



EPSON BUSINESS PARTNER CODE OF CONDUCT

Epson is committed to conducting its business on the principles of integrity, safety and sustainability. Our principles depend not only on our employees but also upon our business partners, such as suppliers, distributors and agents who share our commitment to ethical business practices.

This Code articulates our own commitment and our expectations of our business partners. It also reflects our support for the Code of Conduct established by the Responsible Business Alliance (RBA), the basic principles of the United Nations Global Compact and the United Nations Sustainable Development Goals.

If any part of this Code is unclear, clarification should be sought from Epson. Non-compliance with this Code may lead to measures, including termination of the business relationship.

INTEGRITY

ANTI-CORRUPTION

We expect all our business partners to do business fairly, honestly and legally. **It is against the law to accept or give bribes or kickbacks in any business relationship for any reason.**

Epson business partners must not offer, give, promise or authorise any bribe, gift, loan, fee, reward or other advantage to any governmental officers or other public entities, or employee, any customer, any Epson employee or any other person to obtain any business or improperly influence any action or decision. Entering into a business transaction with or for Epson or accepting certain terms and conditions must not be influenced by gifts or entertainment.

Accepting or giving gifts or gratuities beyond common business courtesies of nominal value are not considered acceptable.

Epson business partners must comply with all applicable international anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

FAIR COMPETITION

Epson business partners must not (i) propose or enter into any agreement with any competitor to fix prices, margins, terms and conditions or to divide up any markets or customers, or (ii) propose or enter into any agreements or understanding restricting resale pricing or Epson products.

HONEST AND ACCURATE DEALINGS

There must not be any false misrepresentation in connection with any Epson transaction including but not limited to misrepresentation of fact or the promotion or utilization of false documentation such as non-genuine customer purchase orders, fraudulent or forged contracts, forged letters of destruction or any other false or inaccurate records.

FRAUD PREVENTION

Our partners must have internal controls designed to prevent, detect and respond to fraud and money laundering. Transactions must be properly recorded and subject to review. Any potential fraud that may have an impact on Epson must be reported to us immediately.

RESPONSIBLE SOURCING OF MATERIALS

Our business partners must exercise due diligence to ensure that the materials used in their products manufacturing or at any stage of their business process do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses such as forced labour and human trafficking.

CONFLICT OF INTEREST

Business partners must avoid any situation that may involve a conflict or the appearance of a conflict between their personal interests and the interests of Epson. Personal or friendly relationships with an Epson employee must not be used to influence the employee's business judgment. If an employee of business partner is related to an Epson employee, and this may represent a potential conflict of interest in a transaction or business relationship, our partners must disclose this fact to Epson.

Our partners do not provide financial or other support to political parties to influence transactions with or for Epson.

TRADE CONTROLS

It is essential that our business partners comply with export and import control regulations applicable to their business, and that they provide accurate and truthful information to the customs and other authorities when required. They identify and manage trade restrictions applicable to their business with Epson, including those of sanctioned countries and parties.

INTELLECTUAL PROPERTY

We expect our business partners to respect intellectual property rights, including those of Epson. Epson's intellectual property such as its trademarks, copyrights and logos may only be used in a manner permitted under their contract with Epson. Our business partners are not to misappropriate or infringe the intellectual property rights of others. Epson business partners must not misuse any trade secret or proprietary or confidential information of Epson or of others for their own purposes or disclose such information to unauthorised third parties. Epson must be notified if business partners become aware of any unauthorised use of Epson's brands, trademarks or logos by third party.

ADVERTISING AND MARKETING

In the course of marketing communication, there must not be false or misleading statements made. Epson sells its products and services based on their merits. There shall be



no exaggeration of product performance. Neither shall there be advertising that slanders others.

CONFIDENTIALITY

Our business partners must protect Epson's information, not disclose it to any unauthorised third party except when disclosure is authorised and legally mandated. There must be appropriate measures to prevent unauthorised access to Epson's confidential information made available to them.

SAFETY

PEOPLE SAFETY

Our business partners shall provide its employees and contractors with a safe and healthy workplace, and must control hazards and take necessary precautionary measures against accidents and occupational diseases.

Regular and adequate training must be provided to ensure that employees and contractors are educated on health and safety issues.

There is to be a system to detect, prevent and respond to potential risks to the safety of all employees.

PROCESS SAFETY

It is important that our business partners systematically assess and control the operational risks of hazards, injuries, waste or harm resulting from their activities for Epson, such as research, manufacture, warehousing and transport. Their employees must follow safety procedures. Safety risks and incidents must be reported and controlled promptly.

PRODUCT SAFETY

Our partners must comply with product safety regulations, label products properly and communicate product-handling requirements. People exposed to products manufactured for and supplied to Epson must be protected from exposure to hazardous substances. Products supplied to Epson and the raw materials used to manufacture these products, must meet all applicable product regulatory requirements.

SUSTAINABILITY

HUMAN RIGHTS

Our business partners recognise the human rights of all people as outlined in the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights. They take responsibility for avoiding infringement of human rights and for remediating the impact, if any, on human rights resulting from activities performed and products made for Epson.

EMPLOYMENT RELATIONSHIPS

Epson business partners' employees hired and retained should be suitable for the job. Our business partners are committed to apply principles of the International Labour

Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. People are not employed against their will, transported for exploitation, engaged in slavery or servitude, or deprived of their rights. Legal minimum age requirements as outlined in the relevant ILO conventions and the laws of the countries of operation are adhered to and children under the age of 16 are not employed.

The people our partners deal with are treated with dignity and respect. Our business partners do not harass or discriminate, whether through culture, nationality, race, religion, gender, political preference, disability, association, sexual orientation or age.

Working hours and remuneration must comply with laws while being fair and just. Overtime is compensated and leave is offered as required. Individual rights to freedom of opinion and association, including the right to collective bargaining, are respected.

ENVIRONMENTAL PROTECTION

Our business partners shall take a precautionary approach towards environmental challenges, undertake initiatives to promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies.

The waste produced by all the activities undertaken by our business partners shall be identified, monitored and managed. Our partners shall strive to reduce the waste, and waste treatment shall be in accordance with applicable environmental laws.

SUBCONTRACTORS COMPLIANCE

Any party our partners engage on behalf of Epson or to perform work for the benefit of Epson will be made aware of the principles in this Code and will be held to act in accordance with them.

GRIEVANCE

Epson expects each of its business partners to develop its own processes by which their employees can submit concerns regarding unethical or illegal conduct. These processes should be publicised to employees who must feel free to submit such complaints without fear of retaliation. These concerns will be addressed in a fair and transparent way. Our partners protect confidentiality and prohibit retaliation against those raising the concern.

Business partners that become aware of a violation of applicable laws of this Code in relation to their business with Epson must report the matter promptly to Epson through Epson Speak UP! Platform at www.EpsonSpeakUP.ethicspoint.com.