

## **SUPPLIER FORCED LABOR PREVENTION POLICY**

Hitachi High-Tech America, Inc. (“HTA”) recognizes that strong supplier relationships are essential for our continued success. This success is not only defined by meeting our customers’ expectations and needs, but also by complying with all applicable requirements of international, national, state, and local laws, regulations, directives, and other mandatory standards, prohibitions, and restrictions (“Laws”). We are dedicated to serving as a responsible corporate citizen, consistent with the strong principles and values mandated in our policies, procedures, and business operations.

In pursuit of these commitments, and to ensure that the products HTA sells meet all legal and regulatory requirements, we have adopted this comprehensive Supplier Forced Labor Prevention Policy that prohibits the use of forced, bonded, or indentured labor, involuntary or exploitative prison labor, slavery, or human trafficking within all facets of HTA’s supply chain. HTA expects its suppliers to take any necessary actions to ensure compliance with this Policy, for all activities related to the HTA supply chain, in accordance with all applicable Laws relating to forced labor (“Forced Labor Laws”).

Thus, it is essential that each supplier that sells or otherwise supplies to HTA any products, components, parts, accessories, packaging, or other related items (“Products”), for HTA to resell or otherwise redistribute, or incorporate into or with an HTA product, adheres to the guidelines outlined below when conducting business with HTA.

1. Each supplier must conduct the required due diligence needed to ensure that all supplied materials, goods, parts, or products are not produced or manufactured, in whole or part, via the use of forced, bonded, or indentured labor, involuntary or exploitative prison labor, slavery, or human trafficking (“Forced Labor”). Accordingly, each supplier is required to conduct periodic audits of its supply chains and business operations to confirm compliance with all Forced Labor Laws. Any known or identified instances of Forced Labor within the supplier’s supply chain, as well as any sub-tier supplier’s supply chain, must be reported to HTA and immediately addressed and rectified. Each supplier is required to maintain records that demonstrate compliance with all Forced Labor Laws, allow HTA to audit such records, and provide any related information that HTA may request when needed.

2. In accordance with the Uyghur Forced Labor Prevention Act (Public Law No. 117-78), also known as the “UFLPA”, each supplier is required to assure against the use of any prohibited suppliers, as well as any banned sub-tier suppliers, noted on the “UFLPA Entity List”<sup>1</sup> and maintain awareness of any new prohibited suppliers added to the UFLPA Entity List. Each supplier is required to address any known instances of Products produced in the Xinjiang Uyghur Autonomous Region of China (“XUAR”) or the utilization of Uyghur laborers within all related supply chains and business operations, and each supplier must promptly report such findings to HTA, as appropriate. Each supplier also must communicate these requirements to all of its active sub-tier suppliers, mandating that all such sub-tier suppliers and related parties will conduct their business operations with the same due diligence necessary to comply with all Forced Labor Laws.
3. In the event that the U.S. Customs and Border Patrol (“CBP”) detains any imported supplier shipments for review, the supplier is required to promptly provide (within 14 days of any request) HTA with any relevant transaction records (including purchase orders, invoices, transportation records, etc.), production records, as well as any other documents requested by the CBP to secure the release of all seized goods from detention.
4. Each supplier must comply with any survey, questionnaire, inquiry, or audit requests made by HTA pertaining to any Products manufactured, produced, sourced, or procured, in whole or part, potentially impacted by any Forced Labor Laws. This may include any requests pertaining to a supplier’s practices for monitoring the supply chain to eliminate forced labor as well as any requests to perform specific types of due diligence or recordkeeping that may be necessary to evaluate compliance in the supply chain.

Please contact HTA promptly with any questions or concerns related to the requirements described above.

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<sup>1</sup> The UFLPA Entity List is available at: <https://www.dhs.gov/uflpa-entity-list>