

Code of Business Conduct and Ethics Policy Statement Version 1.0 – July 2022

Freely Chosen Employment

Any form of force, bondage (including debt bondage), involuntary and slave labor, exploitative prison, and trafficking of persons are prohibited in SFA SEMICON. All work will be voluntary and all workers are free to leave after reasonable notice. Workers will not be required to pay fees and hand over government issued identification, passports or work permits as condition for employment except to ensure compliance with applicable laws. All workers have free access to toilets, drinking station, canteen and clinic facility.

Child Labor Avoidance

SFA SEMICON does not approve the use of child labor. Workers will be hired only after legitimate proof of age is presented which meets local laws. SFA SEMICON will ensure that workers below the age of 18 are not hired directly or via agencies/contractors, except in cases of apprenticeships/internships. Apprenticeship/Internship is not practiced but if need arises, SFA SEMICON will comply with all applicable labor laws and wages.

Working Hours

Work hours are regularly monitored through timekeeping system. Teams that are found to have members rendering work in excess of the required hours in a week are notified and advised accordingly.

Wages and Benefits

Workers shall be paid as per statutory requirements. Wages shall not be deducted for performance disciplinary action.

Humane Treatment

Harsh or inhumane treatment is not allowed in SFA SEMICON. Sexual harassment, sexual abuse, mental or physical coercion or verbal abuse, intimidation or any threats or acts of violence are prohibited and not tolerated. All disciplinary actions shall be in accordance with SFA SEMICON disciplinary procedures and shall be clearly defined and communicated to workers.

Non-Discrimination

SFA SEMICON is committed to a workforce free from harassment and unlawful discrimination. SFA SEMICON does not permit nor tolerate unlawful discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, marital status, pregnancy or union membership in its employment practice including promotions, rewards and access to training.

Freedom of Association

SFA SEMICON is committed to providing a positive work environment for all employees and respect the rights of workers to associate freely and to form or enroll in a trade union. With the Small Group Activity (SGA) policy, workers are encouraged to engage in recreational activities. Workers are free to communicate openly with management regarding working conditions and other individual or collective concerns without fear of reprisal, intimidation or harassment.



SFA Semicon Philippines Corporation

Business Integrity

SFA SEMICON upholds the highest standards of integrity, fair business, advertising and competition. Any and all forms and inclination of bribery, corruption, extortion and embezzlement are not tolerated. Employees who refuse to participate in these prohibited activities are protected from retribution. Collusion with other companies on product pricing or other factors that could reduce competition is prohibited.

No Improper Advantage

SFA SEMICON ensures an open and transparent business transaction, thus it does not tolerate or allow acceptance of gifts of any kind or form from a supplier/contractor or potential supplier/contractor of the Company in the course of, in relation to, or as a result of, doing business with the Company.

Responsible Sourcing of Minerals

SFA SEMICON supports the use of Conflict-Free Minerals. “Conflict-Free Minerals” is defined to mean products which do not contain conflict minerals that directly or indirectly finance armed groups in the Democratic Republic of Congo or adjoining countries. SFA SEMICON will avoid knowingly purchasing such products and will require suppliers to undertake reasonable measures to ensure that the minerals are not being sourced from mines in these conflict areas.

Protection of Identity and Non-Retaliation

SFA SEMICON encourages workers and employees of suppliers to stand against non-ethical behavior. A system is in place where employees can report concerns, suggestions and any anomalous activities and violations of business conduct without fear of retaliation.

Intellectual Property and Confidential Information

SFA SEMICON values all intellectual properties and confidential information of its own, its customers and its suppliers. All employees holding positions of trust and confidence are required to execute non-disclosure agreement with SFA SEMICON, which enumerates reporting requirements, penalties and sanctions should there be a violation of any of the provisions of the said agreement. SFA SEMICON also ensures that its contracts and transactions are covered by non-disclosure agreements and/or intellectual property and confidentiality clauses, as applicable, that are for the mutual benefit and protection of the parties.