

Guideline on Code of Conduct of SK Gas Partner Companies

Table of Contents (CONTENTS)

1. INTRODUCTION
2. HUMAN AND LABOR RIGHTS
 - 2.1 Voluntary working
 - 2.2 Young people's work
 - 2.3 Working hours
 - 2.4 Wage and benefits
 - 2.5 Humane treatment
 - 2.6 Prohibition of discrimination
 - 2.7 Freedom of association
3. SAFETY AND HEALTH
 - 3.1 Industrial safety
 - 3.2 Emergency response
 - 3.3 Disease and industrial accident management
 - 3.4 Industrial hygiene
 - 3.5 Musculoskeletal diseases
 - 3.6 Machine safety
 - 3.7 Food hygiene, hygiene, dormitory safety
 - 3.8 Safety and health communication
4. ENVIRONMENT
 - 4.1 Environmental permits and reporting
 - 4.2 Pollution prevention and resource conservation
 - 4.3 Hazardous Materials Management
 - 4.4 Wastewater and general waste
 - 4.5 Air pollutants
 - 4.6 Controlled substances
 - 4.7 Rainwater management
 - 4.8 Energy consumption and greenhouse gas emissions
5. ETHICS
 - 5.1 Business Integrity
 - 5.2 Prohibition of unfair profits
 - 5.3 Information disclosure
 - 5.4 Intellectual property rights
 - 5.5 Fair trade
 - 5.6 Personal protection and prohibition of retaliation
 - 5.7 Privacy
 - 5.8 Responsible mineral sourcing
6. MANAGEMENT SYSTEM
 - 6.1 Management Participation
 - 6.2 Responsibilities and Obligations
 - 6.3 Legal compliance and customer demand management
 - 6.4 Risk analysis and crisis management
 - 6.5 Improvement plan management
 - 6.6 Training and education
 - 6.7 Worker communication
 - 6.8 Worker and Stakeholder Participation
 - 6.9 Audit and Analysis
 - 6.10 Improvement Management Procedure
 - 6.11 Records Management
 - 6.12 Supply chain management
7. REFERENCES

1. INTRODUCTION

Recently, stakeholder's interest in social/environmental transparency of the supply chain within the electrical and electronics industry has been increasing. Major stakeholders are demanding not only the verification results of SK Gas' social/environmental status, but also efforts to spread transparency regarding the labor rights/human rights, safety/health, and environment of its partner companies, and evaluating our company's level of spread in the supply chain by the index.

The reason why stakeholders are questioning the sustainability of the supply chain and trying to identify the risks is that risks arising from companies that violate workers' human/labor rights and do not comply with safety/health, and environmental regulations have the high potential to have a negative impact not only on the survival of the company in question but also on the entire supply chain.

Accordingly, SK Gas has created a guideline on code of conduct for partner companies to respond to internal/external demands while supporting self-inspection in the social/environmental areas of partner companies.

We hope that this guideline will help you establish/improve the direction the company wants to pursue by assessing the company's social/environmental status level and analyzing the results.

Guideline on Code of Conduct of SK Gas Partner Companies

During the process of checking compliance with Guideline on Code of Conduct of SK Gas Partner Companies, the professionalism of the person in charge and the effectiveness of worker training can be measured through interviews with the person in charge and workers.

Even if the document verification is perfect, if the professionalism and training effectiveness of the person in charge is judged to be invalid, it may be included in the violation items.

2. HUMAN AND LABOR RIGHTS

2.1 Voluntary working

2.1.1 We do not require workers to engage in any type of forcing involuntary confinement, labor bounded by slave contract, or work under debt (for debt repayment, etc.) and do not use human trafficking or slave labor.

(Example: Foreign migrant workers must receive a written employment contract before employment (or before leaving their country), and this contract must include terms and conditions of employment. Replacement or modification of the employment contract is not permitted when the worker enters the country thereafter, with the exception of cases where changes are made to comply with local laws and terms and conditions are equal to or better than the existing terms and conditions. The employment contract must specify working conditions in a language that the worker can understand. Additionally, workers should not be asked to hand over their government-issued identification cards or passports.)

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. All fees, deductions, and fines must be announced to workers, and related matters must be documented.
2. Forced labor, convict labor, human trafficking, slave labor, excessive fee demands, and forced labor that imposes a debt burden using employment as collateral must be prohibited in employment contracts and working conditions. The same applies to workers hired through recruitment agencies.
3. Recruitment and hiring
 - Employees must not be required to pay recruitment fees or other similar fees as an excuse of employment. If the worker is found to have paid such fees, the fee must be reimbursed to the worker within 90 days from that date.

- If the notice is not properly submitted and the termination period of the employment contract is not completed, the total penalty or fee must be capped at 60% of the worker's total basic wage for one month. However, no penalty or fee may be requested if the employee resigns due to documented harassment, abuse, or threats to safety.
 - Salary deductions (taxes, insurance premiums, meal allowances, dormitories, etc.) must be disclosed and relevant laws and regulations must be complied with.
 - When an intention to resign is expressed, retaliatory actions such as threats, violence, or non-payment of salary must be restrained.
 - Employee deposits should be prohibited unless required by relevant laws and regulations. If a deposit is required by law, a receipt for the worker's deposit must be provided and the deposit must be refunded in full within one month after termination of employment or within the deposit return period, whichever is stricter.
 - The notice period for resignation cannot exceed one month (resignation must be processed within one month after the intention to resign is announced)
4. When dealing with a private employment agency (PEA), the PEA must verify that all permits and certificates are valid for all jobs and conduct job interviews with some of the workers hired or employed to ensure that employment terms and conditions are accurately described. In addition, regular audits must be conducted to ensure compliance with relevant laws and codes of conduct for PEA.
5. When hiring through a private employment agency (PEA), the partner company must pay all fees and expenses incurred for recruitment settlement, processing, transportation or ongoing management, as well as third party expenses and fees, including but not limited to these. If an overseas worker has paid fees and expenses in connection with employment, the fees and expenses must be reimbursed to the overseas worker within 30 days from the date of commencement of employment or knowledge of the fact.

Recruitment fee	Transportation and lodging expenses	Documentation, medical, education and government fee
1. Reservation or execution fee 2. Official/unofficial broker fees 3. Sending country recruitment service fee 4. Receiving country recruitment service fee 5. Deposit	1. Transportation costs from the sending country to the receiving country 2. Transportation costs from the receiving country to the sending country 3. Accommodation and living expenses required to travel from the sending country to the receiving country. 4. Accommodation and living expenses required to travel from the receiving country to the sending country. 3. Aviation tax	1. PEA service fee 2. Passport fee 3. Visa fee 4. Cost of taking photos for passport or visa 5. Health examination / diagnosis / vaccination costs in the receiving and sending countries 6. Renewal of temporary work or residence permit 7. Document fees in the sending country (notarization, translation fees, attorney fees)

		8. Insurance 9. Government fees 10. Job competency test cost 11. Training or orientation costs in the sending country 12. Reference check (reputation search) cost 13. Costs of work-related equipment, tools, clothing, etc.
--	--	--

※ Direct transportation costs from the worker's home in the sending country to the regional or central recruitment center are borne by the overseas worker, except in cases where they must be borne in accordance with relevant laws and regulations.

6. All foreign workers must obtain a valid legal work permit.
7. In accordance with the laws of the receiving country, if a pregnant overseas worker must return to her home country (or sending country) to give birth, the partner companies must provide protective measures to the pregnant worker in accordance with relevant laws and regulations.
8. Not allowed to prevent overseas workers from contacting their embassies.

2.1.2 Appropriate and effective policies and procedures are established to ensure the prevention of forced labor (convict labor, etc.) of workers.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

• Dismissal and early retirement:

1. There must be relevant company regulations or work procedures to prevent the use of forced labor or slave labor.
2. Related education and communication must be provided to workers, partner companies, and in-house contractors.
 - There must be an anti-forced labor training or communication procedure to be shared with partners and hiring agencies.
3. Improvement procedures for monitoring policy compliance and remediating discovered forced labor must include at least the following measures:
 - Policies to prohibit forced labor should apply to both directly and indirectly employed workers.
 - Documented work procedures must be established to check compliance with the ban on forced labor by first-tier partner companies.
 - Recruiting and hiring practices: Policies and procedures must be in place to prohibit excessive fees.
 - Dismissal and early retirement: Contracts, employee handbooks, or training materials must provide for workers to leave without penalty and within applicable laws, and to pay workers for all hours worked upon termination of employment.
 - Other fees/deposits/liabilities: Must state that the employer is not required to grant fees, deposits or incur debt as part of the employment, either as a one-off or installment repayment, either directly or through wage deductions.
 - The effectiveness of your policy compliance monitoring program must be determined regularly.

2.1.3 To ensure that workers understand the terms of the contract, pre-employment terms and conditions are explained in writing and orally in the worker's native language through employment letters/agreements/contracts as required by law.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. A labor contract must be signed with the worker in his or her native language, and the following conditions must be notified orally in the worker's native language. The employment contract must contain at least the following components:
 - Job characteristics, working hours, holidays and vacations, wages, retirement qualifications, welfare benefits, commission details and amounts, salary deduction details, severance pay, insurance details
 - In the case of overseas contractors, the worker's name, date of birth, government-issued ID card, emergency contact information, terms and conditions for storage and possession of identity documents during the employment contract, contract period, work characteristics and location, detailed living conditions such as food and lodging expenses (if any), and deposit repayment date must be additionally included.
 - Employees must be able to resign without disadvantage if they notify their resignation within a reasonable period of time according to the employment contract.

2. Employment conditions must meet the requirements of the ILO Agreement and relevant laws and regulations. When using a labor agent/contractor or subcontractor/agent, an agreement to comply with the requirements applicable to workers must be entered.

3. When changing the employment contract, the changes must be disclosed and all legal requirements regarding communication/negotiation with employees must be complied with.

2.1.4 After hiring, the worker's original ID card and related documents are not kept.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Workers (including foreigners) living in residential facilities provided by the company must be provided with a personal storage space that is always accessible and safe.
2. Workers must know where personal documents (e.g. original ID cards and related documents) are stored (e.g. personal storage space)

[Document review]

1. Company regulations or work procedures must specify that the company does not retain the originals of workers' ID cards or related documents. However, the company may request a copy of the worker's identification document.
 - Original worker documents: passport, work visa, citizenship card, residence card, social security/insurance card, birth certificate, bank documents, etc.
2. However, if the employer is legally obligated to keep the original ID card and related documents of the foreign worker, the requirements below must be complied with.
 - Business procedures for storing documents related to personal identity in accordance with legal requirements
 - Safe storage procedures and location (however, the location must be accessible to workers within 12 hours upon request)
 - No separate storage fee should be charged.

2.1.5 The free movement of workers is not restricted.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Workers' movement and basic needs (e.g. access to restrooms, drinking water, visiting medical facilities, etc.) must not be unreasonably restricted.
2. Workers must freely leave work after working hours or have no restrictions on entering or leaving the dormitory.

[Document review]

1. There must be relevant company regulations and work procedures that guarantee free movement.
2. If there is an entry record, there must be no restrictions on entering and exiting restrooms, drinking water facilities, medical institutions, and dormitories.

2.2 Young people’s working

2.2.1 All workers are above the legal minimum age.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Apply 15 years of age or under the legal minimum age, whichever is stricter, but workers under the age limit must not work.

[Document review]

1. Procedures must be established to prohibit child labor
 - Must have robust age verification measures in place, including at least the following:
 - If no supporting documentation is officially required by law, validation must be obtained from at least two of the following: a birth certificate, other government-registered document verifying date of birth, or hospital or dental examination certificate showing age.
2. All workers on the worker list and personal personnel file must be above the 15 years of age or the legal minimum age, whichever is stricter.

2.2.2 When recruiting directly or indirectly (recruiting by a third-party agency), regulations or work procedures are established to comply with the applicable age regulations.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Workers under the legal minimum age must not work on site.

[Document review]

1. Education/promotion regarding child labor prohibition regulations must be conducted and related records must be maintained.
 - A process for age verification (ex: birth certificate, government-issued ID card, certified copy, etc.) must be established.
2. In order to manage workers' entry/exit to the company, there must be an ID verification system that controls access to the facility, such as a company pass with a photo attached.
3. If the child worker's age meets legal requirements, the child worker's application for employment must not be rejected.
4. If child workers are discovered on site, protective measures must be established.
 - Immediate movement to a safe location, health check-up, and mandatory training must be supported. The income of child workers must be guaranteed until the legal working age.
 - No dismissal or fines must be imposed, and best efforts must be made to transfer the employee to a legal minor worker status within the scope of the Labor Standards Act.
5. Periodic visual inspection of potential underage workers in the facility.

2.2.3 Workers under the age of 18 do not work night time or work overtime, and work is done in an environment free of risk factors.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Workers under the age of 18 must not work in a work environment with hazardous factors.

[Document review]

1. Procedures for the working environment of workers under the age of 18 must be established and include at least the following items:
 - Proper health examination, risk assessment of working environment, limitation of working hours and working days, if necessary, prohibition of night work or overtime work.
 - As a result of the work environment evaluation, placement in a work environment with risk factors for health and safety is prohibited.
 - Work involving exposure to hazardous locations, hazardous environments, substances, drugs or processes, including but not limited to:
 - 1) Environment/conditions with risk of stress or injury due to heat or cold
 - 2) Noisy environment requiring hearing protection
 - 3) Items containing explosives or explosive ingredients
 - 4) Exposure to radium, self-luminous compounds, thorium salts, and other radioactive substances with annual ionizing radiation levels exceeding 0.5 rem according to U.S. Department of Labor guidelines.
 - 5) Underground, underwater, height over 2m, hazardous restricted area
 - 6) Electric hoists, electric mobility devices without a legal work permit.
 - 7) Stamping, cutting and laser equipment or equipment that could get your hands caught.
 - 8) In case of chemical processes or work surrounding the process exceeding the legal standards for workers before cleaning, or in cases where there are no legal standards, 50% of the adult exposure standards are applied.

2. In general, night work refers to work lasting more than 7 hours from 10 PM to 7 AM.
3. When hiring workers under the age of 18, procedures regarding the working environment of workers under the age of 18 must be reflected in the personnel file (personal records, medical records, working hours).

2.2.4 There are company regulations or business procedures regarding the employment of apprentices, internships, and student workers.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Apprentices, internships, and student workers must perform work related to their major field and must not perform work prohibited by relevant laws.

[Document review]

1. Even if a company does not employ apprentices, internships, or student workers, related company regulations must be established.
2. The internship period must not exceed one year under any circumstances.
3. Work procedures for apprentices, internships and student workers must be established.
 - Compliance and rights protection based on laws and regulations, such as work assignment related to major field, work characteristics, working hours, welfare benefits, maximum training period (if the worker's wage is lower than the minimum wage, it cannot exceed 6 months), details on providing employment opportunities after the training period ends, etc.
 - Recruiting, hiring, and job placement of apprentices, internships, and student workers through human resources agencies is prohibited.
 - All work, including study options, must be based on voluntary working. In particular, student workers cannot perform any overtime work.
 - Procedures for managing personal personnel files of apprentices, internships, and student workers (including documents related to training purposes, evaluations, educational materials, and work assignments) must be established.
 - Managers, field supervisors, and workers working with apprentices, internships, and student workers must be trained on the relevant regulations on a regular basis.
 - Restrict hiring of apprentices, internships, and student workers simply to fill job vacancies.
 - A copy of the training program outline and training materials must be available at all times.

Specific requirements:

	student worker	Interns	Trainee
Three-party contract (student, school, company/audited person)	Yes	Not applicable	Not applicable
No financial/academic penalties - Academic penalties are permitted only in cases directly related to educational performance.	Yes	Yes	Not applicable
Ensure that workers are enrolled in a valid training program at an educational institution - Establish correction and appropriate sanctions (including termination of relationship) for violations.	Yes	No	Not applicable
Must be paid the same wages as other workers performing the same or similar work	Yes	No (minimum wage or higher)	Not applicable*

* Must receive agreed pay increases upon meeting skills requirements and stipulated promotions and pay adjustments following successful apprenticeship.

2.3 Working hours

2.3.1 Has not violated the Labor Standards Act requirements (prohibition on working over 52 hours per week) within the past 1 year. (However, in workplaces with less than 5 employees that are not subject to the Labor Standards Act, the work hours do not exceed 60 hours per week.)

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. The workers selected for interview must not exceed 52 hours of work per week (including OT) in their attendance records for the past 3 months within the past year. In the case of overseas workplaces, the conditions that are more favorable to workers, including 60 hours and local laws, must be observed (unless stipulated by local laws, workers in management and senior management positions are excluded from the inspection standards)
2. Partner companies must include the following activities in their official work time records:
 - Time spent on the production line, regardless of whether the line is operating or not (hereinafter referred to as “downtime”)
 - Mandatory training and meeting times on company policies and procedures
 - If waiting time to record attendance, security screening time to enter the production line, or waiting time for supervisor approval to record attendance exceeds 15 minutes in total, it must be included in official working hours.
3. Calculation of working hours must be based on accurate hours and minutes. If calculation by minutes is not possible, overtime hours should be calculated rounded to the nearest 15 minutes as follows:

Hour (Minute)	$0 < x \leq 15$	$15 < x \leq 30$	$30 < x \leq 45$	$45 < x \leq 60$
Rounding time allocation (minutes)	15	30	45	60

4. In emergency situations such as power outages, disasters, fires, strikes, etc., if the weekly working hours of workers exceed 60 hours, document records of the emergency situations must be managed do.
5. If it is difficult to manage weekly working hours by using a working time management system recognized by the state or related organizations in accordance with local laws and regulations, Systematic management may be excluded, but regulations must be proven through official documents from the country or related organizations.

2.3.2 Workers may not work more than 6 consecutive days.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. If workers selected for interview are prohibited from working for more than 7 consecutive days or are subject to local regulations, they must be provided with a day off according to conditions favorable to the worker. (Checking attendance records for 4 months within the past year)
2. Exceptions are permitted only in emergency and unexpected situations such as earthquakes, fires, floods, and other emergency events beyond the control of the partner companies. However, foreseeable events such as holidays, peak production, and seasonal fluctuations are not included in emergencies and unexpected situations.

2.3.3 There are work procedures and company regulations to manage (training, recording, etc.) regular working hours (including OT) of workers.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Check that the working time management system operates normally and working hours are accurately recorded.

[Document review]

1. Related company regulations and implementation systems must be established to manage working hours, including OT and holidays.
 - Management standards must integrate legal requirements and RBA requirements to monitor compliance.
 - If a violation is discovered, documented enforcement actions must be implemented and the progress of enforcement actions must be documented.
 - Internal education/promotion regarding related laws and RBA working hours must be conducted.
 - A communication, guidance, and education system that provides advance warning as the maximum possible working hours approaches must be established.
 - Working hour information for all workers must be accurately recorded. Working hours information must include the following information (regular working hours, overtime working hours, daily/weekly/monthly working hours)

2.3.4 Workers are provided with statutory holidays and leave, including sick leave or maternity leave.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Workers must be able to take breaks (including meal breaks, vacations, holidays, etc.) specified in the Labor Standards Act.

[Document review]

1. Workers must be able to take statutory breaks, holidays, and vacations, and these matters must be made known to workers through employment contracts, company regulations, handbooks, or other forms of employee communication.
2. There must be records of vacation and non-working days, company regulations and procedures related to sick leave and pre/post-natal leave, and financial disadvantages due to use of leave are prohibited.

2.4 Wages and Benefits

※ SK Gas does not recognize any waiver of rights that affects workers' wages and welfare. We do not even accept waivers issued by local authorities or government agencies. (e.g. China's comprehensive working hours system)

2.4.1 The legal wage for regular working hours, including OT, is paid correctly.

※ If there is no national legal minimum wage, the industry appropriate wage is applied as the standard.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. Wages must be paid commensurate with working hours (working hours include official meetings and training)
2. Above the legal minimum wage is guaranteed, and wages and benefits must be paid accurately according to the terms of the employment contract. This should apply to both directly and indirectly employed workers.
3. In the case of probationary employment, the cumulative number of months in the common category cannot exceed 3 months as a probationary period.
4. Wage payment details must be kept for at least 12 months.

2.4.2 Workers must receive a pay slip on a set date every month with an easy-to-understand explanation of deduction details and wage structure.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. Workers must be provided with a pay stub that specifies detailed information such as OT hours and allowances.
 - If deductions are made as part of services provided to workers, workers should be given the right to opt out of such services.
2. Regular training on how to calculate wages must be provided and reflected in pay stubs.
3. Salary paid regularly every month must be paid on the agreed-upon date, and if the payment date falls on a holiday, it must be paid before that date.
4. Salaries received regularly every month must be paid directly to the worker (if there is a legally designated third party, payment may be made to a third party).
5. Severance pay must be paid in accordance with local law or within one month after the last day of work, whichever is stricter.

2.4.3 The four major insurance policies required by law are provided to all workers.

※ Partner companies must comply with legal social insurance requirements.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. The details of the four major insurance policies paid by the company every month must be verifiable.
2. Workers must be aware of the four major insurance policies paid by the company.
3. Pay slips/processes must comply with local legal and regulatory deductions/rates

2.4.4 Salary deductions and mandatory welfare benefits will not be reduced due to disciplinary action.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. Company regulations must be enacted prohibiting punitive salary deductions and reductions in mandatory welfare benefits.
2. There should be no punitive salary deductions in disciplinary records and salary statements.

2.5 Humane treatment

2.5.1 There is no sexual harassment, corporal punishment, mental/physical abuse, verbal abuse, or intimidation in the company.

※ There is a difference between verbal violence and verbal abuse. Verbal abuse is “habitually yelling or using insulting or aggressive language.” On the other hand, verbal violence is “an act of habitually making direct or indirect threats.” For example, habitually swearing loudly at production line workers constitutes verbal abuse. If you continue to slander a worker by calling him or her incompetent, and the worker is eventually fired, this constitutes verbal abuse. Both cases are violations of SK Gas standards.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Workers must not be treated inhumanely.

[Document review]

1. A means of reporting must be provided, and when a report is received, improvement measures must be taken immediately and records must be kept.
2. If disciplinary action is taken, inhumane disciplinary action must be prohibited.

2.5.2 There are regulations or work procedures to provide fair treatment and a humane working environment, and workers are educated and informed of these matters.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. Rules prohibiting sexual harassment and physical abuse must be written and must comply with the following:
 - Establishing a clear definition of sexual harassment
 - Measures/procedures for humane treatment
 - Operate a channel to report when you are treated inhumanely
 - Procedures for investigating and resolving reports received (procedures must include disciplinary action against perpetrators of inhumane treatment)
 - Non-retaliation policy against reporters in good faith
2. Procedures must be established to inform workers of related rules, such as training, handbooks, and posting on bulletin boards.
3. New employees must receive training to prevent abusive behavior, and retraining must be conducted every year.
4. All security work is performed without distinction between men and women, but human rights must not be violated. Searches of bags or personal items for the purpose of preventing theft are permitted only when conducted equitably to all employees, regardless of status or other factors. Body searches must be conducted by a security officer of the same gender as the person being searched, in open areas and when culturally acceptable.
5. Security personnel must receive training in search procedures, and completion of the training must be documented and managed.

2.5.3 Disciplinary action records are managed in accordance with procedures.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. Disciplinary action procedures must be documented, comply with relevant laws, and inhumane measures must be prohibited.
2. Records of cases of disciplinary action must be maintained (records for at least the past 1 year), and written notice of disciplinary action and consent to disciplinary action must be obtained from the person being disciplined.

2.6 Prohibition of discrimination

※ Partner companies prohibit discrimination based on race, skin color, age, gender, sexual orientation, gender identity and expression, nationality, ethnicity and national origin, disability, pregnancy, religion, political orientation, union membership, veterans' pension eligibility, genetic information, military service status, health checkup results, or marital status in recruitment and employment practices, including wages, promotions, compensation, and training opportunities.

2.6.1 There is no discrimination against workers within the company.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Discrimination against workers must be prohibited in the workplace.

[Document review]

1. Discrimination based on pregnancy test results must be prohibited
 - Must prove the compliance with legal requirements such as employment protection, welfare benefits, and wages before/after childbirth.
 - Prohibits dismissal of workers due to pregnancy
2. Discrimination based on the results of health checkups must be prohibited.
 - Unless it is due to work characteristics or workplace safety reasons, health checkup results must be prohibited from being used as a discriminatory factor in employment.
 - Health examinations, pregnancy tests, and contraception should be prohibited as prerequisites for employment.
3. Discrimination based on religion, race, sexual orientation, political orientation, married life, etc. must be prohibited (recruitment conditions in job announcements, etc.)
4. Internal education/promotion must be conducted on matters prohibiting discrimination.

2.6.2 There are company regulations and work procedures to prohibit discrimination and harassment.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. Documented company regulations and work procedures must be established to prevent discrimination and harassment.
2. Work procedures must contain information on work performance qualifications, and discrimination against other factors must be prohibited.
3. Workers, management supervisors and staff in charge, recruiters, and purchasing managers must be regularly trained and training records maintained on matters prohibiting discrimination and harassment.
 - Company joining training
 - Regular training once a year for management supervisors and staff in charge
4. Activities must be taken to prevent discriminatory behavior in regular recruitment and hiring practices, compensation records, employee evaluations, promotion data, training data, welfare benefits, retired employees, and disciplinary data.

2.6.3 Have provided reasonable convenience for religious activities.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. If a significant number of workers require space to perform religious ceremonies, a clean and safe place must be provided.

[Document review]

1. In order to improve reasonable convenience for religious activities, there must be written management rules to review the feasibility of reasonably adjusting the work environment to allow religious beliefs to be followed during the job application process.
 - Work schedule changes, voluntary shift changes, job changes and reassignments, dress code, use of company facilities
2. Workers and management supervisors must receive training on procedures for providing reasonable religious convenience and requests for objections, and must be regularly retrained.
3. There must be a process for receiving religious convenience requests.
 - When a request is received, reviewed, approved for religious ceremonies, or rejected, the applicant must be provided with a reasonable reason in a timely manner.
 - After reviewing the company's operation, installation costs, and possible impact on other workers, the performance of religious ceremonies within the company may be canceled for safety reasons.
 - If it is impossible to use internal facilities, the possibility of using external alternative facilities must be reviewed.
4. Provision of religious convenience must be reviewed and evaluated based on collective bargaining agreements.
5. If there are differences in the provision of religious convenience between collective bargaining agreements, consultation with employee representatives must be made. However, this is limited to cases where the privacy of the person requesting religious convenience is not violated.

2.7 Freedom of association

2.7.1 Workers' right to free choice is respected when establishing and joining a labor union.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. The right of workers to associate freely must be respected, and the right of workers not to engage in such activities must also be respected.

[Document review]

1. Records of complaints/reports related to freedom of association must be documented and managed.
2. If a collective bargaining agreement has been concluded, the company must comply with the provisions of the collective bargaining right in good faith.
3. If a collective bargaining agreement has been concluded, copies must be distributed to workers who signed the agreement.
4. In countries where freedom of association and collective agreement rights are legally restricted, companies must support legally permitted alternative means of association and collective agreement.

2.7.2 Have shared and educated workers on their legal rights related to freedom of association.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Management must respond to the labor union's request for negotiation.
2. The company must faithfully participate in the collective negotiation process with employee representatives or labor unions that have been delegated authority by employees.

[Document review]

1. Rules and work procedures stipulating compliance with freedom of association must be documented.
2. Freedom of association education materials and rules related to delegate meetings must be managed.
3. Workers, management supervisors and staff in charge must maintain regular retraining and training records on freedom of association.

2.7.3 Have shared and educated workers on their legal rights related to freedom of association.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. There is no discrimination between unionized and non-unionized workers.

[Document review]

1. It must be able to be confirmed that there is no discrimination against labor union workers through review of pay stubs, promotion records, training materials, disciplinary records, and retirement records.

2.7.4 Any attempt to manage or manage a labor union through incentives or threats is prohibited.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Not discriminate between union and non-union workers for the purpose of prohibiting unity

[Document review]

1. There must be no discrimination between union and non-union workers in salaries, promotions, training, discipline, hiring and termination records.
2. It is prohibited to fire, discipline, or explicitly threaten workers with the purpose of encouraging or discouraging them from forming or joining a labor union, or from doing so.

2.7.5 Control or attempt to control labor unions by management is prohibited.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. There must be no evidence suggesting union control by management.

[Document review]

1. Policies that address freedom of association must include management not interfering with or funding labor unions.
2. Donations from management should be limited to providing meeting venues and meeting materials (note-taking materials, etc.)
3. Salary records must confirm that union employees are paid the same as other workers in similar jobs.

3. SAFETY AND HEALTH

3.1 Industrial safety

3.1.1 We have permits, qualifications, and inspection results for industrial safety, and the requirements are regularly updated within the deadline through management policies.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. The validity period of the permit/operation/registration/insurance certificate of equipment used within the workplace is managed and renewed within an appropriate period.

[Document review]

1. Safety-related permits, declaration certificates, and test reports required by local laws must be held, and a notification system (information system, calendar, e-mail, etc.) must be operated to manage the validity period of these requirements.
2. Must have an inspection report related to safety certification of hazardous and hazardous machinery as required by local laws and regulations. (The frequency specified in local laws or the requirement to conduct once every two years, whichever is more stringent, applies)
3. Inspection must be conducted within the period by applying the most stringent standards among permits, licenses, and customer requirements.
4. Drinking water quality must be tested every other month or in accordance with local regulatory requirements, whichever is more stringent.
5. The company must possess the following proof:
 - Certification document certifying the structural safety of the facility by a structural engineer
 - Facility construction permit approved by government office
 - As-built drawings (latest version) for each building specified in the building permit and business registration certificate are required.
 - As-built drawings must include layout (ground foundation/floor), building elevation, floor plan, etc.
 - As-built drawings must be verified for consistency through measurements, analysis reports, and terrain survey data.
 - As-built drawings must include detailed information on material size, strength, cross-section, etc.

3.1.2 Workers are safely managed from potential risks (electricity, heat, pressure, fire, machinery, falls, noise, etc.).

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Conduct a sample survey of the following items along the on-site tour route
 - 1) Meeting building use permit requirements, 2) Installation of guardrails and handrails on stairs and aerial work areas, 3) Appropriate load capacity of aerial work platforms, 4) Falling risk in hallways, stairs, and work areas, 5) Prevent electric shock from switchboards and power supplies (Battery, generator, etc.), 6) protective measures for electrical equipment (grounding, non-conductive materials, etc.), 7) physical separation of pedestrian paths within the power transport work area, 8) chemical and material warnings labels in a language that workers can understand, 9) Fall prevention facilities when working at heights, 10) Identification of confined spaces, 11) Storage areas for flammable materials must be set to a minimum, and appropriate fire detection and protection spaces must be provided. 12) Combustible materials must be stored properly to prevent accumulation of vapor, and the risk of ignition within the use area must be eliminated (smoking, electric sparks, exposure to flame, etc.)

[Document review]

1. A risk assessment of confined areas must be conducted before workers enter.
2. A risk assessment of the work environment must be conducted and safe work procedures must be established.
3. A permit system for high-temperature work in welding, cutting, and brazing must be established.
4. Daily safety inspections of all power vehicles must be conducted, recorded, and managed.
5. Electrical facilities must be regularly inspected, recorded, and managed to prevent electric shock.
6. In places where electrical, machinery, and mechanical energy is stored, Lock-out and Tag-out programs must be established to prevent worker injuries due to careless operation and use of equipment.
7. For safe work, training materials (safety work instructions, etc.), PPE (safety glasses, earplugs, etc.), operating procedures (lock-out, tag-out, etc.), and engineering controls (ventilation, mechanical safety devices, sprinklers, etc.) are must be established.
8. Procedures and guidelines should be implemented to encourage workers to pose safety risks.

3.1.3 Personal Protective Equipment (PPE) is provided and managed appropriately according to the risk factors in the work environment.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Conduct a sample survey of the following items along the on-site tour route
 - 1) Adequacy of prescribed PPE, 2) Adequacy of quantity provided, 3) Duration of validity, 4) Accessibility to workers.

[Document review]

1. According to the evaluation of the work environment (noise, chemicals, work at heights, work with heavy materials, risk of falling objects, etc.), PPE management procedures for each work environment and work content (warning statements, regular inspection by the manager, inspection of the work area, request for PPE (free of charge), replacement cycle and procedures, inventory management records, etc.) must be appropriate.
2. Even if it is a chemical storage tank in an open space, the PPE of workers/entrants must be required to wear all the 1) mask/gas mask, 2) safety shoes, 3) long sleeves/sleeve top, 4) chemical resistant gloves, and 5) full-face safety gear/safety glasses.
3. Fit Test record management for respiratory protective equipment

3.1.4 There are procedures in place to exclude pregnant and lactating women from high-risk work, to minimize all workplace safety and health risks to pregnant and lactating women, and to provide reasonable facilities.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Pregnant women and lactating women are not assigned work that is legally prohibited (occupations prohibited for pregnant women, etc. (Appendix 4 in relation to Article 40 of the Labor Standards Act))
2. Appropriate facilities for lactating women must be provided in the workplace.
3. The lactation facility must be an independent, individual space and must be arranged so that the general public cannot enter.

[Document review]

1. Policies and procedures for pregnant and lactating women must be established.
2. A risk management process (risk assessment) for pregnant women must be established and evaluated including the items below.
 - Assessment of potential risks to pregnant women
 - Worker-specific risk assessment for the job (including risks that may occur after childbirth)
 - Establishment of improvement plan for risk assessment and implementation of measures
3. During periods when breastfeeding is necessary, records must be maintained to ensure that reasonable rest time is provided to workers for breastfeeding.
4. Records of risk assessment for pregnant women and measures taken must be recorded and reviewed

3.2 Emergency response

3.2.1 Emergency response-related permits, qualifications, and inspection results are available, and the expiration date of permits, licenses, etc. must be managed at all times and updated in a timely manner through management policies.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Conduct a sample survey of the following items along the on-site tour route
 - 1) Compliance with local fire codes, 2) Adequacy of emergency response regulations

[Document review]

1. Permits, reports, and test reports must be held within the validity period required by local laws and regulations related to emergency response, and a notification system (information system, calendar, e-mail, etc.) must be operated to manage the validity period.

3.2.2 There are adequate and effective fire detection, alarm and suppression systems.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Conduct a sample survey of the following items along the on-site tour route
 - 1) Compliance with laws and regulations related to firefighting and alarm facilities, 2) Emergency bell location (must be installed along the emergency evacuation route), 3) Open status of sprinkler valve and automatic operation status of water pump, 4) Whether a screen (large duct, etc.) that prevents fire extinguishing is installed at the bottom of the sprinkler, 5) Whether verifiable alarm facilities are installed in all facilities (including visual alarm facilities in the hearing-impaired employment area), 6) Installation of heat and smoke detectors and confirmation of system interlocking operation status, 7) Whether manual or automatic fire alarms and notification systems are installed, 8) Fire extinguisher placement and inspection status, 9) Whether the fire extinguishing facility pressure is within the normal range.
2. All interior materials in the work space must be made of refractory materials.
3. The use of fire extinguishing equipment (e.g. blankets, etc.) containing asbestos should be prohibited.
4. The company must install an automatic sprinkler system in the building in accordance with regulations.
 - A sprinkler system (Auto) that matches the type, purpose, and fire protection requirements of the building must be installed.
5. Piping connected to the sprinkler system (Auto) must be free from damage, leakage, or corrosion.
 - Sprinklers should not be used to hang objects (e.g. portable lights, etc.)
6. Sufficient water must be supplied to the sprinkler system (Auto), and fire pumps and related facilities must be maintained and repaired in accordance with regulations so that when water is sprayed from the sprinkler, it can reach the fire.

[Document review]

1. Visual inspection of fire-fighting facilities (sprinklers, fire extinguishers, smoke alarms, fire detectors, etc.) must comply with the stricter inspection cycle among the manufacturer's recommendations, relevant laws, and customer requirements (minimum inspection cycle: monthly inspection).
2. Regular functional inspection of all fire-fighting facilities must be managed in accordance with documented procedures, and must comply with relevant laws and regulations, the manufacturer's recommended interval, or the more stringent inspection cycle of customer requirements (Minimum inspection cycle: annual inspection, twice a year for special fire safety management targets).

3.2.3 A business continuity plan (BCP) including an emergency response plan is established by evaluating/analyzing the risks of all potential emergency situations.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Internal gathering points (in case of abnormal weather such as typhoons) and external gathering points (in case of fire or chemical leak) must be defined for each emergency situation.
2. Signs containing emergency contact information, emergency response personnel, evacuation routes, and response plans in case of emergency situations must be posted within the workplace.
3. Emergency response kit (first aid kit) must be located close to the assembly area and accessible.

[Document review]

1. BCP must be established based on a risk assessment of hazardous situations (minimum requirements: fire, chemical spill, earthquake, bombing, volcanic eruption, workplace violence, strike, extreme weather), and BCP conformity must be reassessed within at least two years.
2. BCP must include external reporting procedures and must be established for the purpose of minimizing human and environmental damage.
3. All workers must receive guidance on role-specific duties and emergency evacuation gathering points defined in the BCP, and receive regular training.
4. The recovery plan must include root cause analysis, improvement activities, and worker guidance procedures to prevent similar cases.
5. BCP should focus on minimizing damage to people, the environment, and assets, and risk assessment should include changes in nearby facilities (e.g., construction of high-risk buildings with potential for chemical spills, risk of explosion, etc.)

3.2.4 A sufficient number of emergency passages, emergency doors, and passageways to the gathering point must be secured, and all doors on the emergency route until reaching the final emergency door must be immediately accessible at any time and must be maintained in optimal condition.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Emergency doors and escape routes
 - One or more emergency doors and escape routes must be installed/defined in different directions, and the distance to each emergency door must be indicated at the branch point of each escape route.
 - Emergency doors (the final exterior door in the building, the intermediate door on the path to the final exterior door) must be opened outward without a key, badge, password, special knowledge, or effort. If a lock is required, only panic devices (e.g. push bars, etc.) are permitted.
 - The movement path from the area where work takes place to the gathering point must be free of loads that impede traffic.
 - Emergency doors and escape routes should not be defined to pass through warehouses or confined spaces.
 - The gathering point must always be equipped with an assembly point sign and emergency response supplies.
 - The final exterior door must lead to an open area outside the building.
 - Doors ('middle door', 'final outer door') in areas where more than 50 workers reside in the building enter or exit or in hazardous areas must be opened towards the outside.
2. Emergency door sign
 - All emergency doors must be equipped with an emergency door sign and must be capable of emitting light on their own when the power supply is interrupted (using batteries and emergency power).
 - The main passageway must indicate the distance to two or more emergency doors, and there must be a directional sign pointing to the nearest emergency door at any point/place in the building

3. Emergency lighting

- Emergency lighting must be able to emit light on its own even when the power supply is interrupted (using batteries and emergency power).
- Emergency lighting must be installed in all places where installation is required by local regulations.

4. Separation

- Fire doors must be maintained in optimal condition and closed semi-automatically/automatically (when a fire alarm sounds or smoke is detected).
- Installation is permitted only on connection pipes such as sprinkler pipes, water supply pipes, electrical pipes, and ventilation pipes within the escape route.
- Doors and windows in spaces along the emergency escape route must be equipped with fire doors and fireproof windows.

[Document review]

1. Management procedures and guidelines for emergency escape routes must be established.
2. Emergency response facilities must maintain regular inspection records in accordance with relevant laws, manufacturer management standards, or customer requirements, whichever is more stringent.

3.2.5 Have conducted evacuation training for fire and other dangerous situations for all personnel (partner companies, contractors, dispatched personnel, welfare facility support personnel, etc.) within the workplace and manage training records.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. Evacuation drill management standards
 - Target workforce: All personnel (all shift workers, in-house contractor workers, consignment facility workers, temporary workers, etc.)
 - Target area: All facilities (production facilities, warehouses, dormitories, restaurants, office spaces, research institutes, etc.)
 - Training frequency: twice a year or local legal requirements, whichever is more stringent. However, if the number of workers has changed more than 20% since the last training, new training must be conducted on a regular basis. Conduct training separately during day and night. An appropriate training cycle must also be identified through a risk assessment for disasters that may occur in the facility other than fire.
 - Retraining criteria: Retraining is conducted if more than 20% of workers in the training target space change.
 - Training record contents: Emergency response training plan, emergency response training evaluation report, emergency response training improvement action plan, and all training records must record the training date and participants.
 - Emergency response training effectiveness evaluation (conducted each time): training time, time required to evacuate out of the building or time required to respond to an emergency situation, supplementary items identified during the training process, etc.
 - Training record storage: last 3 years
2. Evacuation training scenarios must include natural disaster situations (earthquakes, floods, abnormal weather, etc.) defined within the BCP.
3. If policies or procedures regarding emergency evacuation are changed, all workers must be notified 30 days prior to implementation, and annual training must be provided for all staffs in charge.

3.2.6 Emergency Response Team (ERT) is provided with appropriate personal protective equipment and receives appropriate training for emergency response every year. (Emergency response organizations (personnel) must be provided with a level of personal protective equipment corresponding to each individual role defined in the emergency response plan)

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Protective equipment for ERT must be labeled/stored separately and operate normally.
2. Badges, different colored hats/clothes, and ERT identification marks must be installed in the seats in the work area to identify ERTs.
3. ERT must be able to respond including working hours of all shifts.

[Document review]

1. ERT personnel’s qualifications, training, meeting minutes, situation sharing procedures, contact information, etc. must be managed in writing (ERT duties and roles must be aimed at protecting workers’ safety, the environment, and assets)
2. If workers other than ERT personnel are mobilized for situation control, cleaning, hazardous material disposal, firefighting, etc., matters regarding regular training and provision of protective equipment appropriate for their roles must be included in the emergency response plan.
3. ERT personnel involved in the control, purification, disposal, or other emergency response procedures (e.g., firefighting) of hazardous substances must conduct emergency response training at least once a year, and the results of training and education must be recorded.
 - Training topics: 1) Chemical hazards and precautions, 2) Spill containment and clean-up, 3) Fire hazards and response, 4) Proper handling and disposal of chemicals and contaminated absorbents, 5) Selection and use of protective equipment, 6) Other training required by the relevant laws and regulations
4. Each work unit in every area within the facility must have at least one ERT worker to follow the instructions of the ERT worker in emergency situations.

3.3 Disease and industrial accident management

3.3.1 Have permits, qualifications, and inspection results related to diseases and industrial accidents, and the requirements are regularly updated within the deadline through management policies.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. The latest version of the notice containing information on disease and industrial accident prevention must be posted in common areas (workspace/rest area/restaurant, etc.)

[Document review]

1. All local legal requirements related to diseases and industrial accidents must be legally complied with within the validity period.
2. Disease and industrial accident evaluation reports must comply with legal requirements and biennial standards, whichever is more stringent, and evaluation reports conducted on a regular basis must be available for review.
3. A separate notification system (guidance system, calendar, e-mail system, etc.) must be operated to manage the inspection cycle.

3.3.2 Records of accidents, root cause analysis, and improvement activities for the prevention/management of diseases and industrial accidents over the past three years must be maintained in documentation, and worker communication procedures for prevention/management are established.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. All accidents over the past three years must be subject to statistical management and accident investigation to prevent accidents, and must be documented and managed.
 - Management targets: diseases and industrial accidents, accidents requiring first aid, and fatal accidents
 - Minimum statistical analysis cycle: 3 years
 - Minimum contents of accident investigation: root cause analysis, improvement plan, improvement status, worker education/promotion
 - If equipment, protective equipment, work procedures, etc. are improved during the improvement plan and training/promotion to workers is required, the results of training/promotion must also be confirmed.
2. The health checkup system must comply with local laws and regulations, and health checkup items must include respiratory, hearing, and work-related disease tests.
3. There must be a program to identify workers whose health has deteriorated due to exposure to chemicals in the work environment. If the results of a medical examination are abnormal or an injury occurs, the employee must be immediately removed from the current job and offered another position. Termination of labor contracts must be prohibited due to the results of medical examinations, and treatment, re-examination and rehabilitation costs must be paid.
4. In order to protect workers who handle hazardous chemicals, a monitoring program must be prepared before, during, and after work related to the storage, transportation, and handling of dangerous substances or hazardous substances subject to management in accordance with the rules on occupational safety and health standards (Guideline number: K-1-2011).
5. Medical examinations must be conducted at an accredited clinic, and workers in processes using hazardous substances must undergo workplace medical examinations at least once every two years (medical examination results must be presented when requested by workers).
6. Medical examination records of workers in working environments handling hazardous chemicals must be kept for 40 years or 20 years after the period of employment.
7. Medical examination records of hazardous waste managers must be kept for 30 years or as required by local regulations, whichever is more stringent.

3.3.3 Efficient first aid procedures and trained first aid personnel are in operation, and first aid kits are provided for emergency treatment of injuries and diseases.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Trained first aid personnel must wear badges, hats/clothing of different colors, and have signs installed in separate work areas or seats to identify trained first aid personnel.
2. In-house medical facilities must be staffed with sufficient medical personnel to respond to in-house accidents. If there is no own medical facility that can provide medical treatment 24 hours a day, an agreed upon alternative medical facility must be prepared outside.

[Document review]

1. Emergency treatment response procedures for cases determined to be high risk must be established (including a series of work handling procedures such as emergency measures, initial treatment at the in-house hospital, and transport to the outside hospital)
2. Qualifications and training records for in-house medical personnel or trained first aid personnel must be managed.
 - Checklist when operating an in-house hospital
 - 1) All medical treatment records must be kept (confirmation may not be possible depending on local medical regulations and personal information protection laws)
 - 2) Permission, qualification requirements and validity period for operating an in-house hospital required by local laws and regulations must be properly managed.
 - 3) A level of care and treatment that can be handled by the in-house hospital must be established as a documented procedure.
 - 4) The status of valid qualifications for doctors, nurses, etc. working in in-house hospitals, health care centers, etc. must be determined.

3.3.4 Efficient first aid procedures and trained first aid personnel are in operation, and first aid kits are provided for emergency treatment of injuries and diseases.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. First aid kits should always be kept in an easily accessible place. However, locking and storage is permitted only if first aid personnel are always present with the key. If accessible only to first aid personnel, all workers must be informed.
2. First aid kits must be placed around the gathering point (inside/outside).
3. A first aid kit (Article 82 of Occupational Safety and Health) must be placed in a designated location with the prescribed quantity: 1) bandage materials, cotton pads, tweezers, bandages, 2) trauma disinfectant, 3) tourniquet, splint, stretcher, 4) Burn medicine (where applicable)

[Document review]

1. First-aid kits must be inspected on a monthly basis, supplied with accessories, and the status of payment management must be documented and managed.
2. All workers must be educated/promoted on the right to freely use first aid kits.

3.4 Industrial hygiene

3.4.1 Have permits, qualifications, and inspection results related to industrial hygiene management, and the requirements are regularly updated within the deadline through management policies.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. All local legal requirements related to industrial hygiene management (related permits, licenses) must be legally complied with within the validity period.
2. When assessing work environment risks, chemical, biological, and physical hazards must be evaluated.
3. A separate notification system (information system, calendar, e-mail, etc.) must be operated to manage the renewal/inspection cycle.

3.4.2 Chemical, biological and physical hazards are appropriately controlled.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Chemical, biological, and physical hazards must be appropriately limited/eliminated based on engineering controls, administrative controls.
 - Removal, replacement: Removal and replacement of risk factors
 - Engineering controls: facility isolation, forced exhaust, etc.
 - Administrative control: restrictions on working hours, job rotation, etc.
 - Appropriate and effective PPE

[Document review]

1. Documented work procedures for risk assessment must be established every year and analysis data for the past three years must be stored.
2. An evaluation of respiratory, hearing loss, or other job-related medical concerns must be maintained in medical records to assess whether a particular job worker is being harmed.
3. It must be possible to check the management records of inspection and payment items to improve risk factors.
4. When introducing a new substance, a prior risk assessment must be conducted.
5. Hazardous substance alarm table which includes Material Safety Data Sheet (MSDS), Safety Data Sheet (SDS) or chemical properties (name, CAS number, etc.), use and storage location, usage amount, and maximum legally permitted storage amount must be managed
6. Suppliers must comply with standards or laws in accordance with International Fire Code (IFC) requirements or relevant laws.
 - If an underground storage tank (UST) or an above-ground storage tank (ATS) is used to store liquid hazardous chemicals, all UST and ATS registers must be prepared and kept, and the design guidelines for hazardous chemical storage tanks must be complied with.
 - Secondary containment structures must be installed, tank integrity tests must be conducted every two years, and leaks must be detected at an early stage through visual inspection, instrument monitoring, and other methods.

7. Monitoring of hazardous environmental substances in the workplace (work environment measurement) must be conducted at least once a year or in accordance with relevant regulations.

3.4.3 Potential combustible dust hazards are adequately controlled.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Processes in which dry or wet dust collectors are used, dust from grinding, sanding, cutting, milling, routing, and drilling processes, and the flammability of dust from polishing or buffing processes must be properly managed.

[Document review]

1. If there is a possibility of dust explosion, fire risk must be measured and managed through minimum ignition energy (MIE) (ASTM E2019) and prior testing.
2. Training on dust control and use of appropriate fire extinguishing facilities must be provided to workers in dusty areas.

3.5 Musculoskeletal diseases.

3.5.1 Identify/evaluate/communicate risks to effectively manage exposure to musculoskeletal diseases.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. To reduce and prevent musculoskeletal disorders, engineering controls (palletization, lift tables, etc.) and administrative controls (exposure time limits, job rotation, etc.) must be appropriately operated.

[Document review]

1. Risk assessment and management must be conducted every year according to documented work procedures.
 - Risk assessment cycle: Annually (limited to cases where there are no new processes or facility changes. If there are changes, they must be reevaluated. The assessment cycle defined by the documented procedures must specify cases where there are no changes to the process/facility.)
 - Minimum requirements: dynamic behavior, fixed posture, load, torsion of muscles and joints, contact pressure, vibration, repeatability, lighting, lifting, noise, temperature, duration, etc.
2. Must be able to check musculoskeletal risk assessment, accident root cause analysis, and statistical management records for the past three years.
3. A prior risk assessment must be conducted when installing/using new or changed production lines, equipment, tools, or workbenches.

3.6 Machine safety

3.6.1 Have permits, qualifications, and inspection results related to machine safety management, and the requirements are regularly updated within the deadline through management policies.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Posts on machine safety must be kept up to date and posted in a place where they can be viewed by the public.

[Document review]

1. All local legal requirements related to machinery safety management must be legally complied with within the validity period.
2. Safety check inspection must comply with the more stringent standards of relevant laws, manufacturer recommended interval, or 2 years.
3. In case of process changes, use of new chemicals, or addition of biological/physical hazards that may expose workers to new risks, a risk assessment for industrial safety must be conducted.
4. A separate notification system (information system, calendar, e-mail, etc.) must be operated to manage the renewal/inspection cycle.

3.6.2 A reasonable and effective machine hazard control program is in operation, and workers are using machines safely.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. All machines must be equipped with protective devices (firewall, inter-lock, etc.) and emergency stop buttons.
2. Hazardous factors such as gaps in machinery, equipment rotation, rotating plates, and chains must be controlled.

[Document review]

1. Machine safety management procedures must include the following items:
 - Machines must be installed after prior risk assessment
 - Procedures must include the installation of appropriate safety devices to control risks.
 - Regular inspection must be performed according to the inspection cycle of the machine (including inspection of safety devices and emergency stop buttons)
2. If guidance/instructions for machine operation are necessary, they must be provided in the worker's native language, and training must be provided on how to use safety equipment and use the emergency stop button.

3.7 Food hygiene, hygiene, dormitory safety

3.7.1 Have permits, qualifications, and inspection results related to the operation of meal facilities and dormitory facilities, and the requirements are regularly updated within the deadline through management policies.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. All local legal requirements related to the operation of meal facilities and dormitory facilities must be legally complied with within the validity period.
2. Workers at food service and cooking facilities must possess certification and health examination records required by local laws and regulations.
3. Drinking water in feeding and cooking facilities must be evaluated for water quality in accordance with local regulations and bimonthly, whichever is more stringent. However, if water is supplied through a regional water supply that meets WHO standards, water quality testing is not required. However, proof of water quality must be available on site.

3.7.2 Dormitories, bathrooms, and worker spaces meet international standards and are operated cleanly and safely.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Dormitory facilities must be operated hygienically and safely.
 - Only bunk beds or single beds must be used. The minimum distance between bunk beds must be 0.7m or more. When parallel to each other, the passage width must be 0.7m. Shared use by more than 8 people per room is restricted.
 - Personal living space per person must be provided with a volume of 10m³, a floor area of 4m², and a height of 2.1m or more. Windows for ventilation and lighting must be provided with locking devices and mosquito nets, and heating and safe personal storage box must be provided.
 - Stairs must be equipped with railing supports to prevent falls.
 - At least one emergency door must be open at all times on every floor, and only the locking device of the panic device (push bar) is permitted (emergency doors on the 1st floor must open outward).
 - Rooms and cooking facilities must be separated, and all rooms must be equipped with detectors, alarms, and firefighting facilities.
 - First aid kits must be provided in appropriate quantities.
 - Waste must be disposed of legally and hygienically in accordance with methods prescribed by local laws and regulations.
2. Separate dormitory facilities must be provided for men and women, and if they share the same facilities, separate areas for men and women must be provided.
3. Public shower rooms must be designated separately for men and women in a language that workers can understand. One shower faucet must be installed per 15 people, and the distance between faucets must be more than 1m.
4. Drinking water must be available within 61m of each room, and water quality testing must be conducted once a year.
5. The use of personal electrical equipment over 36V should be prohibited.
6. Smoke detectors must be installed in each dormitory bedroom and all common areas, and inspections must be conducted once a year.

7. A window of appropriate size must be installed in each room, and illumination and ventilation must be provided.
8. An emergency response training system must be established for boarders, and training must be conducted twice a year.

[Document review]

1. Must include up-to-date records of cleaning and sanitation, pest control records, and preventive maintenance records for emergency response support equipment.

3.7.3 The food service facility must comply with local regulations and standards, and workers at the food service facility must undergo health examinations that comply with local regulations.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Food service facilities must be operated hygienically.
2. Food/food material storage facilities must be operated as follows.
 - Food/food ingredients must be stored separately from the floor, and refrigeration facilities must be provided if necessary.
 - Cooked food and uncooked food ingredients must be stored in separate spaces, and covers must be provided.
 - Food/food ingredients must be discarded before expiration date.
3. An appropriate number of emergency doors must be installed in the food service facility.
4. Food service/cooking workers must wear masks, hair caps, gloves, etc. to prevent food contamination.
5. An appropriate level of pest control must be implemented.
6. Adequate levels of hand washing facilities must be provided.
7. Heat and smoke detectors are installed in the food service facility, and regular checks must be conducted to determine whether the alarm and fire suppression systems are operating normally.
8. The maximum number of people in the cafeteria must be posted.
9. The food service facility must be equipped with an appropriate number of first aid kits considering the maximum number of people.

[Document review]

1. Cleaning, disinfection, and pest control performance records must be confirmed.
2. The adequacy and validity period of permit inspection prescribed by local regulations must be recorded and maintained.
3. When processing seafood, it must be prepared in accordance with hygiene standards (freezing, storage, cooking preparation area).

3.8 Safety and health communication

3.8.1 Safety and health information (including training) is clearly communicated to workers.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Safety and health information within factory facilities must be announced in a language that workers can understand.
2. Appropriate signs/marks must be attached to indicate risk factors (biological/chemical substances, electric equipment, etc.) within the workplace.
3. There must be a reporting system where workers can report safety concerns at any time.

[Document review]

1. Training and education

- To establish a training plan, analysis of the need for necessary training must be conducted according to documented procedures.
- Based on the analysis results, a training plan must be established for each worker, worker group, or work unit.
- All training programs must include training content, training records, reasonable training cycles, etc., and records must be managed.
- Training performance must be measured (post-verification demonstration, interview with training participants, etc.)
- Training programs must be conducted in a language that workers can understand.
- Education and training programs must be established
 - 1) Health/Safety Training Program, 2) Use of PPE, 3) Emergency/emergency response, 4) Gathering point, 5) Safety manual when operating machinery, 6) What to do in case of an accident, 7) Confined space work program, 8) LOTO, 9) Chemical management manual, etc.
- Verification and evaluation of the effectiveness of education and training programs must be conducted.

2. Communication

- Communication of risk situations in the working environment (guidance and dissemination procedures by risk type) and addition of new processes must be communicated through official communication programs (e.g. labor-management council/occupational safety and health committee, etc.)
- Communication must be conducted in a language that workers can understand.
- All workers and visitors must be notified of internal and external gathering points.

4. ENVIRONMENT

4.1 Environmental permits and reporting

4.1.1 All environmental-related permits, qualifications, and inspection results are available, and requirements are regularly updated within the deadline through management policies.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. On-site inspection of air emissions, wastewater emissions, rainwater exposure conditions, storage and use of hazardous substances, and waste management

[Document review]

1. All local environmental law requirements must be legally complied with within the validity period.
2. In order to manage changes in hazardous waste (generation of new substances, etc.), procedures must be in place to check permits, qualification conditions, etc. on a regular basis or when changes occur.
3. A separate notification system (information system, calendar, e-mail, etc.) must be operated to manage the renewal/inspection cycle.
4. Hazardous waste loading records must be kept for 3 years, and hazardous waste-related accidents must be kept for 5 years.

4.1.2 Environmental-related reports required by local laws and regulations are reported on a regular basis.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. There must be a documented work procedure that specifies the reporting cycle and reporting contents, and the reporting contents and management records for the past three years must be confirmed.

4.2 Pollution prevention and resource conservation

4.2.1 There is a management policy that includes goal setting and identification of improvements to effectively reduce all pollutant emissions.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. Codified policies, procedures, and requirements (e.g., setting clear goals for waste by each emission source once a year, etc.) must be established in accordance with laws, regulations, and management standards for environmental protection, pollution prevention, and reuse.
2. Minimum management program requirements
 - Materiality assessment (environmental impact assessment): The environmental impact of used substances must be evaluated and substances requiring management must be classified.
 - Management standards: Current resource use/consumption/waste generation for each material category must be understood.
 - Status management: The status of material use and waste generation must be managed at least every year.
 - Regular inspection: Improvements must be identified through regular inspection at least every year.

4.3 Hazardous Materials Management

4.3.1 Hazardous materials, including waste, are properly classified, stored separately, and processed through legal waste transportation/disposal companies.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Hazardous substances in the workplace must be classified, used, stored, and transported by substance.
2. To control the potential exposure risk of workers, appropriate measures such as double containers, exhaust facilities, fire prevention, appropriate storage space, hazardous material MSDS and label, warnings, and access restrictions must be in operation.
 - GHS, MSDS, labels, and warnings must be written in a language that workers can understand.
3. Information signs (danger, personal protective equipment for entry, related regulations and prohibition labels, etc.) must be installed in the hazardous material waste storage area, and unauthorized access must be prohibited. Exposure to rain/wind should be prevented using fences or other coverings, and secondary containment containers should be installed to limit leaks or spills.

[Document review]

1. All local legal requirements related to the handling of hazardous substances must be legally complied with within the validity period.
2. Appropriate procedures for approval, receipt, storage, payment, use, recovery, disposal, etc. for each hazardous substance must be documented.
 - Approval: When approving a new chemical substance, it is necessary to review the introduction of a safe or less dangerous alternative.
 - Storage: Hazardous material storage status and regular inspection records must be managed.
 - Reception and disposal: Records of the import/export of hazardous materials must be kept for the past three years or as required by local laws. Hazardous waste must be disposed of within 90 days or the period required by relevant local laws, whichever is more stringent (emissions to air, discharge of wastewater, storage and use of hazardous substances, generation and disposal of hazardous waste, etc.)

3. If improvement in hazardous materials handling procedures is necessary, planning and implementation must be completed within the target date.
4. Material safety data sheets (MSDS) must be provided in a language that workers can understand at the time of use and storage.
5. When transporting chemicals and hazardous waste into and out of the workplace (including consignment), it must be checked whether the transport is carried out in a vehicle holding a government certificate/license and whether the qualification is valid.

4.3.2 Users of hazardous substances are provided with adequate and appropriate training.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. Training appropriate for work, such as use, storage, cleaning, and disposal of hazardous substances, must be provided, and training results must be recorded and managed (cycle: at least 1 year)
2. Workers responsible for handling chemical storage, spills, purification, and disposal must receive special training.

4.3.3 If the management, storage, and disposal of hazardous material waste is carried out by a partner company, regular evaluations should be conducted on compliance with laws and contract conditions.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. The waste reduction plan must include measures to minimize hazardous waste.
2. There must be a procedure for conducting regular evaluations (at least once every three years or before selecting a new company in case of major changes) on whether waste transport companies and disposal agencies comply with the contract terms and for improvement measures.
 - Must retain copies of documents confirming your qualifications for processing, such as a copy of the waste transport or disposal company's transportation certificate, permit, certification, or register.
 - Must have a waste company inspection report or evaluation report that includes improvement plans and improvement completion status for potential risks for the past two years.
 - Evaluation must be done through on-site inspection or a third-party agency.
 - To ensure that improvement measures based on evaluation results are properly implemented, they must be reflected in contract terms or evaluation procedures.

4.4 Wastewater and general waste

4.4.1 Solid waste is effectively verified, managed, reduced, disposed of and recycled.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Waste within the workplace must be properly verified, classified, transported and stored.
 - Warning statements and material information (Label and MSDS) must be provided in a language that workers can understand.
 - Each substance must be classified and, if necessary, isolated and restricted access areas designated.
 - The storage space must be equipped with appropriate exhaust and fire-fighting facilities.
 - Must be able to identify reuse and recycling programs

[Document review]

1. A management policy must be operated to ensure management of the necessary qualifications and validity periods of reports. Supplier must retain copies of all waste vendor licenses/authorizations to verify legality in the use of waste transportation and disposal.
 - In the case of a disposal agencies, it must be done by a company that possesses legal qualifications in accordance with local regulations.
 - In the case of disposal agencies, copies of certificates for all companies must be retained.
2. Minimization of non-hazardous solid waste, legal disposal, and establishment and management of a reuse system must be carried out.
3. Recycling programs must establish operating procedures that include confirmation of recyclable materials and tracking management.
 - Minimum requirements: reuse/recycling management goals, performance measurement, improvement plan management based on goal achievement
4. Apply stricter standards for the past three years or the period required by local laws,

whichever is more stringent, and documentation of loading and disposal of solid waste during that period must be confirmed.

4.4.2 Regularly inspect the performance of wastewater treatment facilities to prevent wastewater leakage and comply with discharge standards for each component.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Tanks, pipes, and other storage facilities for storing and transporting wastewater must use products suitable for storing and transporting the relevant substances.
2. Inspection of the operational efficiency of wastewater treatment facilities must include visual inspection (wastewater outlet/discharge, etc.)
3. Untreated wastewater must be prevented from being discharged into nearby areas.
4. Can be discharged through a wastewater treatment facility (if permitted by local laws and regulations) or discharged into surface water.

[Document review]

1. All local regulatory requirements related to wastewater discharge, storage and transportation, and treatment must be legally complied with within the validity period.
2. Do not discharge untreated wastewater (except as permitted by local laws and regulations).
3. Treatment materials must be identified and classified by wastewater treatment process.
4. Wastewater treatment facilities must comply with the following and local legal requirements.
 - 1) Permission and capacity for each facility, 2) Processable substances, 3) Facility inspection and PM, internal inspection beyond inspection and maintenance procedures (once a year), 4) Treatment system efficiency monitoring program, 5) Regular wastewater treatment effluent Water quality inspection, 6) Immediate detection system for problems, 7) Response procedures for emergency situations, 8) Wastewater treatment and tracking management system, 9) Analysis of root cause of improvement items, establishment of improvement plan, and monitoring procedure for completion of improvement
5. Quality inspection records for effluent treated from wastewater treatment facilities must be kept for at least 2 years, and operational monitoring and reporting records of the wastewater treatment system must be kept for at least 5 years or in accordance with the standards required by local regulations, whichever is more stringent.
6. A person in charge of the management organization must be designated for each item (maintenance, internal inspection, water quality and facility monitoring, treatment process, waterproofing, emergency response). Each person in charge must be provided with training appropriate for the substance used, and records must be maintained.

7. A wastewater reduction program must be established and include reuse and reduction management goals, performance measurement, and improvement management.

4.5 Air pollutants

4.5.1 In the case of air pollutant emissions, management procedures are established for identification, classification, regular inspection, management, and discharge of treated substances to comply with legal requirements. Regularly measure the performance of our emissions reduction program.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Air emissions facilities must be installed to comply with legal requirements.

[Document review]

1. Records of emissions and emissions from air emissions facilities, communication with external parties such as government agencies, regulatory agencies, and other communication groups, and changes due to new processes and new products must be reviewed.
2. Processing facilities that can comply with legal requirements, regular PM, monitoring of processing facility efficiency, documented work procedures and records for tracking and managing processing quality, improvement monitoring for improvement items, response procedures for emergency situations, an air emission system that includes reduction goals must be established.
3. Records of regular reports (air emission facility self-measurement result reports, etc.) must be kept every year for the past 5 years or according to legal requirements, whichever is stricter, and records for the past 3 years must be able to be confirmed in the emission quality inspection report.
4. A person in charge of the management organization for operating air emissions facilities and programs must be designated.

4.5.2 Noise caused by factory facilities is managed in accordance with legal standards.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. It is necessary to check whether noise occurs within the site boundary area.

[Document review]

1. Noise in the site boundary area must be regularly checked for legality, regularly monitored, and managed.
2. If there is a change in the purpose of use in the area near the factory or if a complaint is received from the nearby area, the noise must be measured and managed annually in accordance with the legal site boundary noise standards, and if improvements are necessary, establishment of a plan and inspection of completion of improvement must be included.
3. Site boundary noise records for the past 5 years and site boundary noise reports for the past 3 years must be kept.
4. A person in charge of the management organization must be designated for the operation of noise management facilities and programs.
5. Noise must be managed in accordance with relevant local laws and regulations and the more stringent standards in the table below.

Use of land in an expropriated area	Daytime	Evening	Night
	(6 a.m. to 18 p.m.)	(18:00 p.m. to 24:00 p.m.)	(24:00 p.m. to 6:00 a.m.)
Dedicated residential areas, green areas, schools, hospitals and religious facilities among urban areas	50 dB(A) or less	45 dB(A) or less	40 dB(A) or less
General residential areas, semi-residential areas, green areas, public areas, parks and entertainment facilities among urban areas	55 dB(A) or less	50 dB(A) or less	45 dB(A) or less
High-density residential areas, residential and residential complex areas	60 dB(A) or less	55 dB(A) or less	50 dB(A) or less
Commercial district	65 dB(A) or less	60 dB(A) or less	55 dB(A) or less
Industrial area	70 dB(A) or less	65 dB(A) or less	60 dB(A) or less

4.6 Controlled substances

4.6.1 In order to comply with legal requirements and customer requirements, documented business procedures and records of the purchasing and production departments are managed to ensure that no regulated substances are used during the product or production process.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. An official management program for purchasing raw materials, packaging, and parts must be operated to comply with legal requirements and customer requirements.
 - There must be a documented compliance evaluation procedure to ensure compliance with customer requirements.
 - Product sampling and evaluation methods must comply with appropriate standards (IEC 62321, etc.), laws, and customer requirements.
 - There must be a documented list of controlled substances that require review when purchasing raw materials and parts.
 - Design documents and manuals for supplied raw materials, as well as data proving that they do not contain restricted substances according to the certificate, must be managed.
 - Must have raw material and component analysis reports for customers
 - Must have product manuals and certificates to respond to customer requests
 - Audit and analysis must be conducted once a year or according to legal requirements, whichever is more stringent.
2. There must be an official work program that includes verification of restricted substances for raw materials, establishment of an improvement plan, and monitoring of completion.
3. Monitoring and reporting data for the past three years must be kept.
4. Reporting records must be kept for the last 10 years to meet laws and customer requirements.

4.7 Rainwater management

4.7.1 Appropriate work procedures are in place to prevent contaminated rainwater from being discharged to the outside through rainwater pipes.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. The impact and situation that contaminated rainwater outflow and leakage may have on the local environment must be analyzed.
2. Records of rainwater-related environmental accidents must be retained for 3 years.
3. Must have a rainwater recovery system to prevent contaminated rainwater outflow and leakage.
 - All status of drains other than rainwater drains must be kept and must not include unauthorized discharge outlets.
 - Response preparation procedures must be established to prevent rainwater from being contaminated with pollutants.
4. A Storm Water Pollution Protection Plan (SWPPP) must be established to prevent leakage of contaminated rainwater.
 - There must be a facility map indicating rainwater collection facilities, water storage tanks, transportation routes, discharge outlets, and possible contamination areas.
 - A regular monitoring system must be established to manage stormwater discharge water quality.
 - A management system must be established to minimize or prevent environmental impacts caused by contaminated rainwater.
 - An immediate discharge stop system must be operated to respond to storm water spills containing hazardous substances.
 - To prevent contaminated rainwater discharge, it must be controlled through non-structural controls (preventing contact of unauthorized substances with rainwater, etc.) and structural controls (sumps, berms, secondary containment containers, separators, rainwater recovery facilities, etc.)
5. Internal evaluation must be conducted every year to review suitability for stormwater management.
 - Visual inspection, sample data, and analysis data must be evaluated.

- Partner companies must collect samples of stormwater discharge when it rains and analyze major stormwater pollution indicators (color, odor, transparency, suspended solids, settled solids, solid materials, foam, grease, metals, toxic organics, etc.)
- Partner companies must collect samples of stormwater discharge for experimental analysis once a quarter and analyze color, total solids, oil and grease, total metals, total toxic organics, etc.
- Test results must be managed according to the procedures defined in the Storm Water Pollution Protection Plan (SWPPP)
- Must include accident investigation, cause analysis, and improvement management

4.8 Energy consumption and greenhouse gas emissions

4.8.1 Energy consumption and greenhouse gas emissions are documented and managed.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Electrical energy purchased or directly produced within the facility, fuel consumed, amount of renewable energy used, thermal energy leakage, and greenhouse gas emissions must be documented and tracked and managed.

[Document review]

1. It must be possible to review the status of energy used and greenhouse gases emitted every year. It should be possible to easily estimate the energy used and greenhouse gas emissions based on energy-related purchase costs. Establishing greenhouse gas emissions targets and monitoring data must be reviewed periodically.
 - Scope 1: Greenhouse gas emissions generated from sources (factories, workplaces) owned and controlled by the company
 - Combustion: Records of the total amount of fuel burned on site compared to the previous year must be kept, or easily estimated through fuel bills and other fuel purchase records.
 - Scope 2: Greenhouse gas emissions resulting from the production of electricity and steam purchased and consumed by companies
 - Electricity purchase: Electricity bill or meter reading records must be managed to check monthly and annual electricity consumption.
 - Vehicle fuel: Gas, diesel, ethanol, and propane purchase records must be maintained
 - Renewable energy use: Renewable energy consumption must be trackable by type and total amount consumed.
 - Other greenhouse gas emission sources: Major emission sources such as CFC or SF6 must be tracked by consumption and emissions

4.8.2 Making improvements to improve energy efficiency and minimize energy usage and greenhouse gas emissions.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Must be able to identify technologies or management strategies to minimize greenhouse gases and energy consumption
 - Energy-related automation facilities within the building (lighting management, insulation management, air conditioning technology, etc.)
 - Optimization of energy efficiency and greenhouse gas emissions for motorized vehicles operating within the facility
 - Purchase and production of renewable energy

[Document review]

1. Efficient management procedures must be established for energy efficiency and greenhouse gas emissions limitation, and must be tracked, managed, and managed for improvement.
 - Documentary procedures must be established to track the establishment and achievement of annual greenhouse gas emission management goals.
 - Documented procedures must include personnel, roles, management procedures, goals, monitoring, and reporting procedures.
 - Reviews to improve performance must be conducted regularly every year.
 - Necessary education and training must be provided to relevant personnel.

5. ETHICS

5.1 Business Integrity

5.1.1 Workers are prohibited from being treated unfairly due to refusal of unethical behavior or reporting of unethical behavior.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. A code of ethics that stipulates prohibition of unethical behavior and punishment (Zero Tolerance) must be documented.
2. There must be a written work procedure that allows workers to report unethical behavior and conflicts of interest.
 - Record keeping of report details
 - Business procedures to protect informants from retaliation for reporting unethical behavior
3. Personal personnel files and vacation/leave records must be managed.
4. Education records regarding punishment regulations for unethical behavior (Zero Tolerance) must be managed.

5.2 Prohibition of unfair profits

5.2.1 If bribery, money, etc. for unfair gain is reported, an investigation is conducted.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. A clear number of goods/monies provided to interested parties must be defined, and work procedures must be established regarding the prohibition of bribery to obtain unfair profits.
2. A constant monitoring system must be established.
 - Workers and officials are prohibited from receiving unfair benefits such as bribes, money, etc.
 - Investigation and measures, investigation results, preventive measures upon reporting on receiving unfair profits
 - Investigation records, investigation methods, objective data, testimonial records, disciplinary decisions and actions taken according to disciplinary procedures
3. Regular training on the prohibition of unfair profits and training materials must be regularly updated.

5.3 Information disclosure

5.3.1 Company information is disclosed fairly and transparently in accordance with relevant laws and regulations.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. There must be work procedures related to regular review/evaluation/examination to ensure the accuracy of information.
2. Third-party verification is required to verify the accuracy and completeness of accounting policies, procedures, and records.
3. There must be an internal control system to ensure the accuracy of information, and reports must be made to government agencies in a timely manner in accordance with relevant laws and regulations.
4. Annual reports and accounting reports must be prepared in accordance with relevant laws and regulations.

5.4 Intellectual property rights

5.4.1 We protect the intellectual property and corporate information of customers and partner companies in accordance with procedures.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. As part of the contract concluded with the customer, there must be a program and related company regulations to protect customer information (price, product supply volume, product components, etc.)
 - The classification of information to be protected must include the following items:
 - 1) Customer support name and contact information, 2) Contract price and size, 3) Subcontractor/Supplier name, 4) Identity and trademark, 5) Third party intellectual property, 6) Patent record, 7) Copyrighted content
2. There must be a program and work procedures to review and protect intellectual property rights, and through the procedures, the information and non-disclosure of customers, partners, workers, and partners must be protected in accordance with relevant laws and regulations.
3. IT-related company regulations must include provisions for information protection.
4. Person in charge and management supervisors must receive regular training on information protection procedures.
 - Training materials and records must be kept and updated regularly.

5.5 Fair trade

5.5.1 To ensure fair trade and competition, accurately disclose job advertisements, product information, company introduction

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Company data disclosed to the public must be accurate.

[Document review]

1. There must be procedures and programs to ensure the objectivity and accuracy of the contents of company products and services, job advertisements, etc.
2. Procedures for record management must be established in relation to fair trade, advertising and competition

5.5.2 There is no risk of collusion.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. There must be measures to prevent collusion with other companies regarding product prices.
 - Establishment of company regulations related to collusion, collusion investigation procedures and monitoring system
 - Regular training and training materials for workers, managers, management supervisors, and partners must be regularly updated.
 - In particular, managers must undergo annual refresher training.

5.6 Personal protection and prohibition of retaliation

5.6.1 There is a channel through which workers and partner companies can report unethical behavior.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide

[On-site inspection]

1. Reporting channels such as complaint boxes and hotlines must be well known and confirmed.

[Document review]

1. The company must verify the validity of the reporter's report, take immediate action when validity is proven, and protect the reporter.
2. There must be a channel through which workers and partners can report without fear of retaliation.
3. There must be a process to prevent threats of retaliation and to report anonymously.
4. As part of the investigation process for reports, there must be detailed procedures to protect the identity of the informant.
5. Workers must be trained and training materials and records must be updated regularly.

5.6.2 There is no risk of collusion.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. Companies must clearly communicate anti-retaliation provisions to workers.
2. Procedures must be established to investigate claims of retaliation.
3. Workers must be trained and training materials and records must be updated regularly.

5.7 Privacy

5.7.1 Personal information is protected in accordance with legal requirements.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide

[Document review]

1. There must be company regulations and programs related to personal information (partner companies, customers and workers)
 - The program must contain information on legal compliance requirements when collecting, storing, transmitting, receiving, and sharing personal information.
2. Persons in charge and workers must receive training on information protection procedures, and training materials and records must be updated regularly.

5.8 Responsible mineral sourcing

5.8.1 Corporate regulations and related programs are in place regarding minerals designated as 3TG (Tantalum ‘Tantalum’, Tin ‘TiN’, Tungsten ‘Tungsten’ and Gold ‘Gold’), cobalt or other conflict minerals that are used to directly or indirectly finance human rights abuses by armed groups based in conflict and high-risk areas (can be found in OECD Due Diligence Guidance)

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. Documented corporate regulations and related programs that ensure the prohibition of the use of 3TG, cobalt and other conflict minerals used directly or indirectly to finance armed groups based in conflict and high-risk areas must comply with the following:
 - Prohibit the use of minerals used as a source of finance for armed groups in conflict and high-risk areas.
 - The sources and uses of 3TG, cobalt and other conflict minerals used in the company's products must be reflected.
 - Must reflect Congo and neighboring countries (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia)

2. Documented business procedures to verify the country of origin of the company's purchasing policy must meet the requirements below:
 - There must be a purchasing procedure (OECD due diligence guidelines or an equivalent and consistent method) to ensure legal mining, and company regulations must be reflected in this procedure.
 - The process to prove the legality of 3TG, cobalt, and other conflict minerals purchased by the company must be reflected.
 - The primary partner must document its intention to purchase 3TG, cobalt and other conflict minerals from a smelter certified by a third-party verification company.
 - If the material used is a conflict mineral, matters for establishing and implementing a plan for improvement must be reflected.
 - An annual review of procedures should be conducted

3. The following matters related to conflict minerals must be recorded and reviewed:
 - Records related to the inspection of conflict minerals are maintained for at least 5 years.
 - Establishment of annual review and improvement plan
 - Establishment of supplier's mitigation program when risks are identified
 - If mitigation measures are insufficient, additional measures must be established to ensure completion within the deadline.

6. MANAGEMENT SYSTEM

6.1 Management Participation

6.1.1 Management participation/review of human and labor rights, safety and health, environment, and ethics regulations and codes is in progress.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

- * If there are valid certificates for human and labor rights, safety and health, environment, and ethics, inspection can be skipped in those areas. (Example: Environmental inspection can be skipped in case of ISO 14001)
- * The code of conduct and ethics in the field of ethics must include all of the following items.
 - General ethics: integrity (business with honesty/integrity)
Example) Prevention of conflicts of interest, theft and extortion, embezzlement, protection of company assets, fair competition, protection of whistleblowers, operation of anonymous reporting channels, etc.
 - Compliance with laws: Anti-trust, Anti-corruption or Anti-Bribery, Privacy, Intellectual Property (IP) Protection, Responsibly Sourcing Minerals
 - Operating rules: Accurate and transparent disclosure of information

[On-site inspection]

1. Regulations and codes must be freely available in a language that all workers can understand.

[Document review]

1. A statement confirming top management's participation/review of the regulations and codes, signature on the regulations, and support must be confirmed.
2. Regulations and codes must be appropriately structured to reflect the scope and characteristics of facility operation.

6.2 Responsibilities and Obligations

6.2.1 There are systems and regulations in the areas of human and labor rights, safety and health, environment, and ethics to regulate the responsibilities and obligations of all workers (from senior managers to workers).

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

* If there are valid certificates for human and labor rights, safety and health, environment, and ethics, inspection can be skipped in those areas. (Example: Environmental inspection can be skipped in case of ISO 14001)

[Document review]

1. Senior managers must be given the responsibility to improve the program.
 - Ensure compliance with relevant laws and regulations and the RBA Code.
 - Authority must be granted to improve programs, establish work procedures, and promote improvement activities to comply with relevant laws and regulations and the RBA Code.
2. The authority and responsibility for each organization, member, and role must be documented in the management system, and the authority and responsibility for peacetime and emergency times, necessary training and training records, and management of the validity period of qualification requirements must be documented.

6.2.2 The management system and performance in the areas of human and labor rights, safety and health, environment, and ethics are efficiently reviewed by management and continuous improvement activities are carried out.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

[Document review]

1. Management review documents and review procedures must include the following items (must be reported regularly at least once a year)
 - Review procedure: Reporting topics, reporting cycle, reporting items, meeting minutes management, and other record management for management review
 - Review documents: reporting date, reporting person (recommended to report directly to senior management), due diligence results, risks, improvement plan, and other records for management review and improvement of efficiency

6.3 Legal compliance and customer demand management

6.3.1 Request review, compliance review, and status management procedures are established to ensure efficient management and compliance with laws and customer requirements in the areas of human and labor rights, safety and health, environment, and ethics.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

* If there are valid certificates for human and labor rights, safety and health, environment, and ethics, inspection can be skipped in those areas. (Example: Environmental inspection can be skipped in case of ISO 14001)

[Document review]

1. Establishment of management procedures
 - Implement management procedures once a quarter to identify changes in laws and customer requirements and apply them within the company (Management procedures: Identify external change factors → Track → Evaluation → Integration → Execution → Record management)
2. Records management
 - Management of laws and customer requirements list
 - Record of quarterly management procedure implementation notification through alarm System
 - Summary of laws and customer requirements related to the company's business
 - Records of newly added or changed 'business operations/company regulations/procedures' within the company as a result of reviewing the latest laws and customer requirements

6.4 Risk analysis and crisis management

6.4.1 Conducting risk identification, analysis, risk minimization, risk transfer, and risk management for efficient risk management in the areas of human rights and labor rights, safety and health, environment, and ethics.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

- * If there are valid certificates for human and labor rights, safety and health, environment, and ethics, inspection can be skipped in those areas. (Example: Environmental inspection can be skipped in case of ISO 14001)

[Document review]

1. Process

- Establish a process to identify the most vulnerable risks in the workplace compared to each code standard, including laws and customer requirements
- Risk assessment must be updated if there are major changes (code, etc.)
- For matters assessed as risk, an improvement action plan must be established to mitigate the risk.
- Evaluation of the effectiveness of measures must be conducted regularly.

2. Document records

- Formal risk assessment report
- Plan improvement/prevention measures for each risk and indicate the person in charge and deadline in the action plan to track implementation.

6.5 Improvement plan management

6.5.1 Establish performance management processes for labor, safety/health, and ethics. The performance management process should include establishing performance goals, establishing an improvement plan against the goals, regularly reviewing the status of the performance goals, and revising them when necessary.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

* If there are valid certificates for human and labor rights, safety and health, environment, and ethics, inspection can be skipped in those areas. (Example: Environmental inspection can be skipped in case of ISO 14001)

[Document review]

1. The following should be considered when establishing annual performance goals and management processes:
 - Direction for improvement of vulnerabilities as a result of risk assessment, matters related to the company's business among laws/customer requirements, and improvement needs through goal management as a result of review of internal standards/requirements (e.g. VoC)
2. The annual performance goal establishment and management process must include the following:
 - Performance promotion manager, execution plan, completion date, process sharing plan with workers, performance inspection cycle, continuous improvement plan and improvement plan for each performance goal
 - Reporting material to the person responsible for the annual performance goal establishment and management process

6.6 Training and education

6.6.1 There are training programs provided to workers regarding labor, safety/health, environment, and ethics-related company regulations, policies, procedures, and management of work and performance goals.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

* Ethics must include workers, contractors, partners, and other related parties.

[Document review]

1. The training program must include the following:
 - New employee orientation plan, analysis of training needs, training plan, training content, training records, training cycle, verification of training effectiveness
2. Evaluate the education program at least once every three years, or shorten the period when major changes occur.
3. Education and training records
 - Training effectiveness verification results
 - Education and training evaluation and improvement action plan
 - Educational materials

6.7 Worker communication

6.7.1 Procedures are established for appropriate and efficient reporting/communication of regulations, activities, and performance in the areas of human and labor rights, safety and health, environment, and ethics with managers, workers, partner companies, and customers.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

* Ethics must include workers, contractors, partners, and other related parties.

[Document review]

1. The official communication program must include the following:
 - The communication system, guidance system, and training for partner management must be included and operated.
 - Contract terms must specify compliance with the RBA Code of Conduct, customer requirements and applicable environmental/safety/health laws and regulations.
2. A regular customer communication program must be operated at least once a year and must include the following:
 - Recruitment program that can prove the guarantee of a free working environment (employment statistics through direct job postings and labor placement agencies: proportion of workers recruited through the labor placement agency in use, wage expenditure, expenditure on referral fees, etc.)
3. Conduct communication program evaluation at intervals not exceeding 3 years or when significant changes occur.
 - Relevant information must be included and recorded.
 - Communication records, including communication effectiveness
 - Education and training materials
 - Records distributed to suppliers

6.8 Worker and Stakeholder Participation

6.8.1 A complaint/inconvenience-related work system is in operation to ensure that workers can report complaints and inconveniences related to working conditions freely and efficiently without the threat of retaliation or intimidation.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

* If there are valid certificates for human and labor rights, safety and health, environment, and ethics, inspection can be skipped in those areas. (Example: Environmental inspection can be skipped in case of ISO 14001)

[On-site inspection]

1. Complaints and inconveniences must be clearly reported through reporting channels, and must be provided in the worker's native language (report box, hotline, hot-mail, third-party communication means, etc.)
2. A grievance channel where complaints can be filed within the workplace must be installed in a conspicuous place or must be easily accessible to anyone.

[Document review]

1. An anonymous reporting method must be operated to prevent intimidation and threats.
 - An appropriate and effective process must be established to report grievances and complaints anonymously without retaliation from internal (workers and employees) and external (supplier workers, communities or stakeholders).
2. Annual retraining must be provided to all workers regarding the use of complaints and inconvenience reporting channels, and the contents and performance of the training must be documented and managed.
3. Information on reporting procedures for reporting complaints and inconveniences must be provided to workers.
4. Immediately investigate the validity of all grievances and complaints and immediately take corrective action if warranted.
5. Grievance/complaint records must be maintained for at least 12 months.

6.8.2 Appropriate participation or consulting procedures are established to encourage worker/stakeholder opinion participation or create a culture through various methods.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

* If there are valid certificates for human and labor rights, safety and health, environment, and ethics, inspection can be skipped in those areas. (Example: Environmental inspection can be skipped in case of ISO 14001)

[On-site inspection]

1. Systems and tools (report boxes, etc.) for opinion participation in the field must be clearly identified.

[Document review]

1. Official worker participation and consulting procedures must necessarily include the following:
 - Employee surveys, suggestion boxes, labor unions, labor-management councils including workers, worker representatives, and related company regulations to promote improvement activities.
2. Employee opinion and participation must be analyzed and procedures for implementing improvement activities must be established.
3. The progress and completion of the established improvement plan must be tracked and managed.
4. Feedback records must be maintained for at least 12 months
5. Documented information on grievances and complaints (including action plans, implementation, etc.) must be provided to workers.

6.9 Audit and Analysis

6.9.1 Internal inspection procedures have been established to autonomously check compliance with the RBA Code of Conduct and related laws, regulations, and customer requirements in the areas of human and labor rights, safety and health, environment, and ethics.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

* If there are valid certificates for human and labor rights, safety and health, environment, and ethics, inspection can be skipped in those areas. (Example: Environmental inspection can be skipped in case of ISO 14001)

[Document review]

1. Internal inspection activities that must be performed regularly every year must necessarily include the following:
 - Relevant laws, RBA Code of Conduct, customer requirements for social/environmental responsibility, internal regulations, and other regulations for facility operation
2. The scope of internal inspection activities that must be conducted regularly every year must comply with the following:
 - Interviews with all facilities, all processes and operations, management of documented records, and personnel in social/environmental areas
 - Records of all internal inspection activities must be maintained.
3. Potential improvements discovered during internal inspection activities must be reviewed by middle managers.
4. A corrective action plan must be established and implemented according to the review results.

6.10 Improvement Management Procedure

6.10.1 To ensure that nonconformities or violations in the areas of human and labor rights, safety and health, environment, and ethics are traced or completed, management procedures have been established to efficiently improve legal violations and non-compliance with the RBA Code of Conduct identified through internal inspection and external verification, including root cause analysis, corrective and preventive actions.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

* If there are valid certificates for human and labor rights, safety and health, environment, and ethics, inspection can be skipped in those areas. (Example: Environmental inspection can be skipped in case of ISO 14001)

[Document review]

1. A formal improvement management program must be established that includes the following for reporting and tracking improvements.
 - Analysis of root cause of improvements and analysis of differences with current status
 - Specific improvement plan and manager for each improvement item, completion date for each improvement plans
 - If the established plan schedule needs to be modified, the procedure for modifying the schedule
 - Middle managers complete review of completed improvements
 - Differences between documented improvements and goals, improvement management, performance management
2. Retain copies of all regulatory citations/violation notices received within the past three years, including communications with government agencies.
3. If a citation is received, it must be possible to review that the problem has been resolved/closed, and corrective and preventive actions must be applied throughout the facility.

6.11 Records Management

6.11.1 For efficient document management of records in the fields of human rights and labor rights, safety and health, environment, and ethics, it is provided only to authorized administrators for maintenance of the management system and protection of personal information.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
●	●	○	○

● Compliance Guide (inspection units: human and labor rights, safety and health, environment, ethics)

* If there are valid certificates for human and labor rights, safety and health, environment, and ethics, inspection can be skipped in those areas. (Example: Environmental inspection can be skipped in case of ISO 14001)

[On-site inspection]

1. Only authorized access is allowed to the document management system, and documents must be checked for safe storage.

[Document review]

1. Records management policy must comply with relevant laws and customer requirements.
2. Documented records management items must include at least the following items:
 - Wages and working hours, employee age verification, accounting audit report, NDA (Non-Disclosure Agreement), contract conditions, internal audit report, legal compliance assessment, risk analysis, work procedures, performance management, service agencies and contractors, labor agency inspection report, incident investigation and record management, compliance with working conditions, training and education records, management system inspection and improvement activity records
3. A list of management items including related laws and customer requirements for compliance management must be documented and managed.
4. Employee personnel files must be able to be used to manage conflicts of interest.

6.12 Supply chain management

6.12.1 Have communicated with important tier 1 suppliers about the requirements of the RBA Code of Conduct.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. Documented work procedures must be established to implement the RBA Code of Conduct for partners.
2. The RBA code of conduct and requirements must be shared with partner companies under supply contracts through an official partner company communication program.
 - Classification of partner company management targets (definition of important primary partners)
 - Method of communication with primary partners (meeting, e-mail, etc.)
 - Communication language in contracts, orders, and orders
 - when using a human resources agency, must comply with the RBA Code of Conduct (Prohibition of child labor, free labor, broadcasting fees, wages, allowances, welfare benefits, prohibition of discrimination, freedom of association) and all laws related to the worker's home country and local laws in the workplace when signing a contract with the labor agency.
3. A communication process must be established to insert the requirements and provisions of the Code into contracts with customers.
4. The following information is included in relation to the contract.
 - Implementation and compliance with the RBA Code
 - Implementation of the RBA Code on Labor and Ethics Review Standards
 - Compliance with local and home country legal requirements
 - Workers must be able to resign without penalty.

6.12.2 Effective processes are in place to verify compliance with the RBA Code of Conduct by important primary partners.

● Verification Process

On-site inspection	Document review	Interview with person in charge	Interview with worker
○	●	○	○

● Compliance Guide

[Document review]

1. When using RBA SAQ (Self-Check), the information must be verified by visiting with an auditor (Consulting) to confirm the documented minutes of SAQ results and SAQ information.
2. Documented standards, guidelines, and enforcement procedures for evaluation/audit and Finding Closure Verification must be established.
3. The policies, goals, procedures, and execution level implemented by the company must be verified.
4. When a major (Priority) nonconformity is discovered, immediate action must be taken and an improvement management (CAP) process must be carried out.
5. Documented record data after an evaluation/audit is conducted at the workplace must include the relevant information.
 - Visit verification report
 - Audit records
 - Corrective action plan
 - Verification system through which corrective actions are implemented;
 - Data on working hours and wages

7. REFERENCES

- **Apple Code of Conduct**
: <https://www.apple.com/supplier-responsibility/>
- **Dodd-Frank Wall Street Reform and Consumer Protection Act**
: <https://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>
- **RBA Code of Conduct**
: <https://www.responsiblebusiness.org/code-standards-and-accountability/>
- **ILO Code of Practice in Safety and Health**
: <https://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf>
- **ILO International Labor Standard**
: <https://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm>
- **ISO 14001**
: <https://www.iso.org/home.html>
- **OECD Due Diligence Guidance**
: https://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html
- **ISO 45001**
: <https://www.iso.org/home.html>
- **United Nations Global Compact**
: <https://www.unglobalcompact.org>