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An Apple Company

IMI SUPPLIER CODE OF CONDUCT

CONTENT

PART I: INTRODUCTION

PART II: ASPECTS OF CORPORATE SOCIAL RESPONSIBILITY

A. Labor

1. Freely Chosen Employment
2. Young Workers
 - Child Remediation Program
3. Working Hours
4. Wages and Benefits
5. Humane Treatment
6. Non-Discrimination
7. Freedom of Association

B. Health and Safety

1. Occupational Safety
2. Emergency Preparedness
3. Occupational Injury and Illness Procedures and Systems
4. Physically Demanding Work
5. Machine Safeguarding Production
6. Sanitation, Food, and Housing
7. Health and Safety Communication
8. Industrial Hygiene

C. Environmental

1. Environmental Permits and Reporting
2. Pollution Prevention and Resource Reduction
3. Hazardous Substances

4. Solid Waste
5. Air Emissions
6. Materials Restrictions
7. Water Management
8. Energy Consumption and Greenhouse Gas Emissions
Energy

D. Ethics

1. Business Integrity
 - Conflict of Interest
2. No Improper Advantage
3. Disclosure of Information
4. Intellectual Property
5. Fair Business, Advertising and Competition
 - Accepting gifts or gratuities, and entertainment
 - Giving gifts or gratuities, and entertainment
6. Protection of Identity and Retaliation
7. Responsible Sourcing of Minerals
8. Information Security
9. Privacy

E. Management Systems

1. Company Commitment
2. Management Accountability and Responsibility
3. Legal and Customer Requirements
4. Risk Assessment and Risk Management
5. Improvement Objectives
6. Training
7. Communication
8. Employee feedback, Participation and Grievance
9. Audits and Assessments
10. Corrective Action Process
11. Documentation and Records
12. Supplier Communication

INTRODUCTION

Our Company, **Integrated Micro-Electronics Inc.**, is committed to upholding the highest standard of ethical business practice and corporate governance as articulated in IMI's Code of Conduct (the "Code of Conduct").

This Supplier Code of Conduct defines the main principles underlying the business activities of our suppliers. It outlines the standards to ensure full compliance with the laws, rules and regulations of the countries in which it operates and recognizes international standards in order to advance social and environmental responsibility, and business ethics. This means that in addition to providing the highest quality products or services, it is important that our suppliers also operate their business in a way that supports our commitment to the highest ethical standards.

ASPECTS OF CORPORATE SOCIAL RESPONSIBILITY

A. LABOR

IMI is committed to uphold the human rights of all employees and to treat them with dignity and respect as understood by the international community. This applies to all employees including temporary, project, migrant, student, direct employees, and any other type of employee. It also recognizes international standards (e.g., Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI), UN Global Compact, and the Ethical Trading Initiative (ETI)) as references. IMI expects the same fair labor management practice and commitment from its suppliers.

1. Freely Chosen Employment

Supplier will not use forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. Supplier will not tolerate unreasonable restrictions on employees' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities. All work shall be voluntary, and employees shall be free to leave work at any time or terminate their employment in accordance with the Company's policies. Employees are not required to pay employers' or agency recruitment fees or other related fees for their employment.

2. Young Workers

The minimum hiring age follows the mandatory requirement in the country where it operates, e.g., at least 18 years old in the Philippines. Supplier shall ensure that no child labor is utilized in any stage of its manufacturing process. It also supports the use of legitimate workplace learning programs compliant with laws and regulations. The wage rate for interns and apprentices complies with the applicable local laws.

3. Working Hours

The Supplier's workweek will not exceed the maximum set by local law, i.e., one (1) rest period of not less than twenty-four (24) consecutive hours for every six (6) consecutive normal workdays. Further, a workweek is defined to be 60 hours per week inclusive of overtime, except in emergency or unusual situations necessitated by exigencies of business operations, catastrophic cases or as maybe required by the customers.

4. Wages and Benefits

The Supplier shall pay no less than the applicable minimum wage in all sites where it operates. Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, employees shall be compensated for overtime. Deductions from wages as a disciplinary measure shall not be permitted. A timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed is provided.

5. Humane Treatment

Supplier shall not practice harsh and inhumane treatment, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees nor does it tolerate threat of any such treatment. Policies and procedures in support of these requirements are defined and communicated to employees.

6. Non-Discrimination

Supplier commits to a workforce free of harassment and unlawful discrimination. IMI is a non-discriminatory employer and does not discriminate based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, labor organization membership, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Employees are provided with reasonable accommodation for religious practices. In addition, employees or potential employees will not be subjected to medical tests or physical examinations that could be used in a discriminatory manner.

7. Freedom of Association

Supplier respects the rights of employees to associate freely, form or join labor organizations of their own choosing, to bargain collectively and to engage in peaceful assembly, in conformance with local law, as well as respect the right of employees to refrain from such activities. Employees can communicate openly with management regarding working conditions without fear of discrimination, reprisal, intimidation, or harassment. IMI believes that open communication and direct engagement between employees and management are the most effective ways to resolve workplace issues.

B. HEALTH and SAFETY

Supplier shall recognize that the quality of products and services, consistency of production, and employees' retention and morale are enhanced by a safe and healthy work environment. Supplier shall also recognize that inputs from employees and education are keys to identifying and solving health and safety issues in the workplace. Recognized management systems such as ISO 45001 and local guidelines (Department of Labor and Employment and Department of Health in the Philippines) on Occupational Safety and Health aligning with ILO standards were used as references in preparing the Code and may be a useful source of additional information.

IMDS (International Material Data System) / CAMDS (China Automotive Material Data System) All automotive suppliers are required to be ready in providing material data in electronic format per the requirements defined in the International Material Data System (IMDS) and / or (CAMDS – for China automotive suppliers). For specifics and further information relating to this requirement; visit <http://www.mdsystem.com>. and <http://cuc2.camds.org/camds>. Suppliers of components are also responsible for the on-time provision of all IMDS relevant material data for their products and the products of their suppliers.

1. Occupational Safety

Supplier ensures employees' potential exposure to hazardous conditions (e.g., chemical, electrical, and other energy sources, fire, vehicles, fall hazards, biological and physical agents) will be identified, assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout), and ongoing safety training. Industrial Hygiene in the workplace is established and implemented. Systems and procedures on hazards communication (e.g., labeling, training) are in place for workers to ensure awareness and safe practices.

Reasonable steps are taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

2. Emergency Preparedness

Potential emergency situations and events are identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, employee training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures focus on minimizing harm to life, the environment and property.

3. Occupational Injury and Illness Procedures and Systems

These are in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage employee reporting; 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 employees to work.

4. Physically Demanding Work

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 identified, evaluated, and controlled.

5. Machine Safeguarding Production

Machine safeguarding production and other machinery are evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to employees.

6. Sanitation, Food, and Housing

Employees are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Staff houses or dormitories provided are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

7. Health and Safety Communication

Supplier shall provide employees with appropriate workplace health and safety information and training in the language of the employee or in a language the employee can understand for all identified workplace hazards that employees are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards.

8. Industrial Hygiene

Employee exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards were identified, participants shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, Employees are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

C. ENVIRONMENTAL

IMI recognizes that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, climate, environment, and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information. IMI expects the same level of environmental stewardship and care from its suppliers.

1. Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

2. Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants (including GHG Scope 1, 2, 3) and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, and minerals, is to be conserved or by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, waste recycling and recovery or other means.

3. Hazardous Substances

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

The supplier should declare to IMI compliance to customer hazardous substance requirements and other international substance restrictions and comply with the following:

Report to IMI the hazardous substances contained in the goods supplied;

- REACH (Registration, Evaluation and Authorization of Chemicals) and RoHS (Restriction of Use of Hazardous Substances)

IMI's expectation is that all suppliers understand and comply with the REACH and RoHS legislation, particularly the pre-registration and registration requirements, since it is relevant to all IMI- procured products.

Suppliers must comply with European Union Regulation Registration Evaluation Authorization and Restriction of Chemicals (REACH) and Restriction of Use of Hazardous Substances any/all amendments. This applies to suppliers that provide substances on their own, in preparations or in articles. For information about how to comply with this requirement and you can also obtain information from the following web site regarding REACH: <http://www.echa.europa.eu>. A written confirmation by the companies REACH and RoHS responsible must be sent to IMI Corporate Quality - HSPM.

- HSPM Documentation Requirement Submission

All HSPM documentation requirements other than stated above must be submitted one week after the date of request. Should supplier be unable to provide based on IMI lead time, they must advise 3 days ahead of the target deadline their own lead time. In both cases of delayed submission, supplier's rating will be deducted depending on the effect on production, product approval and shipment.

Refer to appendix III for statutory and regulatory requirements that IMI might require from suppliers depending specific customer requirements based on the application and destination of product.

4. Solid Waste

Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous) in accordance with the local regulations.

5. 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, routinely monitored, controlled, and treated as required prior to discharge. Supplier shall conduct routine monitoring of the performance of its air emission control systems.

6. Materials Restrictions

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

7. Water Management

Supplier shall implement a water management program that documents, characterizes, and monitors water consumptions, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. IMI conducts routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8. Energy Consumption and Greenhouse Gas Emissions Energy

Consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Supplier will look for cost-effective methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions.

D. ETHICS

All Supplier's top management, directors, officers, employees, manufacturers, and principal suppliers are expected to comply with the highest standard of ethics, laws, rules, and regulations that are applicable to the Company or its

business. The Ethics Policy Statements enumerated below does not summarize all applicable laws, rules, and regulations.

1. Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Both IMI and Supplier, shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion, and embezzlement.

- **Conflict of Interest**

Failure of the supplier to disclose and obtain clearance for any actual or possible conflict of interest situation may result in disqualification or possible severance of the supplier's business opportunities with IMI.

Prohibited acts Conflicts of interest include, and are not limited to the following acts:

- engaging in transactions that actually constitute or could be perceived as creating conflict of interest, including giving valuable gifts or extending a loan or ownership of a significant part of a company business);
- performing back door selling or conniving with any personnel or staff of IMI and using the same for its business advantage;
- personal financial involvement in activities that might conflict with IMI's interest, such as ownership in companies where IMI's activities have a major impact;
- using insider or confidential information for personal gain.

Undertaking of the Supplier To comply with the foregoing, the supplier should conduct the following:

- if a proposed transaction or situation raises any questions or doubts, refer the said matter to the Chief Finance Officer or Head of the Human Resources of IMI before entering into the relationship or situation in question;

- should a conflict occur, make a declaration disclosing information concerning:
 - (1) potential conflicts of interest relating to its activities as an IMI supplier;
 - (2) any financial interest an IMI employee may hold in the supplier's business;
 - (3) the supplier's personal or private business engaged in a business similar to that of IMI's; or
 - (4) the supplier's immediate family members working for IMI;
- in case of conflict of interest, obtain clearance from the Head of Materials Management of IMI; and
- to submit annually to IMI's Head of Global Procurement Organization (GPO) a statement which confirms that the supplier is in compliance with and has agreed to comply with the IMI's conflict of interest policy.

2. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

3. Disclosure of Information

All business dealings should be transparently performed and accurately reflected on business books and records. Information on labor, health and safety, environmental practices, business activities, structure, financial situation, and 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 are unacceptable.

4. Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information are to be safeguarded.

The Supplier will, at its sole cost and expense, indemnify, defend, and hold IMI harmless from and against any claim brought by a third party to the extent that such claims arise out of infringements by the goods supplied of any patent, trade secret, copyright, trademark or other intellectual property rights.

Suppliers should adhere to international trade regulations and export control regulations. IMI shall be free from any liability should the Supplier commit any violation of the said regulations.

5. Fair Business, Advertising, and Competition

Each director, officer and employee should endeavor to deal fairly with the Company's customers, suppliers, competitors, officers, and employees. No one should take unfair advantage of anyone through bribery, manipulation, concealment, misinterpretation of material facts, or any other unfair dealing practices.

- **Accepting gifts or gratuities and entertainment**

Directors, officers, and employees may accept gifts and entertainment when it is lawful and ethical, occasional, customary, and in support of IMI's business and not just for the employee's well-being or use. Cost of travel and overnight accommodation are not to be accepted as these are considered more than token value.

There are cases when directors, officers and employees are sent gifts or are invited to lunch or dinner by Company clients or suppliers. A director, officer or employee may only keep a gift or accept an invitation if:

- It is directly attributable to purely familial or personal relationships;
- Its value does not exceed reasonable limits of propriety;
- It is a simple promotional item or is part of the supplier's promotional program; and
- It is part of business meetings or discussions.

However, if the gift does not fall under any of the above-mentioned conditions, directors, officers, and employees should report to the Global HR Head or Compliance Officer all gift items received, in cash or in kind for proper disposition.

Giving gifts or gratuities, and entertainment

Gifts, favors, and entertainment may be given to customers and suppliers if:

- It is consistent with customary business practice;
- It is of minimal value;
- It is not in violation of applicable law or ethical standards; and
- It would not embarrass the Company or employee if publicly disclosed.

Gifts to government officials are not permitted. On exception basis, gifts of minimal value may be provided subject to approval of the Global HR Head or Chief Compliance Officer.

6. Protection of Identity and Retaliation

Supplier shall provide and maintain a Whistleblower Policy that ensures the confidentiality and protection of whistleblowers in sites where it operates, unless prohibited by law. Communicated processes are in place for raising of any concern without fear of retaliation.

7. Responsible Sourcing of Minerals

Supplier shall support responsible sourcing of minerals to ensure that tantalum, tin, tungsten, and gold in the products that IMI 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. IMI exercises due diligence on the source and chain of custody of these minerals and make information available to customers upon request.

8. Information Security

Supplier shall take the subject of information security very seriously. We have a duty to protect the information that we collect and use for the benefit of the organization and its customers. All directors, officers and



employees are expected to comply fully with all the information security policies that are in place and to report any breaches of these policies of which they may become aware.

9. Privacy

All Supplier's top management, directors, officers, employees, manufacturers, and principal suppliers are committed to protecting reasonable privacy of personal information of partners we do business with, including suppliers, customers, and consumers. IMI commits to comply with privacy and information, security laws, and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

All Supplier's top management, directors, officers, employees, manufacturers, and principal suppliers signed a Non-Disclosure Agreement (NDA) to ensure confidentiality of "confidential information" entrusted to them by the Company or its suppliers and customers. Unauthorized disclosure, use or stealing of this confidential information, or trade secrets or assisting any person to have access to such confidential information is strictly prohibited.

E. MANAGEMENT SYSTEMS

IMI integrates Sustainability, ESG, and CSR into the existing Management Systems. The management systems are designed to ensure (a) compliance with applicable laws, regulations, and customer requirements related to the IMI's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. IMI also uses risk-based thinking and continual improvement activities in the way it conducts its business. Supplier shall implement equivalent governance and management to ensure compliance to this Supplier Code of Conduct.

1. Company Commitment

Supplier articulates its commitment to corporate social, environmental, health and safety responsibility including compliance and continual improvement.

2. Management Accountability and Responsibility

Supplier shall identify its company representative/s responsible for ensuring implementation and periodic review of the status of management systems and associated programs.

3. Legal and Customer Requirements

Supplier shall continuously identify, review, evaluate, and monitor its compliance with applicable laws, regulations, and customer requirements.

4. Risk Assessment and Risk Management

As part of its risk assessment and management, Supplier shall continuously determine the applicable and associated CSR (Governance, Supply Chain, EHS, Labor and Ethics) risks and relevant significance, to determine and implement appropriate controls and ensure regulatory compliance appropriate to business risks.

5. Improvement Objectives

There are written standards or performance objectives, targets and implementation plans including a periodic assessment against set objectives.

6. Training

There are programs to train managers and employees to implement policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements of this code.

7. Communication

There are processes for communicating clear and accurate information about applicable policies, practices, expectations and performance to employees, suppliers, and customers.

8. Employee feedback, Participation and Grievance

There are continuous improvement programs in place to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this code and to foster continuous improvement. There are different types of communication programs to encourage employees to participate and provide inputs for improvements.

9. Audits and Assessments

Periodic audit and self-evaluation will be conducted to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

10. Corrective Action Process

There is established adequate and effective corrective action processes for timely correction and closure of deficiencies identified by internal and external assessments, inspections, investigations, and reviews.

11. Documentation and Records

System procedures and records are available, maintained and properly kept ensuring regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

12. Supplier Communication

IMI communicates, promotes, and monitors its sustainability initiatives and programs to suppliers to ensure that IMI's objectives are being met by them.

APPENDIX I. REPORT OF NON-COMPLIANCE

I am aware of a situation that may not be in compliance with the IMI Supplier Code of Conduct. The potential or actual conflict are described, as follows:

Name and contact details (voluntary information):

Please send this report to Global CSR globalcsr@global-imi.com



Appendix II. CERTIFICATION

I, the undersigned, confirms that the company has understood and will comply with the IMI's Supplier Code of Conduct.

Date, City

Company Name

Signature

Name

Title

NOTE:

Pls. send all signed original copy to material in charge and/or send scanned signed copy to Global CSR globalcsr@global-imi.com within 1 month after receipt of this document.

Appendix III. HAZARDOUS SUBSTANCE COMPLIANCE GUIDE

Product Content Requirements	Documentation Requirements					
	Test report	Material Declaration	Compliance Declaration	IMDS/CAMDS	CMRT	EMRT
RoHS	✓	✓	✓	o	x	x
China RoHS	✓	✓	✓	o	x	x
REACH	✓	✓	✓	o	x	x
TSCA	✓	✓	✓	o	x	x
California Prop65	✓	✓	✓	o	x	x
Halogen-free	✓	✓	✓	o	x	x
VOC	✓	✓	✓	o	x	x
PFOS/PFOA	✓	✓	✓	o	x	x
GADSL	✓	✓	✓	o	x	x
MDS	x	✓	x	✓	o	o
MSDS	x	✓	x	✓	o	o
IMDS	x	✓	x	✓	o	o
CAMDS	x	✓	x	✓	o	o
Conflict Minerals Reporting	x	x	x	x	✓	✓
Extended Minerals Reporting (formerly Cobalt Reporting and Mica Reporting)	x	x	x	x	✓	✓

✓ - required

o- optional

x – not required

NOTE 1: Not all product content requirements indicated on this table will be required from all suppliers.

NOTE 2: Specific product content requirement will be requested from suppliers by IMI-HSPM Team based on specific customer requirement.