
DY INNOVATE ESG Standards and Code of Conduct

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1. Overview

A. Purpose of the Code of Conduct

DY INNOVATE has established this Code of Conduct to build a sustainable supply chain. This Code requires all suppliers to strictly comply with applicable laws and regulations related to business operations and to implement best practices across ethics, environment, labor/human rights, health & safety, and management systems. DY INNOVATE hopes that through adherence to this Code, suppliers will grow into more respected and socially responsible companies, while also creating opportunities for mutual growth.

B. Scope of Application

This Code of Conduct applies to all suppliers that provide goods or services to DY INNOVATE or are under contract for any type of business transaction. Suppliers subject to this Code are also encouraged to ensure that their subcontractors and lower-tier partners throughout the supply chain comply with the principles set forth in this Code.

C. Supplier Responsibilities and Roles

All DY INNOVATE suppliers must consider the standards outlined in this Code when making business decisions and operating their businesses.

Third-party organizations authorized by DY INNOVATE may, within the limits permitted by law, conduct assessments or audits to verify the supplier's compliance with this Code. Based on the results of such reviews, DY INNOVATE may recommend corrective actions for identified risks. Suppliers are expected to engage in mutual consultation and implement mitigation plans accordingly.

This Code of Conduct does not represent an exhaustive list of all compliance obligations but may be updated and revised periodically to support the ongoing development of a sustainable supply chain. DY INNOVATE will continue to collaborate with its suppliers in compliance with this Code and remain committed to advancing sustainable supply chain policies for mutual prosperity.

2. Ethics

A. Transparent Management and Anti-Corruption

- ① Supplier employees must comply with the highest standards of integrity required by each country in which they operate.
- ② Supplier employees shall not engage in bribery, extortion, embezzlement, influence peddling, or solicitation by abusing their position of power. They must not seek any unjust benefit by

exploiting another party's vulnerabilities or weaknesses.

B. Prevention of Conflicts of Interest

- ① Suppliers must conduct their duties responsibly in accordance with established operational policies.
- ② Supplier employees must not promise, offer, permit, or provide any other form of benefit to gain undue or inappropriate advantage. This includes causing harm to the company for personal gain or receiving benefits through third parties.

C. Prevention of Unfair Trade Practices

- ① Suppliers shall comply with all fair trade laws and regulations of the countries in which they operate.
- ② Suppliers must not engage in unfair practices that may hinder fair competition, such as abusing market dominance or transactional positions.
- ③ Suppliers must not collude with other companies to restrict competition regarding price, supply volume, transaction regions, or conditions.
- ④ Suppliers must not obtain information through illegal means from competitors, partners, or other organizations, nor shall they use or disclose such information acquired through improper channels.

D. Prevention of Counterfeit Parts

- ① Suppliers shall not manufacture or use unauthorized raw materials or components, nor shall they sell or distribute counterfeit items.
- ② Suppliers must regularly verify whether counterfeit raw materials or components are being used or produced in their facilities. If identified, they must report the issue to the government or customers immediately.
- ③ Suppliers should make efforts to ensure that the raw materials and components they produce are used and distributed in accordance with their intended business purpose and contractual terms.

E. Compliance with Export Controls

- ① Suppliers must comply with national laws and international regulations related to export controls.
- ② Suppliers must not engage in transactions with countries, regions, or individuals subject to export restrictions or economic sanctions.
- ③ Suppliers must regularly review their compliance with export control and sanction-related regulations and cooperate with DY INNOVATE's efforts to assess the current status when

requested.

F. Information Protection

- ① Suppliers must not disclose the trade secrets or confidential information of customers or business partners without authorization. Information obtained during business operations must not be stored or used without prior permission or approval.
- ② Suppliers must respect the intellectual property rights of customers and business partners and take appropriate measures to protect their own intellectual property. They must also regularly check for potential infringements.
- ③ Suppliers must collect and use personal data only within the intended purposes and retention period, and must obtain prior consent if any changes to these terms occur.

G. Responsible Sourcing of Materials

- ① Suppliers must establish a process to identify the origin and smelters of all minerals and raw materials used in their products, including conflict minerals such as tin, tungsten, tantalum, and gold.
- ② Based on this process, suppliers should work to assess and address any serious human rights violations, ethical misconduct, or negative environmental impacts associated with the origin or processing of such materials.
- ③ If a supplier primarily handles such minerals and raw materials, it should either self-verify or seek external certification to ensure that the mining and processing are free from human rights abuses, ethical violations, and environmental harm.

3. Environment

A. Establishment of an Environmental Management System

Suppliers must establish and operate an environmental management system to manage environmental risks and ensure continuous improvement in their environmental performance.

B. Energy Use and Greenhouse Gas Emissions Management

Suppliers must manage energy consumption and greenhouse gas emissions to reduce their environmental impact. They should make efforts to improve energy efficiency and use renewable energy where possible.

C. Water Resource Management

Suppliers must monitor water usage and quality, and strive to minimize water consumption and pollution in their production processes. They must also prevent the release of hazardous

substances into water systems.

D. Air Pollutant Management

Suppliers must identify and manage emissions of air pollutants from their operations and facilities in compliance with applicable environmental regulations.

E. Waste Management

Suppliers must properly classify, store, treat, and dispose of waste generated in the course of business operations. They are encouraged to reduce waste generation and promote recycling and reuse.

F. Chemical Substance Management

Suppliers must establish procedures to safely handle, store, and dispose of hazardous chemicals. They must ensure that chemical substances used in their operations are properly labeled and that Material Safety Data Sheets (MSDS) are maintained and updated regularly. Employees must receive appropriate training to safely manage chemicals.

4. Labor / Human Rights

A. Prohibition of Discrimination

Suppliers must not discriminate in any employment-related decisions—such as hiring, promotion, compensation, or training—on the basis of gender, age, disability, religion, race, nationality, ethnicity, political opinion, marital status, or pregnancy. They must provide equal opportunities and foster a diverse and inclusive work environment.

B. Wages and Welfare Benefits

Suppliers must comply with applicable wage laws, including those related to minimum wages, overtime pay, and legally mandated benefits. They must not deduct wages unfairly and should provide employees with pay statements that clearly outline earned wages and deductions.

C. Working Hours Management

Suppliers must comply with local laws and industry standards regarding working hours, rest breaks, and holidays. Overtime must be voluntary and compensated appropriately, and excessive working hours must be avoided.

D. Humane Treatment

Suppliers must treat all employees with respect and dignity. Any form of inhumane treatment—

including harassment, abuse, coercion, or corporal punishment—is strictly prohibited.

E. Freedom of Association

Suppliers must respect employees' rights to freely associate, form or join labor unions, and engage in collective bargaining in accordance with local laws. Employees must not be disadvantaged or retaliated against for participating in such activities.

F. Prohibition of Child Labor

Suppliers must not employ children under the minimum working age defined by local laws or international standards. If young workers are employed, suppliers must ensure that their work does not interfere with compulsory education or harm their health and development.

G. Prohibition of Forced Labor

Suppliers must not use any form of forced, bonded, or indentured labor, or involuntary prison labor. Workers must be employed of their own free will and must not be required to surrender identification, passports, or work permits as a condition of employment.

5. Health and Safety

A. Establishment of a Health and Safety Management System

Suppliers must establish and maintain a health and safety management system that complies with applicable laws and ensures a safe and healthy work environment. They must continuously assess and improve their safety performance to prevent workplace accidents and illnesses.

B. Safety Management of Machines, Tools, and Equipment

Suppliers must regularly inspect and maintain machinery, tools, and equipment to ensure they are safe for use. They must provide appropriate protective equipment and safety devices and ensure all employees are properly trained in their use.

C. Emergency Response

Suppliers must establish and implement emergency response plans for natural disasters, fire, epidemics, and other emergencies. These plans should include procedures for reporting, evacuation, response, and follow-up actions. Emergency exits, alarms, fire detection systems, and firefighting equipment must be installed and inspected regularly to ensure proper operation.

D. Incident Management

Suppliers must implement systems to record and monitor industrial accidents and occupational

illnesses. In the event of an accident or serious illness, work must be stopped immediately, employees evacuated, and necessary measures taken. The root cause must be investigated and corrective actions established.

E. Safety Inspections

Suppliers must regularly assess workplace safety risks to identify employee exposure to hazards. Risk levels must be evaluated by combining the probability and severity of hazards, and control measures must be implemented accordingly. Findings must be shared with employees in a language they understand and posted in accessible locations.

F. Health Management

Suppliers must promote physical and mental health and take preventive measures against work-related diseases and injuries. They must monitor and manage exposure to noise, dust, and hazardous chemicals, and maintain a clean and safe working environment. Chemical substances must be managed safely, with up-to-date MSDS maintained and proper handling procedures followed. Regular health checkups must be conducted as required by national laws, and follow-up actions—such as work reassignment or reduction of hours—must be taken based on results.

6. Management System

A. Public Disclosure of Corporate Statements

Suppliers must establish and disclose their corporate mission statements or policies that reflect their commitment to ethical conduct, sustainability, and legal compliance.

B. Appointment of Responsible Personnel

Suppliers must assign personnel responsible for overseeing compliance with this Code of Conduct and managing sustainability, ethics, and regulatory issues within their organization.

C. Risk Assessment

Suppliers must regularly identify, assess, and manage risks related to business ethics, human rights, labor, environment, and health and safety. Preventive and corrective measures must be taken accordingly.

D. Training and Communication

Suppliers must provide employees and relevant stakeholders with appropriate training and communication on ethical conduct, regulatory compliance, and the standards outlined in this Code. Training records must be maintained, and awareness should be reinforced regularly.

E. Information Management

Suppliers must maintain accurate records related to their operations and compliance with this Code. Information must be managed transparently and made available to DY INNOVATE upon request, where permitted by law.

F. Grievance Mechanism

Suppliers must establish a grievance mechanism that allows employees and stakeholders to report violations or concerns confidentially and without fear of retaliation. All reports must be investigated promptly and addressed appropriately.

G. Subcontractor(Lower-tier Supplier) Management

Suppliers must ensure that their subcontractors and lower-tier suppliers are aware of and comply with the requirements of this Code. Suppliers are encouraged to conduct assessments and provide support to improve compliance throughout the supply chain.

H. Compliance with Code of Conduct

Suppliers must continuously monitor and review their adherence to this Code of Conduct. DY INNOVATE may conduct assessments or request information to verify compliance, and suppliers are expected to cooperate in good faith.