

Sanken Group Human Rights Policy

Sanken Electric Co., Ltd. and its consolidated subsidiary (*1) (hereinafter referred to as "Sanken Group"), to clarify its approach to respecting human rights based on the management philosophy of "We respect each and every employee and treat all employees fairly. We also strive to help our employees grow as trusted individuals and business people.", established this human rights policy (hereinafter referred to as "this policy") as the highest guideline for its efforts, by incorporating the opinions of external experts, resolving at the Management Committee, which is the highest decision-making body for business execution, and reporting to the Board of Directors.

Scope of human rights policy

This policy applies to all officers and employees working for Sanken Group. We also expect all business partners, including the suppliers of Sanken Group, to understand and support the content of this policy, and we will continue to work to ensure that this policy is respected.

Commitment to respect for human rights

Sanken Group adheres to not only "the UN Guiding Principles on Business and Human Rights" as well as "the International Bill of Human Rights" and International Labor Organization's (ILO's) "Declaration on Fundamental Principles and Rights at Work" referenced therein but also other international norms and principles related to human rights including "the Children's Rights and Business Principles", and is committed to respecting human rights.

Human rights that Sanken Group considers important

Sanken Group considers the following human rights to be of particular importance at the time of formulating this policy.

- 1) Freely Chosen Employment
- 2) Prohibition of Child Labor and Protection of Young Workers (*2)
- 3) Proper Working Hours
- 4) Proper Wages and Benefits (*3)
- 5) Humane Treatment
- 6) Non-Discrimination/Non-Harassment
- 7) Freedom of Association (*4)
- 8) Occupational Health and Safety
- 9) Protection of Personal Information and Privacy

The above human rights items are not exhaustive and will be updated as appropriate based on the results of the human rights impact assessment process of human rights due diligence that is continuously implemented based on this policy.

Remediation

If Sanken Group's business activities, products, or services have adverse impacts on the human rights of customers, local communities, or other stakeholders, we will provide remedy through

appropriate procedures. In addition, if Sanken Group's business partners, including its suppliers, adversely impact the human rights of stakeholders in connection with Sanken Group's business activities, products, or services, Sanken Group will strive to provide a remedy by exercising its influence over its business partners.

Compliance with applicable laws and regulations

Sanken Group complies with all applicable laws and regulations in the countries and regions in which it operates. In cases where the laws and regulations of the country or region in question differ or contradict internationally recognized human rights principles, we will seek ways to honor internationally recognized human rights principles.

Governance

To fulfill its responsibility to respect human rights, Sanken Group will establish an internal system to steadily implement human rights due diligence initiatives based on this policy. We will also ensure that this policy is appropriately embedded into our business activities.

Human rights due diligence

Sanken Group will establish a human rights due diligence process adhering to the UN Guiding Principles on Business and Human Rights. First, we will identify, assess, prevent and mitigate any adverse human rights impacts that may arise in its value chain as a result of its business decisions and operations. Next, we will continuously track and evaluate the effectiveness of our response to prevent and mitigate such adverse impacts on human rights. We will disclose information on these initiatives on time through our website and other means.

In the above human rights due diligence, we will comply with the above-mentioned international norms and principles on human rights, as well as with the Code of Conduct and various standards and procedures established by Responsible Business Alliance (RBA), which are the international CSR standards for the supply chain of electronic components.

In situations involving stakeholders over whom Sanken Group cannot control decision-making, we will strive to continuously exercise our influence to ensure that this policy is respected and that it is not complicit in human rights abuses.

Grievance mechanism

Sanken Group will establish internal and external reporting channels available to relevant stakeholders for early detection and resolution of concerns, including adverse human rights impacts. In addition to ensuring the anonymity of whistleblowers and the confidentiality of the content of their reports, we will prohibit any disadvantageous treatment and retaliatory measures against whistleblowers, and will thoroughly protect them.

Stakeholder engagement

Sanken Group recognizes the importance of addressing adverse impacts on human rights from the

perspective of the affected people or groups. To this end, we will strive to engage in dialogue and consultation with those stakeholders. We will also consult the opinions of external experts.

Dissemination/education

Sanken Group will provide appropriate education and training to all officers and employees to ensure that this policy permeates throughout the company. At the same time, we will share this policy with our suppliers and business partners to ensure their understanding and penetration.

Human rights policy formulation process and review

Sanken Group will review this policy as appropriate based on social trends, changes in the business environment, and discussions and dialogues with stakeholders, and will strive to enhance our efforts to respect human rights.

Sanken Electric Co., Ltd.

Hiroshi Takahashi

Representative Director, President

November 1, 2022

***1: Excluding Allegro Group and Polar Semiconductor LLC**

Allegro Group and Polar Semiconductor LLC are excluded because they are managed as U.S. companies.

***2: Prohibition of Child Labor and Protection of Young Workers**

Any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country or region, whichever is greatest.

***3: Proper Wages and Benefits**

Following the Universal Declaration of Human Rights and international human rights treaties, we will properly set wages for workers in line with the principle of equal remuneration for the work of equal value.

***4: Freedom of Association**

Respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to participate in peaceful assembly, in accordance with local law.