MINO Automation USA Inc.



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1 Purpose

MINO is committed to conducting business in a legal, ethical, and socially responsible manner. We believe that sustainable success is built on respecting the rights and dignity of individuals, protecting the environment, and operating with integrity. This commitment extends to our own operations and throughout our supply chain.

This Code of Conduct outlines the minimum standards we require all our suppliers, subcontractors, and business partners (collectively "Suppliers") to adhere to. Compliance with this Code is a mandatory condition for doing business with MINO.

2 Scope

This Code applies to all Suppliers providing goods or services to MINO. Suppliers are responsible for ensuring their own operations and their sub-tier suppliers comply with the principles set forth in this Code.

We expect our Suppliers to:

- Integrate these standards into their management systems and business practices.
- Communicate this Code to all their employees and relevant subcontractors.
- **Provide** necessary training to ensure understanding and implementation.
- Maintain transparent and accurate records to demonstrate compliance.
- **Enable** monitoring activities, including announced and unannounced audits, and promptly remediate any identified non-conformities.

3. Core Standards

Suppliers must operate in full compliance with all applicable laws and regulations of their country of operation. Where this Code sets a higher standard, the Code shall prevail.

3.1 Labor Standards

3.1.1 Freely Chosen Employment & Prohibition of Forced Labor

- There shall be no use of forced, bonded, indentured, or prison labor.
- •All work must be voluntary. Workers shall not be required to hand over government-issued identification, passports, or work permits as a condition of employment and shall be free to leave their employment after reasonable notice.

3.1.2 No Child Labor

- The use of child labor is strictly prohibited. No person shall be employed under the age of 16 (or the age of completing compulsory education in the country, whichever is higher). We maintain a zero-tolerance policy towards child labor.
- Suppliers must implement robust age verification procedures at the time of recruitment, using reliable proof-of-age documents.
- If child labor is identified, the Supplier must immediately implement a remedial action plan that prioritizes the child's health, safety, and educational needs, in accordance with the best interests of

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the child.

3.1.3 Working Hours & Rest Days

- Working hours must not exceed the legal maximum. In any case, a work week shall not exceed 60 hours, including overtime, except in exceptional business circumstances.
 - Workers shall be provided with at least one day off in every seven-day period.
- Overtime must be voluntary, managed responsibly, and compensated at a premium rate as required by law.

3.1.4 Wages & Benefits

- Wages paid for a standard work week must meet or exceed legal minimum wage standards and shall be sufficient to meet basic needs.
 - Deductions from wages as a disciplinary measure shall not be permitted.
- All workers shall be provided with clear, written information about their employment conditions and wages.

3.1.5 Humane Treatment & Non-Discrimination

- The workplace must be free of harassment, harsh or inhumane treatment, and discrimination.
- Employment decisions, including hiring, compensation, promotion, and termination, must be based on merit and not on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status.

3.1.6 Freedom of Association & Collective Bargaining

- Suppliers shall respect the right of all workers to form and join trade unions of their choice and to bargain collectively, in accordance with local laws.
- In situations where the right to freedom of association is restricted by law, Suppliers shall not hinder the development of alternative means for workers to associate and bargain collectively.

3.2 Health & Safety

- A safe, clean, and healthy work environment must be provided to prevent accidents and injury.
- Hazardous areas and equipment must be identified, controlled, and safeguarded.
- Workers shall receive regular health and safety training, and have access to clean drinking water, sanitary facilities, and adequate medical resources.
- Emergency plans and procedures (e.g., for fire evacuation) must be in place, and drills conducted regularly.

3.3 Environmental Protection

- Suppliers must comply with all applicable environmental laws and regulations.
- They must obtain and maintain all required environmental permits and registrations.
- Efforts shall be made to minimize waste, conserve resources (including water and energy), and reduce greenhouse gas emissions.

3.4 Business Ethics

3.4.1 Anti-Corruption

• Suppliers shall prohibit any form of bribery, corruption, extortion, or embezzlement.

3.4.2 Transparency & Disclosure

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• All business transactions must be transparently recorded. Falsification of records or misrepresentation of conditions is strictly prohibited.

3.4.3 Confidentiality & Privacy

• Suppliers must protect any confidential information shared by [Company Name] and respect the data privacy rights of individuals.

4. Monitoring & Compliance

MINO reserves the right to assess Supplier compliance with this Code through self-assessment questionnaires, on-site audits (both announced and unannounced), and review of relevant documentation.

Suppliers are required to promptly disclose any violations of this Code and cooperate fully in any investigation. Failure to comply may result in corrective action plans and, in cases of serious or persistent non-compliance, termination of the business relationship.

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