



KDDI Group
Sustainable and Responsible Procurement Guidelines

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Corporate Procurement Division, KDDI Corporation

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Section 1 Code of Conduct

1. Respecting Laws and Internationally Recognized Standards

Companies shall respect internationally recognized standards in addition to complying with the laws and regulations of their home country as well as countries and regions where they conduct business.

[Explanation]

Internationally recognized standards refer to expectations about the behavior of a socially responsible organization, guided by customary international law, generally accepted principles of international law, and intergovernmental agreements that are universally or near-universally accepted (including conventions and treaties). For example, this corresponds to documents such as the Guiding Principles on Business and Human Rights and Sustainable Development Goals (SDGs) of the United Nations, the Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development (OECD), and the MNE Declaration (Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy) of the International Labor Organization (ILO).

2. Human Rights and Labor

Companies shall respect the rights of workers in line with international human rights standards, including the ILO core labor standards, in addition to complying with relevant laws and regulations.

(2-1) Prohibiting Forced Labor

Companies shall not use labor obtained by force, bond, exploitative prison labor, slavery, or human trafficking. Companies also shall protect the right of workers to change or terminate employment, and shall not force workers to work.

[Explanation 1]

Worker(s) refers to anyone that works, regardless of the form of employment, including regular employees, temporary employees, migrant workers, students, contract employees, and directly hired employees. International human rights standards to refer to include the Universal Declaration of Human Rights and International Bill of Human Rights of the United Nations and the Core Labor Standards of the ILO.

[Explanation 2]

Companies are prohibited from transporting, concealing, employing, transferring, and receiving people by means of threat, coercion, abduction, or deceit. Having workers pay fees for employment may also lead to forced labor, and forced work to pay off such a fee is also prohibited. In particular, there are many reports of migrant workers, including foreign workers,

being forced to work. When employing foreign workers, those workers shall be provided with an employment contract containing the employment conditions in a language that they can understand, before they leave their home country. Other acts that lead to forced labor include hindering workers from using their government-issued identification, passport/visa, work permit, or immigration application (except when the law stipulates that someone other than the worker retain such documents) by means of concealment or confiscation, or imposing limitations on worker entry/exit to facilities or movement within facilities.

[Explanation 3]

Forced labor refers to involuntary labor conducted under the threat of penalty, etc. Types of forced labor include the following.

- (1) Abusing vulnerabilities (such as employment contracts not in the native language of migrant workers)
- (2) Deception (such as employment/labor conditions not explained correctly, or replaced during employment)
- (3) Isolation (such as having workers work in locations that are difficult to access or communicate with from the outside)
- (4) Threats and intimidation (such as penalizing workers for making workplace complaints, or demanding that workers pay a fine when they want to terminate employment)
- (5) Withholding wages (such as delaying wage payments or forcibly storing or putting aside a portion of wages)
- (6) Debt coercion (such as workers taking on debt in order to pay off recruitment fees)
- (7) Excessive overtime (such as making workers work overtime in excess of what is allowed by the law or the labor-management agreement)
- (8) Prohibiting movement (such as restrictions on movement not based on a reason such as information security or health and safety, or constant monitoring of a dormitory via surveillance cameras)
- (9) Physical or mental abuse (such as violence, yelling, or sexual harassment)
- (10) Withholding the original copies of identification (such as when the employer holds the passport of a worker)

Bonded labor refers to labor that workers cannot voluntarily terminate. This includes cases where workers are forced to incur debt in order to pay recruitment fees, and not allowing the workers to leave until that debt is paid. Exploitation refers to unfair treatment based on the abuse of a superior bargaining position, and exploitative prison labor refers to the act of making prisoners work without paying adequate wages.

(Modern) Slavery is defined by the United States Department of State as an umbrella term that encompasses trafficking in persons, which includes forced labor and sex trafficking. It is also defined by the Modern Slavery Act of 2015 in the United Kingdom as unfair exploitation of people in forced-labor circumstances.

(2-2) Prohibiting Child Labor and Respecting the Rights of Young Workers

Companies shall not allow children who are under the minimum age for employment to work. Furthermore, companies shall also not allow young workers under the age of 18 to perform hazardous work that is likely to jeopardize their health or safety, including night work or overtime.

[Explanation 1]

Child labor is prohibited in all circumstances by the ILO and national laws. In particular, there is a pressing need to immediately address the worst forms of child labor. The Worst Forms of Child Labour Convention, 1999 (No. 182) of the ILO defines these as the following four forms of child labor.

- All forms of slavery or practices similar to slavery
- Using, procuring or offering a child for prostitution, for the production of pornography or for pornographic performances
- Using, procuring or offering a child for illicit activities, in particular for the production and trafficking of drugs
- Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children

Workers (including students, etc.) under the age of 18 should be guaranteed satisfactory working conditions, and The Minimum Age Recommendation, 1973 (No. 146) of the ILO stipulates the following benefits in particular.

- Provision of fair remuneration and its protection, bearing in mind the principle of equal pay for equal work (and the wage rate for student workers, interns, and trainees engaging in job assignments that are identical with or similar to those performed by other newly hired workers shall be at least the same wage rate as that for such newly hired workers)
- Strict limitation of the hours spent at work in a day and in a week, and the prohibition of overtime, so as to allow enough time for education and training (including the time needed for homework related thereto), for rest during the day and for leisure activities
- Granting, without possibility of exception save in genuine emergency, of a minimum consecutive period of 12 hours' night rest, and of customary weekly rest days
- Granting of an annual holiday with pay of at least four weeks and, in any case, not shorter than that granted to adults

- Coverage by social security schemes, including employment injury, medical care and sickness benefit schemes, whatever the conditions of employment or work may be
- Maintenance of satisfactory standards of safety and health and appropriate instruction and supervision

Due diligence is also required to protect the rights of children and young workers.

Minimum age for employment		
	Developed countries	Developing countries
Regular work	15 years	14 years
Hazardous work	18 years	18 years
Light work	13 years	12 years

[Explanation 2]

Child labor refers to any kind of activity or work which, by its nature or the circumstances in which it is carried out, is harmful to the intellectual, physical, social and moral development of young people and undermines their education, preventing them from going to school, constraining them to abandon schooling too soon or forcing them to balance work and study at the same time. A description to such effect has been set forth in the International Labour Standards and Sustainable Sourcing Handbook Towards the Realisation of Decent Work through the Tokyo 2020 Olympic and Paralympic Games, 2019 of the ILO/Tokyo2020.

The minimum age for employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years old according to the Minimum Age Convention, 1973 (No. 138) of the ILO (during the transitional period, a developing country whose economy and educational facilities are insufficiently developed may initially specify a minimum age of 14 years). The age at which employment is allowed also differs according to the nature of labor. In regard to hazardous work, all countries must set a minimum working age of 18 years. However, such work may be allowed from the age of 16 years in cases where national organizations of employers and workers concerned have been consulted beforehand, the health, safety and morals of the young persons concerned are fully protected, and the young persons have received adequate specific instruction or vocational training in the relevant field of activity.

Hazardous work refers to the following, which are defined in the Worst Forms of Child Labour Convention, 1999 (No. 190) of the ILO.

- Work which exposes children to physical, psychological or sexual abuse
- Work underground, underwater, at dangerous heights or in confined spaces

- Work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads
- Work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health
- Work under particularly difficult conditions such as work for long hours or during the night, or work where the child is unreasonably confined to the premises of the employer

(2-3) Decent Working Hours

Companies shall not allow workers to work in excess of the maximum working hours set by local laws and regulations, and shall appropriately manage working hours and days off in consideration of internationally recognized standards.

[Explanation 1]

Companies are required to assign work hours and grant leave and rest periods based on applicable laws and regulations. They should also consider internationally recognized standards. For example, as in the Hours of Work (Industry) Convention, 1919 (No. 1) and Hours of Work (Commerce and Offices) Convention, 1930 (No. 30), international standards of the ILO stipulate that weekly work hours must not exceed 48 hours including overtime, except in emergency or unusual situations. The Weekly Rest (Industry) Convention, 1921 (No. 14) and Weekly Rest (Commerce and Offices) Convention, 1957 (No. 106) stipulate that workers must be granted a rest period of at least one full day (24 hours or longer) off or longer each week (work must not exceed six consecutive days). Although the Hours of Work (Industry) Convention, 1919 (No. 1) and Hours of Work (Commerce and Offices) Convention, 1930 (No. 30) are important conventions, they are not an up-to-date instrument. The ILO has also issued the Reduction of Hours of Work Recommendation, 1963 (No. 116), which promotes the ratification of the Forty-Hour Week Convention, 1947 (No. 47) as the social standard to achieve. Several industry standards also set a weekly limit on work hours at 60 hours including overtime.

[Explanation 2]

Appropriately manage refers to the following.

- Annual working days shall not exceed the maximum set by law.
- Weekly work hours including overtime shall not exceed the maximum set by law (excluding unavoidable times of disaster or emergency).
- Workers shall be allowed the right to paid annual leave, maternity leave, and childcare leave as stipulated by the law.
- Workers shall be allowed to take the break time stipulated by the law.

- Physical and mental health checks shall be conducted to ensure the health of workers.
- Even working hours for employees, etc. defined in relevant laws and regulations shall be reduced so that they will not engage in excessive labor.

(2-4) Adequate Wages and Allowances

Companies shall comply with all applicable laws and regulations regarding payments for work (including local minimum wages, overtime payments, and allowances and deductions required by law). Furthermore, it is expected that companies pay wages at a level that allows workers to meet their basic needs (living wages).

[Explanation 1]

Unfair wage deductions may be deemed as non-payment of wages. For example, in the SA8000 international standard regarding labor and human rights, pay cuts shall not be made for the purpose of discipline.

Furthermore, compensation for overtime work shall be paid to workers at a rate higher than the standard hourly pay rate, according to the laws and regulations of the corresponding region. Upon payment, companies shall provide a wage slip that includes information that enables the breakdown of payments to be checked.

[Explanation 2]

Local minimum wages refer to the minimum wages stipulated by laws regarding wages in the country where the company is operating. This must be paid to workers at the appropriate time without delay, based on the law where the company is operating.

Living wages refer to wage levels that meet the needs of a worker and their family and satisfies the dignity of that worker, according to international standards.

Unfair wage deductions refers to wage deductions that violate laws on labor, etc. For example, companies cannot deduct the cost of uniforms, personal protective equipment required for work, or the cost of cleaning uniforms from wages. However, this does not include nonpayment of wages corresponding to time not worked due to worker's absence or late arrival at work.

(2-5) Prohibiting Inhumane Treatment

Companies shall respect the human rights of workers and shall not treat workers in a manner that is or may be construed inhumane, including physical and psychological abuse, coercion, or harassment.

It prohibits the use of security companies and others to unilaterally clear up disruptions with inhuman or humiliating treatment because workers have failed to follow instructions or control, and must ensure that this is complied with.

Companies shall also provide workers with individually secured facilities for storing their personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

[Explanation]

Psychological abuse refers to the act of causing mental or emotional harm through psychological violence to others by means, for example, of inhumane expressions or harassment, neglect, or words that damage one's self-esteem.

Physical abuse refers to violence and work under harsh circumstances.

Coercion refers to the act of forcing others to do something against their will through intimidation, etc. For example, forcing workers to work overtime.

Harassment refers to the act of making others feel unpleasant due to pestering or bullying. This includes sexual harassment, sexual abuse, physical punishment, physical or mental oppression, verbal abuse, and the withdrawal of basic physical comfort (such as chairs or personal protective equipment). In addition, it also includes abuse of authority, or pregnancy discrimination and maternity harassment.

The Violence and Harassment Convention, 2019 (No. 190) of the ILO defines violence and harassment as shown below.

- (a) The term violence and harassment in the world of work refers to a range of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.
- (b) The term gender-based violence and harassment means violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment.

(2-6) Prohibiting Discrimination

Companies shall not engage in discrimination or harassment. Companies shall also consider requests from workers regarding religious practices where appropriate.

Behavior that may lead to discrimination is not allowed with respect to wages, promotions, rewards, access to training, hiring, and employment practices, including discrimination based on race, color, age, gender, sexual orientation, gender identify and expression, ethnicity or

national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, protected genetic information, or marital status. Furthermore, health checks and pregnancy tests are also regarded as discrimination if they could harm equal opportunity or the fairness of treatment.

[Explanation]

The causes of discrimination are diverse.

- Race and color: Discrimination made on the basis of belonging to a specific ethnic group, which may affect ethnic minorities, indigenous peoples, or tribal populations.
- Sex: Discrimination on the basis of biological characteristics and functions that distinguish men and women and of social differences between men and women. It also includes discrimination on the basis of marital status, family structure, or motherhood.
- Religion: Discrimination on the basis of membership of a certain religion or expression of religious belief. It also includes discrimination against atheists.
- Political opinion: Discrimination on the basis of different opinions with respect to established political principles, membership of a particular political party, political or sociopolitical attitudes, civic commitment, or moral qualities.
- National extraction: Discrimination on the basis of a person's birthplace, ancestry or foreign origin. It may target national or linguistic minorities, nationals who have acquired their citizenship by naturalization, and the descendants of migrants from other countries, etc.
- Social origin: Discrimination on the basis of social class, occupational category, or caste. Social origin may affect one's career.

The principle of non-discrimination with respect of employment and occupation covers the principle of equal remuneration for men and women who accomplish work of equal value. According to the Equal Remuneration Convention, 1951 (No. 100) of the ILO, the principle refers to all the elements of remuneration, such as a salary or ordinary wage and other basic fees, directly or indirectly paid, in cash or in kind, by the employer to the worker arising from the employment (Convention No. 100). Objectively determining the value of work requires consideration of the elements such as work components, responsibilities, skills, effort, working conditions, and major achievements.

Discrimination can also be based on factors such as age or disability, health (in particular HIV/AIDS), membership of a labor union, and sexual orientation.

In the United States, the following factors must also be considered.

- Veteran status
- Protected genetic information

(2-7) Freedom of Association and Right to Collective Bargaining

In conformance with local laws and regulations, companies shall respect the right to collective bargaining of workers and openly communicate with workers for improving working environments and wage conditions.

Workers and their representatives shall be able to engage candidly in collective bargaining to gain mutual understanding together with management regarding opinions and concerns about working conditions and management practices, without fear of discrimination, retaliation, intimidation, or harassment.

[Explanation]

To develop effective Collective Bargaining, the Right to Organize and Collective Bargaining Convention, 1949 (No. 98) of the ILO requires that companies recognize representative organizations of workers for the purpose of collective bargaining, encourage bona fide negotiations between both sides, and incorporate provisions for dispute resolution into collective agreements. The following items are recommended as concrete examples of relevant corporate activities.

- Provide the necessary facilities for establishing effective collective agreements
- Enable duly authorized representatives of workers to negotiate with management representatives who are authorized to make decisions on the matters under negotiation
- Not threaten or suggest retribution to unfairly influence negotiations or hinder the exercise of the right to organize
- Provide information required for meaningful negotiations
- When requested by the government, respond constructively with relevant information on their operations

3. Health and Safety

In addition to complying with relevant laws and regulations, companies shall consider standards such as ILO health and safety guidelines to minimize injury and physical and mental illness accompanying services by workers in the workplace, and maintain a safe and healthy working environment.

(3-1) Occupational Safety

Companies shall identify and assess risks regarding occupational safety, and maintain safety through suitable design, engineering, and administrative controls. Reasonable steps shall also be taken to protect pregnant women and nursing mothers.

[Explanation]

Risks regarding occupational safety refer to the potential risk for health problems and accidents to occur during work due to factors such as electricity or other energy, fire, vehicles

or moving objects, floors that are slippery or prone to cause tripping, and falling objects.

Proper design, engineering, and administrative controls refer to the elimination or reduction of risks according to the hierarchical control of: (1) elimination of risk factors or substitution with safer options; (2) engineering control (such as monitoring dangerous places using sensors and shutting down the power source of machinery or equipment (lock out)); (3) administrative control (such as signs indicating prohibition of operating an energy shutoff device while the power source is shut off (tag out)); and (4) providing personal protective equipment (safety gear such as protective goggles, helmets, and gloves).

Reasonable steps to protect pregnant women and nursing mothers from hazardous conditions include avoiding risks such as lifting/moving heavy objects, exposure to infectious diseases, exposure to lead, exposure to poisonous chemical substances, physically demanding work, exposure to radioactive substances, threats of violence, long work hours, extreme temperatures, and extreme noise.

For one year after childbirth, if it is necessary for a worker to nurse a child, it is desirable for a company to provide appropriate break times for nursing or feeding, and to implement measures such as providing a safe and clean place to do so, that colleagues and the general public cannot enter and cannot see.

(3-2) Emergency Preparedness

Companies shall identify the possibility of emergency situations such as natural disasters or accidents that may adversely affect human life or safety, establish procedures in case of emergency to minimize harm to workers and property, install the required equipment, and conduct training and drills so that the required responses can be taken in case of emergency.

[Explanation]

Emergency plans refer to, for example, emergency reporting, communication to employees, clarifying evacuation procedures, installing evacuation equipment, ensuring easily identifiable exits without obstruction, providing appropriate exit facilities, storing medical supplies for emergencies, installing fire-detection systems, installing fire extinguishers, fire shutters, and sprinklers, securing external communication methods, and maintaining recovery plans.

Dissemination of emergency plans within the workplace is also required. This involves, for example, providing emergency training (including evacuation drill) to workers, and placing/posting emergency procedures in the workplace in an easily accessible location.

(3-3) Occupational Injury and Illness

Companies shall identify, assess, record, and report the status of occupational injury and illness, and implement appropriate countermeasures and corrective actions.

[Explanation]

Appropriate countermeasures refer to the following systems and measures.

- (1) Promoting reporting by workers
- (2) Classifying and recording injuries and illnesses
- (3) Providing medical treatment when necessary
- (4) Investigating injuries and illnesses
- (5) Implementing corrective actions to eliminate causes and facilitating workers' return to

work

This also includes implementing the required administrative procedures stipulated by law and taking out industrial accident insurance.

(3-4) Industrial Hygiene

Companies shall identify, assess, and appropriately control the risk of workers' exposure to hazardous biological, chemical, or physical agents in the workplace.

[Explanation]

Hazardous agents include substances that are poisonous, radioactive, or cause chronic illness (such as lead and asbestos).

These substances may exist in smoke, steam, mist, or dust form. Noise and odors may be deemed hazardous to the human body if they are significantly strong.

Appropriate control refers to establishing and implementing management standards, and providing the appropriate training and personal protective equipment to workers.

(3-5) Physically Demanding Work

Companies shall identify and assess worker exposure to the hazards of physically demanding tasks, and appropriately control such work so that it does not lead to occupational injury and illness.

[Explanation]

Physically demanding work includes long hours of work in an unnatural position, long hours of repetitive or continuous work such as data entry or assembly work that causes physical exertion, and heavy labor such as the manual handling of heavy raw materials or manual transport of heavy objects.

Appropriate management includes providing an ergonomic working environment, regular breaks, providing work aids, and having workers multiple workers share and cooperate on tasks. (It is also effective to consider ways to reduce accidents and mistakes by organizing a work environment that enables people to move around properly and efficiently.)

Ergonomics, or Human Factors, is a field of research used in the actual design of objects and environments to ensure that people can use them in as natural a state as possible and with movements as natural as possible. (This also includes reducing accidents and mistakes by organizing a work environment that enables people to move around correctly and efficiently.)

(3-6) Machine Safeguarding

Companies shall evaluate the machinery used by workers for safety hazards and provide appropriate safeguarding.

[Explanation]

Appropriate safeguarding refers to management that prevents injuries and accidents that could occur during work, safety mechanisms such as fail safes, fool proofing, interlocks, and tag outs, and safety devices and protective barriers in place, as well as regular inspection and maintenance of machinery.

(3-7) Health and Safety at Facilities

Companies shall appropriately maintain the health and safety of facilities and accommodations provided to workers (such as dormitories, cafeterias, and toilets). Dormitories also require appropriate emergency exits to be provided.

[Explanation]

Maintaining health and safety refers to maintaining the cleanliness and sanitation of facilities, and requires consideration of the following points.

- Drinking water: Water quality tests compliant with laws and regulations, and safe drinking water (provided by a water cooler, etc.)
- Sanitary food preparation: Clothing cleanliness and health checks for kitchen workers, pest control, temperature control of food storage, certification of cafeteria business licenses, etc.
- Toilets: A sufficient number of clean toilet facilities, providing toilet paper, etc.
- Dormitories: A fire response plan, emergency exit routes (egress), secured facilities for storing personal items (providing lockable storage), adequate living space (3.3 m² or more per person), ventilation, temperature control, adequate lighting, etc.

(3-8) Health and Safety Communication

Companies shall provide training on appropriate health and safety information regarding various workplace hazards (including, but not limited to, hazards related to machinery, electricity, chemicals, and fire, as well as physical hazards) that workers may be exposed to in the workplace in languages and methods that the workers can understand. A system that enables workers to provide feedback on safety is also required.

(3-9) Worker Health Management

Companies shall conduct appropriate health management for all employees.

[Explanation]

Appropriate health management refers to conducting health checks at least at the level stipulated by law, and working on the prevention and early detection of worker illness.

It is also necessary to adequately consider treatment such as mental healthcare and the prevention of health problems due to heavy workloads.

4. Environment

Companies shall actively address global environmental problems such as resource depletion, climate change, and pollution, as well as address regional environmental problems considering the health and safety of people in its relevant local community.

They must also contribute to the realisation of a sustainable society by improving energy efficiency and promoting the use of renewable energy sources.

(4-1) Environmental Permits and Reports

Companies shall obtain the permits and approvals required for conducting business as well as register and report according to local laws and regulations.

[Explanation]

In accordance with laws and regulations of countries in which companies are located, they shall obtain the permits and approvals required from administrative agencies, if necessary. Moreover, they shall submit required management reports to administrative agencies without fail.

Examples in Japan include the obligation to assign a manager who has obtained the qualifications stipulated by law, such as laws on waste disposal (a specially-controlled industrial waste manager), energy saving (an energy manager in plants that use energy at or above a certain level), and the control of air pollution (a pollution prevention manager at plants that emit chemical substances, dust, or smoke).

Furthermore, companies may be obligated to assign a manager responsible for poisonous/deleterious substance management, designated chemical substance management, and hazardous substance management, depending on the chemical substances used in the business.

It may also be necessary to receive permission for facilities that handle hazardous substances and environmental impact assessments, depending on the type of business conducted and the location of plants.

(4-2) Reducing Energy Consumption and Greenhouse-Gas Emissions

Companies shall address energy efficiency and make continuous efforts to reduce greenhouse-gas emissions and energy consumption.

Improving energy efficiency involves minimizing energy consumption and the related scope 1 and scope 2 greenhouse gases (GHG), and companies shall track and document energy efficiency at each facility or business site. Moreover, it is desirable to track and manage the emission of greenhouse gases of scope 3.

[Explanation]

There are various types of greenhouse gases, but the term greenhouse gas generally refers to the six groups of substances defined in the Kyoto Protocol, which are carbon dioxide, methane, nitrous oxide, HFC, PFC, and SF₆.

Continuous efforts to reduce greenhouse gas emissions refers to the process of setting voluntary reduction targets for the above six greenhouse gas types, and making and executing plans to achieve them.

Scope 1 greenhouse gas emissions are direct emissions caused by a company, and scope 2 greenhouse gas emissions are indirect emissions caused by the use of electricity, heat, and steam provided by another company.

In addition, the term "scope 3" refers to the quantity of greenhouse gas emissions discharged through procurement of raw materials and products, transportation, product use, and disposal processes, which are outside the scope of emissions discharged in-house.

(4-3) Air Emissions

Companies shall comply with relevant laws and regulations and implement appropriate measures to reduce the emission of hazardous substances into the atmosphere.

[Explanation]

Hazardous substances discharged to the atmosphere include volatile organic chemicals, aerosols, corrosives, micro particles, ozone-depleting substances, and combustion by-

products. Companies shall strive to analyze and monitor these substances prior to discharge, and only discharge them after conducting the required control and treatment based on the results of that analysis and monitoring. Relevant measures include routine monitoring of treatment system performance and the handling of discharged substances.

(4-4) Water Management

Companies shall comply with laws and regulations, monitor the source, usage, and discharge of water used, and save water. All wastewater shall be tested as required, and monitored, controlled, and processed before discharge or disposal.

Sources of pollution that may cause water pollution shall also be identified and appropriately managed.

(4-5) Effective Use of Resources and Waste Management

Companies shall comply with laws and regulations and implement appropriate management, promote the 3Rs (reduce, reuse, and recycle) and build a circular economy system, shall ensure the effective use of resources, and minimize waste.

[Explanation]

Even when disposing of wastes not identified as hazardous, companies shall identify and manage the same, implement a systematic approach for responsible disposal or recycling, and work to reduce waste.

Companies shall implement measures for disposal of substances according to local laws and regulations and minimize such disposal, and ensure that natural resources are not wasted.

It is possible to achieve the aforementioned goals through changing the production equipment at the source, using alternative materials, and reusing and recycling resources. Companies should also set voluntary targets to help in compliance with laws and regulations. Natural resources refer to water, fossil fuels, minerals, virgin forest, and the products of virgin forest, etc. Preventing environmental pollution leads to saving natural resources and is closely related to global sustainability.

(4-6) Chemical Substance Management

Companies shall comply with laws and regulations to identify, label, and manage chemical and other substances that pose danger hazard to humans or the environment, and conduct management to ensure safe handling, transport, storage, use, recycling, reuse, or disposal of such substances.

[Explanation]

In Japan, companies shall perform management of chemical substances based on the Act on the Evaluation of Chemical Substances and Regulation of Their Manufacture, etc., the Poisonous and Deleterious Substances Control Act, the Industrial Safety and Health Act, Fire Service Act, and PRTR (Law Concerning Reporting, etc. of Releases to the Environment of Specific Chemical Substances and Promoting Improvements in Their Management). Companies shall also consider chemical substance management in manufacturing processes.

(4-7) Managing the Chemical Substances Contained in Products

Companies shall comply with all laws, regulations, and customer requests applicable to the prohibition and restriction of use of specific substances contained in products.

[Explanation]

Companies shall also consider customer requests regarding the chemical substances contained in products.

- Companies shall follow the laws and regulations of the countries where the products are sold.
- Companies shall take responsibility for the components included in the end products, and upstream companies shall provide the required information to downstream companies.

For example, when exporting to the EU, the relevant laws and regulations include the RoHS Directive and the REACH Regulation. It is also necessary to consider added, mixed, or adhered substances during the manufacturing process.

(4-8) Biodiversity Conservation

Measures related to biodiversity conservation and sustainable biodiversity shall be promoted.

[Explanation]

The term "biodiversity conservation" refers to a situation in which, subject to the Basic Act on Biodiversity, enriched biodiversity will be maintained by promoting measures related to biodiversity conservation and sustainability thereof in a comprehensive and planned manner, and as a result, a society coexisting with the nature that makes it possible to enjoy benefits therefrom in the future can be realized, thereby contributing to conservation of the global environment.

(4-9) Soil Management

Companies must recognise soil as a valuable resource and, in order to minimise its impact on the environment, must prevent the discharge and run-off of substances that cause soil pollution and promote sustainable use through the proper disposal of waste materials.

Companies must recognise soil as a valuable resource and promote the sustainable use of soil to minimise its impact on the environment.

5. Fair Trading and Ethics

Companies shall conduct business activities based on high ethical standards in addition to compliance with the law.

(5-1) Preventing Corruption

Companies shall not be involved in bribery, corruption, blackmail, or embezzlement in any form.

[Explanation]

Companies shall uphold a policy of prohibiting any and all forms of bribery, excessive entertainment or gifts, corruption, blackmail, or embezzlement, and maintain continuous compliance.

Continuous compliance requires not only establishing such a policy, but also appropriately training employees and continuing to ensure that the policy is implemented.

(5-2) Prohibition of Providing and Receiving Improper Benefit

Companies shall not provide or accept any promises, propositions, or approvals as a means of obtaining bribes or any other illicit or inappropriate benefit.

In particular, in relation to bribery, considering the global standards, including the laws of England and the U.S. concerning bribery regulations, companies shall be required to observe the laws and regulations of other associated countries and regions.

KDDI Group does not request any benefits that can only be obtained through via bribery or other wrongful means. Moreover, regardless of whether inside or outside relevant countries, for the purpose of obtaining and maintaining business projects with KDDI Group and facilitation in the course of business projects thereof, KDDI Group does not allow any companies involved in business projects with KDDI Group to attempt to influence official duties by public servants or persons similar thereto (hereinafter referred to as "Public Servants, etc."), directly or indirectly provide such Public Servants, etc. with money or any other benefits or conveniences (hereinafter referred to as "Money, etc."), promise or offer to do so, or tolerate such actions.

Furthermore, depending upon the country or region, in relation to customs clearance, security checks at a checkpoint, entry into a country, issuance of a stay visa or application for extension of the same, work for water and sewage service facilities or phone lines, etc., Public Servants, etc. may request payments in small amounts not in accordance with associated laws or regulations (hereinafter referred to as "Facilitation Payment(s)"). Such Facilitation Payments are prohibited as bribery to Public Servants, etc.

[Explanation 1]

Companies are prohibited from directly or indirectly providing or receiving something valuable, or promising or proposing to do so, in order to gain business or obtain inappropriate benefit. It is necessary to clarify relevant policies and procedures and implement monitoring systems/procedures therefor in order to comply with laws regarding the preventing of corruption.

[Explanation 2]

Public Servants, etc. includes the following persons (regardless of country). Attention shall be paid to extensively widening the scope in question beyond the extent assumed on a normal basis.

- Employees of governmental offices, ministries, local governments, etc. (e.g., Diet members, military personnel, police officers, firefighters, tax inspectors, and customs officers)
- Officers and employees of government-affiliated enterprises and corporations (and government-affiliated enterprises and corporations include organizations that government offices, ministries and government offices, local governments, etc. control as a matter of fact through main officers, etc., regardless of the shareholding ratio in question (e.g., state-owned or semi-government public utility corporations related to electricity, gas, railways, or the like, national universities, and national hospitals))
- Officers and employees of public international institutions (e.g., the United Nations (UN) and the World Trade Organization (WTO))
- Officers and employees of a political party

- Candidates for an elected public office
- Persons conducting public duties on behalf of the aforementioned parties (e.g., government-designated inspection bodies and designated testing agencies)

(5-3) Fair Information Disclosure

Companies shall disclose information regarding labor, health and safety, environmental activities, business activities, organizational structures, financial status, and performance according to applicable laws and regulations and industry practices. Falsification of records or the disclosure of false information is not allowed.

[Explanation]

Companies are required to actively provide and disclose information to stakeholders.

The information to provide and disclose to stakeholders includes details of business activities, financial status, ESG (environmental, social, and governance) information, risk information (e.g., damage due to large-scale disasters, adverse impacts on the environment and society, and the discovery of significant legal violations), and information regarding the supply chain. Disclosing information on critical risks in a timely manner, and communicating to customers are also examples of actively providing information.

Companies are not allowed to tamper with records, misrepresent information, or disclose false information.

(5-4) Respecting Intellectual Property

Companies shall respect intellectual property rights, and the transfer of technology and know-how shall be performed in a manner that protects intellectual property. Companies shall also protect the intellectual property of third parties such as customers and suppliers.

[Explanation]

Intellectual property includes trade secrets and technical know-how in addition to intellectual property rights.

Intellectual property rights are rights defined by law, and include patent rights, utility model rights, design rights, trademark rights, copyrights, or the like.

(5-5) Conducting Fair Business

Companies shall engage in fair business, competition, and advertising.

Companies shall comply with laws regarding fair business, including fair competition and subcontract law, and shall not conduct illegal acts such as cartel agreements to restrict competition, unfair business practices, actions that disadvantage suppliers based on the abuse of a superior bargaining position, or misleading representation.

It must maintain transparency and fairness, have high ethical standards against conflicts of interest and a reputation as a trusted company.

It is also necessary to avoid forces that pose a threat to the order and safety of civil society, and comply with laws, regulations, and all social standards. In catalog presentations and advertising of products and services, companies shall not express untruths or mislead consumers and customers, and shall also make sure not to include information that slanders or infringes the rights of other companies or individuals.

[Explanation]

Fair competition refers to complying with local laws regarding fair competition and fair trading and promoting free and fair competition while avoiding cartel agreements to restrict competition, unfair business practices, and misleading representation. Fair advertising refers to advertising that provides factual information that is not for unfair purposes.

The term "abuse of a superior bargaining position" refers to a situation in which transactional conditions with suppliers, etc. are to be determined and altered in a one-sided manner, and unreasonable demands and obligations are to be imposed through use of the position of the purchaser and consigning party.

(5-6) Protecting Whistleblowers

Companies shall protect the confidentiality of information regarding whistleblowing and the anonymity of whistleblowers, and avoid retaliations towards whistleblowers.

[Explanation]

Whistleblowing refers to reporting or disclosing unfair practices in one's company or supply chain.

Whistleblower refers to a person who reports or discloses inappropriate activity by an employee or director of a company or a public official or public institution.

Disadvantageous treatment refers to acts that damage the work environment including harassment, as well as changes to working conditions such as unfair performance evaluation, rewards, dismissal, or reshuffling.

(5-7) Responsible Minerals Procurement

Companies shall exercise due diligence regarding places of origin for minerals and the process for circulation to ensure that the minerals contained in their manufactured products do not cause or contribute to serious human rights abuses, environmental destruction, corruption, or disputes in Conflict-Affected and High-Risk Areas, such as the Democratic Republic of the Congo and neighboring countries. Such companies shall disclose information on the status of use of the minerals listed below in their products.

- (1) Tantalum
- (2) Tin
- (3) Tungsten
- (4) Gold
- (5) Minerals designated by the Secretary of State of the United States
- (6) Cobalt

Subject to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, companies shall implement the following five steps.

Step 1: Establish strong company management systems

Step 2: Identify and assess risks in the supply chain

Step 3: Design and implement a strategy to respond to identified risks

Step 4: Carry out independent third-party audits of smelters'/refiners' due diligence practices

Step 5: Implement annual reporting on supply chain due diligence

Moreover, companies shall observe legal regulations, such as the Section 1502 of the Dodd-

Frank Wall Street Reform & Consumer Protection Act in the United States and the Conflict Minerals Regulation of the European Union.

(5-8) Fair Trading Practices

Companies are required to comply with international standards, laws and regulations on human rights, environment and social responsibility, and to take appropriate measures to prevent illegal trade in land, forests and other property, forced evictions and other practices.

6. Quality and Safety

Companies shall ensure the safety and quality for provided products and services and provide correct and accurate information thereof.

(6-1) Ensured Product Safety

Companies shall fulfill their responsibility as suppliers by ensuring that products meet safety standards stipulated by national laws and conduct designing, manufacturing, and sales of products regarding which adequate product safety is ensured.

Strict standards of quality control should be set and inspection processes implemented to guarantee product quality. Appropriate inspection methods and techniques must be used to identify and eliminate counterfeit parts.

(6-2) Quality Management

Companies shall not only comply with all laws and regulations applicable to the quality of products and services but also create an appropriate structure and management system for observing their own quality standards and customer requirements.

(6-3) Providing Accurate Information on Products and Services

Companies shall provide customers and consumers with correct and accurate information on products and services that will not cause misunderstandings. Companies shall not provide false information or information that has been falsified.

[Explanation]

Accurate information includes, but is not limited to, the following.

- Information on specifications, quality, and handling method of products and services that is true and correct
- Information on substances contained in the materials and components used in products, etc. that is true and correct

7. Information Security

Companies shall prevent leaks of confidential information and personal information, and strengthen their information security.

(7-1) Defense from Cyber-Attacks

Companies shall implement protective measures against threats such as cyber-attacks and implement controls to prevent related damage incurred thereby and by other third parties.

[Explanation]

Examples of cyber-attacks include targeted e-mail that leads to malware infections and malicious sites that can cause the leak of personal information, customer information, business partners' information, and confidential information such as trade secrets, as well as other harm such as important files becoming encrypted and held for ransom.

(7-2) Protecting Personal Information

Companies shall comply with relevant laws and regulations for all personal information of suppliers, customers, consumers, and employees and appropriately manage and protect the same.

Collection, storage, modification, transmission, sharing, and other disposal of personal information shall be performed within the scope required to achieve the specified purpose of use thereof.

[Explanation]

Personal information is information about a living individual, and contains information which enables that particular individual to be identified, such as name, date of birth, or other attributes (including information that can be easily matched with other information to identify a particular individual).

Appropriate management refers to establishing and implementing a general control framework for personal information, and includes establishing rules and policies that workers shall comply with as well as establishing relevant plans and implementing relevant measures, audits, and reviews in accordance with the aforementioned rules and policies. Appropriate protection includes preventing personal information from being wrongfully or unfairly retrieved, used, disclosed, or leaked.

(7-3) Leakage of Confidential Information

Companies are required to establish an appropriate framework and management system for controlling the confidential information collected thereby or received from third parties. This includes defining information management levels and employee training.

[Explanation]

Confidential information generally refers to information disclosed according to a written confidentiality agreement (including digital information recorded magnetically or optically) or information disclosed orally upon confidential notice.

Appropriate management refers to establishing and implementing a general control framework for personal information, and includes establishing rules and policies that workers shall comply with as well as establishing relevant plans and implementing relevant measures, audits, and reviews in accordance with the aforementioned rules and policies.

Appropriate protection involves preventing confidential information from being wrongfully or unfairly retrieved, used, disclosed, or leaked.

8. Business Continuity Planning

Companies shall make preparations to ensure that they can quickly resume business activities

in order to fulfill their responsibility of supply in the event that they or their business partners become victims of large-scale natural disasters, etc.

(8-1) Developing and Preparing a Business Continuity Plan

Companies shall identify and assess risks to business continuity, examine the impact of such risks on their business, and establish preparatory measures required in the medium to long term and a business continuity plan (BCP) that indicates the status of those initiatives.

The occurrence of large-scale natural disasters such as earthquakes and typhoons as well as terrorism, riots, infectious diseases, and accidents may have a major impact on business continuity. In light of such events, companies shall make appropriate preparations to ensure that production operations can quickly resume, and thereby minimize the impact on the supply chain. Recognized management systems such as ISO22301 were referred to when establishing these guidelines and may contain additional useful information.

9. Social Contribution

Companies shall contribute to the sustainable development of society and enterprise through social contribution activities (including those through business projects) in response to requests by an international society (e.g., U.N.).

(9-1) Contribution to Society and the Earth

Companies shall voluntarily take part in contribution activities for the development of international society and regional communities, such as contribution to the Paris Agreement's zero emissions plan and SDGs determined by the U.N.

The term "contribution activities for the development of international society and regional communities" refers to activities that assist communities through employing corporate management resources. In general, the following efforts constitute the aforementioned activities for the development of international society and regional communities.

- Social contribution through use of original services, technologies, or the like
- Nonmonetary social contribution through use of facilities, expertise/human resources, etc.
- Social contribution via monetary donation

Specific examples include resolution of social issues through main business, collaboration with regions in times of disaster, volunteer activities by employees, assisting in activities conducted by NPOs, NGOs, etc., donation activities, and dispatching and introducing various kinds of information. Each company should determine the scope of activities it can carry out, and engage in proactive social contributions.

Section 2 Establishing a Management System

A. Establishing a Management System

Companies shall establish a management system in order to comply with the code of conduct in Section 1. KDDI Group will give advice on an as-needed basis when constructing the management system at companies and implementing company education activities for employees (e.g., buyer training).

[Explanation]

A management system is for establishing a framework for continuous improvement through the Plan-Do-Check-Action (PDCA) cycle regarding policy compliance, implementation systems, corrective actions, and stakeholder engagement. This is not necessarily designed for acquiring certification.

Furthermore, a management system includes the following.

- 1) Company commitment
- 2) Management accountability and responsibilities
- 3) Legal and customer requests
- 4) Risk identification (risk assessment) and risk management
- 5) Improvement objectives
- 6) Training
- 7) Communication
- 8) Worker feedback, participation, and grievances
- 9) Audits and assessments of identified risks
- 10) Corrective Action Process
- 11) Documentation and recording
- 12) Supplier's responsibility

Examples of well-known management systems are indicated below.

- Health and safety management systems such as ILO Guidelines on occupational safety and health management systems, OHSAS18001, and ISO 45001
- Environmental management systems such as ISO 14001 and Eco-Action 21
- Quality management systems such as the ISO 9000 family, IATF16949, and ISO13485
- Information security such as ISO/IEC 27001
- Business continuity such as ISO22301
- Due-diligence guidelines on all corporate conduct: the OECD Due Diligence Guidance for Responsible Business Conduct.
- Due diligence in the field of labor: ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy

B. Supplier Management

In the Guiding Principles for Business and Human Rights of the United Nations and OECD guidelines, companies are required to take the same responsibility for CSR in their supply chain as they do at their own companies. Therefore, companies shall establish a process for communicating the requirements of the code of conduct in Section 1 to suppliers and monitoring supplier compliance.

[Explanation]

A supply chain refers not only to the process starting from raw materials and to the end when products and services arrive at the consumers, but all relationships such as worker dispatching agencies and contractors, regardless of the individual roles of each company.

C. Proper Import/Export Control

Companies shall maintain a clear management system and conduct appropriate procedures for the import and export of technologies and goods regulated by law.

[Explanation]

Companies shall understand and comply with the various national laws and regulations for importing and exporting in various countries.

Technologies and goods regulated by law refer to components, products, technologies, equipment, and software subject to import/export control according to laws and regulations based on international agreements, etc. (such as the Wassenaar Arrangement). It may be necessary to obtain permission, etc. from the competent authorities regarding importing and exporting.

D. Establishing a Grievance Mechanism

Companies shall establish a grievance mechanism that can be used by stakeholders, including workers and suppliers, in order to prevent illicit behaviors in-house as well as throughout the supply chains.

It is recommended that a multilingual grievance mechanism be implemented, such as one in Japanese and English.

[Explanation]

A grievance mechanism is a framework that enables related parties to report acts suspected to be in breach of Section 1: Code of Conduct in order to promote corrective action. It is important that complaints can be lodged anonymously. Whistleblowers shall not be treated disadvantageously due to their complaints. Examples of a grievance mechanism include a suggestion box, telephone, e-mail, or hotline managed by an external organization.

E. Disclosing the Activities

Companies shall disclose information about their actions according to these guidelines and relevant laws and regulations.

Examples of types of information disclosure include media, such as sustainability reports via company websites and printed media.

[Revision History]

Version Number	[Month] [Date], [Year]	Description
Version 1.0	March 1, 2021	Establishment of <ul style="list-style-type: none"> • KDDI Sustainable and Responsible Procurement Policy • KDDI Sustainable and Responsible Procurement Guidelines
Version 2.0	March 31, 2022	<ul style="list-style-type: none"> •Separated the collective description of KDDI Sustainable and Responsible Procurement Policy and KDDI Sustainable and Responsible Procurement Guidelines •Updated KDDI Sustainable and Responsible Procurement Policy as KDDI Group Sustainable and Responsible Procurement Policy
Version 3.0	April 1, 2023	•Updated KDDI Sustainable and Responsible Procurement Guidelines as KDDI Group Sustainable and Responsible Procurement Guidelines
Version 4.0	October, 2023	<ul style="list-style-type: none"> · Several provisions added and amended. 2. human rights and labour (2-5) Prohibition of inhuman treatment. 4. environment 4. Environment (4-9) Soil management 5. Fair trade/ethics (5-5) Fair business conduct 5. Fair trade/ethics (5-8) Fair business conduct 6. Quality and safety (6-2) Quality management

This document is a revised version of the KDDI CSR Procurement Policy formulated by KDDI in February 2014 and the KDDI Guidelines for CSR in the Supply Chain established thereby in March 2016. This document refers to the RBA's (Responsible Business Alliance) Code of Conduct (Ver. 7.0: issued in January 2021) and JEITA's Responsible Business Conduct Guidelines (Ver. 1.1: issued in March 2023), furthermore, includes additional items unique to KDDI.

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