

SENA Code of Conduct

Sena Technologies Co., Ltd. and its subsidiary companies (“SENA”) are committed to respecting the highest standards of labor, human rights, environmental, and ethical conduct. SENA’s employees, directors, officers, agents, and suppliers are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever they make products or perform services for SENA. SENA requires its employees, directors, officers, agents, and suppliers to operate in accordance with the principles and requirements, as applicable, in this SENA Code of Conduct (“Code”), and in full compliance with all applicable laws and regulations.

Our Principle

The Code is based on internationally recognized human rights, as set out in the United Nations’ International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. SENA is deeply committed to respecting human rights and our approach is based on the UN Guiding Principles for Business and Human Rights (UNGPs).

SENA will assess compliance with this Code, and any violations of this Code may jeopardize a relationship with SENA up to and including termination. This Code applies to SENA and their employees, directors, officers, agents, and suppliers (including their subsidiaries and affiliates), as well as any subcontractors and sub-tier suppliers (each a “SENA Member”) providing goods or services to SENA.

Labor and Human Rights

SENA believes all workers in SENA and its supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and SENA Members shall uphold the highest standards of human rights.

Anti-Discrimination

SENA Member shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law, in hiring and other employment practices. SENA Member shall not require pregnancy or medical tests, except where required by applicable laws or regulations or prudent for workplace safety and shall not improperly discriminate based on test results.

Anti-Harassment and Abuse

SENA Member shall commit to a workplace free of harassment and abuse. SENA Member shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.

Prevention Involuntary Labor and Human Trafficking

SENA Member shall ensure that all work is voluntary. SENA Member shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of their exploitation.

SENA Member shall not withhold workers’ original government-issued identification and travel documents. SENA Member shall ensure that workers’ contracts clearly convey the conditions of employment in a language understood by the workers. SENA Member shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities.

Workers shall not be required to pay employers’ or their agents’ recruitment fees or other similar fees to obtain their employment. If such fees are found to have been paid by workers, such fees shall be repaid to the worker.

Third Party Employment Agency

SENA Member shall ensure that the third-party employment agency it uses are compliant with the provisions of this Code and the law.

Prevention of Underage Labor

SENA Member shall employ only workers who are at least 15 years of age, the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is highest. SENA Member may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

Juvenile Worker Protections

SENA Member may employ juveniles who are older than the applicable legal minimum age but are younger than 18 years of age, provided they do not perform work that might jeopardize their health, safety, or morals, consistent with ILO Minimum Age Convention No. 138. SENA Member shall not require juvenile workers to work overtime or perform nighttime work.

Educational Program Management

A SENA Member which runs a student program at its facilities shall ensure a proper management plan through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. SENA Member shall provide appropriate support and training to all such students at its facilities.

Working Hours

A workweek shall be restricted to 60 hours, including overtime, and workers shall have at least 1 day off every 7 days except in emergencies or unusual situations. Regular workweeks shall not exceed 48 hours. SENA Member shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

Wages and Benefits

SENA Member shall pay at least the minimum wage and provide any benefits required by law and/or contract. SENA Member shall compensate workers for overtime hours at the legal premium rate. SENA Member shall communicate pay structure and pay periods to all workers. SENA Member shall meet all legal requirements relating to wages and benefits, pay accurate wages in a timely manner, and shall not use wage deductions as a disciplinary measure. All use of temporary and outsourced labor shall be within the limits of the local law.

Freedom of Association and Collective Bargaining

SENA Member shall freely allow workers' lawful rights to associate with others, form and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment.

Grievance Management

SENA Member shall ensure that workers have an effective mechanism to report grievances and that facilitates open communication between management and workers. Grievances and communication may include but not be limited to instances of harassment and abuse, discrimination, retaliation, non-payment of wages, requests for discussions regarding hours and wages, food preferences, living conditions requests, and so forth.

Health and Safety

Worker health, safety, and well-being is important to SENA. SENA Member shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

Health and Safety Permits

SENA Member shall obtain, keep current, and comply with all required health and safety permits.

Occupational Health and Safety Management

SENA Member shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment.

Chemical Management

SENA Member shall develop and implement a program to take reasonable steps to prevent adverse impacts to people and planet arising from processes and operations of chemicals.

Emergency Preparedness and Response

SENA Member shall identify and assess potential emergency situations. For each situation, SENA Member shall develop and implement emergency plans and response procedures that will minimize harm to life, environment, and property.

Infectious Disease Preparedness and Response

SENA Member shall develop and implement a program to take reasonable steps to prepare for, prevent, and respond to the potential for an infectious disease among its employees.

Incident Management

SENA Member shall have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports. SENA Member shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

Working and Living Conditions

SENA Member shall provide workers with reasonably accessible and clean toilet facilities, as well as potable water. SENA Member-provided dining, food preparation, and storage facilities shall be sanitary. Worker dormitories provided by SENA Member shall be clean, safe, and provide reasonable living space.

Health and Safety Communication

SENA Member shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

Environment

SENA is committed to protecting the environment, and environmental responsibility is at the core of how we operate. SENA Member shall develop, implement, and maintain environmentally responsible business practices.

Environmental Permits and Reporting

SENA Member shall obtain, keep current, and comply with all required environmental permits. SENA Member shall comply with the reporting requirements of applicable permits and regulations.

Solid Waste Management

SENA Member shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle waste.

Air Emissions Management

SENA Member shall identify, manage, reduce, and responsibly control air emissions emanating from its operations that pose a hazard to the environment.

Ethics

SENA expects the highest standards of ethical conduct in all of our endeavors. SENA Member shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations.

Responsible Sourcing of Materials

SENA Member shall exercise due diligence on relevant materials in their supply chains. SENA Member shall develop particular due diligence policies and management systems in order to identify applicable risks and take appropriate steps to mitigate them. Due diligence shall be conducted down to the material processing level in order to determine whether relevant materials originate from conflict-affected and high-risk areas, which include areas associated with armed conflict, fragile post-conflict areas, as well as areas witnessing weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses. Such violations include without limitation the worst forms of child labor, forced labor, human trafficking, and sexual violence.

Business Integrity

SENA Member shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. SENA Member shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates applicable international anti-corruption conventions.

SENA Member shall have a policy relating to business with SENA that prohibits the giving and acceptance of gifts. Gifts include items such as cash or cash equivalents including entertainment, gift cards, product discounts, and non-business activities. SENA Member shall have a process to investigate and report any violations of the policy.

Disclosure of Information

SENA Member shall accurately record information regarding its business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation to all appropriate parties and as required by law.

Protection of Intellectual Property

SENA Member shall respect intellectual property rights and safeguard customer information. SENA Member shall manage technology and know-how in a manner that protects intellectual property rights.

Privacy and Data Protection

SENA Member acknowledges that SENA considers privacy to be a fundamental human right, and shall have processes and practices in place to secure and protect personal data.

SENA Member shall comply with all privacy, data protection, and cybersecurity laws that are applicable to SENA or SENA Member.

Information Security

SENA Member shall maintain a security program, which is inclusive of technical and organizational measures to prevent misuse, compromise, loss, alteration or unauthorized disclosure, acquisition of, or access to, confidential proprietary or protected information.

Whistleblower Protection and Anonymous Complaints

SENA Member shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. SENA Member shall protect whistleblower confidentiality and prohibit retaliation.

Direct Responsible Individual

SENA Member shall identify the responsible individual to oversee and enforce the implementation of the Code.

Documentation and Records

SENA Members shall maintain appropriate documents and records to ensure regulatory compliance.

Training

SENA Member shall have an ongoing process to obtain feedback on its practices related to this Code and to foster its continuous improvement.

Corrective Action Process

SENA Member shall have a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.

SENA Technologies Co., Ltd. reserves the right to conduct audits either by its own or a third party after appropriate communication on the matter covered by this Code and its practical application.

In the event a SENA Member violates the principles of this Code and does not implement timely correction, SENA reserve the right to early terminate any business relationship as well as to take actions for compensation for any loss, damage, expense, or other costs that may arise from such violation.

Report of Violation

SENA Member shall report to SENA Technologies Co., Ltd. any violation, by any person or entity within SENA Member, of this Code through the following e-mail: [compliance@sena.com]. We guarantee the confidentiality of the identity of those who report in good faith.

Entry into Force

This Code shall enter into force on November 16, 2021.

This Code be revised on November 3, 2023.