**Daeduck Electronics**

**Code of Conduct**

**Ver.1.0**

**Daeduck Electronics’ Principles**

The Code of Conduct of Daeduck Electronics Co., Ltd. (hereinafter referred to as the “Code”) was enacted to establish a safe working environment and create a corporate culture that respects executives and employees at all domestic and overseas business sites of Daeduck Electronics and its partners involved in the production of Daeduck Electronics’ products.

Daeduck Electronics Co., Ltd. respects all labor rights of all executives and employees, enhances the safety and health system at its workplaces, and recognizes its responsibility to protect the environment in the production process. In addition, we will pursue compliance with the highest ethical standards in our business operations and continuously develop our management system for this purpose.

**What is your company doing to make the world a better place?**

**Silence or evasion isn’t an option either.**

(Mark Fenwick, Tronel Joubert, Sanita Van Wyk and Erik P. M. Vermeulen)

**Preface**

This Code is enacted on the premise that all executives and employees in the workplace have the right to pursue happiness with dignity and value as human beings. Therefore, Daeduck Electronics Co., Ltd. will comply with relevant laws and international standards with the goal of building a sustainable supply chain with its partners.

The text specifies the items that the workplace must comply with. Each workplace must implement specified items and the implementation and improvements must be documented. This Code is based on the RBA Code of Conduct. In addition, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the Ten Principles of UN Global Compact, and the international standards established by the International Labor Organization (ILO) may be used as references, and this Code may be revised in accordance with changes to the RBA Code of Conduct and other international standards.

The detailed standards for implementing this Code follow the Daeduck Electronics’ Code of Conduct Guide. This Code comprises of six areas; specifically, it provides the standards for A. Labor Rights, B. Safety and Health, C. Environment, and D. Ethical Management, and E. Management System stipulates the matters necessary to comply with the above. Daeduck Electronics Co., Ltd. (and/or external audit organization) may request a visit to a partner to evaluate compliance with this Code and may request an improvement plan and results based on the evaluation.

**Code of Conduct**

**A. LABOR**

1. Voluntary Work 2. Protection of Underage Workers

3. Working Hours 4. Wages and Benefits 5. Humane Treatment

6. Non-Discrimination and Non-Harassment 7. Freedom of Association



A.1 Voluntary Work

□ **All work must be done voluntarily and not under coercion.**

Workplaces must not employ forced labor, indentured labor (including labor for repayment of debt), involuntary labor (prison labor), slavery, or human trafficking. This includes all acts of transporting, recruiting or transferring socially disadvantaged persons by means of threat, force, coercion, abduction, or fraud for labor. Workers should be free to transfer or leave at any time without penalty, provided that they give reasonable notice in accordance with the contract. There shall be no unreasonable restrictions on workers’ freedom of movement in the workspace in addition to unreasonable restrictions on entering or exiting company-provided facilities, including workers’ quarters or accommodations. Workers must be provided with a written employment contract in a language they understand that contains a description of the terms and conditions of employment. In addition, such employment contracts shall be provided to the foreign workers before they arrive in the country. Unless required by law or to provide a better condition than the existing one, the details of the employment contract of foreign workers may not be amended. The employer and its agent (including the employment agency) may not hold or otherwise destroy, conceal, or confiscate workers’ identity or immigration documents, such as government-issued identification, passports, or work permits unless it is required by law for the employers to hold them. If the employer or its agent is holding such documents on the workers’ behalf, access to such documents shall not be denied. The employer or its agent may not require the workers to pay recruitment fees or other related fees for their employment and, if any such fees are found to have been paid by workers, such fees shall be repaid to the workers.

A.2 Protection of Underage Workers

□ **Child labor is strictly prohibited at all stages of manufacturing**

‘A ‘child’ refers to a person who is under the greatest of ① the age of 15, ② the age of completion of compulsory education, or ③ the legal minimum age for employment. Workplaces shall employ an adequate mechanism for ascertaining the age of workers during the recruitment process. Where a case of child labor is spotted, the workplaces should take corrective and supportive measures. They may attend legal programs for training purposes in the workplace. Youth workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. The workplaces shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable laws and regulations, and provide appropriate support and training to all student workers.

A.3 Working Hours

□ **Workplaces shall not violate the requirements of the Labor Framework Act regarding the working hours**

Working hours per week may not exceed 52 hours or legal working hours, including extended working hours, except in emergency or special situations. In addition, workplaces must guarantee the worker at least one day off every seven days. Workplaces shall follow all applicable laws and regulations with respect to working hours and holidays, and all overtime must be voluntary.

A.4 Wages and Benefits

□ **Workplaces comply with all applicable wage laws, including the minimum wage paid to the workers as the consideration for their work, overtime compensation, and statutory benefits.**

Workplaces must pay the minimum wage, overtime compensation, and statutory allowances in accordance with applicable laws and must provide overtime compensation that is higher than the hourly wage applied to regular working hours. Wage statements must be provided to workers promptly, in a language that is easy for them to understand, prior to the signing of their employment contracts and each time they are paid during their employment. No salary deductions as a disciplinary measure are permitted. All uses of temporary, dispatch and outsourced labor shall be within the limits of the relevant law.

A.5 Humane Treatment

□ **There is no sexual harassment, corporal punishment, mental or physical coercion, verbal abuse, mistreatment, or intimidation in the Company.**

There must be no harsh and inhumane treatment of workers, including violence, sexual violence, sexual harassment or abuse, corporal punishment, mental or physical coercion, harassment, public humiliation, or verbal abuse, and no threat of such treatment. Workplaces must clearly define the disciplinary policies and procedures for inhumane actions and communicate to workers these policies and procedures to ensure the humane treatment of workers.

A.6 Non-Discrimination and Non-Harassment

□ **Workplaces should take action to ensure that workers are not subject to harassment or unlawful discrimination.**

Workplaces shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, military service, genetic information, or marital status in hiring and employment services, such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable facilities for religious practices. In addition, workers or candidates shall not be subjected to medical tests, including pregnancy tests, that could be used in a discriminatory way unless required by relevant laws and regulations or for purposes other than safety.

A.7 Freedom of Association

□ **All workers are guaranteed the right to form and join labor unions by free choice.**

The Company must respect the right of workers, in accordance with relevant laws and at their choice, to organize and join labor unions and to associate freely with other workers for collective bargaining and peaceful assembly and demonstration, as well as their right not to join such activities. Workers and/or their representatives should be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

**B. HEATH AND SAFETY**

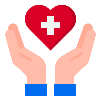
1. Occupational Safety 2. Emergency Preparedness

3. Prevention of Occupational Accidents and Diseases

4. Industrial Hygiene 5. Physically Demanding Work

6. Machine Safeguarding 7. Sanitation, and Housing

8. Health and Safety Communication



B.1 Occupational Safety

□ **Workplaces shall prevent workers from being exposed to potential safety hazards (chemicals, electric shock, fire, vehicles, fall hazards, etc.).**

Potential health and safety risks to worker safety (e.g., chemicals, electricity, and other energy sources, fires/explosions, vehicles, and falls) shall be controlled through proper design, engineering and administrative controls, preventive maintenance, safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. If they cannot be adequately controlled through these measures, workers shall be provided with appropriate personal protective equipment. In addition, pregnant and lactating women must not be placed in hazardous work environments, hazards to their health and safety must be eradicated or reduced, and reasonable accommodations shall be provided. Furthermore, workers shall be free to raise concerns about safety issues with management.

B.2 Emergency Preparedness

□ **Workplaces shall proactively identify and assess potential emergencies and accidents.**

Workplaces shall identify and assess potential emergencies and accidents and minimize their impact by implementing emergency plans and response procedures, which include emergency reporting, communication to workers, evacuation procedures, and worker education and training. Emergency drills shall be conducted annually or in accordance with applicable laws, whichever is more stringent. Emergency plans shall focus on minimizing damages to people, the environment, and property and should include appropriate fire detection and suppression equipment, adequate unobstructed emergency exits, contact information for the emergency response manager, and recovery plans.

B.3 Prevention of Occupational Accidents and Diseases

□ **Workplaces shall have a system for workers’ occupational accidents and diseases.**

Workplaces shall have in place procedures and systems to prevent, manage, trace, and report occupational accidents and diseases, including encouraging workers to report, classify, and record injury and illness cases, providing necessary medical treatment, investigating cases, and taking corrective actions to eliminate causes, and enabling the return to work.

B.4 Industrial Hygiene (Reduction of Exposure to Hazards)

□ **Workplaces shall systematically manage worker exposure to chemical, biological, and physical agents.**

Workers’ exposure to chemical, biological, and physical agents shall be identified, assessed, and controlled. Where potential hazards are identified, they shall be managed through appropriate design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers must be provided with and use appropriate and well-maintained personal protective equipment. The protection program includes training materials associated with these hazards.

B.5 Physically Demanding Work

□ **Workers’ exposure to the hazards of physically demanding work tasks shall be effectively controlled.**

Workplaces shall identify, assess, and control tasks that place excessive physical demands on workers, such as manual labor, heavy lifting, and heavily repetitive or strenuous assembly tasks.

B.6 Machine Safeguarding

□ **Workplaces shall place an appropriate and effective machine guarding program and workers shall operate the machinery safely.**Workplaces shall conduct safety hazard evaluations on their production facilities and other machinery. Where machinery presents an injury hazard to workers, physical protection, safeguards, and barriers shall be provided and properly maintained.

B.7 Sanitation, and Housing

□ **Food and housing -related spaces provided to workers must be safe and clean.**

Workplaces shall provide clean toilet facilities, drinking water, sanitary food preparation and storage facilities, and a place to eat to workers. Worker dormitories shall be clean and safe and provided with adequate emergency exits, hot water, adequate lighting, heating, ventilation, individual storage facilities for belongings and valuables, and reasonably seized private spaces with access controls.

B.8 Health and Safety Communication

□ **Workplaces shall share information related to health and safety with workers and provide them with adequate training.**

Workplaces shall provide workers with health and safety training in a language the workers can understand about the hazards of their work, including mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in a location identifiable and accessible by workers. Training shall be provided regularly to all workers prior to the beginning of work and regularly thereafter. In addition, workplaces shall encourage workers to freely raise concerns and opinions about health and safety.

**C. ENVIRONMENT**

1. Acquisition of Environmental Permits 2. Pollution Prevention and Resource Reduction   
3. Hazardous Substance Management 4. Solid Waste 5. Air Pollutant Emissions

6. Compliance with Substance Regulation in Products

7. Water Management 8. Energy Consumption and Greenhouse Gas Emissions



C.1 Acquisition of Environmental Permits

□ **Workplaces shall keep all environmental permits required for the business operations up to date.**

Workplaces shall acquire and maintain all required environmental permits, approvals, and registrations and comply with operational and reporting requirements for the permit process.

C.2 Pollution Prevention and Resource Reduction

□ **Workplaces shall minimize or eliminate pollutant emissions and waste generation.**

Workplaces shall do their best to minimize or eliminate emissions, pollutant discharges, and waste generations at source through changes in production, maintenance, and processes or otherwise. Workplaces shall apply production, maintenance, facility management, use of alternatives, reuse, conservation, recycling, or other available means with respect to the conservation and use of natural resources such as water, fossil fuels, minerals, and wood.

C.3 Hazardous Substance Management

□ **Hazardous waste shall be disposed of through a licensed contractor.**

Workplaces shall identify chemicals, waste, and other materials posing a hazard to humans or the environment and label and manage them for safe handling, movement, storage, use, recycling or reuse, and disposal.

C.4 Solid Waste

□ **Solid waste shall be systematically managed with the goal of reducing solid waste generation.**

Workplaces shall identify and manage solid waste to reduce waste generation and systematically manage them to ensure responsible disposal or recycling.

C.5 Air Pollutant Emissions

□ **Workplaces shall monitor the emission of air pollution-related substances at all times and discharge them legally.**

Workplaces shall determine, regularly monitor, treat, and dispose of volatile organic compounds, aerosols, corrosives, dust (fine particulate matters), ozone depleting substances, and combustion byproducts in accordance with applicable regulations. Ozone depleting substances shall be managed per the Montreal Protocol and applicable laws and regulations. In addition, air emission control systems shall be regularly monitored to ensure their operation.

C.6 Compliance with Substance Regulation in Products

□ **Workplaces shall eliminate and improve harmful substances in products, parts, and raw materials and establish an environmental quality management system.**

Workplaces shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

C.7 Water Management

□ **Workplaces shall systematically prevent pollutants from illegal discharges and chemical leaks from entering stormwater pipes.**

Workplaces shall implement a water management program that documents, characterizes, and monitors water sources, use, and discharge, seeks opportunities to conserve water, and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as per applicable regulations prior to discharge or disposal. Workplaces shall conduct regular monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

C.8 Energy Consumption and Greenhouse Gas Emissions

□ **The Company, business units, and partners (supply network) shall establish energy consumption and greenhouse gas reduction targets and operate policies to reduce them.**

Workplaces shall establish company-wide greenhouse gas reduction targets. In addition, they shall trace, document, and publicly report their energy consumption and greenhouse gas reduction targets. They shall also look for methods to improve energy efficiency and minimize energy consumption and greenhouse gas emissions.

**D. ETHICS**

1. Business Integrity 2. Prohibition of Improper Advantage

3. Disclosure of Information 4. Protection of Intellectual Property

5. Fair Trade, Advertising, and Competition

6. Identity Protection and Non-Retaliation

7. Management of Supply Chain for Controlled Substances 8. Privacy



D.1 Business Integrity

□ **Workplaces shall uphold the highest standards of integrity in all business activities.**

Workplaces have a zero-tolerance policy against all forms of bribery, corrupt behavior, unjust enrichment, and embezzlement. All transactions must be transparent and accurately reflected in the business records. In addition, workplaces shall implement monitoring and implementation procedures to ensure compliance with anti-corruption laws and regulations.

D.2 Prohibition of Improper Advantage

□ **No one shall offer or receive bribes or any other consideration for improper and unfair advantage.**

No one shall promise, offer, authorize, give, or receive bribes or any other means to obtain an unfair or improper advantage. This includes promising, offering, authorizing, giving, or receiving anything of value, directly or indirectly, through a third party to obtain or retain business. In addition, the workplace shall also implement monitoring, recordkeeping, and enforcement procedures to ensure compliance with anti-corruption laws.

D.3 Disclosure of Information

□ **Falsification or misrepresentation of records will not be tolerated, and falsification or misrepresentation of information subject to disclosure will not be tolerated.**

All transactions related to business shall be conducted transparently and recorded accurately. Workplaces shall accurately record and truthfully disclose information related to labor, occupational health, environmental management practices, management activities, governance, financial conditions, and performance.

D.4 Protection of Intellectual Property

□ **Respect intellectual property rights.**

Workplaces shall respect intellectual property rights and ensure that any transfer of technology and know-how is done in a way that respects those rights. In addition, workplaces shall safeguard customers’ and partners’ information.

D.5 Fair Trade, Advertising, and Competition

□ **Workplaces shall comply with standards for fair trade, advertising, and competition.**

Workplaces shall comply with fair trade, advertising, and competition laws and have measures in place to protect customers’ information.

D.6 Identity Protection and Non-Retaliation

□ **Workplaces shall operate a program to protect whistleblowers.**

Workplaces shall maintain whistleblowing-related procedures and notify workers of such procedures so that they can raise any concerns without fear of retaliation.

D.7 Management of Supply Chain for Controlled Substances

□ **As part of a responsible supply chain, workplaces must not minerals (such as tantalum, tungsten, tin, gold, cobalt, etc.) from certain countries of origin whose use is restricted by the international community due to serious concerns about human rights abuses and environmental destruction.**

Workplaces shall adopt policies and conduct due diligence on the source and management chain of tantalum, tin, tungsten, and gold to ensure that they are sourced in a manner consistent with the OECD Guidance on Responsible Supply Chains for Minerals from Conflict and High-Risk Areas or equivalent.

D.8 Privacy

□ **Workplaces shall make reasonable efforts to protect the privacy of everyone associated with the Company, including customers, partners, consumers, and employees.**

Workplaces must protect all personal information related to their businesses, including that of customers, partners, consumers, and employees. Workplaces shall comply with applicable laws, including the Personal Information Protection Act, when collecting, storing, processing, transferring, and sharing personal information.

**E. MANAGEMENT SYSTEM**

1. Demonstration of Commitment to Comply 2. Management Accountability and Responsibility

3. Response to Legal and Customer Requirements

4. Risk Assessment and Management 5. Establishment of Improvement Objectives

6. Training 7. Communication 8. Executive and Employee Feedback, Participation, and Grievance

9. Audits and Assessments 10. Corrective Action Procedures 11. Documentations and Records

12. Supply Chain Engagement and Accountability



E.1 Demonstration of Commitment to Comply

□ **Management shall sign a statement on the Company’s social and environmental responsibilities.**

Workplaces shall publish a statement of policy, approved by the management, expressing the organization’s commitment to social and environmental responsibility and commitment to continuous improvement and post it in workplaces.

E.2 Management Accountability and Responsibility

□ **The CEO shall regularly review the status of the management system.**

Workplaces shall identify senior executives and company representative(s) responsible for ensuring the implementation of the management systems and related programs. The senior executives shall regularly review the operation of the management system.

E.3 Response to Legal and Customer Requirements

□ **Workplaces shall establish processes to comply with laws and respond to customer needs.**

Workplaces shall have procedures in place to identify, monitor, and understand applicable laws and customer requirements, including this Code of Conduct.

E.4 Risk Assessment and Management

□ **Workplaces shall determine the importance of the risks identified in each area, control the identified risks, and check them regularly.**

Workplaces shall have procedures in place to identify compliance, environment, health, safety, labor, and ethics-related risks. Workplaces shall prioritize each risk to control identified risks and implement appropriate procedural and physical controls to ensure compliance.

E.5 Establishment of Improvement Objectives

□ **Workplaces shall periodically evaluate processes to improve implementation performance in each area.**

Workplaces shall periodically document their objectives, targets, and implementation plans to improve social, environmental, health, and safety performances, with periodic assessments of progress.

E.6 Training

□ **Workplaces shall establish an executive and employee training program for compliance with the Code of Conduct and applicable laws.**

Workplaces shall operate training programs for managers, executives, and employees to implement their policies, procedures, and improvement objectives and to comply with applicable laws and regulations.

E.7 Communication

□ **Workplaces shall establish processes to communicate information about the Company’s policies and performance.**

Workplaces shall have a process for communicating clear and accurate information about policies, practices, expectations, and performance to executives, employees, partners, and customers.

E.8 Executive and Employee Feedback, Participation, and Grievance

□ **Workplaces shall establish a process to gather executive and employee feedback on the Code of Conduct to promote continuous improvement.**

Workplaces shall have a process for assessing executives’ and employees’ understanding of this Code of Conduct, including an effective grievance procedure, and for gathering input (such as receipt of feedback and violations) to foster continuous improvement. Executives and employees shall be provided with an environment where they can provide complaints and feedback without fear of retaliation.

E.9 Audits and Assessments

□ **Workplaces shall periodically assess the Company’s and partners’ compliance with the Code of Conduct.**

Workplaces shall periodically evaluate compliance with this Code of Conduct, relevant laws, and contractual customer requirements related to social and environmental responsibility.

E.10 Corrective Action Procedures

□ **Workplaces shall build a process to correct deficiencies identified by assessments.**

Workplaces shall have a process in place for timely correction of deficiencies identified by internal and external assessments and inspections.

E.11 Documentations and Records

□ **Documentation and record keeping must comply with applicable laws.**

The creation and maintenance of documents and records kept in the course of business operations must comply with regulations related to external disclosures and be consistent with appropriate confidentiality management requirements to protect company and personal information.

E.12 Supply Chain Engagement and Accountability

□ **Workplaces shall be responsible for requiring and managing the implementation and commitment to the Code of Conduct from Suppliers.**

Workplaces shall have procedures in place to communicate the requirements of this Code of Conduct to suppliers and to monitor their compliance.