



Compliance with Code of Conduct for the Industry

This self-assessment is based on the Supplier Code developed by the International Die-Casting Association (IDCA) and the Electronic Industry Code Of Conduct developed by the Electronic Industry Citizenship Coalition (EICC). As soon as Solikamsk sourced both industries with its products, self-assessment was performed in compliance with both Codes. The requirements of both Codes are combined and results of this self-assessment are provided in the table below.

1. Business Ethics	Compliance
<i>1.a. Compliance with legislation</i>	
The Company must be in compliance with all applicable national and international laws and regulations, as well as with relevant international agreements.	Yes
<i>1.b. Product safety</i>	
The products and services provided by the Company must never endanger persons or the environment, and must meet the agreed and legally specified product safety standards. Instructions on their safe use are adequately communicated by the Company.	Yes
<i>1.c. Anti-corruption</i>	
No form of corruption will be tolerated. This pertains in particular to the payment of bribes and payoffs and to extortion in order to exert influence on business partners and representatives of the political, administrative, and judicial systems or the public.	Yes
<i>1.d. Fair Competition, Advertising and Business</i>	
The Company shall apply the rules governing fair business, advertising and competition to all its business activities. It complies with the relevant antitrust laws as well as legislation prohibiting unfair business practices. Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.	Yes
<i>1.e. Protection of Intellectual Property</i>	
The Company respects the intellectual property rights of third parties; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.	Yes
<i>1.f. Disclosure Of Information.</i>	
Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.	Yes
2.Human Rights	
<i>2.a. Prohibition of Child Labor</i>	
The Company may not employ anyone under the age of 15. In countries where economic standards and educational facilities are less developed, the minimum age is 14 years and for light work 13 years. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Dangerous work may only be performed by persons over the age of 18. (ILO Conventions 79, 138, 142, 182, Recommendation 146).	Yes
<i>2.b. Prohibition of Forced Labor</i>	
Any and all forced or compulsory labor including bonded, indentured or prison labor is prohibited. All work will be voluntary, and workers shall be free to leave upon reasonable notice. The Company or Labor Agent can not require employees to hand over personal documents, such as identification card, passport or work permit, as a condition of employment. (ILO Conventions 29, 105).	Yes
<i>2.c. Prohibition of Discrimination</i>	
Equal opportunity shall be afforded all employees in hiring, employment practices and remuneration, promotions, rewards, and access to training. The Company should not discriminate against anyone on the grounds of gender, age, ethnic origin, nationality, religion, sexual orientation, union affiliation or any type of disability. (ILO Conventions 100, 111, 143, 158, 159).	Yes
<i>2.d. Prohibition of Disciplinary Measures and Inhumane Treatment</i>	
The Company's disciplinary policies and procedures shall be clearly defined and communicated to workers. 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 employees: nor is there to be the threat of any such treatment. The Company may not inflict corporal punishment or coercion of any kind on its employees. This is particularly true in the event that employees report in good faith business practices that	Yes



violate national, international or internal regulations.	
3.Socially Responsible Working Conditions	
<i>3.a. Safe and Healthy Workplaces</i>	
<p>Occupational safety and health protection should be provided as a minimum in the scope of the national regulations. Employee exposure to potential safety hazards including, but not limited by that, electrical and other energy sources, fire, vehicles, potentially dangerous chemicals, biological and natural substances as well as fall hazards are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout of potentially dangerous objects), and ongoing safety training. Where hazards cannot be adequately controlled by these means, employees are to be provided with appropriate, well-maintained, personal protective equipment. The Company must implement occupational health and safety guidelines and procedures and inform its employees of these in order to reduce or prevent accidents and occupational diseases.</p> <p>Risks of employees exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.</p> <p>Production and other machinery is to be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to employees.</p> <p>Employees are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Employees dormitories are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, and adequate heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.</p> <p>Employees shall not be disciplined for raising safety concerns. (ILO Convention 155, Recommendations 164, 190).</p>	Yes
<i>3.b. Emergency Preparedness</i>	
<p>Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, employee training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.</p>	Yes
<i>3.c. Occupational Injury and Illness</i>	
<p>Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage employee reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and e) facilitate return of employees to work.</p>	Yes
<i>3.d. Living Wages, Wages and Benefits</i>	
<p>The Company shall compensate its employees adequately and in accordance with the legally or contractually stipulated minimum wages or in line with the industry standard.</p> <p>In compliance with local laws, employees shall be compensated for overtime at pay rates greater than regular hourly rates.</p> <p>The basis on which employees are being paid is to be provided in a timely manner via pay stub or similar documentation.</p> <p>Compensation should be sufficient to meet the basic needs of every employee and his immediate family, in addition to having a discretionary income.</p> <p>The Company furthermore provides the social benefits to which the employee is entitled by law. Compensation is paid transparently, at regular intervals and in the legal means of payment. Illegal and unauthorized wage deductions as well as deductions in the form of disciplinary measures are not permissible. (ILO Conventions 26, 131).</p>	Yes
<i>3.e. Regulated Working Hours</i>	
<p>The Company ensures that its employees do not work more than the maximum number of hours legally prescribed or collectively agreed upon in the respective country or dictated by the industry standard.</p> <p>The maximum working requirement should not exceed 60 hours a week (including overtime). Overtime should be voluntary and compensated by the Company according to applicable law. Employees are to be granted at least one day off following six consecutive workdays. Employees are furthermore entitled to a regular annual holiday. (ILO Conventions 1, 14).</p>	Yes
<i>3.f. Freedom of Association and Collective Bargaining</i>	
<p>Open communication and direct engagement between employees and management are the most effective ways to resolve workplace and compensation issues.</p>	Yes



<p>Employees have the right to bargain collectively and to organize themselves in labor unions. Should a labor union not be permitted in a country for political reasons, the Company must facilitate independent alliances in another form. The Company may not discriminate against employee representatives on the grounds of their function or against unionized employees because of their membership. Employees shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment. (ILO Conventions 87, 98, 135, 154, Recommendation 143).</p>	
<p>4. Environmental Standards</p>	
<p><i>4.a. Environmental Permits and Reporting</i></p>	
<p>All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.</p>	Yes
<p><i>4.b. Sustainable Use of Resources</i></p>	
<p>The Company shall reduce to a minimum the consumption of resources for every business activity. Particular emphasis shall be given to the conservation of energy and water. The use of renewable resources is encouraged wherever possible.</p>	Yes
<p><i>4.c. Prevention and Reduction of Environmental Impact, Avoidance of Hazardous Substances</i></p>	
<p>The Company shall reduce or eliminate emissions and waste of all types, including water and energy, at the source or by practices such as state of the art technologies, and shall control harmful emissions and treats them prior to discharge. Waste is to be avoided or recycled wherever possible. Materials should be reused at every opportunity. Substances which pose a threat to health and the environment are to be avoided if possible. The Company shall put in place a hazardous substances management that ensures the safe use, transport, storage, treatment and disposal of hazardous substances. Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal. Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.</p>	Yes
<p><i>4.d. Environment-friendly Products</i></p>	
<p>The Company shall develop products and services that are efficient in their consumption of energy and natural resources and that can be recycled, reused and disposed of safely. The Company is to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.</p>	Yes
<p>5. Management Systems</p>	
<p>The Company shall establish management systems that adhere to the fundamental principles set forth in this Code and certify these according to recognized standards. Customer shall give preference to Companies who actively operate a quality management system according to ISO 9001, an environmental management system according to ISO 14001, in addition to OHSAS 18001 for occupational health and safety, or other comparable systems. A management system for social accountability in line with SA 8000 standards is recommended.</p>	Yes
<p><i>5.a. Company Commitment</i></p>	
<p>Corporate social and environmental responsibility policy statements affirming Company's commitment to compliance and continual improvement, endorsed by executive management.</p>	Yes
<p><i>5.b. Management Accountability and Responsibility</i></p>	
<p>The Company clearly identifies Company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.</p>	Yes
<p><i>5.c. Legal and Customer Requirements</i></p>	
<p>Identification, monitoring and understanding of applicable laws, regulations and customer requirements.</p>	Yes
<p><i>5.d. Risk Assessment and Risk Management</i></p>	
<p>Process to identify the environmental, health and safety and labor practice and ethics risks</p>	Yes



<p>associated with Company's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.</p> <p>Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and employee housing/dormitories.</p>	
<i>5.e. Improvement Objectives</i>	
Written performance objectives, targets and implementation plans to improve the Company's social and environmental performance, including a periodic assessment of Company's performance in achieving those objectives.	Yes
<i>5.f. Training</i>	
Programs for training managers and employees to implement Company's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.	Yes
<i>5.g. Communication</i>	
Process for communicating clear and accurate information about Participant's policies, practices, expectations and performance to workers, suppliers and customers.	Yes
<i>5.h. Employees Feedback and Participation</i>	
Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.	Yes
<i>5.i. Audits and Assessments</i>	
Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.	Yes
<i>5.j. Corrective Action Process</i>	
Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.	Yes
<i>5.k. Documentation and Records</i>	
Creation and maintenance of documents and records to ensure regulatory compliance and conformity to Company requirements along with appropriate confidentiality to protect privacy.	Yes
6. Implementation	
<i>6.a. Monitoring and Verification</i>	
The Company should perform a self-assessment, provide correct and comprehensive information, and monitor execution of these requirements.	Yes
<i>6.b. Non-Compliance</i>	
If Company's management system does not comply with listed requirements, the Company should apply corrective actions in order to adjust its managerial system to abovementioned requirements.	Yes