

Procedure for EICC requirements

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1.0 Purpose: To layout a procedure for meeting EICC (Electronic Industry Code of Conduct) requirements

2.0 Scope: This procedure applies to all manufacturing activities at Electronic PCB assembly facility (plot# 36 / 37) & Cable facility (Plot# 17)

3.0 Associated Material

3.1 HR Manual

3.2 Risk Assessment procedure # 62190005.856

3.3 Emergency Preparedness & Response doc# 62190002.304

3.4 Procedure for safety Doc # 62190002.077

3.5 Procedure for Legal Compliance, procedure # 62190019.003

3.6 Procedure for identification & evaluation of Environmental Aspects, Procedure# 62190002.301

3.7 EICC Code of Conduct v 4.0(www.eicc.info)

4.0 Responsibilities: As laid out in the procedure

5.0 Procedure

Management of SFO tech is committed to meet EICC requirements & continuously improve on this requirement.

Social Policy

At nest Group, we are committed to ensure employee welfare in all aspects including health, safety and overall well being. We are committed to meet the requirements of the EICC standard and the applicable labor related regulations. We shall continually improve our social accountability performance through employee involvement and systematic reviews

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5.1 EICC requirements related to Labor

5.1.1 SFO tech is committed to uphold the right of workers and to treat them with dignity and respect. All employees have freely chosen employment which includes no forced, bonded labor or involuntary prison labor. All work will be voluntary, and workers shall be free to leave the company upon reasonable notice.

5.1.2 No child labor is used in any stage of manufacturing. During recruitment HR ensures that employee's age is verified before issuing appointment. Details of verification procedure is referred in HR manual Doc# HMS 001.

5.1.3 HR department ensures over time given is as per local government laws. HR department shall monitor the working hours of workers to ensure the work weeks do not exceed the maximum set by local law.

5.1.4 HR department ensures compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. The basis on which workers are being paid is to be provided in a timely manner Via pay stub or similar documentation shall be kept with HR department. Refer HR Manual for details

5.1.5 SFO tech disciplinary policies & procedures is clearly laid out in HR procedures Doc# HMS 001

5.1.6 SFO is committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. Details are referred in HR manual (Doc# HMS 001)

5.1.7 SFO respect the rights of workers to associate freely, join or not join labor unions, seek representation, join workers' councils in accordance with local laws. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment

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5.2 EICC requirements Related to Health & Safety

5.2.1 All potential Health & safety hazards shall be identified through Risk assessment procedure doc# 62190005.856. Wherever high risks are identified such exposure shall be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. (Refer PPE usage Doc# 62190005.407. Responsibility is as laid out in procedure # 62190005.407

5.2.2 All Emergency situations & events are identified in doc# 62190002.304 which includes emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

5.2.3. All occupational injuries & illness are tracked, reported. Actions are taken to provide medical treatment, investigate causes & implement corrective actions to eliminate their causes. Procedure for occupational injury & illness are addressed in procedure for safety Doc # 62190002.077.

5.2.4 Based on the risk assessment, worker exposure to chemical, biological and physical agents are identified, evaluated and controlled. Mitigation plans are documented & implemented.

5.2.5 Wherever physically identified work are identified as a potential risk, mitigation plans are documented & implemented

5.2.6 Wherever machine safe guarding is identified as a potential risk, mitigation plans are documented & implemented

5.2.7 Workers are provided with ready access to clean toilet facilities, potable water and eating facilities. Appropriated records for cleaning, test report on quality of water shall be made available.

5.3 EICC requirements Related to Environment

5.3.1 Applicable Industrial consents are obtained from local government authorities and maintained, kept current, their operational & reporting requirements are followed. Refer procedure # 62190019.003

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5.3.2 Environmental objectives are identified for reducing usage of electricity; reduce usage of natural resources

5.3.3 All hazardous substances / Hazardous Air emissions / Wastewater & solid waste released to environment are identified through Aspect – Impact study. Refer doc# 62190002.301 for details. Wherever aspect having high SPDDE score, mitigation plan is implemented.

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5.3.5 Hazardous Air emissions released to environment are identified through Aspect – Impact study. Refer doc# 62190002.301 for details. Wherever aspect having high SPDDE score, mitigation plan is implemented.

5.3.6 All regulatory / customer requirements are identified in procedure# 62190019.003 through aspect – Impact study.

5.4 EICC requirements related to Ethics

5.4.1 SFO ensures highest standards of integrity in all business Interactions. Guidelines are explained in HR manual, procedure# (Doc# HMS 001) .All Information regarding business activities, intellectual property rights, shall be controlled by procedure # 62190002.084 (Procedure for Intellectual Property Protection Policy).

5.4.2 The code of ethics ensures Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

5.4.3 The code of Ethics ,Confidentiality Agreement and Non Disclosure agreements restricts Disclosure of Information

5.4.4 Intellectual Property Rights are to be respected;transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

5.4.5 Standards of fair business ,advertising and competition are to be upheld.Appropriate means to safeguard customer information must be available.

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5.4.6 Programs that ensure the confidentiality and protection of supplier and employee whistleblower(Any Person who makes a disclosure about improper conduct by an employee or officer of a company,or by public official or official body)

5.4.7 Responsible Sourcing of Minerals: Participants shall have a policy to reasonably assure that the tantalum,tin ,Tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of Congo or an adjoining country.Participants shall exercise due diligence on the source and chain of custody o these minerals and make their due diligence measures available to customers upon customer request

5.4.8 Participants are to commit to be protecting the reasonable privacy expectations of personal information of everyone they do business with,including suppliers,customers,consumers and employees.Participants are to comply with privacy and information security laws and regulatory requirements when personal information is collected,stored ,processed transmitted and shared.

5.4.9 Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

5.5 EICC requirements related to Management System

The Management System should contain the following elements:

5.5.1 Company Commitment :A corporate social and environmental responsibility policy statements affirming Participant's commitment to compliance and continual improvement,endorsed by executive management.

5.5.2 Management Accountability and Responsibility:The Participant clearly identifies company representative/s responsible for ensuring implementation of the management systems and associated programs.Senior Management reviews the status of the management on a regular basis.

5.5.3 Legal and Customer Requirements:A Process to identify,monitor and understand applicable laws,regulations and customer requirements,including the requirements of this code.

5.5.4 Risk Assessment and Risk Management System: A Process to identify the environmental,health and safety and labour practice and ethics risks associated with Participant's operations.Determination of the

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relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5.5.5: Improvement Objectives:Written performance objectives,targets and implementation plans to improve the Participant's social and environmental performance,including a periodic assessment of Participant's performance in achieving those objectives.

5.5.6: Training: Programs for training managers and workers to implement Participant's policies,procedures and improvement objectives and to meet applicable legal and regulatory requirements.

5.5.7:Communication: A Process for communicating clear and accurate information about Participant's policies, practices, expectations and performance to workers,suppliers and customers.

5.5.8: Worker Feedback and Participation: Ongoing processes to assess employee's understanding of and obtain feedback on practices and conditions covered by this code and to foster continuous improvement. Employee feedback is taken through suggestion boxes provided at various locations in the plant. HR manual (procedure # Doc# HMS 001) addresses handling of such suggestions.

5.5.9: Audits and Assessments:Periodic self evaluations to ensure conformity to legal and regulatory requirements,the content of the code and customer contractual requirements related to social and environmental responsibility.

5.5.10:Corrective Action Process: A Process for timely correction of deficiencies identified by internal or external assessments,inspections,investigation and reviews.

5.5.11: Supplier Responsibility:A Process to communicate Code Requirements to suppliers and to monitor supplier compliance to the code. As per Supplier Selection, Supplier Rating & Evaluation Doc # 62190002.097,EICC Check list format Q5346 also need to be verified before adding the supplier to AVL, If there are any gaps with respect to the EICC check list a plan shall be made to close them.For existing suppliers :A plan shall be made to verify if the supplier comply to the EICC requirements. Format number Q5346 shall be send to selected suppliers& feedback collected. If there are any gaps with respect to the EICC check list a plan shall be made to close.The details will be logged in format # Q5352,Road Map for EICC Code Implementation for next tier Suppliers.