

# SUMITOMO ELECTRIC DEVICE INNOVATIONS,USA

**Business Code of Conduct ("Code")** is to provide information and guidelines to directors, officers and employees of Sumitomo Electric Device Innovations USA ("Company") to uphold applicable laws and regulations as well as ethical standards.

**FOUNDED** on Sumitomo Business Spirit, Sumitomo Electric Device Innovations USA policy is to operate and conduct its business not only within the letter and spirit of the law, but also in accordance with the highest ethical standards. Sumitomo Electric Device Innovations USA places highest priority on lawful and ethical corporate activities.

## **THE SUMITOMO BUSINESS SPIRIT**

Sumitomo Business Principles

ARTICLE 1 - Sumitomo shall achieve strength and prosperity by placing prime importance on integrity and sound management in the conduct of its business.

ARTICLE 2 - Sumitomo shall manage its activities with foresight and flexibility in order to cope effectively with the changing times. Under no circumstances, however, shall it pursue easy gains or act imprudently.

## **THE SEI GROUP CORPORATE PRINCIPLES**

Each company of the SEI Group shall

- Offer the very best products and services to satisfy customer needs.
- Build technical expertise, realize changes and strive to consistent growth.
- Contribute to creating a better society and environment, with a firm awareness of our social responsibility.
- Maintain high corporate ethics and strive to become a company worthy of society's trust.
- Nurture a lively corporate culture that enables employees' self-improvement.

## **Overview of the code:**

### ***Environment, Safety and Health***

- Compliance with all federal, state and local environment, health and safety laws and regulations regarding products and factory operation,
- Environmental Response Compensation and Liability Act, Toxic Substances Control Act, and Occupational Safety and Health Act, and related state and federal laws.
- Hazardous Substances

### ***Ethics***

- Company Assets- Trade Secrets , Computer Software Programs, Intellectual Property
- Conflict of Interest- Business Integrity, No Improper Advantage, Disclosure of Information
- Inappropriate Payments - Supplier Responsibility, Company Commitment, Worker Feedback
- Dishonesty/Fraud
- Antitrust Compliance

### ***Labor***

- Equal employment opportunities for all persons.
- Non-Discrimination
- Verify the identity and legal authorization to work of all individuals.
- Harassment

### ***Management***

- Company Commitment
- Compliance - Management Accountability and Responsibility, Training and Communication

- Audits and Assessments
- Legal and Customer Requirements
- Worker Feedback/Reporting and Participation
- Corrective Action Process
- Documentation and Recording

***Anti-bribery Compliance***

- Conflict of Interest
- Inappropriate Payments
- Dishonesty/Fraud
- Antitrust compliance