

Business Partner Code of Conduct for Sustainable Procurement (CCSP)

Associates of Cape Cod, Inc. (ACC) believes that collaboration with commercial partners is essential for sustainable development that also contributes to the health and well-being of people around the world. Accordingly, ACC has formulated a code of conduct for the purpose of promoting initiatives aimed at achieving sustainable business practices.

The CCSP sets out our initiatives based on ACC's Basic Sustainability Policy and expresses our expectations for business partners in respect of promoting sustainability initiatives throughout the entire supply chain. ACC encourages our business partners to comply with relevant laws and regulations, but also to promote business activities consistent with the CCSP, as set out below.

1. Scope of application

- Applies to all officers and employees of ACC and its subsidiaries and commercial partners
- ACC encourages commercial partners to understand and comply

2. Fair trading / ethical business conduct

- Work to prevent all forms of corruption, such as bribery, extortion, and embezzlement. In business transactions and relations with the government, regulators, and governing authorities
- Do not take part in giving or receiving bribes or illegal solicitation
- Comply with the competition laws and fair-trading laws and regulations of the countries and regions where commercial activities take place, including the Subcontract Act and Antimonopoly Act of Japan, if applicable
- Do not engage in inappropriate payoffs, acts constituting conflicts of interest, abuse of a superior bargaining position, or improper representations in advertising products or services
- Respect intellectual property rights and do not engage in acts that constitute unauthorized use or infringement of intellectual property
- Carefully manage personal information and confidential information and work to strengthen information security

3. Respect for labor and human rights

- Do not participate in forced labor or child labor of any kind
- Develop structures to prohibit inhumane acts, harassment, and discrimination and foster a worker-friendly environment that promotes mental and physical health
- Respect freedom of association and worker's rights to participate or not participate in labor relations
- Respond in good faith to requests from workers for a dialogue
- Comply with applicable employment, labor and human rights obligations and regulations of the countries and regions in which they operate
- Provide compensation consistent with the laws of the region where commercial activities take place
- Promote education and opportunity

4. Occupational safety and health

- In accordance with applicable laws, protect employees from chemical, biological, and physical hazards in workplaces including employee dormitories, if applicable
- Develop management processes to prevent serious leakage of chemical substances or biological substances
- Identify potential emergencies at workplaces including employee dormitories in advance, and perform risk assessments to determine hazards
- Minimize the impacts of emergencies by preparing emergency plans and response procedures
- Provide training for employees as applicable
- Work to minimize impacts on employees

5. Environment

- Comply with applicable environment-related laws and regulations of the countries and regions in which operations exist and engage in environmentally conscious business activities
- Work to understand and manage greenhouse gas emissions and water use and strive to reduce environmental impact where possible

- Develop systems for ensuring waste, exhaust gas, and wastewater safety. Manage treatment, transport, storage, disposal, recycling, and reuse
- Develop systems to prevent leakage or discharge of toxic substances into the environment and mitigate impacts on local communities and biodiversity
- Increase resource efficiency and promote sustainable resource use and procurement

6. Accountability & Compliance

- Develop systems for the implementation of initiatives based on this Code and express our commitment to the items set forth herein
- Construct appropriate mechanisms to identify and manage the risks set out in this Code.
- Manage and maintain documents for complying with this Code
- Develop appropriate education and training programs for management and workers with respect to this Code
- Formulate achievement objectives and action plans for promoting the content of this Code and achieve continuous improvement through periodic monitoring
- Establish an internal reporting system that ensures the anonymity of whistleblowers and prohibits retaliation or disadvantageous treatment of whistleblowers
- Promote fair and honest information disclosure and engage in continuous dialogue with stakeholders



President & CEO