

Document number: <b>POL EMEA-21294</b>	Document title: <b>Suppliers Code of Conduct</b>				Document owner: <b>Jessica Ström</b>
Doc created, date <b>06/11/2025</b>	Version: <b>1.0</b>	Version date: <b>07/11/2025</b>	Page: <b>1 of 8</b>	Process: <b>Supply chain</b>	Approved by: <b>Phil Nicholson</b>

## 1 Introduction

At Yaskawa Europe GmbH (further regarded as “YASKAWA EMEA”), we collaborate exclusively with our suppliers who uphold our values of integrity, sustainability, and human rights. These partners have committed to adhering to the standards outlined in our Supplier Code of Conduct.

“Supplier(s)” refers to third parties, including individual contractors, that YASKAWA EMEA engages in purchasing goods and/or services and/or works. The Supplier Code of Conduct does not apply to end-use customers.

At YASKAWA EMEA, we support inter alia the 10 principles of the United Nations Global Compact (UNGC) on Human Rights, Labour, Environment and Anti-Corruption, the International Labour Organization’s (ILO) Core Labor Standards, the UN Guiding Principles on Business and Human Rights (UNGPs), as well as applicable laws and principles in the areas of human rights and safe work environment. This Supplier Code of Conduct is based on our own Code of Conduct and sets out the basic requirements that all Yaskawa suppliers must meet to do business with Yaskawa.

## 2 Compliance with the Law

YASKAWA EMEA requires its suppliers to adhere to all applicable laws and regulations that have an impact within the jurisdiction of our supplier. This includes

- Regional laws: ensuring compliance with local regulations and ordinances specific to the regions where our Supplier operate.
- National laws: observing national legislation that governs business practices, trade, and corporate conduct within countries of operation.
- International laws: abiding by international treaties, agreements, and standards that affect cross-border transactions and global activities.

. This commitment to legal compliance is integral to our business ethics and corporate responsibility, ensuring that we operate with integrity and transparency in all our dealings.

All suppliers to YASKAWA EMEA shall meet the requirements of the UK Modern Slavery Act, the European Corporate Sustainability Reporting Directive (EU/2022/2464), and the Corporate Sustainable Due Diligence Directive (EU/2024/1760).

The supplier shall also involve its sub-suppliers to commit to these standards.

## 3 Human Rights

The supplier undertakes to fully comply with (i) all relevant employment laws, (ii) respect all human rights and to provide equal opportunity in the workplace as set forth in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact

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Principles and the ILO Core Labor Standards, the OECD guidelines for multinational enterprises, the European Convention on Human Rights (ECHR), UN Convention on the Rights of the Child, UNICEFs Children's Rights and Business Principles (CRBP). The supplier shall be responsible to oblige his supplier in an adequate form to comply with the same principles as set out under (i) and (ii) above.

The supplier shall respect the personal dignity, privacy and rights of each individual and prohibit behaviours and threats that are intended to harm, and refrain from discrimination, harassment and retaliation based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation, sexual orientation or other characteristics protected under national laws

#### 4 Grievance and Mediation

YASKAWA EMEA expects all suppliers to have an accessible, confidential process for raising concerns about working conditions without fear of retaliation. All grievances should be addressed transparently, tracked, and resolved in a timely manner.

<https://www.yaskawa.eu.com/aboutyaskawa/Compliance/Reporting-System>.

#### 5 Upholding the Freedom of Association

We expect our supplier to acknowledge and fully respect the right of all employees to freely associate, organize, and participate in workers' associations or trade unions of their choice. This includes the right to engage in collective bargaining and other lawful activities related to labour representation.

Employees must be able to exercise these rights without fear of retaliation, discrimination, or interference. Participation in such organizations shall not result in any form of preferential treatment or disadvantage. Whether an employee chooses to join, support, or refrain from joining a workers' organization, their decision must be respected equally.

We expect our supplier to foster an open and inclusive work environment where dialogue between employees and management is encouraged, and where labour rights are upheld in accordance with international labour standards, including those set forth by the International Labor Organization (ILO)

#### 6 Health and Safety in the Workplace

We expect our supplier to maintain the same high standards for health and safety that Yaskawa does. The supplier must ensure a safe and healthy environment for all their workers, including temporary workers, contractors, and any others who may be affected by your activities. In particular, the supplier should:

- Establish suitable organizational structures and procedures to effectively manage health and safety risks and compliance impacts that are applicable with local legislation.

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- Implement effective control measures and set objectives and targets to mitigate risks and reduce impacts.
- Ensure that all workers are sufficiently aware of the risks and are appropriately trained in the subject.
- Identify and assess potentially hazardous conditions in the workplace and minimize potential impact.
- Track and document performance data related to your improvement programs.

## 7 Working Conditions

The supplier must ensure that working conditions throughout its operations and supply chain comply with all applicable labour laws, collective bargaining agreements, and internationally recognized standards. All workers must be treated fairly, with dignity and respect, and employed under conditions that support their physical, mental, and economic well-being.

### 7.1 Wages and Living Income

Suppliers must provide all employees with wages, benefits, and compensation packages that:

- Comply with applicable national laws, regulations, and collective agreements regarding minimum wage, working hours, overtime pay, and statutory benefits.
- Are paid regularly, in full, and transparently, with clear documentation (e.g., wage slips) indicating hours worked, rates of pay, and any deductions made.

In addition to legal compliance, suppliers are **strongly encouraged to work progressively toward providing a living wage**—defined as remuneration sufficient to afford a decent standard of living for workers and their families, including food, housing, healthcare, education, transportation, and discretionary income.

Where third-party living wage benchmarks (e.g., Global Living Wage Coalition, Anker Methodology) are available, suppliers should reference them and assess internal compensation policies accordingly.

Suppliers must not make unauthorized deductions, delay wage payments, or use wage withholding as a disciplinary tool.

### 7.2 Working Hours and Rest

Suppliers shall comply with applicable laws and international standards regarding working time:

- The standard workweek must not exceed 48 hours, and total working hours (including overtime) must not exceed 60 hours per week, except under exceptional circumstances permitted by law.

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- Overtime must be voluntary, limited in frequency, and compensated at a premium rate.
- Workers must receive at least one full day of rest every seven days and be entitled to legally mandated rest periods and paid leave (e.g., annual, sick, and parental leave).

Suppliers must have accurate timekeeping systems to track and manage working hours, including overtime and rest days.

### 7.3 Transparent and Fair Employment Terms

Suppliers must ensure that all workers:

- Receive clear, written contracts in a language they understand, detailing employment conditions, job roles, working hours, compensation, benefits, and disciplinary procedures.
- Are engaged under contracts that are lawful, fair, and do not misrepresent terms or conditions.
- Are not subject to exploitative arrangements, such as false self-employment or disguised subcontracting that bypasses labour protections.

### 7.4 Social Protection and Benefits

Suppliers must provide workers with all legally mandated social protections, such as:

- Health insurance, unemployment coverage, pensions, and parental leave.
- Equal access to benefits, without discrimination based on employment type or contract duration.
- Special consideration for workers in vulnerable situations (e.g., pregnant workers, caregivers, young workers above minimum working age).

### 7.5 Migrant and Contract Workers

If engaging migrant, seasonal, or third-party contract workers, the supplier must:

- Ensure fair and equal treatment in wages, benefits, and working conditions, equivalent to those provided to direct hires.
- Cover all recruitment-related fees and costs; workers must not pay to access employment.
- Provide assistance in securing lawful work permits and access to benefits and legal protections

### 7.5 Stable and Regular Employment

Suppliers must avoid practices that undermine regular employment and worker protections, including:

- Excessive reliance on short-term, casual, or agency labour to avoid obligations.

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- Misclassification of employees as independent contractors.
- Use of fixed-term contracts for roles of a permanent nature without justified cause.

## 8 Environmental Protection

The supplier undertakes to establish and maintain an appropriate environmental management system that minimizes the environmental impact of its business activities. This includes, for example, the reduction of waste or the use of environmentally friendly technologies. As part of its environmental management all supplier shall without limitation comply with all statutory regulations on environmental protection, health and on-the-job safety and to install appropriate operational measures to reduce the effects upon man and environment to a minimum. The supplier shall obtain and maintain all required environmental permits, regulatory approvals, and registrations. Further on, the supplier shall minimize their negative impact on biodiversity loss, deforestation, climate change and water usage. The supplier is responsible for ensuring that its sub-suppliers are contractually or otherwise appropriately obligated to adhere to the same principle as set out in this section. This includes taking reasonable and effective measures to communicate, implement, and monitor compliance throughout their supply chain.

The supplier should identify, label and manage chemicals, waste and other materials that pose a danger to people or the environment to ensure that they are handled, moved, stored, used, recycled, reused, or disposed of safely.

The supplier is highly recommended to track its environmental performance through clearly defined and measurable key performance indicators (KPIs), in particular track its GHG emissions, set measurable targets on GHG emissions reduction and other relevant environmental KPIs, develop plans on continuous improvement of its environmental performance and dedicate reasonable financial and organizational resources to implementation of those plans. The supplier is also encouraged to regularly inform both its management and employees on environmental matters through training or other suitable communication channels.

## 9 Fair Business Practices

Integrity is the foundation of a long-term business relationship. The supplier undertakes:

- To not tolerate corruption and bribery and to refrain from any activity aimed at influencing business activities in an unauthorized manner.
- To refrain from extending benefits to Yaskawa employees beyond refreshments during appointments or advertising material as a present.
- To refrain from activities aimed at restricting national and international competition.
- To respect the intellectual property rights of others.
- To comply with export control and customs regulations.
- To not directly or indirectly promote money laundering and terrorist financing.

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- To handle the personal data entrusted to them in a responsible manner.
- To avoid or disclose conflicts of interest that could influence the business relationship.

## 10 Responsible Procurement of Raw Materials

The supplier undertakes to take appropriate measures to avoid the use of raw materials from conflict and risk areas. The supplier who are dealing with raw materials and components containing tin, tantalum, tungsten, gold (3TG) or cobalt that are part of the direct supply chain of YASKAWA EMEA products must comply with all applicable laws concerning responsible sourcing and conflict minerals. The supplier shall follow the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas based on their position in the supply chain, including relevant reporting.

The supplier shall ensure that all supplier in their 3TG and cobalt supply chain are traceable to smelter or refiner level.

## 11 Information security and Data protection

The supplier must comply with all applicable data protection and privacy laws, including but not limited to the General Data Protection Regulation (GDPR) (EU/2016/679) and other relevant local or international standards.

## 12 Protection of Intellectual Property

The supplier must recognize and respect all forms of intellectual property, including but not limited to patents, trademarks, copyrights, trade secrets, and proprietary technologies.

The supplier must implement appropriate safeguards to protect confidential and proprietary information. This includes physical, technical, and administrative measures to prevent unauthorized access, use, or disclosure.

The supplier should provide regular training to their employees on the importance of intellectual property protection and the specific obligations outlined in the supplier's code of conduct.

## 13 Business Continuity Plan

The supplier undertakes to maintain a business continuity plan as an emergency measure to mitigate the effects of business interruptions, for example due to cyber incidents, war or terrorism, natural disasters or supply chain interruptions.

The supplier agrees to inform YASKAWA EMEA on incidences affecting the business continuity as soon as possible. YASKAWA EMEA will strive to support the supplier to the extent possible.

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## 14 Cooperation and Remediation

The supplier shall cooperate fully with YASKAWA EMEA to ensure compliance with the requirements of this Supplier Code of Conduct. This includes, but is not limited to, the obligation to:

- Provide accurate, complete, and timely information and documentation upon request that demonstrates compliance with the Code's provisions.
- Respond to due diligence inquiries and submit to sustainability-related self-assessments, audits, or site visits carried out by YASKAWA EMEA or by independent third parties acting on its behalf.
- Grant reasonable access to relevant personnel, facilities, and records necessary for verification purposes.

In the event that non-compliance with this Code is identified—either through YASKAWA EMEA's assessment or audit process, or through the supplier's own internal controls, grievance mechanisms, or whistleblowing channels—the supplier is obligated to:

- Promptly notify YASKAWA EMEA of the issue.
- Conduct an internal investigation, as needed, to determine root causes.
- Develop and submit a time-bound and verifiable **remediation plan** that outlines corrective measures.
- Implement corrective actions without undue delay and in accordance with the agreed timeline.
- Provide regular status updates on progress toward full resolution

YASKAWA EMEA is committed to working collaboratively with suppliers to address challenges constructively. However, where:

- Remediation is not feasible or not implemented in good faith,
- Repeated or serious violations occur,
- Or there is a demonstrated unwillingness to cooperate,


We reserve the right to suspend or terminate the business relationship.

The YASKAWA EMEA primary point of contact is through [procurement.compliance@yaskawa.eu](mailto:procurement.compliance@yaskawa.eu). As an alternative, information can be submitted personally or anonymously via the YASKAWA EMEA Whistleblowing System: <https://www.yaskawa.eu.com/about-yaskawa/Compliance/whistleblowing>

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## 15 Signature

The signatory must be duly authorized to sign on behalf of the company.

  
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Phil Nicholson  
Director Operations and Supply Chain  
Yaskawa Europe GmbH

Date: 01/08/2025

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Signature Supplier/Business Partner

Date:

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Signature Yaskawa Local responsible and title

Date:

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Signature Supplier/Business Partner

Date: