

# Murata Machinery Code of Conduct for Business Partners

(Ver.1.1)

July 5, 2024

Murata Machinery, Ltd.

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### Revisions of This Code of Conduct

This Code of Conduct is subject to revisions as appropriate in response to current trends and environmental changes, as well as the demands of society in general.

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#### <Revision History>

Issue/Revision Date	Ver.	Description
2023/07/03	1.0	Established “Murata Machinery Code of Conduct for Business Partners”
2024/07/05	1.1	<ul style="list-style-type: none"><li>• Page 1: Added clarification of agreement to comply with the latest version of the RBA Code of Conduct and relevant amendment.</li><li>• Appendix: (1) Changed the title from “Confirmation of Code of Conduct for Business Partners” to “Consent for Business Partners Code of Conduct” (2) Changed the word “confirm” in the contents to “agree”.</li></ul>

# 1 Introduction

Murata Machinery has established the Muratec Code of Conduct as a specific guideline for practicing our corporate philosophy within the Murata Machinery Group. This code of conduct is based on the fundamental policy of complying with the laws and regulations of each country and region in which we conduct business, and conducting honest and ethical business activities.

Based on this fundamental policy, we are committed to practicing responsible corporate activities while agreeing to the principles of the Code of Conduct of the Responsible Business Alliance (RBA)\*, which includes ensuring a safe and healthy working environment, treating employees with dignity and respect, and being responsible and considerate for the environment, as well as conducting business activities honestly and ethically.

\*The Responsible Business Alliance (RBA) is an industry coalition (advocacy organization) dedicated to promote corporate social responsibility in global supply chains. The RBA defines common values and codes of conduct in the areas of health and safety, labor practices, the environment and ethics.

We believe that the RBA Code of Conduct is meaningful for our suppliers and service providers (“business partners”) to ensure their responsibilities regarding economic, environmental and social impacts. As an integrated guideline, we have established and published Murata Machinery Code of Conduct for Business Partners (hereinafter “Code of Conduct for Business Partners”) that incorporate the perspectives and factors that we consider important into the RBA Code of Conduct.

We ask our business partners that they understand, agree to, and comply with the Code of Conduct for Business Partners, as well as the latest version of the RBA Code of Conduct (see the link below) in their business activities. The Code of Conduct for Business Partners, along with the RBA Code of Conduct, shall be applied to all the business partners of Murata Machinery (including suppliers and service providers; hereinafter referred to as the “business partners”) regardless of business relationship or company size.

RBA Code of Conduct (RBA official website)

<http://www.responsiblebusiness.org/standards/code-of-conduct/>

Our cooperation with the business partners in compliance with these norms, RBA Code of Conduct and the Code of Conduct for Business Partners, will further improve the sustainability of the entire supply chain and increase added value. Through this, we strongly aim for coexistence and mutual prosperity with our business partners.

<Overview of the Code of Conduct for Business Partners>

- Compliance with laws and regulations
- Respect for human rights and diversity
- Fair trade
- Occupational safety and health
- Mitigating climate change and building Circular Economy
- Development of a BCP (Business Continuity Plan)

## 1.1 International Framework

We understand and respect the United Nations' International Bill of Human Rights and Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the laws and regulations of countries in which the Murata Machinery Group conducts business activities. Furthermore, in the event that there is a discrepancy between the human rights recognized by the laws and regulations of each country and international norms, we will seek ways to respect and give priority to international norms. We expect our business partners to think and act in the same manner and to support our activities.

## 1.2 Management System

We ask our business partners to consistently strive for improvement, and establish, implement, and maintain a management system and standards that are approved by our partner's management as relevant to the areas outlined in this Code of Conduct for Business Partners. To comply with the Code of Conduct, essentially the system should be based on the following initiatives: risk assessment, implemented guidelines, processes and procedures, proper business operation, clearly communicated roles and responsibilities, applicable training and guidance, measurable goal setting and evaluation, and a management system that functions effectively.

Further, as a prerequisite for establishing these essentials, we urge our business partners to provide their employees in each organization or company with the means and opportunities to raise concerns about legal requirements or company policies and rules to their employer without fear of retribution. This should include creating and cultivating an open and friendly environment, along with a comfortable and healthy organizational culture where employees can freely express themselves with a sense of psychological safety.

## 1.3 Implementation and Compliance

When evaluating a business partner's compliance with the Code of Conduct for Business Partners, we will take into consideration the scope and applicability of the requirements in relation to the business partner's nature of business and its associated risks. We may define additional requirements for sustainability and risk management for a specific business partner in commercial agreements. In the event of a possible conflict with the Code of Conduct for Business Partners, we ask that the business partner consult us so that we can work together to resolve the issue.

We shall regard failure by the business partner to allow Murata Machinery the opportunity to verify compliance with the Code of Conduct for Business Partners and with the RBA Code of Conduct, or to remedy identified non-compliances within a reasonable time as an infringement of the Code of Conduct for Business Partners. Consequently, we may review transactions and future relationships with the business partner from the perspective of how we can progress building our partnership with the partner.

Each section in the Code of Conduct for Business Partners is structured as follows:

### Requirements

It is the responsibility of each business partner to meet the requirements outlined in the Code of Conduct for Business Partners, in their own organization and supply chain. Note that these requirements should also apply to your suppliers, including service providers on-site.

### Policy

Examples of how to meet the requirements

### How to Verify Compliance

Examples of evidence of compliance with the requirements. Other documents and activities may also be considered as verification material.

## 1.4 Monitoring

All business relations between Murata Machinery and our business partners must be based on honesty, trust, and cooperation. We expect our business partners to understand and comply with the Code of Conduct for Business Partners and commit to meeting these requirements within their own operations and supply chain.

This should be achieved by cooperation in a transparent manner between Murata Machinery and our business partners, and business partners must be able to demonstrate their compliance and compatibility with the requirements with evidence upon request. We may verify the business partner's compliance with the requirements in the Code of Conduct for Business Partners by any means of communication, including dialogue, questionnaires, or on-site audits (Friendly Audits). This includes permission to conduct interviews with their employees and access to accurate and sufficient documentation and records related to the Code of Conduct for Business Partners. Any audits or checks that Murata Machinery conducts at the business partner's contractors will be conducted upon agreement with the business partner. Compliance verifications are conducted either by Murata Machinery's own employees or by an independent third party appointed by Murata Machinery.

It is the responsibility of the business partner to ensure that its contractors comply with the requirements of the Code of Conduct for Business Partners or relevant requirements, and to evaluate and monitor compliance of its supply chain members.

In the event that a business partner becomes aware of a situation that does not appear to conform with the Code of Conduct for Business Partners or the law, the business partner must report it to Murata Machinery as soon as possible, to our contact personnel or through our reporting hotline. We welcome active dialogue with our business partners, including any questions about the Code of Conduct for Business Partners or other comments regarding supply chain sustainability.

Murata Machinery treats all business and personal information received in a responsible manner and takes measures to ensure that this information remains confidential.

## 2 Legal Compliance

Ensuring awareness of, and compliance with, relevant legal requirements is fundamental to complying with the Code of Conduct for Business Partners.

### Requirements

You must stay up to date, and comply with, national and regional legislation as well as relevant and applicable international regulations and conventions related to the areas in the Code of Conduct for Business Partners.

You must respect the human rights of your employees and treat them with respect and dignity, so as to be understood by relevant stakeholders.

In the event that there is a conflict between the Code of Conduct for Business Partners and local laws and regulations, the more stringent requirements shall apply.

### Policy

Be aware of, comply with, and implement existing legal requirements relevant to the business and stay updated on any relevant changes.

Obtain all legally required permits, licenses and registrations and make sure that they remain valid.

### How to Verify Compliance

Murata Machinery will ask you how you construct and implement activities and systems to ensure legal compliance with the following areas:

- human rights
- labor rights
- working conditions and labor practices
- occupational safety and health
- environment
- anti-corruption practices
- data privacy
- fire prevention and facility management permits



## 3 Human and Labor Rights

Respecting human and labor rights is of great importance to Murata Machinery. This includes treating every employee fairly, with dignity and respect, and to avoid causing or contributing to abuse of human and labor rights.

### 3.1 Human Rights Due Diligence

#### Requirement

You must be aware of and address any human rights impacts that you cause or contribute to, or that are directly linked to your operations, products, or services.

#### Policy

Work proactively with human rights. For example, perform human rights due diligence to identify, prevent, mitigate, and account for the business impact on human rights.

#### How to Verify Compliance

Check the following:

- Review the outcomes of due diligence conducted regarding human rights.

### 3.2 Child Labor

#### Requirements

Murata Machinery never accepts child labor. You must work to prevent child labor in your operation and in your supply chain, and ensure legal working conditions for young workers.

In the event that child labor is recognized, a remediation in the best interest of the child must be carried out.

Employees must not be younger than 15 years of age (or 14 if allowed by national law), or older where local law stipulates a higher minimum age for employment.

Young workers (below 18 years old) must not perform work that is mentally, physically, socially, or morally hazardous or that interferes with their mandatory schooling. Young workers must not work night shifts.

#### Policy

Maintain records of legal working age for all employees, for example, copies of age verification documentation.

#### How to Verify Compliance

Check the following:

- All work is performed by employees of legal working age.
- There is a system to certify that no underage workers are employed.
- Young workers are provided with legal working conditions.

### 3.3 Forced and Slave Labor

Murata Machinery never accepts slave labor practices of any kind, including forced, bonded or compulsory labor, servitude, deceptive recruiting and employment, and human trafficking. This refers not only to all work performed involuntarily, but also to instances of coercion, mental and/or physical threat or abuse, abuse of power and deception, as well as associated transportation, concealment, recruitment, transfer of persons and acceptance of such persons.

#### Requirements

You, as well as your recruitment agencies, must not engage in or tolerate:

- restrictions of movement
- excessive recruitment fees or cash deposits
- confiscation of identity documents and/or passports
- withholding of wages
- abusive working conditions
- debt bondage
- violence

or any form of forced, compulsory or illegal labor, including trafficking, prison labor, child slavery, debt-bonded labor or any other kind of exploitation or abuse.

#### Policy

Be aware of risks of complicity in forced and/or slave labor in the international community, and implement policies and preventive measures that affirm refusal of any involvement in such practices.

Avoid business practices or decisions likely to put excessive pressure on your suppliers and contractors which may lead to forced and/or slave labor.

#### How to Verify Compliance

Check the following:

- Overtime work is consensual, unless necessary and mandated according to local laws.
- Employees have the right to leave their company dormitory/housing and workplace freely during their leisure time.
- Employees are not required to surrender original personal certificates or identification documents such as government-issued identification, passports, or work permits to the employer as a condition of employment.
- Unlawful disciplinary practices or financial penalties such as unfair or illegal deductions from wages, withholding of wages or discontinuing benefits are not used as disciplinary measures.
- There are no debt obligations (debts, fees, fines, loans, or repayment agreements) preventing employees from leaving their employment upon providing reasonable notice.
- Repayment agreements are foreseeable, reasonable, and limited in time.
- Migrant workers are treated fairly and on an equal basis with local employees.

### 3.4 Discrimination, Harassment and Harsh or Inhumane Treatment

Murata Machinery never accepts workplace discrimination. Inclusive and diverse teams contribute to enhanced performance and results for the company.

#### Requirements

You must respect the personal dignity, privacy and rights of each employee, and you must not tolerate any physical or mental harassment or abuse, expressed verbally or non-verbally.

You must prohibit behavior, language, and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

You must not discriminate unfairly in hiring or during the employment lifecycle, whether actively or by means of passive support on the grounds of age, nationality or ethnicity, religion, political beliefs, sexual orientation, gender identity or expression, physical ability or any other characteristic protected by law.

You must prohibit public warnings and punishment systems.

#### Policy

Foster a discrimination-free work culture.

Foster a comfortable and healthy organizational culture where employees can freely express themselves with a sense of psychological safety.

Strive to develop diverse teams and a workplace where people appreciate, accept, and respect each other's differences and feel safe to compete with each other and take on challenges.

#### How to Verify Compliance

Check the following:

- Practices for recruitment, remuneration, employment, non-discrimination, equal opportunities, as well as diversity and inclusion are implemented and communicated.
- Mechanisms are in place to report, investigate and sanction discriminatory or harassing behaviors without reprisal or retaliation for victims and informers.

## 3.5 Working Hours and Compensation

Reasonable working hours and fair remuneration are central in providing decent working conditions. Sufficient rest and time off from work prevent workplace injuries and contribute to employee happiness by providing peace of mind.

### Requirement

Working hours, overtime, breaks and leave must comply with relevant legal requirements, or with applicable collective agreements.

Excessive overtime must not be the norm.

At a minimum, employees must be offered compensation and benefits in accordance with relevant legal requirements, or with applicable collective agreements.

Employees must be informed of their employment conditions, including their rights and obligations, in their native language or in a language they understand, for example, in a written labor contract.

You are encouraged to provide working conditions that allow employees to ensure a healthy work-life balance. This includes, for example, giving consideration to those who need to care for their family or holding events to foster and enhance connections between employees.

### Policy

Keep to legal working hours and ensure precise record-keeping.

Maintain accurate records of all wages.

Provide all employees with a pay slip clearly stating all parts of their salary in a comprehensible manner, including overtime compensation, hours worked, benefits, legal deductions, bonuses and other relevant posts.

Inform employees of their employment conditions and keep relevant records, for example, copies of signed labor contracts.

### How to Verify Compliance

Check the following:

- Actual working hours are recorded, divided into normal working hours and overtime hours, unless otherwise agreed.
- Employees are entitled to at least one day off per week and to sufficient rest between shifts.
- Wages are paid regularly, directly to the employee, at the agreed time, and in full for the time worked during the applicable period.
- Review signed labor contracts and pay slips.
- Employees take paid statutory holidays and legally stipulated leave, including paid sick leave and parental leave, without any negative consequences.

## 3.6 Freedom of Association and Collective Bargaining

Murata Machinery supports freedom of association and the right to lawfully and peacefully associate, organize and bargain collectively. We encourage our business partners to engage in dialogue with their employees to motivate them and stimulate employee engagement\*.

\*Employee engagement refers to the voluntary “motivation” to feel satisfaction, meaning, and value in what they are doing. In a workplace with high levels of engagement, employees have a sense of attachment to the organization and the workplace, and they are more likely to work with a desire to contribute to the company. A solid relationship of trust between the company and its employees is its foundation.

### Requirements

You must recognize and respect the right of employees to freely associate, organize and bargain collectively in accordance with the laws of the countries in which they are employed.

You must recognize the importance of open communication and direct engagement between employees and management.

You must allow employees to appoint independent work representatives and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalties, interference or reprisal.

Conversely, those employees who choose not to participate in workers’ associations must be respected for their choice, without fear of harassment, intimidation, penalties, interference or reprisal.

### Policy

Foster a working environment, that allows for mutually constructive engagement, between employees and management, avoiding unnecessary confrontation whenever possible

Engage in dialogue with employees on working conditions and keep records of meetings or communications carried out.

### How to Verify Compliance

Check the following:

- Employees have the right to organize and bargain collectively.
- Employees have the right to appoint independent work representatives and communicate with management.
- Work representatives are recognized by management.
- Review agreements including collective agreements (in applicable cases).
- Evidence of functioning dialogue mechanisms between workers and management.

## 4 Occupational Safety and Health

Safety-first, a sense of security, and the importance of health are fundamental operating principles at Murata Machinery.

### Requirements

You must provide a safe and healthy working environment and take all feasible steps to prevent incidents and injuries.

You must have an adequate, risk-based health and safety approach, including, for example, providing relevant instructions and training that is understandable to all employees.

Employees must have the right to refuse a work situation if they reasonably believe that it presents an imminent and serious risk to their health and safety.

All work premises, including in applicable cases accommodation and canteens, must be regularly checked to prevent disasters, accidents and fires as well as to maintain safety and hygiene standards on an everyday basis.

### Policy

Perform regular health and safety risk assessments of the business and workplace, as well as evaluating the efficiency of preventive and mitigating actions.

### How to Verify Compliance

Check the following:

- Buildings are being used for their intended purpose, verified by operating permits.
- Electrical wiring, lighting and gas fixtures are properly installed and maintained.
- There are functioning fire alarms, adequate firefighting equipment, clearly marked and accessible evacuation routes, and emergency exits that ensure escape in the event of a disaster are maintained based on the size of the facility.
- Evacuation drills for fire and other disasters are carried out regularly and emergency plans and response procedures are implemented.
- Adequate control measures are in place to identify, eliminate, or mitigate potential hazards or harmful effects that may hinder safety, hygiene, and health maintenance in the workplace.
- Employees are using clean, properly fitting, and well-maintained personal protective equipment and clothing, provided free of charge, and suitable for any unmitigated or remaining risks.
- Procedures and systems to manage, track and report occupational injuries and illnesses are implemented.
- Relevant first-aid kits are easily accessible, and employees are trained in first aid.
- The workspace and equipment are clean, well lit, adequately ventilated and kept at acceptable temperatures for comfortable work conditions.
- Free access to clean drinking water, clean areas to eat meals, hygienic toilets and, where applicable, showers are provided.

## 5 Environment

Protecting the environment, mitigating climate change, and building Circular Economy is of great importance to Murata Machinery. The environmental impact from the business must be minimized, and our performance with respect to the environment must be improved continuously. This includes the protection of biodiversity and ecosystems, as well as sustainable use of resources.

### Requirements

You must establish, implement and maintain a risk-based approach to reduce or minimize any negative environmental impact from your business activities, products and services.

You must take precautionary measures immediately when there is a possibility that an action could harm the environment or public health and strive to develop and support environmentally friendly techniques in your products, processes, designs and material selection.

You must pay the social, environmental and economic costs that arise in the case that your business causes damage to the environment.

You must control, measure, document and plan your work to minimize the environmental impact of your business in particularly the following areas:

- Greenhouse gas emissions and energy consumption
- Resource circularity
- Chemicals and hazardous substances
- Waste
- Water consumption
- Other emissions into air, water and soil

### Policy

Perform regular environmental risk assessments of the business value chain, as well as evaluating the efficiency of preventive and mitigating actions.

Work towards the transition to a circular system and conserve finite resources. Secure end-of-life handling and treatment of products by declaring their full material content and by providing information about handling and treatment of the products at the time of disposal.

Select materials and resources that can be reused and recycled whenever possible, and minimize waste for landfill.

Include environmental aspects in product development from a life-cycle perspective, from raw materials to end-of-life (promotion of environment-friendly design for products and services).

Actively work to replace hazardous chemicals with safer alternatives.

Actively work towards optimizing energy and resource efficiency and increase the share of energy sources with low greenhouse gas emissions.

### How to Verify Compliance

Check the following:

- The details of efforts to minimize the negative impact of the business on the environment, and the progress and results of those efforts.
- Information about the presence of hazardous chemicals in your products.

## 6 Business Ethics

Murata Machinery is committed to conducting business with high ethical integrity, including respecting competition law such as the Unfair Competition Prevention Act and the Anti-Monopoly Act, as well as guarding individuals' rights to privacy. We expect the same from our business partners.

### 6.1 Anti-corruption

#### Requirements

You must comply with local laws and international anti-corruption conventions and not engage in, or cause Murata Machinery to engage in, any form of corrupt practices, including bribery, conflicts of interest, deception, embezzlement, illegal kickbacks, threats or nepotism.

You must not offer anything of value to inappropriately influence Murata Machinery employees, contractors, public officials, or any other third parties.

Murata Machinery employees must not provide any benefits in excess of what is necessary, whether direct or indirect, to our business partners in return for some personal benefit. In particular, they must ensure transparency in the following actions, whether public or private, to avoid any suspicion of a conflict of interest.

- Receiving money and/or goods
- Providing drinking and eating as entertainment
- General entertainment activities such as golf

Avoid any potential conflicts of interest during your transactions with Murata Machinery, and inform Murata Machinery of any cases of potential conflicts of interest that cannot be avoided.

#### Policy

Establish processes to prevent corruption, for example, by implementing an anti-corruption policy and by providing relevant training to your staff.

Recognize that corrupt and dishonest actions include, but are not limited to:

- Making false statements in official company records
- Forging evidenced documents, intentionally overcharging, or issuing fraudulent payments
- Misusing or embezzling company funds
- Engaging in bribery, extortion, or offering improper gratuities
- Stealing or illegally selling company assets
- Willfully violating applicable laws and regulations
- Disclosing confidential information without authorization (for example, sharing pricing information, drawings/specifications of other companies)
- Concealing identity fraud or breaching duties.

#### How to Verify Compliance

Check the following:

- Review policies and related communication records, training records, gift and entertainment records, and conflicts of interest declarations.



## 6.2 Competition Law

### Requirements

You must always negotiate agreements, regardless of the contract form, in accordance with fair competition principles and observe the highest level of diligence.

You must not conclude any formal or informal contracts or agreements that are intended to prevent or restrict competition, or result in the prevention or restriction of competition, or contracts or agreements that breach applicable laws relating to competition or fair trade.

### Policy

Communicate the policy regarding competition laws, such as the Unfair Competition Prevention Act and the Anti-Monopoly Act, to relevant employees.

Maintain a record of employees trained in competition law.

### How to Verify Compliance

Check the following:

- Records and documentation are in place, showing that fair competition policy and principles are implemented, and that training of relevant staff has been carried out.

## 6.3 Personal Data Protection

### Requirements

You must follow all applicable principles for personal data protection and use personal data only when lawful and necessary to fulfill legitimate business purposes.

### Policy

Data privacy principles:

- Inform individuals as much as possible about when and why you use their data.
- Use only the types of personal data absolutely necessary to accomplish your lawful and reasonable purposes.
- Store personal data only as long as necessary to fulfill such purposes, and as long as legally required.
- Protect personal data under your control by taking appropriate technical and organizational security measures, and if legally required, notify the relevant authorities of any personal data breaches.

### How to Verify Compliance

Check the following:

- Review relevant documentation and evidence showing that your organization has adopted these data privacy principles and that they are operational within the organization.

## 7 Business Continuity Planning (BCP)

Murata Machinery has established a Business Continuity Plan (BCP)\* to prepare for natural disasters, major fires, infectious disease outbreaks, or other emergencies. These plans must be followed both during normal operations and emergencies to ensure the continuity or swift recovery of our core business activities. To maintain and maintain and strengthen our supply chain network, we believe it is essential for our business partners to establish and continually improve their own BCPs.

\*Business Continuity Plan is a strategy designed to minimize damage and ensure the continuity or swift recovery of business operations in the event of a disruption risk that could impede business continuity.

### Requirements

You need to establish a system to ensure the stable supply of your products and services by developing Business Continuity Plans to address possible risks that may impede business operations.

You must aim to establish a highly effective system to guarantee business continuity in the event of an emergency. To achieve this, under management direction, you need to continuously review and improve the system.

The risks that may impede your business continuity include the following:

- Large-scale natural disasters (for example: earthquakes, tsunamis, floods, heavy rain, heavy snowfall, tornados)
- Infrastructure damage resulting from the above-mentioned disasters (for example: power outages, water outages, transportation paralysis)
- Accidents (for example: fires or explosions), disease outbreaks including epidemic diseases or infectious diseases
- Tight supply and demand of parts/materials in the supply chain
- System errors due to cyberattacks.

You should recognize the sources of product components. You must preferentially pay attention to Critical Parts and Materials (components which could greatly influence the specifications and functions).

### Policy

Periodically assess the risks that could disrupt your business continuity, along with the effectiveness of your prevention and mitigation plans, post-event measures and recovery procedures.

### How to Verify Compliance

Check the following:

- The system for BCPs has been established and recognized by your employees.
- Fire or disaster evacuation drills are carried out regularly.
- Procurement sources of product components are recognized and shared (esp. for Critical Parts/Materials). Your business partners (tier-2, tier-3 suppliers for Murata Machinery) are recognized and shared.
- Plural procurement sources are assured for your product components.
- A system has been established to track the quantities of finished product stock, parts/materials inventory, and process inventory.
- A system has been established with which you can readily report damage to us in the event of large earthquake, fire, or accident.
- Various measures are implemented to ensure production recovery in the event of a contingency, such as a large earthquake, fire, or accidents, including the use of alternate production sites.