

JEOL USA, Inc.

Supplier Code of Conduct

This Supplier Code of Conduct - May 1, 2024,

INTRODUCTION:

JEOL USA, Inc. (“JEOL” or the “Company”) is aware of its corporate responsibility towards the people, communities, and environment wherein we and our suppliers conduct our business. We support a sustainable development policy and the conduct of our people and suppliers is a crucial part of that policy. The conduct of our supplier network is part of our organizational conduct policy and is governed by our business integrity policy as well as our company ethics standards.

1. SCOPE OF CODE OF CONDUCT

1.1 The code of conduct as prescribed in this document pertains to any and all companies and individuals that fall within the definition of a supplier as set out in this document. This includes organizations that are operating as an extension of JEOL USA, Inc. under legal authority as service providers to the Company. The code of conduct is not limited by jurisdiction or region and does not supersede any regulations or laws that might be in effect within these regions. JEOL expects that suppliers apply this code of conduct to their businesses and enact similar policies to their own supplier network.

2. LEGAL AND REGULATORY COMPLIANCE

2.1 Suppliers and Service providers of JEOL USA, Inc. shall conduct their business operations according to the laws and regulations that are in place in their regions, jurisdictions, or countries while they are linked to JEOL USA, Inc. as a supplier. These obligations will be in addition to the laws and legislature of their jurisdiction but will not be limited to the following:

2.2 Strict compliance to anti-corruption laws within the countries of operation, these laws include but are not limited to the Combating of Corrupt Activities Act, the United States Foreign Corrupt Practices Act or the UK Anti Bribery Act or any other such legislation in the country of your business operations. Under no circumstance should you make illegal payments directly or indirectly to any government or corporate officials to illicit the abuse of his/her position to obtain or retain contractual business from said organizations.

2.3 Conduct your business in full compliance with any anti-trust or fair competition regulation in place within your jurisdiction of business operations.

- 2.4 Conduct your business in full compliance with environmental laws and statutes when it comes to the handling of hazardous material, air emissions, waste products, wastewater discharge. This includes the transportation, storage, disposal, and release of these waste products and materials into the environment.
- 2.5 Conduct your business in an honest and transparent manner with any agency or government officials at all times.

3. STANDARD BUSINESS PRACTICES

- 3.1 The suppliers, vendors, and employees of JEOL's suppliers will at all times conduct their business with integrity. Furthermore, suppliers will do the following:
 - 3.2 Accurately record all business transactions and information and comply with the relative laws and regulations pertaining to the recording and storage of this information.
 - 3.3 Maintain accurate records both created and stored in compliance with the regulation pertaining to financial record keeping in your jurisdiction. Responsibly act on behalf of the Company when you are dealing with clients and other suppliers to protect the data and assets of the Company as well as intellectual property.
 - 3.5 Maintain security to protect the intellectual property rights of the Company which includes but is not limited to copyrights, patents, trademarks, or trade secrets. Any usage of software, hardware, or content, electronic or otherwise must comply with the specific terms of the license agreements associated with them.
- 3.4 At no time will a supplier offer any bribes, kickbacks, or any type of barter for business.
- 3.5 Maintain clear business relationships that do not appear or are in fact improper or might be seen as improper. No supplier will conduct any business with a supplier if their spouse, life partner, or any other family member is employed in the department that they deal with. This policy will extend to the negotiating of the supplier's contract prior to a business relationship being initiated.

4. EMPLOYMENT PRACTICES

- 4.1 JEOL USA, Inc. maintains a high standard when it comes to human rights and equal opportunity within the workplace. We require our suppliers to comply with this standard in their employment policies as well as keep in line with the current laws and regulations within their jurisdictions. The following aspects will gain special attention but will not be limited to these aspects:
 - 4.2 Ensure that the workplace is free of harassment and unlawful discrimination. We will at all times be focused on creating and maintaining a work environment that does not include hiring discrimination, inequality of compensation, access to training and promotion, wrongful termination or retirement based on age, religion, disability, gender, marital status, sexual orientation or union memberships as well as political views or legally protected categories.

- 4.3 Comply with the relative employment regulations as stipulated in the country of business legislation.
- 4.4 Maintain a safe work environment that promotes mental and physical health and complies with all relevant health and safety regulations. This will include any usage of Company premises and the interactions with any people authorized to access the property.
- 4.5 Prevent the use or possession and distribution of illegal drugs on any property associated with the business practices of the Company.
- 4.6 Prohibit the use of forced labor in any facilities or properties associated with the business operations of the Company.
- 4.7 Comply with the local minimum working age and at no time be a party to child labor practices or exploitive labor practices.
- 4.8 Maintain clear written employment information for all employees that define remuneration, deductions, and terms of employment. This employment documentation should also clearly define the disciplinary actions and procedures that will govern the interactions between employer and employee.
- 4.9 Maintain proper employee records in accordance with local regulations and legislation.

5. SUSTAINABILITY

- 5.1 The Company believes in living up to a high standard of social responsibility and sustainability. We are constantly striving to live up to our stewardship of the environment and this is extended to all our suppliers and their business practices. The Company and Supplier will at all times work on finding better ways of fulfilling the commitment to the environment and business sustainability.

6. CODE OF CONDUCT COMPLIANCE

- 6.1 It is the responsibility of the supplier and its company officers to ensure that all employees and its representatives comply with the Code of Conduct contained within this document. Any transgression or violation of these policies must be reported to the Company officers to prevent damage to the business relationship with the Company's clients and supply chain. In the event of a violation, the Company reserves the right to request the removal of persons or persons that committed the transgression, and in this regard, the Company reserves the right to conduct audits to evaluate the compliance at its discretion.

7. BREACH OF CONDUCT

7.1 Any breach of conduct must be promptly reported to JEOL USA, Inc. at the following address:

JEOL USA, Inc.
Supplier Conduct
11 Dearborn Road
Peabody, MA 01960

Any questions regarding JEOL's Supplier Code of Conduct should be directed to the address above.