

Hitachi Construction Machinery Group Procurement Partners

Hitachi Construction Machinery Group Sustainable Procurement Guidelines

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Hitachi Construction machinery Co.,Ltd.

Procurement Division

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These Guidelines were established based on Hitachi Construction Machinery Group's various policies (the Hitachi Construction Machinery Group Codes of Conduct (revised in June 2018), etc.), initiatives (including the results of human rights due diligence), widely recognized global standards, and other references.(*)

(*)References:

- United Nations Universal Declaration of Human Rights
- <https://www.un.org/en/about-us/universal-declaration-of-human-rights>
- United Nations Guiding Principles on Business and Human Rights
- https://www2.ohchr.org/english/bodies/hrcouncil/docs/17session/A.HRC.17.31_en.pdf
- OECD Guidelines for Multinational Enterprises
- <http://www.oecd.org/daf/inv/mne/48004323.pdf>
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- <http://www.oecd.org/corporate/mne/mining.htm>
- ISO 9000 (QUALITY MANAGEMENT)
- <https://www.iso.org/iso-9001-quality-management.html>
- ISO 14001 (ENVIRONMENTAL MANAGEMENT)
- <https://www.iso.org/iso-14001-environmental-management.html>
- ISO 45001 (Occupational health and safety)
- <https://www.iso.org/standard/63787.html>
- RBA (Responsible Business Alliance) Code of Conduct 7.0 (2021)
- <https://www.responsiblebusiness.org/code-of-conduct/>
- JEITA (Japan Electronics and Information Technology Industries Association) The Guideline (2020) *Currently Japanese only
- <https://www.jeita.or.jp/japanese/pickup/category/2020/200331.html>

1. Hitachi Construction Machinery Group Policies and Initiatives

1-1. Hitachi Construction Machinery Group Policies

A. Hitachi Construction Machinery Group Corporate-wide Policies

A-1 Hitachi Construction Machinery Group Code of Conduct

Preface

Our Vision is “To pass on a productive environment and prosperous cities to future generations. HCM Group helps to create comfortable living spaces.” In striving to accomplish this, we embrace the values of the Hitachi Construction Machinery Employee Spirit “Kenkijin Spirit”, and we are working to create new value aimed toward achieving our “Vision.” The Hitachi Construction Machinery Group will maintain the core values: Harmony, Sincerity and a Pioneering Spirit.

The Hitachi Construction Machinery Group Codes of Conduct consist of rules and principles intended to assist officers and employees in making decisions and taking actions in accord with these core values. All officers and employees of Hitachi Construction Machinery Group companies shall understand and follow the Codes of Conduct and act with sincerity and fairness in a highly ethical manner.

1. Toward a Sustainable Society

- (1) We will contribute to resolving social issues by promoting innovative solutions, accelerating collaborative creation with partners and stakeholders, and further integrating social and environmental responsibility into our business activities.
- (2) We will strive to develop technologies that contribute to social development and use them with due consideration of their impact on society.
- (3) We envision a low-carbon society, a resource efficient society, and a harmonized society with nature. To this end, we will endeavor to reduce CO₂ emissions, use water and other resources efficiently, and minimize impacts on natural capital throughout our value chain.
- (4) As a corporate citizen, we will make efforts to build rapport with communities and contribute to their development by working together to resolve social issues.

2. Sincere and Fair Business Activities

2.1 Fair Trading

- (1) To ensure fair and open competition, we will observe the fundamental rules of trade, including domestic and overseas competition laws and regulations, and act in compliance with legislation and sound corporate ethics.
- (2) We will have no relationship whatsoever with antisocial forces anywhere in the world, and resolutely reject involvement in improper or antisocial transactions.
- (3) We will not trade shares using undisclosed information regarding the group, affiliated companies, business partners, or customers that could affect the judgment of investors (insider information).

- (4) We strictly prohibit and will have no involvement in bribery and other corrupt business practices. We will neither give or receive gifts nor extend or accept invitations to business entertainment beyond socially accepted limits, as we recognize that such practices can foster corruption. When working with political entities, we will build and maintain sound and transparent relationships.
- (5) We will help maintain international peace and security through compliance with all applicable laws and regulations concerning import and export and will operate appropriately according to our internal rules and policies.
- (6) We will comply with applicable laws, respect social cultures and practices, and act sincerely and fairly in countries and regions where we have operations. Furthermore, we will do so guided by international norms and standards even in areas where legislation is not adequately enforced.

2.2 Relationships with Suppliers

- (1) With a global vision, and mindful of the long-term perspective, we will find qualified suppliers and build fair and equal partnerships with them, working together to build mutual understanding and trust.
- (2) In selecting suppliers, we will thoroughly review the quality, reliability, delivery time, and price of the materials they provide as well as their business stability and technological capability. We will give due consideration to their adoption of social responsibility practices, including areas such as the abolition of unfair discrimination, the elimination of child labor and forced labor, and environmental conservation.
- (3) We will not accept any personal benefits from suppliers in procurement transactions.

2.3 Relationships with Customers

- (1) We will provide products and services that meet the needs and requirements of our customers, complying with relevant laws and standards and ensuring quality and safety by setting additional standards of our own where necessary.
- (2) We will communicate with customers sincerely, address defects and customer complaints quickly and in good faith, and strive to determine causes in order to eliminate them and prevent recurrence.

3. Respect for Human Rights

- (1) We will promote our understanding of internationally recognized human rights, and will respect and not infringe on the human rights of all those involved in our business activities.
- (2) We will implement human rights due diligence appropriate to the social circumstances of the countries and regions where we have operations and the nature of our businesses, products, and services there.
- (3) We will assess and prevent potential violations of human rights. In the event of such a violation, we will promptly take internal and external actions to correct and remedy the situation.

- (4) We will respect individual human rights in the recruitment and treatment of employees and during all other company activities. We will not engage in any acts that may impair individual dignity or discriminate on bases such as sex, sexual orientation, age, nationality, race, ethnicity, ideology, belief, religion, social status, family origin, disease, disability.
- (5) We will hire employees in compliance with the relevant laws and regulations in each country and region, and in accordance with international norms and standards. We will not use child labor that employs children below the minimum working age or forced labor that is against the will of employees.
- (6) We will strive to resolve issues through sincere and constructive discussion between management and employees, in compliance with the laws, regulations, and labor practices of each country and region, and in accordance with international norms and standards.

4. Building a Work Environment That Brings Out Employee Strengths

- (1) Prioritizing health and safety above all else, we will strive to ensure the safety of employees and the workplace. In addition, we will promote the physical and mental health of employees and their families.
- (2) We will support flexible work styles and respect diverse values, creating workplaces that provide employees with a sense of accomplishment and personal growth, and we will promote the sustainable growth of the organization and individuals.
- (3) We will invest in educational programs to help employees expand their capabilities and exercise their strengths. Supervisors will fairly and appropriately support, guide, and educate their employees to develop their abilities.

5. Information Management and Communication

- (1) We will promote the ethical handling of information, so as to ensure respect for human rights and security, through the proper management of personal information based on our Personal Information Protection Policy.
- (2) We will properly manage and protect confidential information related to our business activities in compliance with domestic and international laws and regulations as well as our internal rules and policies.
- (3) In order to maintain and expand our trusting relationship with the Hitachi Construction Machinery Group's diverse stakeholders, we will disclose information openly and transparently, and respond to stakeholders responsibly through dialogue and other means of communication.

6. Protection of Intellectual Property and Brand

- (1) We will protect our own intellectual property, respect third-party intellectual property, and use both effectively for smooth business operations.
- (2) We will manage our own and third-party confidential information by importance and manage and handle it appropriately based on this ranking.

(3) We will protect and enhance the value of the Hitachi Construction Machinery Brand, recognizing it as an important management asset.

7. Securing Corporate Assets

We will use all our corporate assets only for business activities and other appropriate purposes and manage them properly to protect their value.

8. Crisis Management

We will make concerted efforts throughout the Hitachi Construction Machinery Group to secure employee safety and business continuity in case of disasters and threats such as earthquakes, tsunamis and floods, cyberattacks, and terrorism.

9. Responsibilities of Employees

Employees shall pledge to comply with the Codes of Conduct. If they become aware of any non-compliant activity, they shall immediately report to their manager or via the internal reporting system.

10. Responsibilities of Top Management

Top managers shall take the initiative in complying with the Codes of Conduct and make their best efforts to conduct business based on corporate ethics and the law. In the event of violation of the Codes of Conduct, top managers shall swiftly take corrective measures and actions to prevent the recurrence of similar incidents, while at the same time strictly disciplining themselves as well as those involved in the violation.

Supplementary Provisions to the Hitachi Construction Machinery Group Codes of Conduct

The Hitachi Construction Machinery Group Codes of Conduct shall apply to all officers and employees of Hitachi Construction Machinery CO., Ltd. and its consolidated subsidiaries. The subsidiaries shall establish their own codes of conduct by adopting or revising the Hitachi Construction Machinery Group Codes of Conduct at a policymaking meeting, ensuring that all their officers and employees fully understand the provisions of the codes.

Each subsidiary shall streamline its organizational structure and systems (e.g. internal reporting system, disciplinary system) to comply with the Hitachi Construction Machinery Group Codes of Conduct. In the event of violation, disciplinary action shall be taken in accordance with the related rules and internal procedures.

Subsidiaries may enact their own codes of conduct, incorporating the contents of the Hitachi Construction Machinery Group Codes of Conduct. Such codes of conduct may vary by country or region in accordance with legal systems, social customs, or business characteristics, or include stipulations that do not exist in the Hitachi Construction Machinery Group Codes of Conduct. Under no circumstances, however, may they contradict the provisions of or weaken the effectiveness of the Hitachi Construction Machinery Group Codes of Conduct.

When a subsidiary institute a revised version of the Hitachi Construction Machinery Group Codes of Conduct, it shall expressly stipulate that revisions have been made based on or with reference to the Hitachi Construction Machinery Group Codes of Conduct.

<https://www.hitachicm.com/global/corporate/conduct/>

A-2 Hitachi Construction Machinery Group Compliance Program (HGCP)

1. Hitachi Construction Machinery Group Code of Ethics and Compliance

In April 2020, the Hitachi Construction Machinery Group Code of Ethics and Compliance was established to further clarify our basic approach towards corporate ethics and compliance that has been shared on a global Group basis. By each of us putting these guidelines into practice in our daily work, the Hitachi Construction Machinery Group will be able to continue to respond to the trust placed in us by society with good faith and sincerity.

2. Hitachi Construction Machinery Group Compliance Program (HGCP)

The Hitachi Construction Machinery Group has established the Hitachi Construction Machinery Group Compliance Program (HGCP) based on the spirit of observing the highest level of ethical standards, complying with applicable laws and regulations in all countries and regions where the Group operates its businesses, and respecting fair business practices. Under this program, the Group will make constant efforts to accomplish its mission under the highest standards of ethics and integrity.

A-3 Hitachi Construction Machinery Group Human Rights Policy

The Hitachi Construction Machinery Group supports the realization of human rights by contributing to society through the development of superior, original technology and products, and delivering innovations that answer society's challenges. As a prerequisite to this, Hitachi Construction Machinery seeks to meet its responsibility to respect human rights.

The Responsibility to Respect Human Rights

Hitachi Construction Machinery strives to meet its responsibility to respect human rights by not infringing on human rights and addressing negative human rights impacts with which the company may be involved through its operations and business relationships. Hitachi Construction Machinery understands human rights to be, at a minimum, those outlined in the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. The responsibility to respect applies to all officers and employees of Hitachi Construction Machinery Co., Ltd. and its consolidated subsidiaries.

Hitachi Construction Machinery expects its business partners and other parties whose own impacts may be directly linked to Hitachi Construction Machinery's operations, products, or services to respect and not infringe upon human rights and will respond appropriately where they are not respecting human rights.

Relationship to Hitachi Construction Machinery's Values and Policies

Hitachi Construction Machinery is aware that as a business enterprise it is a member of society and can contribute to creating an environment in which human rights are respected. Meeting the responsibility to respect human rights is key to operating as a responsible business, and is accepted to be a baseline expectation for all companies. It is an expression of Hitachi Construction Machinery Group's Mission and Vision. This policy supplements the Hitachi Construction Machinery Group Codes of Conduct and CSR policy.

Implementing the Responsibility to Respect Human Rights

Hitachi Construction Machinery is committed to meeting the responsibility to respect human rights through implementing the UN Guiding Principles on Business and Human Rights. Hitachi Construction Machinery will develop and implement on going human rights due diligence. Due diligence processes will include identifying and assessing potential and actual human rights impacts and taking appropriate action to prevent or mitigate risks. The processes will also entail tracking to ensure the effectiveness of Hitachi Construction Machinery's actions to address impacts and risks. To account for how Hitachi Construction Machinery responds to potential and actual human rights impacts, the group will also develop and implement processes to communicate its findings externally. Where Hitachi Construction Machinery identifies that it has caused or

contributed to a negative human rights impact, the company will provide for or cooperate in legitimate processes to provide remediation. Hitachi Construction Machinery adheres to national law and regulation in each market in which it operates. Where Hitachi Construction Machinery faces conflicts between internationally recognized human rights and national laws, the company will follow processes that seek ways to honor the principles of international human rights.

Hitachi Construction Machinery will provide appropriate training and capacity building in order to embed this policy commitment throughout the company and to ensure that its consolidated subsidiaries understand and implement human rights due diligence effectively.

Hitachi Construction Machinery is committed to engaging in dialogue with and consulting relevant external stakeholders about addressing potential and actual human rights impacts

B. Hitachi Construction Machinery Group Procurement Policies

B-1 Procurement policy

1. Partnership policy

At Hitachi Construction Machinery we fully realize the value of developing trusting relationships with our valued suppliers.

2. Our open-door policy

Regardless of whether a supplier is a domestic or overseas company, we do our utmost to insure free competition.

3. Selection of suppliers policy

We evaluate and select suppliers based upon criteria such as quality, price, lead time, quality of management, technical standards and abilities

4.. Our policy for sharing information and maintaining confidentiality

We attend to all suppliers' offers sincerely, and are willing to offer necessary information to suppliers. At the same time, we realize that suppliers' offers supply us with confidential or sensitive information. We always endeavor to maintain and keep such information strictly confidential.

B-2 Guidelines for Procurement Activities

These guidelines define business transaction standards which shall be applied to all Hitachi Construction Machinery executives and employees in connection with their activities purchasing necessary materials, products, services, and information from outside sources.

1. Overall procurement activities of Hitachi Construction Machinery shall adhere to the Hitachi Construction Machinery Group Code of Conduct.

2. Hitachi Construction Machinery shall maintain proper partnerships, mutual understanding, and reliable relationships with suppliers with a view to the long-term results.
 - (1) Hitachi Construction Machinery shall treat all suppliers impartially and be prohibited from favoritism such as giving unfair priority to any specific suppliers.
 - (2) Hitachi Construction Machinery respects fair business dealings with suppliers and will avoid any improper act which might cause a loss to a supplier apart from normal and customary business transactions
 - (3) Hitachi Construction Machinery shall keep suppliers 'trade secrets strictly confidential and prevent them from being revealed or improperly used.
3. Hitachi Construction Machinery develops suppliers to maintain competitiveness from a worldwide point of view.
 - (1) Hitachi Construction Machinery responds to all suppliers' offers sincerely and is always willing to offer the information necessary for suppliers to complete on an even playing field.
 - (2) Hitachi Construction Machinery shall periodically check and review suppliers' performance and will consider offering more advantageous business opportunities when comparison with other resources allows.
4. Through a designated selection process, suppliers shall be evaluated by product quality, reliability, delivery, price, suppliers' business stability, technical development ability, fair and transparent information release, compliance with societies' rules, regulation compliance, respect for human rights, elimination of discrimination in respect of employment and occupation, elimination of all forms of forced and compulsory labor, environmental preservation activities, social contributions, good working environment, and recognition of social responsibilities with business partners.
 - (1) Hitachi Construction Machinery shall not request quotations from suppliers with whom there is no intention to enter a future business relationship.
 - (2) In accordance with specified internal procedures, the role and responsibility for specifications, terms and conditions, product acceptance and inspection belong to each Requester, Procurement Department and Inspection Department.
 - (3) Procurement Departments shall be a representative of Hitachi Construction Machinery when contracting with suppliers.
5. Hitachi Construction Machinery members are prohibited from receiving any personal gifts or offers from suppliers.

B-3 Hitachi Construction Machinery Group's policy for Responsible Supply Chain of Minerals

Hitachi Construction Machinery Group is committed to responsible procurement activities as its policy to ensure that the procurement of materials containing conflict minerals (tin, tantalum, tungsten, and gold) and cobalt does not encourage the activities of armed groups, human rights violations including child labor, corruption, and environmental destruction in the conflict and high-risk regions.

The Group also respects the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and conducts more detailed investigations based on the Guidance while understanding social issues and the expected roles of companies in the regions.

For its suppliers, the Group will continue to inquire into their minerals' country of origin and supply chains using the Conflict Minerals Reporting Template (CMRT) issued by the Responsible Minerals Initiative (RMI), and request its suppliers to procure minerals from smelters certified under RMI's Responsible Minerals Assurance Program (RMAP).

1-2. Hitachi Construction Machinery Group's policy for Responsible Supply Chain of Minerals

Group Procurement Initiatives

Hitachi Construction Machinery attaches great importance to sustainability in its value chains. Hitachi Construction Machinery Group's procurement division began working on corporate social responsibility (CSR) in supply chain management in the early 2000s and has accelerated and advanced this initiative. In dealings with its suppliers, the Group commits itself thoroughly to procurement activities based on its policies and codes of conduct introduced in "1-1. Hitachi Construction Machinery Group Policies." In addition, the Group has distributed the Supply Chain CSR Procurement Guidelines to suppliers to disseminate its Sustainable procurement policies and asked them to conduct Sustainable monitoring (conducting Supplier survey) and auditing with the aim of minimizing procurement risks. The Group has formulated the Hitachi Construction Machinery Group's policy for Responsible Supply Chain of Minerals to address the issue of materials containing conflict minerals and is promoting responsible procurement activities based on international guidelines.

Hitachi Construction Machinery is advancing its initiatives with a strong belief that developing business activities with a focus on sustainability will lead to mutual prosperity for the Hitachi Construction Machinery Group and its suppliers. Hitachi Construction Machinery deeply appreciates its suppliers carefully reading and following these Guidelines with the above purposes in mind.

For the latest information and other details concerning Hitachi Construction Machinery Group's sustainability, please visit the following website.

<https://www.hitachicm.com/global/en/sustainability/>

2. Hitachi Construction Machinery Group Supplier Code of Conduct

A. Labor

Your company must uphold the human rights of workers and treat them with dignity and respect as understood by the international community. This applies to all types of workers, including temporary staff, migrant workers, students, and direct employees.

(1) Recruitment and Employment of Workers

Your company must not use forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or human trafficking. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. Unreasonable restrictions must not be imposed on workers entering and exiting company-provided facilities (including, if applicable, worker dormitories and living quarters) and workers' freedom of movement in the facilities. As part of the hiring process, your company must provide all workers with a written employment agreement that includes employment terms and conditions stated in their native language or a language properly understood by them. Foreign migrant workers must receive the employment agreement prior to departure from their home country, and no substitution or changes are permitted in the employment agreement upon arrival in the destination country unless these changes are made to meet local laws and provide equal or better terms. All work must be voluntary, and workers are free to leave work at any time or terminate their employment without penalty or punishment if reasonable notice is given as per their contract.

Your company must not retain or otherwise destroy, conceal, or confiscate workers' identification certificates or immigration documents (government-issued identification, passport, work visa, personal ID card, etc.). Employers are allowed to retain these documents only if such retention is required by law, but even in this case, workers are allowed access to their documents at all times.

Your company must not make workers bear recruitment fees or other expenses related to their employment charged by employers' agents or sub-agents. Any such costs found to have been paid by workers will be refunded to the workers.

(2) Employment of Young Workers

Your company must not use child labor at any stage of manufacturing. The term "child" refers to any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in each country, whichever is highest. Your company must have an appropriate mechanism to verify the age of its workers. Legitimate workplace learning programs are approved as long as they comply with all laws and regulations. Workers under the age of 18 (young workers) are not to

engage in work, including night shifts and overtime, that may jeopardize their health or safety.

Your company must ensure appropriate management of student workers by properly maintaining their employment records, conducting rigorous due diligence of educational partners, and protecting student workers' rights in accordance with applicable laws and regulations. Your company must also provide all student workers with appropriate support and training for their tasks. As for student workers' wages, in the absence of local laws, the wage rates for student workers, interns, and apprentices will be at least the same as those for other entry-level workers performing equal or similar tasks.

(3) Working Hours

Studies on business practices have revealed that overwork is clearly linked to lower productivity, higher turnover, and a greater risk of injury and illness. Your company must therefore ensure that working hours do not exceed the limit set by local laws. Further, the total weekly working hours, including overtime, must not exceed 60 hours or the legal working hour limit, except in the case of emergencies or unusual circumstances. All overtime work must be voluntary. Efforts must also be made to prevent workers from being overworked, and workers will be granted appropriate days off (at least one holiday that complies with local laws or 24 consecutive hours of rest in any seven-day period, whichever is longer).

(4) Wages and Benefits

Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime work, and legally mandated benefits. In compliance with local laws, workers must be paid for overtime work at a rate higher than their regular hourly rate. Workers must be timely provided with easy-to-understand pay slips that include sufficient information to verify accurate compensation for the work performed during each payment period. All temporary, dispatch, and outsourced workers are to be used within the limits of local laws.

(5) Humane Treatment of Workers

No workers will be subjected to harsh or inhumane treatment that includes violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse; nor will there be the threat of any such treatment. Your company must clearly define and communicate to workers its disciplinary policies and procedures in support of these requirements.

(6) Non-Discrimination/Non-Harassment

Your company must be committed to a workplace free of harassment and unlawful discrimination, and 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, veteran status, protected genetic information, or marital status in recruitment and employment practices such as wages, promotions, rewards, and access to training opportunities. Workers must be provided with reasonable accommodation for religious practices. In addition, workers or potential workers must not be subjected to medical tests, including pregnancy and virginity tests, or physical exams that could be used in a discriminatory way.

(7) Freedom of Association

Your company must respect the right of all workers to form and join trade unions of their own choosing, bargain collectively, and participate in peaceful assembly as well as the right to refrain from such activities in accordance with local laws. Workers and/or their representatives must be able to openly communicate and share their ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

B. Health and Safety

Your company must recognize that a safe and healthy work environment enhances the quality of products and services, product consistency, and workforce stability and morale, in addition to minimizing the occurrence of work-related injuries and illnesses. Your company must also recognize that continuously providing information and education to workers is essential to identify and resolve health and safety issues in the workplace. Widely recognized management systems, such as ISO 45001 and the ILO Guideline on Occupational Safety and Health Management Systems, may provide useful information to formulate corporate codes.

(1) Occupational Safety

Your company must identify and assess its workers' exposure to potential health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and falls), and mitigate the hazards using the Hierarchy of Controls. This approach includes eliminating hazards, substituting processes and materials, controlling through proper design, implementing engineering and administrative controls, preventive maintenance, and safety work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. When hazards cannot be controlled properly by these means, workers must be given appropriate, well-maintained personal protective equipment, and education on the risks related to these hazards must be provided effectively in a language properly understood by workers. Appropriate measures must also be taken for pregnant women and nursing mothers, such as work reassignment to avoid serious hazards, eliminating or reducing occupational health and safety risks involving their work assignment, and providing reasonable accommodation for nursing mothers.

(2) Emergency Preparedness

Your company must identify and assess potential emergency situations and events and minimize the impact by implementing emergency plans and response procedures, including emergency reports, notification to employees, evacuation procedures, and training and drills for workers. Emergency drills must be conducted at least once a year or as required by local laws, whichever is more stringent. Emergency measures include appropriate fire alarm and suppression systems, visible and unobstructed exit routes, facilities with appropriate emergency exits, contact information for emergency responders, and recovery plans. These measures and procedures must focus on minimizing harm to life, the environment, and property.

(3) Occupational injury and illness

Your company must have procedures and systems in place to prevent, control, track, and report occupational injuries and illnesses. These procedures and systems must include provisions to encourage reporting from workers, classify and record injury and illness cases, provide the necessary medical treatment, investigate the cases in detail, implement corrective measures to eliminate the causes, and facilitate the workers' return to work.

(4) Industrial Hygiene

Your company must identify, assess, and control workers' exposure to chemical, biological, and physical agents based on the Hierarchy of Controls. If potential hazards are identified, your company must seek opportunities to eliminate or reduce the hazards. If elimination or reduction is not feasible, the hazards must be controlled through proper design, and engineering and administrative controls. When hazards cannot be controlled properly by these means, workers must be provided with and use appropriate, well-maintained personal protective equipment free of charge. Protection programs must be implemented continuously and include education on the risks associated with these hazards.

(5) Accommodation for Physically Demanding Work

Your company must identify, assess, and control the risk of injury for workers engaged in such work as manual material handling, physically demanding tasks, repetitive heavy lifting, prolonged standing, and forceful assembly tasks in order to prevent problems from occurring.

(6) Machinery Safeguarding Measures

Your company must assess safety hazards of production and other machinery. Physical guards, interlocks, and barriers must be installed and properly managed and maintained where machinery poses an injury risk to workers.

(7) Sanitation, Food, and Housing

Your company must provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by your company must be maintained in a clean and safe condition, and be equipped with appropriate emergency exits, hot water for bathing and showering, proper lighting, heating, ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space with easy access.

(8) Health and Safety Communication

Your company must provide appropriate workplace health and safety information and training on all identified workplace hazards (including, but not limited to, mechanical, electrical, chemical, fire, and physical hazards) to workers in their native language or a language properly understood by them. Health and safety-related information must be clearly posted in facilities or placed in locations identifiable and accessible to workers. Training will be provided to all workers prior to the beginning of work and regularly thereafter. Workers will be encouraged to raise health and safety concerns without retaliation.

C. Environment

Your company must recognize that environmental responsibility is integral to the manufacture of world-class products and identify the environmental impact of manufacturing activities and minimize the adverse effects on the community, the environment, and natural resources while safeguarding public health and safety. For Hitachi Construction Machinery Group's green procurement approaches, please refer to the Hitachi Construction Machinery Group Green Procurement Guidelines.

(1) Environmental Permits and Reporting

Your company must obtain, maintain, and update all required environmental permits (e.g. discharge monitoring), approvals, and registrations, and comply with their operational and reporting requirements.

(2) Pollution Prevention and Resource Reduction

Your company must minimize or eliminate pollutant emissions and waste generation at the source by installing additional pollution control equipment, modifying production, maintenance, and facility processes, or implementing other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, must be controlled through modifications of production, maintenance, and facility processes, materials substitution, reuse, conservation, and recycling, or other means.

(3) Environmentally Hazardous Materials

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

(4) Solid Waste

Your company must implement a systematic approach to identifying, managing, reducing, and responsibly disposing of or recycling solid waste (non-hazardous).

(5) Air Emissions

Your company must characterize, routinely monitor, and control air emissions of volatile organic chemicals (VOCs), aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations, and treat these substances as required prior to discharge. Ozone depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Your company must routinely monitor its handling of substances emitted into the air and the performance of its air emission treatment systems.

(6) Materials Restrictions

Your company must comply with all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and during manufacturing, including labeling for recycling and disposal.

(7) Water Management

Your company must implement a water management program that documents, characterizes, and monitors water sources, use, and discharge, while seeking opportunities to conserve water and controlling contamination routes. All wastewater must be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Your company must routinely monitor its wastewater treatment systems and water tanks to ensure optimal performance and regulatory compliance.

(8) Energy Consumption and Greenhouse Gas Emissions

Your company must establish a corporate-wide greenhouse gas reduction goal. Energy consumption and all relevant Scope 1 and 2 greenhouse gas emissions must be tracked and documented, and their comparisons with the reduction goal publicly reported. Your company must seek ways to improve energy efficiency and minimize its energy consumption and greenhouse gas emissions.

(9) Conservation of Biodiversity and Ecosystems

To conserve biodiversity and ecosystems that serve as the foundation for the survival of both humanity and business, your company must procure raw materials and products with an awareness of their impact while keeping the following items in mind.

- Preferential procurement of paper and office supplies confirmed to be produced with consideration given to biodiversity and ecosystems
- Ecologically friendly approaches to mining raw materials and developing, producing, and procuring raw materials, components, and products
- Consideration for the local ecosystem, such as protecting rare species in the region before land acquisition or rebuilding and avoiding habitat fragmentation
- Promotion of nature conservation activities, including growing forests with native species and planting trees to conserve ecosystems
- Pollution prevention from the perspective of ecosystem conservation, 3R (reduce, reuse, and recycle) activities, and continuous improvements of energy conservation activities
- Request for suppliers to promote ecosystem conservation

D. Business Ethics

Your company must uphold the following highest standards of business ethics to meet its social responsibilities and to achieve success in the marketplace.

(1) Continuing Commitment to Business Integrity

Your company must maintain the highest level of integrity to continue its business and uphold a zero-tolerance policy that prohibits all forms of bribery, corruption, extortion, and embezzlement. All business transactions must be conducted with transparency and accurately reflected in your company's accounting books. Monitoring and procedures must be implemented to ensure compliance with anti-corruption and related laws.

(2) Elimination of Improper Advantages

Your company must not promise, offer, authorize, give, or accept bribes or other means of obtaining undue or improper advantages. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly, through a third party in order to acquire or retain business, assign business to someone else, or otherwise gain improper advantages. Monitoring, record keeping, and procedures must be implemented to ensure compliance with anti-bribery and anti-corruption laws.

(3) Disclosure of Information

All business transactions must be conducted with transparency and accurately reflected in your company's accounting books and records. Your company must disclose information regarding its labor, health and safety, environmental conservation efforts, business activities and structures, financial status, and performance in accordance with applicable regulations and prevailing industry practices. Falsification or misrepresentation of events occurring in your company's supply chains or implemented measures is unacceptable.

(4) Intellectual Property

Your company must respect and protect intellectual property rights. Transfer of technology and knowhow must be conducted in a way that does not infringe on intellectual property rights, and information of customers and suppliers must also be safeguarded.

(5) Compliance with Fair Business, Advertising, and Competition Laws

Your company must conduct its business activities in accordance with fair competition rules, and its activities must comply with all applicable competition laws, such as accuracy and integrity in advertising. Appropriate measures must also be taken to protect customer information.

(6) Protection of Whistleblowers and Elimination of Retaliation

Your company must maintain a program to ensure the protection of supplier and employee whistleblowers, unless prohibited by law, and disseminate and support a process to enable its personnel to raise concerns without fear of retaliation. A system that allows allegations of wrongdoing to be reported must be guaranteed.

(7) Responsible Minerals Procurement

To reasonably assure the procurement of minerals is consistent with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or equivalent due diligence frameworks. Your company must adopt policies and conduct due diligence on the sources and chains of custody for minerals such as tin, tantalum, tungsten, and gold contained within its manufactured products. Please refer to the Hitachi Construction Machinery Group's policy for Responsible Supply Chain of Minerals to better understand our procurement approaches.

E. Management System

Your company must adopt or establish a management system with a scope related to the contents of this Code. The management system must be designed to ensure the following:

- a. Compliance with applicable laws, regulations, and customer requirements related to your company's operations and products;
 - b. Conformance with these Guidelines; and
 - c. Identification and mitigation of operational risks related to these Guidelines.
- The management system must also facilitate continual improvements.

The management system must contain the following elements:

(1) Company Commitment

Your company must provide corporate social and environmental responsibility policy statements affirming its commitment to compliance and continual improvements that are endorsed by the executive management and posted in its facilities in the local language.

(2) Management Accountability and Responsibility

Your company must clearly identify the senior executive and company representative(s) responsible for ensuring the implementation of its management system and associated programs. Senior management must review the status of the management system on a regular basis.

(3) Response to Legal and Customer Requirements

Your company must establish a process to identify, monitor, and understand the applicable laws, regulations, and customer requirements, including the items listed in these Guidelines.

(4) Risk Assessment and Management

Your company must establish a process to identify legal compliance, environmental, health and safety risks(*) as well as labor practices and ethical risks associated with its operations. To manage identified risks and ensure regulatory compliance, your company must determine the relative significance of each risk and implement appropriate procedural and physical controls.

(*)Areas to be included in a risk assessment of the environment, health, and safety are production bases, warehouse/storage facilities, plant/facility support equipment, laboratories and test areas, sanitation facilities (toilets), kitchens/cafeterias, and worker housing/dormitories.

(5) Setting of Improvement Objectives

Your company must present written performance goals, targets, and implementation plans to improve its social, environmental, and health and safety performance, including a periodic assessment of your company's performance in achieving these objectives.

(6) Development of Training Programs

Your company must establish training programs for managers and workers to implement its policies, procedures, and improvement objectives and to meet the applicable legal and regulatory requirements.

(7) Communication with Workers, Suppliers, and Customers

Your company must establish a process to communicate clear and accurate information about its policies, practices, expectations, and performance to workers, suppliers, and customers.

(8) Worker Feedback, Participation, and Grievance

Your company must establish ongoing processes, including an effective grievance mechanism, to assess workers' understanding of the practices and conditions covered by these Guidelines and promote continuous improvements after obtaining feedback and identifying violations. A safe environment must be provided for workers to voice grievances and offer feedback without fear of reprisal or retaliation.

(9) Audits and Assessments

Your company must implement periodic self-evaluations to ensure conformity with legal and regulatory requirements, these Guidelines, and customer contract requirements related to social and environmental responsibility.

(10) Corrective Actions

Your company must establish a correction process to respond to the deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

(11) Documentation and Records

Your company must create and maintain documents and records to ensure regulatory compliance, conformity with company requirements, and appropriate confidentiality to protect privacy.

(12) Supplier Responsibility

Your company must establish a process to communicate these Guidelines to suppliers and monitor their compliance.

F. Product Quality and Safety

(1) Product Safety

Your company must ensure sufficient product design safety and sell products with an awareness of its responsibility as a manufacturer. Product safety must be ensured in compliance with laws and regulations, with consideration also given to the safety that should be expected from products. Laws, regulations, and safety and other standards related to product safety (Japan: Act on Product Safety of Electrical Appliances and Materials, Consumer Product Safety Act, Household Goods Quality Labeling Act, detailed rules in various laws and regulations, Japanese Industrial Standards (JIS), etc.; overseas: Underwriters Laboratories (UL), British Standards Institution (BSI), Canadian Standards Association (CSA), etc.) must be observed. Product safety must also include traceability (procurement of parts and materials, manufacturing processes, etc.) and other management methods and prompt response to problem solving.

(2) Promotion of Quality Assurance Activities

Your company must formulate a quality assurance policy and accordingly proceed with quality assurance activities on a daily basis to make continuous improvements through the Plan-Do-Check-Act (PDCA) cycle. To this end, your company will establish and promote a quality management system that develops an organizational structure, outlines an activity plan, and specifies responsibility assignment and procedures. For major quality management systems, please refer to ISO9000, ISO/TS16949, and ISO13485.

G. Prevention of Personal and Confidential Information Leakage

(1) Protection against Threats to Computer Networks Including Cyberattacks

Your company must take measures to prevent threats to computer networks, including cyberattacks, from affecting its internal and external operations. These threats include viruses, worms, spyware, ransomware, social engineering, and targeted attacks. Computers or servers infected with viruses and other malware may leak customer and confidential information or attack other companies' computer networks, causing serious harm due to the stagnation of daily operations and the loss of trust. In addition, careful attention must be paid to targeted attacks and other types of threats by hackers who may break into computer networks and leak or destroy a variety of information, resulting in similar damage.

(2) Privacy Protection

Your company must be committed to effectively protecting personal information and privacy of all people involved in its business, including suppliers, customers, consumers, and workers. Personal information must be collected, stored, processed, transmitted, and

shared in accordance with laws and regulations related to privacy and information security.

(3) Measures to Prevent Personal Information Leakage

Your company must ensure that personal information(*) is not obtained, used, disclosed, or leaked illegally and unfairly by formulating codes and policies to be complied with by workers, while thoroughly managing the information through the PDCA cycle.

(*)Personal information refers to information about a living individual that can be used to distinguish that specific individual's identity, such as name, date of birth, and other descriptions (including anything that easily matches other information to identify a specific individual).

(4) Measures to Prevent Leakage of Customer and Third-party Confidential Information

Your company must ensure that all confidential information(*) of customers and third parties is not obtained, used, disclosed, or leaked illegally and unfairly by thoroughly managing the information through the PDCA cycle.

(*)Confidential information refers to information disclosed in a written form (including electromagnetically or optically recorded data information) that is designated as confidential in an agreement or information orally disclosed after confidentiality is notified.