with all applicable anti-money laundering laws and regulations. Partners must take necessary measures, including supply chain due diligence, transaction monitoring and reporting of suspicious activities, to ensure their business is not used for money laundering or terrorist financing.

Additionally, partners must ensure compliance with any other applicable regulations and laws, which aim to prevent the facilitation of tax evasion and other financial crimes. Partners are required to implement robust procedures to prevent any form of tax evasion facilitation within their operations and supply chains (value chains).

XIII. Subcontractors

Partners commit to YKK that they will procure that their relevant suppliers and subcontractors comply with this Partners' Code of Conduct.

XIV. Reporting Violations or Concerns

Partners commit to contacting the procurement department of the YKK subsidiary with which they are associated if they identify any actions or concerns that may violate this Code of Conduct and applicable laws. Contact :

TO [YKK ***]

E-mail: [YOC representative email address]

In certain situations, if the partner believes it is more appropriate to contact the regional YKK headquarters' Procurement and Logistics Group, they may do so. The contact details for the Procurement and Logistics Group are as follows:

TO YKK Europe Limited

Email: emeacompliance.yeu@ykk.com

Fraud and Human Rights Violation Reporting

Partners can also report concerns regarding fraud or human rights violations to YKK via this link: https://ml.helpline.jp/ykkjapan-partner/index_en.html.

Receipt and acknowledgement

On behalf of our company, subsidiaries, and affiliated entities (where applicable), we hereby acknowledge receipt of the YKK EMEA Group Partners' Code of Conduct (COC) Version 2024. We confirm receipt of the COC and confirm that we have read and understood the contents and undertake to fully comply with all provisions of the Code.

Company Name:

Signature:

Date: