



# ETHICAL AND ENVIRONMENTAL CODE OF CONDUCT

Outlines the standards and principles that guide FOZ One in maintaining responsible, sustainable, and ethical business practices.



DOCUMENT ID  
**CSER\_001**

PUBLICATION DATE  
**3<sup>RD</sup> JULY 2025**

REV NO  
**04**

TYPE  
**PUBLIC**

Author(s):

Internal:

**Sathiyar A/L Kalithasan**

**Norazieannita Binti Daud**

External:

**N/A**

Approved by:

Name : **Datuk Lee Fook Yuen**

Title : Executive Chairman

Issue Date : 03<sup>rd</sup> July 2025

This document and the copyright in it are the sole property of FOZ One unless otherwise stated. The document and its contents are confidential and may not be reproduced, disclosed, or used without the prior written consent of FOZ One. This document is also protected by unpublished copyright.

© MyTech & Assembly Sdn. Bhd. & MyBrush Industries Sdn. Bhd.







## 1. INTRODUCTION

FOZ One is committed to respecting human rights, the environment, and ethical business practices. The FOZ One Ethical and Environmental Code of Conduct (“EECoC”) sets out the minimum standards that FOZ One expects its manufacturing operations and all our Business Partners to meet or exceed.

FOZ One has adopted the International Social Compliance Standard & other interested parties' Code of Conduct as a part of its Supplier Code of Conduct for FOZ One and its suppliers. FOZ One expects all suppliers to operate in alignment with FOZ One's Supplier Code, which outlines standards for responsible practices in Labor, Health and Safety, Environmental Protection, and Ethics. In addition to meeting the requirements of the International Social Compliance Standard, this standard also includes expectations specific to FOZ One's suppliers. The International Social Compliance Standard and Code of Conduct are also outlined in the appendix.

FOZ One must comply with all applicable local, national, and international laws and regulations. Where the obligations in the EECoC impose higher standards than those specified by the relevant laws and regulations, then the obligations in the EECoC will prevail.

## 2. SCOPE

- 2.1 This EECoC applies to FOZ One's manufacturing operations and FOZ One's Business Partners.
- 2.2 FOZ One must always comply with this EECOC across all parts of their business operations. FOZ One must ensure that any subcontractors appointed to produce FOZ One products or provide services for FOZ One must comply with the EECoC as if they were a 'Business Partner', and they must also take a proactive approach to ensure that the EECoC's standards are implemented and maintained within their supply chain.



### 3. REFERENCES

- 3.1 ISO 14001:2015 Clause 6.1.3
- 3.2 Environmental Quality Act and its Regulations
- 3.3 Occupational Safety and Health Act and its Regulations
- 3.4 Employment Act and its Regulation
- 3.5 Customer's Social Compliance Code of Conduct or guideline
- 3.6 RBA Code of Conduct Version 8.0

### 4. APPENDIX LIST

- Appendix 1 : Grievance procedure flowchart
- Appendix 2 : Business Partner's Do's & Don'ts on Environmental, Safety, and Health
- Appendix 3 : FOZ One's Commitment towards the RBA Code of Conduct

### 5. RESPONSIBILITY

- Management : To develop a strategic initiative for this policy
- CSER : To implement and ensure compliance with this policy within the organization
- Committee
- Head of : To implement and communicate this policy with their subordinates
- Department
- Employee : To understand and comply with the guidelines set out in this policy

### 6. DEFINITION

- 6.1 **"Business Partners"** means any person (including a company, other legal entity, or individual) working with or on behalf of FOZ One. This may include suppliers, manufacturers, logistics providers, distributors, and other service providers.



- 6.2 **“Child” or “Children”** refers to any person under the age of 15, or under the age of completion of compulsory schooling, or under the minimum age for regular or full-time employment in the country, whichever is greatest.
- 6.3 **“Conflict-Affected and High-Risk Areas (CAHRA)”** are defined by the OECD Due Diligence Guidance and they are identified by the presence of armed conflict, widespread violence or other risks of harm to people.
- 6.4 **“Hazardous Work”** means work likely to jeopardize the health or safety of Workers including underground work, underwater work, work at dangerous heights or in confined spaces; work in unhealthy environments (such as environments that expose Workers to extreme temperatures, loud noise, excessive dust); work with dangerous machinery, chemicals/radioactive substance handling, vibration equipment or electricity; handling heavy loads; working overtime or at night.
- 6.5 **“High-Risk Material”** means any raw material, processed commodity or product that presents any environmental (resource consumption, emissions, waste) or social (human rights, labour practices, health & safety) risk due to country of origin, method of extraction/processing, type of material, or as identified by FOZ One.
- 6.6 **“Juvenile Workers”** means a Worker who is not a Child but is younger than 18 years of age.
- 6.7 **“Migrant Workers”** means a Worker whose nationality and permanent residence is different from the country in which the FOZ One or Business Partner facility at which they are working is located.
- 6.8 **“Sustainability Practices”** means governance, policies and mechanisms in place regarding human rights, labour practices, ethics, responsible sourcing, environmental performance, and health and safety.



- 6.9 **“Third Party Employment Agency”** A private, public or government agency, including subagents, carrying out operations on behalf of individuals or enterprises, whose role is to provide access to employment or career progression by filling employment vacancies.
- 6.10 **“Workers”** means any person working for or on behalf of an organization, including direct employees, temporary or seasonal workers and contract workers.
- 6.11 **RBA** – Responsible Business Alliance
- 6.12 **VAP** – Validated Assessment Program
- 6.13 Any words that follow the terms “include”, “including”, “such as”, or “for example” are intended to be non-exhaustive and they do not limit the generality of the words preceding those terms.

## 7. PROCEDURE/STANDARDS

### 7.1 Labour Practices

- i. **No Forced Labour:** Forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery, or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, fraud; or the making of payments to any person having control over another person for the purpose of their exploitation.
- a. All work must be voluntary and Workers must be free to terminate their employment without penalty if reasonable notice is given, as per the Worker’s contract.



- b. All Workers must be provided with a contract that clearly conveys the terms and conditions of employment in a language understood by the Workers.
  - c. Workers shall not be required to pay employers, agents, sub-agents or facilitators recruitment fees whatsoever or other related fees for their employment. Business Partners will identify (using an appropriate method of their own choosing) where Workers have paid fees and re-pay them to the Worker immediately.
  - d. All Migrant Workers must have full and unconditional access to their personal identification and immigration documents at all times.
  - e. There will be no unreasonable restrictions on Workers' freedom of movement within the workplace or upon entering or exiting company-provided facilities including Worker accommodation.
  - f. Any Third-Party Employment Agencies that are used must comply with the provisions of the EECOC and all applicable laws and regulations.
  - g. Compliance with forced labour prevention legislation is mandatory and therefore labour and materials must not be sourced from regions prohibited by law.
  - h. FOZ One will ensure there is no forced labour in their supply chains by conducting appropriate due diligence.
- ii. **No Child Labour:** Child labour is strictly prohibited. FOZ One must not allow, procure or facilitate any work from Children. FOZ One will ensure there is no Child labour in their supply chains by conducting appropriate due diligence.

The employment of Juvenile Workers is only permitted where all of the following conditions are satisfied:



- a. An appropriate mechanism to verify the age of Workers has been implemented and the age of Juvenile Workers has been verified before they begin work.
- b. Juvenile Workers must not carry out Hazardous Work.
- c. Juvenile Workers must not work overtime or perform night-time work.
- d. Any work conducted by a Juvenile Worker must not prevent participation in or attendance at any schooling to which they are enrolled.
- e. The wage rate for Juvenile Workers must be at least the same wage rate as other entry-level Workers performing equal or similar tasks. Salary and compensation for such work must be paid directly to the Juvenile Worker.

iii. **Working Hours, Wages, and Benefits:**

- a. Working hours shall not exceed relevant national limits in the country of employment. Workers in FOZ One manufacturing operations shall work to a maximum of 60 hours per week, inclusive of overtime.
- b. Overtime must be voluntary and consensual. Workers must be compensated for overtime at rates of pay greater than regular hourly rates and always in compliance with all applicable laws and regulations.
- c. All Workers must receive at least one rest day (24 consecutive hours) in every seven days.
- d. Wages paid to Workers shall comply with all applicable laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits. Wages shall be paid accurately and in





- a timely manner. Workers shall be provided with written and understandable information about their wages.
- e. Workers shall be entitled to paid annual leave, public holidays, medical leave, and benefits in accordance with the requirements of all applicable laws and regulations.
  - f. The regular working week schedule and working hours must be stated clearly in Worker employment contracts and published clearly at the place of work.
  - g. An effective and anonymous feedback mechanism must be provided for Workers to report workplace grievances. Confidentiality will be protected, and retaliation is prohibited.
  - h. Workers shall be provided with reasonably accessible and clean toilet facilities, as well as safe drinking water. Where dining and food preparation facilities are provided, they must be sanitary and comply with all applicable laws and regulations.
- iv. **No Discrimination:** FOZ One and our Business Partners shall not discriminate based on race, ethnicity, caste, national origin, age, religion, disability, gender, pregnancy, gender identity, marital status, sexual orientation, union membership, political affiliation or any status protected by law. There shall be no discrimination in recruitment, hiring, remuneration or access to training and development opportunities, promotion, overtime, termination or retirement.
- v. **Freedom of Association:** FOZ One and our Business Partners will not prevent Workers from free association. This includes the ability to form and join trade unions, to bargain collectively and to engage in peaceful assembly, or choose not to do so, without fear of discrimination or retaliation. Where the right to freedom of association and collective



bargaining is restricted under law, the development of parallel means for independent and free association and bargaining should be facilitated.

- vi. **Fair Working Practices:** Every Worker shall be treated with dignity and respect. No Worker shall be subject to, or threatened by, any physical, sexual, psychological, or verbal harassment, abuse or humiliation.

Disciplinary measures shall not include any financial penalties. Disciplinary policies and procedures shall be clearly defined and communicated to Workers.

## 7.2 Environment

FOZ One and our Business Partners share a commitment to protect human health and the environment. Refer to Appendix 2 on Business Partner's Environmental Do's & Don't.

- i. **Permits and Reporting:** All required environmental permits, licenses, consents (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.
- ii. **Environmental Protection and Greenhouse Gas Emissions:** Environmental impacts and Greenhouse Gas (GHG) emissions shall be identified, measured, managed, reduced, and responsibly controlled. This may include process improvement, energy and resource conservation, use of renewable energy, or other measures. Business Partners shall share related data and information with FOZ One upon request. Applicable laws and regulations about environmental protection and GHG emissions (such as emission limits or reduction mandates) shall be complied with.
- iii. **Resource Conservation:** The use of natural resources (including water, fossil fuels, minerals, and virgin forest products) shall be identified, managed, reduced,



and responsibly controlled. Conservation methods may include material usage reduction or substitution.

Natural resources shall be sourced in compliance with all applicable laws and regulations, and FOZ One shall develop appropriate due diligence policies and management systems to identify relevant risks and take proper steps to mitigate them.

- iv. **Hazardous Substances:** Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labelled, and managed to ensure safe handling, movement, storage, use, recycling or reuse, and disposal, following all applicable laws and regulations.
- v. **Restricted Substances:** All applicable laws and regulations regarding the prohibition, restriction, or declaration of specific substances in products and manufacturing are to be adhered to, including labelling for recycling and disposal.
- vi. **Waste:** The generation of pollutants and waste is to be minimized or eliminated, and in any event, must be within legal limits. Waste data shall be tracked and documented as required by all applicable laws and regulations.
- vii. **Air Emissions:** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting substances, and combustion byproducts generated from operations shall be categorized, routinely monitored, controlled, and treated as required before discharge following all applicable laws and regulations.
- viii. **Water Management:** A water management program that documents, categorizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination, shall be implemented. All wastewater shall be categorized, monitored, controlled, and treated as required prior to discharge or disposal. Routine monitoring of



the performance of wastewater treatment and containment systems shall be conducted, to ensure optimal performance and regulatory compliance.

### **7.3 Health and Safety**

FOZ One and our Business Partners shall provide and maintain safe and hygienic working environments. Refer to Appendix 2 on Business Partner's Health and Safety, Do & Don't.

- i. There must be policies and systems in place to detect, avoid, and respond to potential risks to the health and safety of Workers. Policies and systems should be reviewed regularly to ensure effectiveness.
- ii. Workers shall have access to appropriate workplace health and safety training in an appropriate language. Health and safety-related information shall be posted in the facility and Workers shall be free to raise health and safety concerns without fear or repercussion.
- iii. All required health and safety permits, licenses, and consents shall be obtained, kept current, and complied with.
- iv. Reasonable steps shall be taken to prepare for, prevent, and respond to the potential for an infectious disease or occupational health exposure among workers.
- v. Potential emergencies shall be identified and assessed. Emergency plans and response procedures that minimize harm to life, environment, and property shall be developed and implemented.



## **7.4 Worker Accommodation**

- i. Any accommodation provided for Workers must be safe, clean, hygienic, and suitable for dormitory use.
- ii. Accommodation must comply with all applicable laws and regulations and be fit for purpose, with sufficient toilet facilities and access to safe drinking water, and must be of durable construction. Where dining and food preparation facilities are provided, they must be sanitary and appropriate for the number of workers housed.
- iii. Accommodation must have adequate fire safety and prevention measures, first aid access, and fire emergency procedures in place.
- iv. Individual secure storage for Workers must be provided in the accommodation.

## **7.5 Responsible Sourcing of Materials**

- i. Components, materials, and minerals for use within or relating to the research, development, or manufacturing of FOZ One products must be sourced in an environmentally and socially responsible manner. This includes safe working conditions where work is chosen freely and human rights and animal welfare are respected. Materials shall be sourced in compliance with all applicable laws and regulations.
- ii. FOZ One shall develop appropriate due diligence policies and management systems to identify relevant risks and take appropriate steps to mitigate them.
- iii. Additional due diligence must be performed for the sourcing of High-Risk Materials, and materials from Conflict-Affected and High-Risk Areas, and evidence of this shall be provided to FOZ One upon request.



- iv. Any applicable due diligence legislation shall be complied with, as well as reporting requirements imposed by relevant permits, laws or regulations.

## **7.6 Ethical Business Practices**

FOZ One is committed to operating its business with ethics, integrity, and in compliance with all applicable laws and regulations. Dealing honestly and fairly with the Business Partner and doing our best to make the right choices to help us achieve our business goals. Refer to on Business Partner's Ethical Framework. FOZ One shall:

- i. Operate with the highest standards of integrity and commit to being honest and transparent in all business dealings.
- ii. Not tolerate, permit, or engage in bribery, corruption, or any illegal or unethical practices.
- iii. Maintain complete and accurate records relating to its business activities, labour, health and safety, and environmental practices, ensuring that all transactions are properly and accurately recorded and shared, if requested, with FOZ One.
- iv. Comply with all trade and economic sanctions and embargo laws.
- v. Not conduct unauthorized subcontracting, including delegating or otherwise transferring any portion of the activities that are performed for FOZ One to a third party.
- vi. Comply with all applicable laws and FOZ One policies.
- vii. Commit to protecting FOZ One's intellectual property rights and maintaining the confidentiality of FOZ One's confidential information.
- viii. Uphold standards of fair business, advertising, and competition.



- ix. Commit to protecting the reasonable privacy expectations of individuals concerning their personal information, including suppliers, customers, consumers, and employees. Comply with privacy and information security laws and regulatory requirements.

## **7.7 Corrective Actions and Remediation**

- i. Where a non-compliance is identified, via self-assessment, audit, or other means, FOZ One and our Business Partners shall establish and/or participate in effective and timely corrective action measures and remediation processes.

## **8. EECOC Implementation & Compliance**

- 8.1 FOZ One and our Business Partners will integrate these standards into business operations, including appropriate management systems and training. This EECOC, or an alternative of equivalent standards or higher, shall be displayed in the language(s) of the Workers in all manufacturing facilities and accommodation.
- 8.2 FOZ One will conduct risk assessments and assess compliance with the EECOC, including via audits by FOZ One or authorized third parties acting on FOZ One's behalf. Audits may be performed without prior notice and they may require access to any areas of the Business Partner's and its subcontractors' premises (including areas that are not dedicated to FOZ One). Business Partners must provide full cooperation, including by providing timely access to all information, personnel, premises, facilities, records, policies, and systems as may be requested by FOZ One or its third-party auditor to carry out such audits.
- 8.3 Where FOZ One and our Business Partner have entered into a legally binding agreement ("Agreement"), the terms of this EECOC shall apply to the Business Partner in addition to the terms of the Agreement. Where



this EECOC imposes a higher standard than the Agreement, the higher standard shall prevail to the extent that there is any conflict or inconsistency. Nothing in this EECOC shall limit or exclude any of the rights and remedies to which FOZ One is entitled, or the obligations to which FOZ One is subject, under the Agreement. Breaches of the EECOC by a Business Partner will be deemed to constitute a material breach of the Agreement with FOZ One and may impact the terms of our business relationship, up to and including termination.

- 8.4 Where non-compliance is identified, Business Partners shall work alongside FOZ One to create and implement corrective actions within agreed timeframes.
- 8.5 In addition to the implementation of these standards in their operations, Business Partners are obliged to take a proactive approach to ensuring these standards are implemented within their supply chain.
- 8.6 FOZ One may provide supplementary documentation relating to the EECOC as well as documentation to support continual improvement in sustainability performance, including policies, standards, and guidance. FOZ One reserves the right to review, assess, or monitor our Business Partners' Sustainability Practices when deciding to award future or continue existing business. FOZ One reserves the right to update this EECOC from time to time, and it will notify Business Partners of any changes.

## **9. Support and Reporting Concerns**

- 9.1 FOZ One and our Business Partners shall have programs in place to ensure that whistleblowers may raise concerns confidentially, anonymously and without fear of retaliation (provided such concerns are raised acting in good faith) as permitted by law.





- 9.2 Business Partners must promptly report suspected violations of the EECOC to FOZ One's Legal Compliance and Ethics team by using the platform [whistleblowingpolicy@fozgroup.com](mailto:whistleblowingpolicy@fozgroup.com) or to FOZ One's Internal Audit team.

## **10. Continual Movement**

- 10.1 FOZ One shall ensure a periodic and continuous review and monitoring of the implementation of this Code of Conduct.
- 10.2 FOZ One and our business partner believe in continually improving our social compliance system and labor standards by periodically reviewing our code of conduct, policies, and procedures, and their related processes, and ensuring that our staff are adequately trained and motivated. The internal audit department shall be responsible for a semi-annual review of social compliance and shall recommend areas of improvement to enhance these management practices in the areas of business ethics, social compliance, and CSER.
- 10.3 FOZ One shall have the strategy, processes, and sufficient resources in place to meet the responsibilities related to social compliance and labor standards and ensure that there is continuous improvement in its implementation.



## Appendix 1: Grievance procedure flowchart

Responsibility	Procedure Outline	Interfaces
Employees	Approach: HOD HRBU, Supervisors/Managers/BU/CU Head, or HR Director	a. Discuss
Employees	↓ Submit any suggestions/feedback/questions by using the grievance Apps (Wovo), or the Suggestion Box provided at each plant, or by email, <a href="mailto:grievanceprocedure@fozgroup.com">grievanceprocedure@fozgroup.com</a> (Email will be directed to HR Director)	a. Grievance Apps b. Suggestion Box c. Email
Delegated HR Personnel	↓ Acknowledgement of Receipt (HR acknowledges the grievance within the prompt response period)	a. Wovo & email response period within 48 hours b. Suggestion box within 5 working days
Delegated HR Personnel	↓ Investigation Process (HR conducts investigation – interviews, document review)	a. Investigation b. Master list
CSER Committee/ Management	↓ Resolution Meeting/discussion (Employee + HR + Management discuss findings & solutions)	a. Update master list
HR Personnel	↓ Resolution Implementation	a. Implementation Evidence
HR Director/ Management	↓ Appeal Option (if unresolved or dissatisfied) Employee submits an appeal to a higher authority by email, <a href="mailto:grievanceprocedure@fozgroup.com">grievanceprocedure@fozgroup.com</a>	a. Email will be directed to the Executive Chairman.
HR Director/ Management	↓ Final Review & Decision (Management makes the final decision)	a. Top Management
HR Personnel	↓ Outcome Communicated to Employee	a. Noticeboard/ Notification
	↓ Grievance Closed	



## **Appendix 2: Business Partner's Do's & Don't on Environmental, Safety, and Health**

At FOZ One, we are committed to promoting a safe, healthy, and environmentally responsible work environment. We recognize the critical role that our business partners play in ensuring the protection of people, property, and the planet. Therefore, we required all our business partners to adhere to the following Do's & Don't to maintain the highest standards in environmental sustainability, safety, and health:

### **Do's:**

#### **1.0 Do Ensure Regulatory Compliance:**

- 1.1 Ensure that suppliers and vendors in the factory comply with all relevant environmental, safety, and health regulations, including local, national, and international laws.
- 1.2 Regularly verify compliance through audits, inspections, and certifications (e.g., ISO 14001 for Environmental Management, ISO 45001 for Occupational Health and Safety).

#### **2.0 Do Require Health and Safety Training:**

- 2.1 Ensure that all workers, including those of the Business partner, receive proper health and safety training tailored to their roles and specific risks.
- 2.2 Business partner should implement programs that promote safe working practices and regularly train their workers on emergency procedures, first aid, and machine safety.

#### **3.0 Do Perform ESH Audits and Inspections:**

- 3.1 Conduct frequent safety and environmental audits of factories to identify risks and ensure ESH standards are being met.
- 3.2 Work with Business partner to address any non-compliance or areas of improvement identified during audits.



#### **4.0 Do Enforce the Use of Personal Protective Equipment (PPE):**

- 4.1 Ensure that the Business partner provides appropriate PPE (such as helmets, gloves, goggles, and hearing protection) to their employees based on the factory's hazards.
- 4.2 Make it a requirement that all workers wear PPE when operating machinery or engaging in high-risk activities.

#### **5.0 Do Promote Waste Management Practices:**

- 5.1 Encourage the Business partner to implement responsible waste disposal practices, such as recycling, reusing materials, and minimizing hazardous waste generation.
- 5.2 Ensure that factory waste, particularly hazardous chemicals and materials, is disposed of under environmental standards.
- 5.3 Scheduled waste collectors must understand and comply with the Environmental Quality Act & Regulation, such as the Environmental Quality (Scheduled waste) regulation 2005.
- 5.4 Scheduled waste collectors shall have a valid license from the local authorities, shall declare to FOZ One if there are any changes in the conditions of the license
- 5.5 General waste collectors shall ensure that they only dispose waste at designated areas provided by the district council.

#### **6.0 Do Monitor Environmental Impact:**

- 6.1 Collaborate with the Business partner to track energy consumption, water usage, emissions, and waste generation at the factory.
- 6.2 Establish clear environmental goals and encourage vendors to adopt practices that reduce their carbon footprint, such as using renewable energy and minimizing waste.



## **7.0 Do Ensure Hazardous Material Handling Protocols:**

- 7.1 Suppliers handling hazardous materials must have clear protocols in place for their safe storage, transportation, and disposal.
- 7.2 Provide training for workers on how to handle hazardous substances and ensure there are appropriate emergency procedures, including spill kits and first aid measures.
- 7.3 Any hazardous chemicals used in FOZ One must comply with (Classification, Packaging & Labeling of Hazardous Chemical) Regulation 1997.
- 7.4 Hazardous Chemicals must be labeled clearly and indelibly as specified in Schedule II of the OSH (Classification, Packaging & Labelling of hazardous chemicals) regulation 1997.
- 7.5 The hazardous chemicals must be accompanied by a Chemical Safety Data Sheet (SDS).
- 7.6 When transporting any hazardous chemicals, the subcontractors shall have adequate equipment/materials to handle in case there is an accident.
- 7.7 Business Partner shall inform FOZ One person in case of any accident.
- 7.8 After completion of the job, subcontractors shall ensure the work area is cleaned and without leaving any waste chemicals on site.

## **8.0 Do Make Sure During Repair / Maintenance Work:**

- 8.1 Sub-contractors shall install fire extinguisher/ fire blanket at the job site while performing work using flammable gases.
- 8.2 Avoid using strong chemicals for washing. Do not discharge oil / polluted substances to the drain.
- 8.3 Take safety precautions to avoid fire outbreaks when performing hot works such as welding and grinding.
- 8.4 Ensure that the workers are competent in performing the specific work and proper handling of chemicals used.



## **9.0 To Aware the Transporter Responsibilities:**

- 9.1 Do not leave the engine running while parking in FOZ One premises to avoid excessive smoke emission.
- 9.2 Make sure that there is no oil leakage from the vehicle.
- 9.3 Subcontractor shall always adhere to the safety signs or notices of the related working area.
- 9.4 The vehicle drivers must possess a valid driving license

## **10.0 Do Document and Communicate ESH Procedures:**

- 10.1 Require suppliers to maintain up-to-date documentation on their ESH policies, practices, and procedures, and ensure these are communicated clearly to all workers.
- 10.2 Provide easy access to relevant ESH information for both management and factory workers.

### **Don'ts:**

## **11.0 Don't Tolerate Unsafe Working Conditions:**

- 11.1 Never allow unsafe factory conditions, such as improperly maintained machinery, inadequate ventilation, or unmarked hazards.
- 11.2 Non-compliance with safety regulations should result in corrective actions or a change in Business Partner.

## **12.0 Don't Ignore Environmental Concerns:**

- 12.1 Don't overlook the environmental impact of factory operations. Business Partner should not be allowed to operate in ways that significantly harm the environment, such as improper disposal of waste, excessive water consumption, or air pollution.
- 12.2 Do not allow Business Partner to ignore energy-saving or sustainable practices in favour of short-term gains.



### **13.0 Don't Allow Lack of PPE:**

- 13.1 Never allow Business Partner's workers to operate in hazardous environments without proper personal protective equipment (PPE). Not providing or enforcing the use of PPE is a serious safety risk.
- 13.2 Failure to comply with PPE protocols can lead to injuries or fatalities and should be addressed immediately.

### **14.0 Don't Overlook Emergency Preparedness:**

- 14.1 Do not assume that emergency procedures are in place unless they are clearly outlined and practiced. Every factory should have emergency evacuation plans, first aid kits, fire extinguishers, and trained personnel.
- 14.2 Business Partner should also be required to have contingency plans for dealing with chemical spills, accidents, or other environmental and safety incidents.

### **15.0 Don't Fail to Address Worker Health Concerns:**

- 15.1 Never ignore potential health risks to workers, such as exposure to toxic chemicals, high noise levels, or ergonomic hazards.
- 15.2 Business Partner must regularly assess workplace conditions and implement controls to protect workers' health, such as noise reduction or ventilation improvements.

### **16.0 Don't Neglect Reporting and Documentation:**

- 16.1 Don't allow Business Partner to neglect the documentation and reporting of safety and environmental incidents. These records are necessary for auditing, compliance, and continuous improvement.
- 16.2 Failure to report accidents, near misses, or environmental impacts may lead to fines or reputational damage.



## **17.0 Don't Accept Poor Maintenance Practices:**

- 17.1 Avoid working with a Business Partner who fails to regularly maintain machinery and equipment. Faulty or poorly maintained machines can lead to accidents, injuries, and production disruptions.
- 17.2 Regular maintenance schedules and risk assessments should be established and followed.

## **18.0 Don't Ignore Worker Feedback:**

- 18.1 Don't dismiss feedback from factory workers regarding safety concerns or environmental issues. Workers often have the most valuable insight into day-to-day risks and challenges.
- 18.2 Establish clear channels for reporting issues without fear of retaliation and act on concerns promptly.





### **Appendix 3: FOZ One's Commitment towards RBA Code of Conduct**

FOZ One has adopted the Responsible Business Alliance (RBA) & other interested parties' Code of Conduct as its Supplier Code of Conduct for FOZ One and its suppliers. FOZ One expects all suppliers to operate in alignment with both FOZ One's Supplier Code and the RBA Code of Conduct, which outlines standards for responsible practices in Labor, Health and Safety, Environmental Protection, and Ethics. In addition to meeting the requirements of the RBA Code, this Code also includes additional standards and expectations specific to FOZ One's suppliers. The RBA Code of Conduct is available in multiple languages on the RBA website at [www.responsiblebusiness.org/code-of-conduct/](http://www.responsiblebusiness.org/code-of-conduct/) can also refer to the appendix

1. FOZ One is enrolling and adapting the RBA VAP program and fully supports the vision and mission of the RBA Code of Conduct. FOZ One is enrolling and adapting the RBA VAP program and fully supports the vision and mission of the RBA Code of Conduct. We are expecting our Business Partner to also adopt and implement the principles of the RBA Code of Conduct, and to align their practices, as far as practicable, with the standards outlined within the RBA framework.
2. FOZ One wholeheartedly endorses the collective effort of the RBA VAP program to continuously improve the living, working, and environmental conditions under which it operates.
3. FOZ One progressively pursues aligning the RBA Code of Conduct provisions with internal programs and local laws and regulations to ensure working conditions are safe, workers are treated with respect and dignity, and manufacturing processes and practices are environmentally responsible.
4. FOZ One actively promotes the RBA Code of Conduct as a requirement to suppliers and subcontractors under its direct sourcing and engineering control.
5. FOZ One strives to conduct its global business in a socially and environmentally responsible manner, including, but not limited to, meeting recognized industry and environmental



standards; complying with local and national laws and regulations; and creating internal programs and initiatives.

6. FOZ One reinforces the objectives of the RBA Code of Conduct through an internal management system.
7. FOZ One is committed to implementing and auditing its adherence to the RBA Code of Conduct standards.
8. The Business Partners can access the latest RBA code of conduct for reference as below <https://www.responsiblebusiness.org/code-of-conduct/>.
9. As part of our RBA Code of Conduct implementation, if you wish to submit a grievance or provide feedback regarding our operations or those of our suppliers, you may do so via <https://www.responsiblebusiness.org/grievance/>.



## Business Partner Acknowledgment

We have received the FOZ One Ethical and Environmental Code of Conduct, RBA code of conduct, and understand that compliance is a fundamental condition of our contractual relationship with FOZ One.

Full Legal Entity Name :  
Signature of the Company's Director :  
Name of Company Director :  
Date :