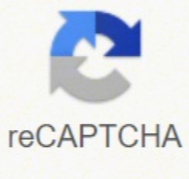




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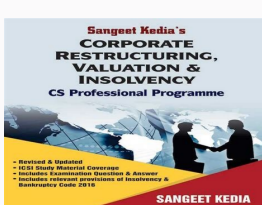


D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Participants and their agents are to uphold the highest standards of ethics including:

- 1) Business Integrity**
The highest standards of integrity are to be upheld in all business interactions. Participants shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Participant's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.
- 2) No Improper Advantage**
Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.
- 3) Disclosure of Information**
Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- 4) Intellectual Property**
Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and, customer information is to be safeguarded.
- 5) Fair Business, Advertising and Competition**
Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.
- 6) Protection of Identity and Non-Retaliation**
Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers* are to be maintained, unless prohibited by law. Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

* Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.



GREENBURY REPORT

- Established 3 years after the publication of the Cadbury Report
- Purpose : to consider questions relating to Directors' remuneration and emoluments.
- require PLCs to establish a Remuneration Committee
- consist exclusively of Non-Executive Directors.
- determines company's policy on ED's remuneration packages
- Chairman of the RC is required to attend AGM to answer questions about Director's remuneration.
- Every PLC must state in its annual report whether it has complied with this code and if it has not, to explain and justify its non-compliance.

Eicc code of conduct rba. Eicc code of conduct working hours. Rba (formerly eicc) code of conduct. Eicc code of conduct 2020. Eicc electronic industry code of conduct. Eicc code of conduct latest version. Eicc code of conduct 2019.

Reduction of Energy Consumption IBM Auditing and Verification GRI 302-5 Reductions in energy requirements of sold products and services achieved during the reporting period, in joules or multiples. Subsequently, IBM eliminated Class II ozone-depleting substances from our products and processes in 1995. Some examples of IBM's commitment to elimination of emissions of concern over time is provided in the latest annual IBM and the Environment Report in the section on Materials research and process stewardship. Energy Indirect (Scope 2) GHG Emissions IBM Verification Statement for 2015 GHG Emissions (129KB) IBM Environmental Reporting GRI 305-3 Gross other indirect (Scope 3) GHG emissions in metric tons of CO2 equivalent. IBM's worldwide EMS helps identify and effectively manage the potential environmental impact of IBM's operations. GRI 305-7 Significant air emissions, in kilograms or multiples for Nitrogen Oxides (NOx), Sulfur Oxides (SOx), and other significant air emissions. Workers Representation in Formal Joint Management-Worker Health and Safety Committees IBM Safety Committees (PDF, 59KB) GRI 403-2 Types of injury, injury rate (IR), occupational disease rate (ODR), lost day rate (LDR), absentee rate (AR), and work-related fatalities, for all employees and other non-employee workers whose work, or workplace, is controlled by the organization. IBM's Worldwide Environmental Management System IBM's Wildlife Habitat Council sites. Markets Served 2017 Corporate Responsibility Report 2017 Annual Report (5.9MB) 2017 Annual 10K (133KB) GRI 102-7 Scale of reporting organization: Scale of the Organization 2017 Annual 10K (133KB) 2017 Annual Report (5.9MB) GRI 102-8 Information on employees and other workers. (xMB) GRI 417-1 Type of product and service information required by the organization's procedures for product and service information and labeling, and percentage of significant product and service categories subject to such information requirements. From 2000 to 2015, IBM's water conservation efforts avoided the accumulated use of 21.3 million cubic meters of water in those operations. Water withdrawals equivalent to 5.4% of total withdrawals were avoided by on-site water reuse for manufacturing processes (reuse of rejected water from deionized water purification systems) and wastewater recycling activities (mainly used in building cooling tower systems and landscape irrigation). Water sources for these locations consisted primarily of municipal water supplies (67 percent), fresh surface waters (24 percent), and groundwater (4 percent). IBM Environmental Reports Not Applicable Class I and II ozone-depleting substances IBM completed the phase-out of Class I ozone-depleting substances in 1993. We did this by using the World Business Council for Sustainable Development's Global Water Tool, which highlighted places around the globe with highly stressed, or extremely highly stressed, water resources. GRI 403: Occupational Health and Safety 2016 Information Links Page(s) Omissions GRI 103-1, GRI 103-2, GRI 103-3 Explanation of Occupational Health and Safety as a material topic and its Boundary, the management approach and its components, and the evaluation of the management approach. Any significant unplanned releases to water are publicly disclosed in the annual IBM and the Environment report under "Audits and Compliance", "Accidental Releases" section at locations that report their waste water discharges into IBM's Environmental Performance Database (EPD) are included under the global EMS and are part of the ISO14001 accreditation, so the management of water discharges are included in the third party auditing process periodically. Incidents of Non-Compliance Concerning Marketing Communications Unavailable IBM does not maintain a record of incidents of non-compliance with regulations and voluntary codes concerning marketing communications. These sites are: Armonk, New York (IBM's Corporate Headquarters) - 7 acres Boulder, Colorado - 12 acres Research Triangle Park, North Carolina - 426 acres San Jose, California (IBM's Almaden Research Center) - 630 acres San Jose, California (IBM's Silicon Valley Laboratory) - 207 acres GRI 304-4 Total number of IUCN Red List species and national conservation list species with habitats in areas affected by the operations of the organization, by level of extinction risk. Without an effective mechanism for company-to-company comparison and reporting there is a high likelihood responses could be misinterpreted or misrepresented. While IBM tracks and measures water discharges and implement management programs were applicable, including for those wastewater discharges from IBM locations holding regulatory discharge permits worldwide, IBM does not publicly disclose water discharge data. IBM tracks and manages water discharges to maintain compliance with the requirements in site specific regulatory discharge permits and/or IBM's own reporting requirements. GRI 305-6 Production, imports, and exports of ODS in metric tons of CFC-11 (trichlorofluoromethane) equivalent, Nitrogen Oxides (NOx), Sulfur Oxides (SOx), and Other Significant Air Emissions GRI 306: Effluents and Waste 2016 Information Links Page(s) Omissions GRI 103-1, GRI 103-2, GRI 103-3 Explanation of Effluents and Waste as a material topic and its Boundary, the management approach and its components, and the evaluation of the management approach. IBM's global EMS also conforms to the ISO 50001 standard on energy management systems. Waste by Type and Disposal Method IBM Environmental Reporting GRI 306-3 Total number and total volume of recorded significant spills. GRI 306-1 Total volume of planned and unplanned water discharges. You may view the full GRI report in PDF form (1.2MB) for printing or review purposes, with links provided to supporting references where applicable. Then, in early 2016, IBM established a new goal to achieve ongoing year-to-year reductions in water withdrawals at these locations. Information on Employees and Other Workers GRI 102-9 Description of the organization's supply chain. These five sites are: Armonk, New York (IBM's Corporate Headquarters) Boulder, Colorado Research Triangle Park, North Carolina San Jose, California (IBM's Almaden Research Center) San Jose, California (IBM's Silicon Valley Laboratory) GRI 304-2 Nature of the organization's significant direct and indirect impacts of activities, products, and services on biodiversity. IBM locations also must report unplanned releases meeting IBM's own incident reporting criteria to management as well as in a corporate database. Energy Consumption Outside of the Organization GRI 302-3 Energy intensity ratio for the organization. Substantiated Complaints Concerning Breaches of Customer Privacy and Losses of Customer Data Not Applicable At this time there do not exist common standards for defining, tracking and reporting customer data disclosure incidents across industries, and in particular for companies that have other businesses as their customers. IBM's remaining water use is primarily associated with cooling at our large facilities and data centers, and with irrigation and domestic water uses at facilities occupied by IBM. All industrial and sanitary waste water treatment plants located on IBM property and/or operated by IBM and processing industrial or sanitary waste water must adhere to these IBM corporate requirements. In addition to routine monitoring discussed above, IBM locations report any significant unplanned releases to water to regulatory agency as required. Membership of Associations 2017 Corporate Responsibility Report Governance Information Links Page(s) Omissions GRI 102-18 Governance structure of the organization, including committees of the highest governance body and committees responsible for the decision-making on economic, environmental, and social topics. Water Withdrawal by Source IBM Environmental Reports CDP Disclosure GRI 303-2 Total number of water sources significantly affected by withdrawal by type. Wildlife Habitat Council Certification Program Index Not Applicable IBM's operations worldwide are not located in areas of significant biodiversity and they have no significant impact on biodiversity or on endangered species. IBM's corporate policy on environmental affairs, first formalized in 1971, is supported by the company's global environmental management system (EMS), which is the key element of the company's efforts to achieve results consistent with environmental leadership and ensures the company is vigilant in protecting the environment across all of its operations worldwide. This 2018 GRI report, based on the GRI Standards guidelines, supplements the IBM 2017 Corporate Responsibility Report. The main uses of water at these locations are for domestic purposes (45 percent), heating, ventilation and air conditioning (HVAC) systems (31 percent), landscape irrigation (19.5 percent), and manufacturing processes (4.5 percent). IBM Engineering Specification 46G3772: Baseline Environment... RBA Code of Conduct V6.0(PDF, 709KB) RBA Validated Assessment Process (VAP) Unavailable We do not undertake specific human rights reviews or impact assessments. Reductions in Energy Requirements of Products and Services 2017 Project level savings (DOC, 32KB) GRI 303: Water 2016 Information Links Page(s) Omissions GRI 103-1, GRI 103-2, GRI 103-3 Explanation of Water as a material topic and its Boundary, the management approach and its components, and the evaluation of the management approach. Management Approach: Water 2017 Annual Environment Report (5.6MB) GRI 303-1 Total volume of water withdrawn broken down by source. We achieved a corporate-level registration to the ISO 50001 standard in 2012. While biodiversity has not been identified as a corporate-wide significant environmental aspect, we do have five locations currently that have their wildlife habitat management and conservation education program certified by the Wildlife Habitat Council. Significant Investment Agreements and Contracts That Include Human Rights Clauses or That Underwrite Human Rights Screening Global Employment Standards GRI 415: Public Policy 2016 Information Links Page(s) Omissions GRI 103-1, GRI 103-2, GRI 103-3 Explanation of Public Policy as a material topic and its Boundary, the management approach and its components, and the evaluation of the management approach. GRI 302: Energy 2016 Information Links Page(s) Omissions GRI 103-1, GRI 103-2, GRI 103-3 Explanation of Energy as a material topic and its Boundary, the management approach and its components, and the evaluation of the management approach. IBM is a public New York State Corporation. External Initiatives EICC Code of Conduct V5 (PDF, 385KB) RBA Code of Conduct V6.0(PDF, 709KB) IBM Environmental Reporting EICC Code of Conduct Voluntary Environmental Initiatives GRI 102-13 Memberships of industry or other associations, and national or international advocacy organizations. Location of Operations 2017 10-K Exhibit 21 - Subsidiaries GRI 102-5 Nature of ownership and legal form. No Information Available Not Applicable None of the water discharges from IBM locations significantly affect water bodies or related habitats. Water discharges is identified as a corporate-wide significant environmental aspect of IBM's Worldwide Environmental Management System. Management Approach: Customer Privacy 2017 Corporate Responsibility Report 2017 Annual 10K (133KB) GRI 418-1 Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data. Workers with High Incidence or High Risk of Diseases Related to their Occupation GRI 403-4 Whether formal agreements (either local or global) with trade unions cover health and safety. See References below. Energy Intensity GRI 302-4 Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples. No Information Available Not Applicable IBM has not identified biodiversity as a corporate-wide significant environmental aspect since the company's operational activities, products and services do not have a significant impact on biodiversity. IBM's corporate policy on environmental affairs, first formalized in 1971, is supported by the company's global environmental management system (EMS), which is the key element of the company's efforts to achieve results consistent with environmental leadership and ensures the company is vigilant in protecting the environment across all of its operations worldwide. GRI 412-2 Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained. With the divestiture of IBM's semiconductor manufacturing operations in July 2015, our direct water use was reduced substantially. Habitats Protected Or Restored Wildlife Habitat Council Certification Program Index IBM's Wildlife Habitat Council sites. Water Recycled and Reused IBM Environmental Reports GRI 304: Biodiversity

2016 Information Links Page(s) Omissions GRI 103-1, GRI 103-2, GRI 103-3 Explanation of Anti-competitive Behavior as a material topic and its Boundary, the management approach and its components, and the evaluation of the management approach. Governance Structure 2018 Proxy Statement URL (2.3MB) GRI 206: Anti-Competitive Behavior 2016 Information Links Page(s) Omissions GRI 103-1, GRI 103-2, GRI 103-3 Explanation of Anti-competitive Behavior as a material topic and its Boundary, the management approach and its components, and the evaluation of the management approach. In 1997, IBM became the first major multinational company to earn a single global registration to the International Organization for Standardization (ISO) 14001 environmental management systems (EMS) standard. Then, in early 2016, IBM established a new goal to achieve ongoing year-to-year reductions in water withdrawals at these locations, even though many of these locations had already undertaken projects to reduce water consumption.In 2017, IBM reduced water withdrawals at these locations in water-stressed regions by 2.9 percent versus 2016. GRI 304-3 Size and location of all habitat areas protected or restored, and whether the success of the restoration measure was or is approved by independent external professionals. IBM Environmental Reports Not Applicable IBM has not identified water sources that are known to be significantly affected from our tracked locations in water stressed regions worldwide. Nevertheless, IBM continues to promote wildlife habitat conservation and management through its membership and participation in the Wildlife Habitat Council (WHC). Employee Training on Human Rights Policies or Procedures Unavailable See additional comments below GRI 412-3 Total number and percentage of significant investment agreements and contracts that include human rights clauses or that have undergone human rights screening. Activities, Brands, Products, and Services 2017 Annual 10K (133KB) GRI 102-3 Location of the organization's headquarters. GRI 102-4 Number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the topics covered in the report. Management Approach: Occupational Health and Safety IBM OHSAS 18001 Global Certification (PDF, 1.1MB) Corporate Policy - Employee Well Being GRI 403-1 Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs. (xxMB) Global Asset Recovery Services and product end-of-life manag... GRI 102-12 List of externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses. Management Approach: Human Rights Assessment RBA Code of Conduct V6 (PDF, 709KB) RBA Validated Assessment Process (VAP) GRI 412-1 Total number and percentage of operations that have been subject to human rights reviews or impact assessments. IBM's corporate program establishes treatment requirements applicable to IBM locations where they discharge directly to receiving waters, where it is not feasible to discharge to an offsite private or publicly owned waste water treatment plant. Incidents of Non-Compliance Concerning Product and Service Information and Labeling GRI 417-3 Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotions, and sponsorship, by type of outcomes. Organizational Profile Information Links Page(s) Omissions GRI 102-1 Name of the organization. See the below website reference. Significant Changes to the Organization and its Supply Chain GRI 102-11 Whether and how the organization applies the Precautionary Principle or approach. The programs at five IBM facilities have been certified by the Wildlife Habitat Council. GRI 102-6 Markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries). Nevertheless, we have established wildlife habitat programs to further enhance habitat at a number of our locations, including corporate headquarters in Armonk, NY. IBM's corporate offices are located in Armonk, New York, USA. No Information Available Not Applicable Public policy is not identified as material to IBM GRI 415-1 Total value of political contributions by country and recipient/beneficiary. GRI 305: Emissions 2016 Information Links Page(s) Omissions GRI 103-1, GRI 103-2, GRI 103-3 Explanation of Emissions as a material topic and its Boundary, the management approach and its components, and the evaluation of the management approach. We have sustained this ISO 14001 certification for 20 years, and in 2017, we completed an update to our global EMS to successfully transition our certification to the 2015 edition of the standard. But we do have frequent employee and labour relations/rights risk assessments of our own operations in various countries across the world as well as thorough audits of compliance of our policies, including human resources, with applicable legislation and corporate policies and instructions. Management Approach: Energy IBM's ISO 14001 & ISO 50001 Registrations IBM's Worldwide Environmental Management System GRI 302-1 Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used. Management Approach: Marketing and Labeling Global Asset Recovery Services and product end-of-life manag... These sources accounted for 95 percent of total water use at these IBM locations, while the remaining 5 percent came from bottled water, on-site process water and treated wastewater. This reduction was primarily associated with planned building infrastructure maintenance programs and use-efficiency enhancements to deionized water purification systems. Management Approach: Biodiversity GRI 304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas. GRI 417-2 Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes. Supply Chain 2017 Corporate Responsibility Report GRI 102-10 Significant changes during the reporting period to the organization's size, structure, ownership, or its supply chain. Requirements for Product and Service Information and Labeling IBM Engineering Specification 46G3772: Baseline Environmenta...

The EICC is committed to obtaining regular input from stakeholders in the continued development and implementation of the Code of Conduct. The Code is made up of five sections. Sections A, B, and C outline standards for Labour, Health and Safety, and the Environment, respectively. Lenovo works with the electronics industry on supply chain issues through our Responsible Business Alliance (RBA) (formerly the Electronics Industry Citizenship Coalition (EICC)) membership. Lenovo contractually applies the RBA Code of... 29/12/2021 Finland and Sweden both pursued a policy of neutrality throughout the Cold War and neither country has ever formally applied to join Nato. However, Sweden, which increased its defence budget after Russia annexed Crimea from Ukraine in 2014, introduced legislation last year that would allow it to join Nato in the future if it decided it was in its interests. 01/01/2021 The RBA Code of Conduct is a set of social, environmental and ethical industry standards. The standards set out in the Code of Conduct reference international norms and standards including the Universal Declaration of Human Rights, ILO International Labor Standards, OECD Guidelines for Multinational Enterprises, ISO and SA standards, and many more. 15/12/2021 The Responsible Business Alliance (RBA) is the world's largest industry coalition dedicated to corporate social responsibility in global supply chains. 19/10/2017 当初は、EICCは、自身が制定した「Electronics Industry Code of Conduct（電子業界行動規範）」の略だったが、活動が拡大するに伴い、「Electronic Industry Citizenship Coalition」に改称。以降、EICCの行動規範は「EICC行動規範」と呼ばれている。 The EICC is committed to obtaining regular input from stakeholders in the continued development and implementation of the Code of Conduct. The Code is made up of five sections. Sections A, B, and C outline standards for Labour, Health and Safety, and the Environment, respectively. Eastern Iowa Community Colleges includes Clinton, Muscatine and Scott Community Colleges. EICC strives to deliver high-quality education and training that prepares a skilled workforce, provides affordable access to higher education, and builds and strengthens our communities. The Conflict Minerals Reporting Template (CMRT) is a free, standardized reporting template developed by the Responsible Minerals Initiative (RMI) that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized. The template also《电子行业行为准则》（Electronic Industry Code of Conduct，EICC）列出了各种标准，以确保电子行业供应链的工作环境安全，工人受到尊重并富有尊严，以及生产流程对环境负责。 CSRの国際基準として期待されるRBA(EICC)とは何か vol.2. EICC（電子業界行動規範： Electric Industry Code of Conduct）(RBA)は、電子機器業界のサプライチェーンにおいて、労働環境が安全であること、そして労働者の敬意と尊厳を持って扱われること、さらに製造プロセスが環境負荷に対して責任を持って... In addition to RBA members, thousands of companies that are Tier 1 suppliers to those members are required to implement the RBA Code of Conduct. More than 3.5 million people from over 120 countries contribute to the manufacture of RBA members' products. Learn about member benefits and requirements 22/12/2021 The World Health Organisation has warned that "no country can boost its way out" of the Covid-19 pandemic.. The rush for wealthy countries to ... Eastern Iowa Community Colleges includes Clinton, Muscatine and Scott Community Colleges. EICC strives to deliver high-quality education and training that prepares a skilled workforce, provides affordable access to higher education, and builds and strengthens our communities.