



Topcon Supplier Code of Conduct

Chapter 1: Labor and Human Rights

Topcon's Suppliers shall:

1.1 Child Labor:

- not employ workers under the age of 14 unless local laws provide the lower minimum age.
- ensure that young workers under the age of 18 not engage in work likely to jeopardize their health, safety or morals.
- ensure all documentation for workers under the age of 18 is secure, accurate and complete.

1.2 Forced Labor:

- not use involuntary labor, whether in the form of prison, indentured or bonded labor.

1.3 Harassment:

- prohibit unlawful discrimination / harassment based on race, color, religion, sex, sexual orientation, gender identity, national origin, cultural background, age, disability, veteran status or other status protected by applicable law.
- prohibit retaliation against employees who report concerns in good faith.
- not subject employees to corporal punishment or use monetary fines as a disciplinary practice.
- provide equal opportunity in employment and business.

1.4 Working Hours:

- ensure that employees' working hours do not exceed the limit on regular and overtime hours provided by applicable laws.

1.5 Wages and Benefits:

- provide employees with wages and benefits that comply with applicable laws inclusive of regular and overtime wages.

Chapter 2: Health and Safety / Environment

Topcon's Suppliers shall:

2.2 Health and Safety:

- maintain a healthy and secure workplace and promote safe working practices.
- be familiar with and comply with all health and safety laws, rules and policies.
- take steps to avoid the existence of hazardous conditions and limit the potential for accidents to occur.
- always put safety first.

2.3 Environment:

- promote environmental protection and conservation of natural resources to minimize the impact of our products and operations on the environment.
- comply with all relevant environmental laws, rules and regulations.

Chapter 3: Gifts, Entertainment, Bribery and Improper Payments

Topcon's Suppliers shall:

3.1 Gifts and Entertainment:

- not provide gifts or entertainment that would compromise or appear to compromise a person's ability to make objective and fair business decisions.
- not provide gifts or entertainment to Topcon employees if it would be viewed as an inducement or reward for a particular business decision.
- never give cash gifts to a Topcon employee under any circumstances.

3.2 Deals with Government:

- comply with all laws regarding gifts, loans, entertainment and transfers of value to government officials.
- comply with the Foreign Corrupt Practices Act and any local laws when acting on behalf of Topcon.

3.3 Bribery:

- not make any monetary payments or provide any benefit or gift with the purpose of influencing a business decision or outcome.
- ensure that any gifts and entertainment are not construed as bribes, kickbacks or other improper payments.
- avoid even the appearance of impropriety relating to the giving of gifts, entertainment or other transfer of value.

Chapter 4: Confidentiality / Intellectual Property / Compliance

4.1 Confidentiality and Intellectual Property

Intellectual Property, is among the most valuable of Topcon's assets. Intellectual Property includes Topcon's trade secrets and confidential information. Other intellectual property includes Topcon's trademarks, copyrights and patents.

Topcon's Suppliers shall:

- protect Topcon's confidential information from unauthorized disclosure and inappropriate use.
- never use Topcon's confidential information or trade secrets except for the business purpose authorized by Topcon.
- comply with all obligations under any non-disclosure agreement with Topcon.
- never disclose Topcon's Confidential Information to any third party without written consent from Topcon.
- not use Topcon's trademarks or copyrighted materials unless authorized by Topcon.

4.2 Compliance

Topcon's Supplier shall:

- comply with all applicable laws and regulations while acting on behalf of Topcon, including all export control, anti-competition and anti-boycott laws.

Chapter 5: Audits / Reporting Concerns

5.1 Audits

To ensure compliance, Topcon may audit a supplier's facility with or without advance notice. Topcon's supplier shall maintain all necessary documentation to demonstrate compliance with this Code and shall make them available to Topcon, at its request.

5.2 Reporting Concerns

If a supplier becomes aware of conduct that may violate this Code, the supplier must report it to Topcon. The reports may be done confidentially and anonymously through Topcon's hotline described below:

- Log onto the following site: <https://secure.ethicspoint.com/domain/media/en/gui/36162/index.html>
Select the "Make a Report" link at the top of this webpage.
-or-
- Dial toll-free, within the United States, Guam, Puerto Rico and Canada: 855-271-2820.

After you complete your report, you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place.

Topcon will investigate all reported concerns and take action appropriate to address violations. The Hotline are available for your use 24 hours a day, 7 days a week. It is operated by an independent organization and any calls or online reports can be completely confidential and anonymous, should you choose that option.

Our Vision Statement

We exist to improve productivity and workflow to meet global demand for sustainable agriculture and infrastructure.