

CORPORATE SOCIAL RESPONSIBILITY POLICY

At NAKAGAWA ELECTRONICS LIMITED (NKG) we are committed to our customers and the communities, whether domestically or abroad, to perform in all our activities in compliance with the highest legal and ethical standards of social responsibility. The principles encompassed in this policy cover all areas of the corporate's operations and have been developed and to be reviewed against and updated by reference to relevant codes of corporate governance and international standard including the EICC Code of Conduct.

This policy applies to the president, the directors, officers and all employees of the corporation which includes headquarter, the factories and offices in other locations. The policy shall be communicated and implementation reinforced down the supply chain as well. All other contractors or subcontractors and individuals acting for or on behalf of NKG shall be made aware of the policy.

Compliance with this policy will be continuously monitored and subjected to review by the management review group of NKG and supported by the audit group. At each location the manager in charge is responsible to ensure that the principles set out in this policy are communicated to, understood and observed by all employees and ensuring compliance in there are of responsibility.

中川電子有限公司 (以下簡稱 NKG) 向我們的客戶和團體承諾, 無論是國內或國外, 我們執行的所有行為都會符合社會責任的最高法律和道德標準. 這項政策裡的準則包含了公司經營的所有區域, 並且已經得到公司管理相關規範和國際標準其中包括 EICC 行為規範的擴展, 重審和更新.

這政策應用於整個企業, 由主席, 董事, 各級主任至全體員工, 包括總部, 生產部及辦公室等所有基地, 以至加強落實到有關供應鍊單位及其餘的合約商, 轉訂合約商或個別單位亦會明白理解. NKG 管理檢閱團將會持續不斷地對此政策的遵守情況進行監測和覆審, 並由審核團給予相關支持.

每個區域的經理負責確保此政策中的準則傳達給所有的員工, 並確保他們能夠理解和遵守.

CONTENTS		內容	
SECTION 1	LABOR POLICY	勞動政策	Page 2
SECTION 2	HEALTH AND SAFETY POLICY	健康與安全政策	Page 3
SECTION 3	ENVIRONMENTAL POLICY	環境政策	Page 4
SECTION 4	ETHICS POLICY	民族政策	Page 5
SECTION 5	MANAGEMENT	管理	Page 6



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SECTION 1**LABOR POLICY****勞動政策**

NKG will ensure that all our activities respect, promote and advance internationally recognized human rights and ensure that all employees are provided with cultural and human rights training and guidance. This shall apply to all employees including temporary staff, students, migrants, direct employees and any other type of worker. The standards we follow are:

- a) Not abusing human rights and ensure a humane treatment of everyone in the company.
- b) Not allowing any kind of discrimination or harassment, punishment or any other form of abuse that include discrimination based on color, race, age, gender, ethnicity or origin, religion, sexual orientation, pregnancy or statuses a person has obtained.
- c) Provide decent work conditions, pay proper wages according to laws and regulations and promote benefits according to the local and company policies.
- d) Allow only appropriate working hours in compliance to internal standards and conform to local laws and regulations, proper working hour control shall be implemented.
- e) Not to employ children, under age worker or practice any form of forced labor and slavery. During the hiring process the employee is provided with a employment contract in his native language, reviewed identification documents are not held by the company. Employees can freely move within the permitted facilities of the company, are free to leave work and can terminate their contract at any time.
- f) Respect the freedom of association in conformance to the local laws.

NKG 確保我們所有的行為將會尊重，發揚和推進國際認證的人權，並確保提供文化和人權的培訓指導給所有員工。這將適用於所有員工，包括臨時工，學生，移民，正式工和其他類型的勞動者。以下是我們所遵循的標準：

- a) 不濫用人權，並確保公司的每一個員工都受到人道待遇。
- b) 不允許任何形式的歧視或騷擾，懲罰或者包括帶有膚色，種族，年齡，性別，種族起源，信仰，性取向，懷孕和個人地位等歧視的其他任何形式的虐待。
- c) 根據法律法規提供良好的工作環境和支付適當工資，根據當地和公司政策提高員工福利。
- d) 根據公司內部準則和當地法律法規，制定合理的工作時間並對此進行實施和控制。
- e) 不允許僱用兒童，未成年和奴隸或任何形或的強迫勞工。在僱用期間，員工與公司之間用當地語言簽署勞動合同，公司可檢證但不持有員工的身份證件。在公司允許範圍之內，員工可以自由活動，可以自由離崗並且可以隨時終止他們的勞動合同。
- f) 根據當地法律，尊重結社自由。

SECTION 2**HEALTH AND SAFETY POLICY****健康與安全政策**

Being aware of that work environment which applies and conforms to recognized occupational health and safety standards enhances the consistency of the production and therefore the quality of the products, NKG is striving to provide best and safest conditions. In order to achieve this, the following standards and guidelines are followed:

- a) In order to guaranty job safety and exposure to potential hazards all necessary measures are to be implemented controlled thru proper administrative tools and work procedures by best of knowledge. High importance to be given to ongoing safety training for all employees.
- b) To prevent or minimize occupational injury and illness proper measures are to be taken under involvement of all employs in order to report and record cases and analyzing problems in order to take corrective actions. Our principle is that "all injuries can be avoided" and the goal is zero injuries.
- c) In order to avoid or minimize harm to life, the environment or property in case of emergency events, procedures are prepared after detailed identification and assessment of different events. Essential for preparedness is continued training and drill of the employees.
- d) In order to guaranty and maintain proper hygiene at the all work stations, exposures to chemicals, biological and other dangerous agents are to be identified and controlled.
- e) Hazards introduced by physical demanding work are to be identified and controlled.
- f) Production and other equipment will be evaluated for safety hazards and appropriate measures taken to prevent injury hazard to the operators.
- g) We see it as a task of the upper management to ensure that appropriate workplace helath and safety can be guaranteed, continuous training is provided and all necessary information and procedures and published or posted in the facility.

工作環境適用和遵守公認職業健康與安全標準會提高生產的一致性和產品的質量。NKG 正努力爭取提供一個最好, 最安全的工作環境。為了達成目標, 我們將遵守以下標準和指導方針:

- a) 為了保證工作安全和受到潛在的危險, 必須盡可能通過合理的管理手段與工作程序來採取必要的措施。予以安全培訓, 讓員工高度重視。
- b) 為了防止或最少化職業損傷和疾病, 在所有員工的參與下採取合理的措施以便做好報告記錄等相關工作, 同時分析原因並採取糾正措施。我們的準則是"避免所有傷害", 而我們的目標是"零傷害"。
- c) 為了避免或最小化在緊急情況下對生命, 環境或財產所造成的損害, 經過對不同事件的詳細確認和評估之後應做好相應的準備工作。最基本的準備預防工作就是經常對員工進行培訓和訓練。
- d) 為了保證和維護所有工作崗位的衛生, 要能夠識別和有效控制接觸性化學, 生物和其他危險劑品。
- e) 識別並控制對體能方面有要求的工作所造成的危險。
- f) 對生產和其他設備進行安全危害性評估並採取合理的措施以預防對操作員工造成傷害。
- g) 確保合適的工作場所, 健康和安全的保障, 不間斷的培訓, 所有重要信息和程序都要公布在車間裡等, 我們把以上這些視為高層管理的一項重要的任務。

SECTION 3

ENVIRONMENTAL POLICY

環境政策

In conjunction with our established environmental control system based on ISO 14001 is NKG taking additional measures in order to avoid adverse effects on the community, environment and natural resources. The standards we follow are:

- a) All environmental permits and approvals being obtained and maintained.
- b) In order to reduce wastewater and solid waste measures are in place to responsibly dispose or recycle non-hazardous waste. Reducing resources and waste of all kinds is essential for a better protection of our environment and we actively contribute to recycling and re-use of materials.
- c) Hazardous chemicals and other materials that may cause harm when released will be identified and properly managed to ensure safe use.
- d) Emission of ozone depleting chemical, organic chemicals, aerosols or corrosive materials will be identified, controlled and monitored to prevent pollution of our environment.
- e) Energy consumption and greenhouse gas emissions are to be monitored and recorded. Analysis of the records shall be used to improve energy efficiency in order to minimize energy consumption and greenhouse gas emissions.
- f) Proper measures shall be in place to avoid illegal drainage or spills of hazardous materials and substances during the event of a heavy storm and rain. In such event it must be avoided that hazardous materials or substances can enter the public drainage system or specific storm drains.
- g) NKG is committed to comply to all applicable laws, regulations and customer requirements in regards of restrictions of the use of hazardous materials and substances in our products and manufacturing processes. We have obtained all material contents of our products, and continuously maintain these records and perform verification tests at third party labs to ensure compliance. At factory level are in house tests performed to ensure compliance of incoming materials (XRF testing). All our products are properly labeled when sent out to customer.

在已建立的環境控制系統 ISO 14001 的基礎上, NKG 正在採取其他措施以避免對社區, 環境和自然資源造成不利影響. 以下是我司所遵循的標準:

- a) 獲得所有環境許可証和認證並對其進行維護.
- b) 為了減少廢水和固體廢物, 需要認真負責處理或重複利用無害廢料. 降低資源和所有廢物的使用可以更好地保護我們的環境, 並且我們會積極主動地對材料加以重複利用.
- c) 當有害化學品和其他可能致害的物質被釋放時, 要能夠識別並確保它們得到正確的使用.
- d) 能夠識別, 控制並監督消耗臭氧層的化學品, 有機化學品, 噴霧器或腐蝕性材料的排放對我們的環境所造成的污染.
- e) 監督並記錄能源消耗和溫室氣體的排放. 通過對記錄的分析來提高能源效率, 從而使能源消耗和溫室氣體的排放降到最小化.
- f) 在暴風雨期間, 應採取正確有效的措施以避免不當排水或有害物質的洩漏. 在此情況下, 必須避免有害物質成分進入公共排水系統或暴風雨專用排水道.
- g) NKG 承諾在關於我司產品和生產過程中限制使用有害物質成分上將會遵守所有適用法律法規和客戶的要求. 我們已獲得產品的所有物質成分, 而且會不斷地對這些記錄進行維護, 並在第三方實驗室做認證測試以確保其符合性. 在工廠內部會對來料進行檢測(XRF 測試). 我們會對所有發給客戶的產品貼上正確的標籤.

SECTION 4

ETHICS POLICY

民族政策

NKG will ensure that all our activities. The standards we follow are:

- a) NKG will not tolerate any kind and all forms of bribery, corruption, extortion and embezzlement. We are committed to keep full transparency in all our interactions with business partners. For all employees it is not allowed to accept any kind of bribery or obtain any other kind of advantage, offer same to someone or authorize execution of such an action.
- b) All necessary information in regards of labor, health and safety, financial situation and business activities are to be disclosed based on regulations and laws at the location of the entity.
- c) NKG is fully respecting intellectual property right when transferring technology and know-how. All obtained customer information is kept safe and accessible only to authorized personnel.
- d) With NKG anyone can expect fair business and competition.
- e) Personal information of any kind from suppliers, customers or employees are protected and kept safe to avoid uncontrolled disclosure. Based on local laws we comply with privacy and information security regulations.
- f) NKG has committed to contribute to the execution and conformance to the Dod-Frank Wall Street Reform and Consumer Act 2010. NKG will adopt and follow the guidelines given by the Conflict-Free Sourcing Initiative (CFSI) and the Organization for Economic Co-operation and Development (OECD) in order to avoid the use of material sources in conflict regions. Our CONFLICT METALS POLICY posted on our homepage has more detailed information for that.

NKG 確保我們所有的行為將遵循以下標準:

- a) NKG 絕不允許任何形式的賄賂, 貪污, 勒索和挪用公款。我們保證和合作夥伴的所有往來將保持全透明。所有的公司員工不允許接受任何形式的賄賂或利益, 也不允許賄賂他人或對此行為給予批准。
- b) 根據當地法律法規, 有關勞動, 健康與安全, 財務狀況和商業行為的所有重要信息都要公開。
- c) NKG 在傳輸技術和專門技能上完全尊重知識產權。除授權人員之外, 所有客戶的資料信息將會安全密存。
- d) 任何人在 NKG 都會得到公平的業務競爭。
- e) 任何有關供應商, 客戶或員工的個人信息都會得到安全保護以防洩漏。根據當地法律, 我們遵守隱私和信息安全規定。
- f) NKG 承諾將有助於 2010 年 Dod-Frank 華爾街改革和消費者行為的執行和一致性。為了避免使用在衝突地區的材料源, NKG 將會採用並遵循無衝突採購計劃 (CFSI) 和經濟合作與發展組織的指導方針。發佈於我們主頁的“衝突金屬政策”對此有更多詳細的內容。

SECTION 5 MANAGEMENT**管理**

NKG is committed to provide the best professional service with a comprehensive integrated management system that coincides with our organizational goals, best quality products and environmental objectives.

- a) NKG is committed to provide the best professional service possible, in order to achieve this compliance to our system goals, to international rules and laws to our policies in regards of labor, health and safety, environmental protection and ethics is a must. A continuous monitoring, analyzing and improvement on this is going to drive us forward.
- b) Our senior executive management level is responsible to monitor and control implementation and full compliance to the management system. Review of the status is to be done on at least an annual basis.
- c) By performing periodic risk assessments to evaluate the performance in regards of labor practices, health and safety, environmental compliance and business ethics our system are to be continuously improved in order to advance our system and improve our performance.
- d) Training is a very essential for all employees including the management level. Training programs are to be established for the implementation and execution of policies, procedures and improvement objectives.
- e) This policy is to be written in both languages (English and Chinese), to be published on website and posted in the facility.

結合我們的組織目標，環境目標和最好的產品質量，NKG 承諾提供最好的專業服務和全面的綜合管理系統。

- a) NKG 承諾提供最好的專業服務。為了實現這個目標，在勞動，健康與安全，環境保護和民族政策上必須符合我們的系統目標，國際法律法規和我們的政策。對此不斷的監督，分析和改善將會推動著我們前進。
- b) 我們的高級管理層會負責監督和控制管理系統的實施與完全符合性。至少每年會對運行狀況進行一次審查。
- c) 就勞動實踐，健康與安全，環境符合性和商業道德做定期風險估計，我們的系統需要不斷地完善以提高我們的執行力。
- d) 對包括管理層在內的所有員工進行培訓非常重要。培訓計劃要建立在政策，程序和改善目標的實施與執行上。
- e) 這項政策的文字表達分別使用了兩種語文(英文和中文)，並且會分別發佈在網站，辦公室及車間。