



CODE OF CONDUCT FOR THE APEM GROUP COMPANIES July 2019

The APEM Group companies and their employees must abide by the highest Professional, Ethical and Legal standards. Therefore, the APEM group's culture and strategy are based on three main principles, namely, keeping our commitments, respecting one another, and enforcing an ethical behavior in accordance with applicable laws.

This Code of Conduct is in fact a global initiative at the APEM Group company's supplier chain level. The APEM Group companies expect that not only their employees but also their suppliers, Tier 2 suppliers and subcontractors to comply with these same rules. Therefore, the APEM Group companies invite their employees, their suppliers, their Tier 2 suppliers and their subcontractors to adopt, maintain and implement, in their respective areas, all the fundamental values pertaining to human rights, Health and Safety, the Environment, Ethical Standards and Compliance with the Law as they are described in this Code of Conduct.

WORKPLACE AND HUMAN RIGHTS

Our employees and business partners come from different backgrounds and have different perspectives, practices and skills. Each of us is required to avoid any behavior that could be interpreted as rudeness, disrespect, discrimination or harassment. As such, we expect our employees and business partners to abide by the rules applicable in the following fields in an environment of trust and mutual respect:

Respect to third parties: Each employee must contribute to the fulfilment of the commitments made with the partners of the APEM Group companies, especially customers, suppliers and public authorities, and must remain objective and fair in their dealings.

Child labor: The APEM Group companies have engaged in a process aimed at respecting all local laws relevant to the workers' minimum age. The minimum age of all workers must respect or exceed the standards of local laws and must comply with international labor regulations.

Forced labor: The APEM Group companies will not use any form of forced or involuntary labor, whether the work is performed without any freedom, contract or under pressure.

Harassment: The APEM Group companies offer a workplace that respects the dignity and human rights of all employees. Under no circumstances should employees be subjected to physical, sexual, moral or verbal abuse.

Moreover, no employee should suffer any corporal punishment. If this is provided for by law, an employee may be subject to monetary sanctions.

The suppliers of APEM Group companies, Tier 2 suppliers and subcontractors must treat their employees with respect and courtesy and cannot discriminate or harass them based on their race, religion, color, nationality, gender, age, disability, military status, sexual orientation or any other law protecting their rights.

Wages and Benefits: The compensation paid to the employees belonging to the APEM Group companies will comply with all applicable laws, including those related to minimum wages, overtime and legal benefits offered in countries in which the APEM Group companies operate. In accordance with the relevant domestic laws if this is the case, employees will be compensated for overtime. Similarly, the deduction of all or part of the salary is allowed if it is provided for by local laws. The salary scale is communicated in a targeted manner to the employees involved in the APEM Group companies.

Freedom of Association: Open communication and direct contact between employees and the management of the APEM Group companies are the most effective ways to resolve disputes over remuneration and/or workplaces. The rights of the employees regarding freedom of association, freedom to join trade unions, freedom to seek representation or freedom to join employee representative committees must respect the applicable local laws. Employees will be able to openly communicate and share their grievances with management regarding working conditions and management practices without any fears of retaliation, intimidation or harassment.

Preventing discriminatory conduct: APEM Group companies are committed to providing their employees with equal opportunities for recognition and career development and regardless of their background, gender, beliefs or disability, and shall not tolerate any form of discrimination or harassment.

HEALTH AND SAFETY

The safety of its employees is a priority for the APEM Group companies, and an everyday battle fought with humility and vigilance. The drive for efficiency must never override the need for safety. We all know, and we all apply, at any level and with the utmost discipline, the safety rules in place. Each of us has a personal responsibility and the authority to intervene in the event of non-compliance with these rules or if a risky situation is assessed. The APEM Group expects the same requirements from its suppliers, Tier 2 suppliers and their subcontractors.

Safety in the workplace: The APEM Group companies provide their employees with a safe and healthy work environment. We expect from our suppliers, Tier 2 suppliers and their subcontractors that they provide their employees with a safe working environment complete with preventative safety procedures and equipment that comply with all local laws as well as regulations.

Employees' exposure to potential safety hazards must be delayed by appropriate mitigation measures, the implementation of administrative checks, preventive maintenance, safe working practices and continuing training in the field of work safety.

Job-related accident and illness : Procedures and systems must be implemented by our suppliers, Tier 2 suppliers and their subcontractors to prevent, manage, track and postpone a job-related accident or illness, including provisions to encourage proper reporting by the employees, the classification and reporting related to occupational injuries and illnesses, provide adequate medical treatment, investigate these cases and implement corrective actions to eliminate their causes and facilitate the return to work of the employees affected.

ENVIRONMENT

Environmental permits and reporting: All required environmental permits, authorizations and registrations must be obtained, maintained and updated. Similarly, operational reporting requirements must be monitored.

Pollution prevention and waste reduction: The waste of all types of resources, including water and energy, must be reduced or eliminated at the source or through practices such as change of production, maintenance and processes, substitution of raw materials, storage, through recycling and reusing raw materials.

ETHICAL STANDARDS

Professional integrity: The highest standards of integrity must be established in all business interactions. APEM Companies have a zero-tolerance policy on all forms of corruption, extortion or embezzlement (covering all undertakings; offer, donation or acceptance of any bribe). All business relationships should be transparent, accurately executed and reflected in the company's books and in



all business reports. Monitoring and enforcement procedures will be implemented to ensure compliance with anti-corruption laws. We expect the same level of requirements from our suppliers, Tier 2 suppliers and their subcontractors.

Compliance with laws on corruption: It is forbidden to pay, offer or grant unwarranted benefits in any form, directly or through an intermediary, to a private person or a government official in any country, to obtain preferential treatment or influence the outcome of a negotiation involving one of the APEM Group companies. Corruption is illegal in most if not all regions where we operate. In addition, laws like the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act apply beyond borders and to activities in other countries. Sanctions imposed for corruption are serious and engage the legal responsibility of both the Legal Entity and the individual concerned. The APEM Group companies are therefore paying the greatest attention to this subject.

Rewards, gifts and benefits: As a rule, accepting gifts and other benefits is prohibited if the interests of the Companies of the APEM Group are affected by it and if the professional independence of employees might be compromised, or seemingly. Accepting gifts and other benefits is only authorized if the estimated value of the gift does not exceed the maximum limit of 100 euros within the European Union. In other countries, this value is adjusted to local standards. The gifts received by the employees of the APEM Group companies will go into a common fund within the company concerned to be distributed to a charity at the end of each calendar year.

Invitations to business lunches or dinners can generally be accepted. As far as invitations to events without any strong professional ties such as attending a concert, a play, a sporting event or other similar events or evenings, each employee must verify that his/her participation in such an event is compliant with the practices of the profession. This means that the host is present, that this participation is of one-time nature. In all cases, the direct supervisor must be informed.

Business loyalty, advertising and competition: Standards in business loyalty, advertising and competition must be met. Appropriate means to safeguard customer information must be implemented.

Intellectual and industrial property: Intellectual property rights must be respected. Transfer of technology and of know-how must take place in a way that protects intellectual and industrial property rights.

Identity and privacy protection: Measures that ensure the confidentiality and protection of employee information must be implemented.

APEM Group companies are committed to protecting the personal information of all their employees and all persons with whom they do business, including suppliers, customers, consumers and employees. We therefore ask you to respect privacy and all information security laws and all regulatory provisions regarding the collection, storage, processing, transmission and sharing of personal information.

LEGAL CONFORMITY

Conformity: APEM Companies comply with the laws of each country and each region regarding applicable competition rules and export restriction laws.

Privacy: All confidential information obtained during business must be protected to prevent any misuse, unsafe dissemination or disclosure to unauthorized persons. You must therefore obviously refrain from making false statements or from mishandling the confidential information in your possession.



Compliance with competition law regulations: The law of competition applies to all aspects of a company's business activity: negotiations with customers and suppliers, contacts with competitors, marketing and sales promotion.

The following are forbidden: any agreement or even discussion with competitors regarding pricing or other trading conditions, production restriction, the distribution of customers or commercial territories.

It is up to each employee of the APEM Group companies to respect competition law.

Violating competition law poses serious threats to the company, its employees and shareholders. The law imposes penalties that can be significant for individuals and corporations while deeply damaging corporate reputation.

As a rule, we must never enter into agreements with competitors that may have the effect of restricting competition. Similarly, we must never use illegal or unethical methods to obtain information on competing companies.

Compliance with insider trading rules: Any employee with the knowledge of non-publicly available information which would be likely to influence the stock price of IDEC Corporation listed in the Tokyo Stock Exchange must refrain from disclosing it to anyone.

The latter must maintain the confidentiality of this information and must not carry out, nor advise a third party to carry out or have someone else carry out transactions on the shares of the IDEC Corporation.

Trading based on undisclosed internal information is illegal and contrary to the APEM Group policy.

Preventing conflicts of interest: Employees are required to avoid any situation that involves a conflict between their personal interests and the interests of the APEM Group.

Links with a competitor, customer or supplier: We may have a conflict of interest when an employee works simultaneously for a client, supplier or competitor or has significant interests, directly or indirectly, in those clients.

It is recommended that the employee, who may be in a situation involving a conflict of interest, bring it to the attention of his supervisor.

PROTECTING THE ACTIVITIES OF THE APEM GROUP

Each employee must protect and keep confidential non-public data and documents of strategic, financial, technical or commercial nature, when their disclosure to third parties would be likely to harm the interests of the APEM Group companies.

Information protection: Similarly, personal, professional or privacy information is confidential and must be handled with all necessary precautions to prevent their tampering or disclosure.

The duty of confidentiality also applies to information entrusted by the partners and customers of the APEM Group companies. It is up to each employee of the APEM Group companies to respect these rules regarding information protection.

This duty of confidentiality continues even after the departure of the employee of the APEM Group companies.

Information on the economic activities, structure, financial situation and performance must be disclosed in accordance with the applicable regulations and laws in countries in which the APEM



Group companies operate and in accordance with the leading practices in the industry. The forgery of these reports or the distortion of conditions or practices in the supply chain is unacceptable.

Protection of property and resources: Each employee is responsible for the proper use and for the protection of the assets and resources belonging to the APEM Group companies such as intellectual property rights, facilities, equipment, and financial resources or cash. These assets and resources must be used in accordance with their professional purpose and within the framework set by the APEM Group companies.

They cannot be used for personal purposes, except in a case of explicit authorization given under set procedures.

Finally, it is up to each employee to protect the assets and resources of the Companies of the APEM Group from any damage, alteration, fraud, loss or theft.

Transparency and integrity of information: The APEM Group companies aim for the highest transparency, and the highest standards in terms of the integrity and reliability of financial, accounting or management information that is processed or communicated.

Any employee involved in the production, analysis, retention or communication of this information must carry out these operations in an honest and transparent manner.

Internal control and audit: The internal controls put in place in the Companies of the APEM Group contribute to the control of its activities, the efficiency of its operations and the efficient use of its resources.

Compliance with laws, regulations, policies or procedures, asset protections, and the reliability of financial information fall within this scope: All employees belonging APEM Group companies must contribute to the effectiveness of internal controls and cooperate with internal or external audits (which are involved in the evaluation of these devices), including by demonstrating due diligence and transparency in their responses to any requests for information.

IMPLEMENTATION OF THE CODE OF CONDUCT

If there are doubts about the interpretation or application, in any given situation, of the rules recalled in the code of conduct, each employee of the APEM Group companies has every opportunity to report those doubts to his/her supervisor or to the Human Resources Department of his/her entity. Similarly, suppliers, Tier 2 suppliers and subcontractors can contact APEM in case of doubt.

Furthermore, no sanction may be taken against an employee who might report in good faith a breach of the rules set out in this document.

This code of conduct is an integral part of the IDEC APEM's approach to CSR. It also aims at disseminating and conveying the main outputs of the IDEC WAY in the APEM Group and within the framework of the APEM Group commercial relationships with its partners:

VISION – Our strategy serves our Ambitions: Pioneer the new norm for a safer and sustainable world

MISSION –. Our fundamental purpose: To create the optimum environment for humans and machines

CORE VALUES – The values that underpin our corporate culture: Harmony, Passion, Innovation, Integrity and Commitment