

## **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 standards.

The YKK EMEA Group Partners' Code of Conduct (hereinafter "Code of Conduct") defines the ethical principles and specifies YKK's expectations toward its partners: manufacturers, sub-contractors, suppliers, and distributors (hereinafter together referred to as "Partners"), on ethical, social and environmental 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 unless he renders 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 following **seven** areas

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.

## **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).

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.

## **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.

## **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.

## **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 YKK EMEA Anti-bribery Policy which will be supplied to each Partner on engagement and Partners will procure that all Partner employees or contractors supplying services to YKK will be made aware of the YKK EMEA Anti-bribery Policy and their obligation to comply with it. 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 YKK EMEA Anti-bribery Policy. 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**

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.

## **XIII. Subcontractors**

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

Contact :

TO **YKK \*\*\***

[E-mail: YOC representative email address]

## Receipt and acknowledgement

We confirm receipt of the YKK EMEA Group PARTNERS' CODE OF CONDUCT 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: .....