

LABOR and ETHICS POLICY

POLICY STATEMENT

Rinchem is committed to provide a working environment where the human rights of workers are upheld and employees are treated with dignity and respect. Rinchem management and all of its employees shall be responsible in conducting business activities in accordance with the Rinchem Code of Business Conduct (the “Code”), the Electronics Industry Citizenship Coalition’s Code of Conduct (“EICC Code”), and local Human Resources (HR) policies.

- I. **Rinchem is committed to conduct its business in an honest and professional manner and uses the Code as its guide to promote compliance with applicable governmental laws, rules and regulations and the prompt reporting of possible Code violations.**

Rinchem shall monitor its working environment and business conduct and will update the Code with new and amended laws and regulations as required.

Rinchem shall communicate its labor and ethics policies and initiatives to employees and, where practicable, other stakeholders. Rinchem shall encourage our subcontractors and suppliers to adopt similar labor and ethics policies and practices.

Rinchem shall establish and implement objectives, targets, and programs to improve our working environment and conduct audits and reviews, when appropriate, to ensure adherence to this policy.

- II. **Rinchem shall be guided by the following Labor Standards :**

- **Freely Chosen Employment**

Forced, bonded, or indentured labor, involuntary prison labor, and slavery or trafficking of persons, shall not be used. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. All work must be voluntary and workers shall be free to terminate their employment. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Excessive fees are unacceptable and all fees charged to workers must be disclosed.

- **Child Labor Avoidance**

Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the aged of completing compulsory educations or under the minimum age for employment in the country. The use of legitimate workplace apprenticeship programs, which comply with all

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laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety.

- **Working Hours**

Continuous overtime causes worker strain that may lead to reduced productivity, increased turnover and increased injury and illnesses. Rinchem will monitor overtime and rest day utilization and take appropriate action to address instances deemed excessive.

- **Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. The basis on which workers are being paid is to be provided.

- **Humane Treatment**

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated.

- **Non-Discrimination**

Rinchem is committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and in employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

- **Freedom of Association**

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labor unions, seek representation, and join workers' councils in accordance with local laws shall be respected. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

III. Rinchem shall be guided by the following Ethical Standards

- **Business Integrity**

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All forms of bribery, corruption, extortion and embezzlement are prohibited. All business dealings should be transparently performed and accurately reflected on Rinchem's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

- **No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

- **Disclosure of Information**

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices are unacceptable.

- **Intellectual Property**

Intellectual property rights are to be respected. The transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

- **Fair Business, Advertising and Competition**

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.

- **Protection of Identity**

Programs that ensure the confidentiality and protection of customer, supplier and employee whistleblowers are to be maintained. These programs are documented in the Code which can be accessed at <http://phx.corporate-ir.net/phoenix.zhtml?c=115640&p=irol-govhighlights>.

- **Privacy**

Rinchem is committed to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees. Rinchem shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

- **Non-Retaliation**

Rinchem has communicated a process for employees to raise any concerns without fear of retaliation. Rinchem affords all employees the right to appeal discipline or termination to an executive team for review of all facts and fairness of decision.

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COVERAGE

This Labor and Ethics Policy applies to all employees and suppliers of Rinchem and shall be implemented in accordance with local labor laws. Rinchem shall adopt a management system whose scope is related to the content of this Policy. The management system shall be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to Rinchem's operations and products; (b) conformance with this Policy; and (c) identification and mitigation of operational risks related to this Policy. It should also facilitate continual improvement.

RESPONSIBILITY

Each Rinchem facility Manager shall be responsible in fulfilling this commitment by providing direction to attain compliance with all applicable labor laws and standards.

The Human Resources Department Director shall be Rinchem's designated representative for labor and ethics polices and shall be responsible for assuring and facilitating compliance with labor and ethics laws, regulations, codes, standards, and management systems. The local Human Resources Department will work with the appropriate departments to:

- Identify, monitor and understand applicable labor and ethics laws and standards,
- Identify and assess labor practice and ethics risks associated with Rinchem's operations and then develop and implement appropriate procedures to manage identified risks,
- Establish labor and ethics objectives and perform a periodic assessment to assess achievement of objectives,
- Create training programs for managers and workers to implement policies and procedures,
- Communicate information about policies and practices to stakeholders, and
- Conduct periodic self-evaluations and maintain appropriate documents and records.

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