

Supplier Code of Conduct







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1. OBJECTIVE

This manual aims to inform Hana Micron Brazil's suppliers about the general requirements, expectations, and guidelines, establishing the minimum criteria for adequate supply, compliance with ESG practices, and maintenance of their Management System. Hana Micron Brazil hereby reinforces its commitment to adopting the Responsible Business Alliance (RBA) Code of Conduct, as well as applicable national, state, and municipal laws in various areas – labor, environmental, occupational safety and health. It expects all its suppliers to act with integrity, ethics, and respect the principles established in this manual.

This Manual is not intended to create new rights or additional benefits for third parties. If there is any conflict with local laws and regulations, the strictest requirements will prevail.

2. RELATED AREAS

All processes and suppliers of HT Micron, Hana Electronics, and Hana Latin. America.

3. GLOSSARY

- RBA (Responsible Business Alliance): A large industry coalition that promotes responsible business conduct in global supply chains, focusing on labor practices, the environment, and human rights.
- **3TG:** Term used to refer to tin, tungsten, tantalum, and gold, which can be used to finance conflicts and human rights violations. Laws require companies to trace the origin of these minerals to ensure they are not financing conflicts.
- **CofC (Certificate of Compliance):** A certificate or report issued by the supplier referencing one or more batches manufactured to fulfill a specific purchase order.
- **PPE:** Personal Protective Equipment.
- SDS (Safety Data Sheet): This is a document standardized by the Brazilian Association of Technical Standards. This document contains general information about the... material, anticipating In cases of ingestion or other poisoning of humans, accidents, leaks, transport, handling, composition, among other specific circumstances.
- FMEA (Failure Mode and Effects Analysis): A group of systematic activities aimed
 at identifying and evaluating potential product failures, their causes and effects,
 identifying actions that can eliminate or reduce the chance of these potential failures
 occurring, and documenting the process.
- **HSMS** (Hazardous Substances Management System): System for the Management of Hazardous Substances.
- QFD (Quality Function Deployment): A method that helps transform customer needs into engineering characteristics for a product or service.



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- SCAR (Supplier Corrective Action Report): A formal complaint regarding a problem related to the products supplied.
- SCS (Supplier Capability Survey): Self-assessment questionnaire completed by the supplier. Basis for conducting audits.
- RoHS (Restriction of Health and Safety of use of Hazardous Substances):
 European directive dealing with the prohibition of the use of certain harmful substances (Cd, Pb, Hg, Cr+6, PBB/PBDE) in electronic and electrical products.
- **REACH (Registration, Evaluation, Authorization and Restriction of Chemicals):** This is a regulation approved by the European Parliament and the Council of the European Community, relating to the registration, evaluation, authorisation and restriction of chemicals.
- **ESG:** The acronym stands for Environmental, Social, and Governance. It is a set of best practices that aims to define whether a company is socially conscious, sustainable, and properly managed .

4. SUPPLIER MANAGEMENT

4.1. Company Presentation

Founded in 2009, Hana Micron Brazil is a group of Brazilian companies dedicated to providing local solutions in semiconductors and electronic components. A result of technological cooperation between Brazil and South Korea, its headquarters are located in the cities of São Leopoldo-RS (HT Micron and Hana Latin). Hana Micron Brazil, based in America and Manaus-AM (Hana Electronics), operates in the electronic components and semiconductor market, offering a wide range of innovative products to various segments of the Brazilian electronics industry. Hana Micron Brazil has been recognized as one of the leading companies in the semiconductor manufacturing segment, acting as a partner and service provider for semiconductor encapsulation and testing for the main industries in this sector.

4.1.1. Integrated Management Policy

The integrated management policy is available on the group companies' websites, through the following links:

https://htmicron.com.br/gestao-da-qualidade/

https://hanaelectronics.com.br/gestao-da-qualidade/

https://Hanalatinamerica.com.br/gestao-da-qualidade/



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4.2. Scope of the Manual

Hana Micron Brazil is committed to preserving the human rights of its employees, establishing a relationship based on dignity and respect, whether with employees, outsourced workers, migrants, students, freelancers, direct employees, or any other type of worker. The commitment to maintaining integrity in all business interactions is a company principle. Based on this, Hana Micron Brazil establishes the Supplier Code of Conduct, applicable to suppliers of raw materials, consumption materials, and services. Adherence to this code supports this strategy, which aims to qualify the supply base and continuously measure supplier performance. It is important to emphasize that this code was also prepared to meet specific requirements applicable to the electronics industry.

The requirements set in this code are based on the RBA (Responsible Business Alliance) Code of Conduct and our commitment to ESG practices.

The RBA code of conduct is available at:

https://www.responsiblebusi n ess.org/code-of-conduct/

Depending on the item provided, the supplier may be exempt from one or more requirements contained in this document. This exemption, if applicable, will only be valid upon approval by Hana Micron Brazil .

4.3. Supplier Responsibilities

Suppliers must meet all legal requirements applicable to the service or product provided to Hana Micron Brazil , operate in accordance with the regulations of the locations where they operate, and follow the following items of the Code:

- Ethics
- Environmental Protection
- Technology Security
- Occupational Health and Safety
- Labor and Human Rights
- Management of Hazardous Substances
- Conflict-ridden mineral policy
- To meet and maintain qualification requirements, including quality controls, financial controls, material controls, process and product controls, document and record control, punctuality, compliance with established rules, and satisfactory technical performance of all products or services to be provided
- Maintain a proper Management System and knowledge of all policies and procedures governing the relationship between the supplier and Hana Micron Brazil

Note: It is the supplier's responsibility to extend compliance with these requirements to sub-suppliers.



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4.3.1. Ethics

The highest standards of integrity must be maintained during business interactions. These standards include:

- A zero-tolerance policy for all forms of bribery, corruption, extortion, and fraud, with transactions being transparently executed. No bribes of any kind or other means of influencing actions or omissions, or obtaining undue or improper advantages, are permitted. This prohibition includes promising, offering, authorizing, giving, or accepting any value, directly or indirectly through a third party, with the aim of initiating or maintaining a business, directing business to any person, or otherwise gaining an undue advantage.
- Treating falsified records and misrepresentation of supply chain conditions or practices in an unacceptable manner.
- Ensure that these requirements are also met by any third parties they contract to provide services to or on behalf of Hana Micron Brazil. Suppliers must have a clear and transparent communication process with their collaborators, free from retaliation.
- To voluntarily declare any situation that constitutes a conflict of interest.

4.3.2. Environmental Protection

Suppliers must ensure environmental protection and sustainable development, strictly observing current legislation and adopting measures such as:

- Maintain compliance with applicable legal requirements and fulfill the obligations of the current operating license.
- To ensure the proper management and correct final disposal of solid, liquid, and gaseous waste, in order to prevent soil, water, and air contamination.
- To monitor pollutant emissions and implement actions to reduce them, in accordance with the limits established by applicable environmental regulations.
- To promote the rational use of natural resources, adopting practices that minimize waste, encourage recycling and reuse of materials, and prioritize renewable energy sources and the reduction of greenhouse gases.
- Conduct periodic assessments of the environmental impacts resulting from the activities, identifying risks and implementing corrective and preventive measures whenever necessary.
- To provide regular training to employees on good environmental practices, proper waste management, and procedures for preventing environmental accidents.
- Maintain all mandatory environmental documentation up to date and ensure that the competent authorities have access to information regarding the environmental performance of operations.
- Immediately notify the competent authorities and the other party of any serious environmental accident or situation that represents an imminent risk to the environment, taking appropriate measures to contain and mitigate the damage.



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4.3.3. Technology Security

Hana Micron Brazil values information security and expects its partners to comply with and respect the following guidelines:

- To guarantee the confidentiality, integrity, and availability of information belonging to Hana Micron Brazil, its clients, suppliers, and partners.
- To ensure the safe disposal of information and information technology equipment.
- To register, monitor, investigate, address, and report information security incidents, ensuring that the necessary protection mechanisms are implemented and maintained to prevent future occurrences.
- To protect sensitive information being processed.
- To protect business processes against significant failures and/or disasters that could compromise information security and business continuity.
- Meeting the requirements of the LGPD General Law for the Protection of Personal Data.
- Ensure that all information is handled correctly according to its classification, as per the table below.

Classification	Description
Public	Information that does not require confidentiality. If it becomes public, it will not impact Hana Micron Brazil 's business.
For internal	Internal domain information, with access permitted only to people from
use.	the originating company.
Restricted	Information that should be limited to people involved in the same process within the company.
Confidential	Information that requires special handling, available only to specific individuals.

 Technology and know-how transfers must be carried out in a way that protects intellectual property rights.

These guidelines must be followed by all suppliers and strategic partners with whom Hana Micron Brazil shares information.

4.3.4. Occupational Health and Safety

Suppliers must ensure a safe and healthy work environment, in accordance with current legislation, including:

- Maintain all necessary occupational health and safety permits, licenses, and test reports in effect and valid.
- Implement practices and procedures that prevent and manage accidents and occupational diseases, promoting the physical and mental well-being of workers.
- To offer regular training on safety, proper use of personal protective equipment (PPE), and workplace hazard prevention.



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- Ensure the supply, maintenance, and mandatory use of appropriate PPE for the activities performed.
- Promote continuous monitoring of working conditions, conducting periodic risk assessments and adopting corrective measures whenever necessary.
- To ensure that workers have access to occupational health services, including preemployment, periodic, and termination medical examinations, as required by law;
- Maintain a procedure for responding to accidents and emergency situations, with an adequate number of trained first responders available to provide appropriate first aid to workers, if necessary.
- To prohibit and curb labor practices that jeopardize the health or safety of workers, adopting disciplinary measures in case of non-compliance with applicable internal and legal regulations.
- Immediately notify the relevant authorities and the other party of any serious accident or situation that poses an imminent risk to health and safety at work.

4.3.5. Labor and Human Rights

The supplier, in compliance with legal obligations and the principles enshrined in international human rights and labor treaties, must undertake to:

- No use of child labor, forced labor, labor analogous to slavery, exploitative labor, involuntary imprisonment, or human trafficking under any circumstances, as well as any derivative thereof. All workers must be free to come and go, respecting the working hours stipulated in their contracts. Workers' identification documents must not be retained beyond the time limits permitted by law.
- To guarantee its workers decent working conditions, including reasonable accommodations with access to clean sanitary facilities, drinking water, respect for legally established working hours, and the payment of wages and benefits consistent with current legislation and the principles of social justice set out in international treaties.
- Establish efficient procedures for determining, communicating, recording, managing, and controlling hours worked, including overtime, with detailed and reliable records of employee hours worked and overtime. Salaries for regular and overtime hours must be correctly calculated and paid to all workers.
- For each payment period, workers should receive a timely and understandable pay report that includes sufficient information to verify the accurate compensation for the work performed.
- To adopt effective measures to prevent, suppress, and punish any practice of moral or sexual harassment, discrimination, or inhumane treatment, in accordance



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with national legislation and other relevant instruments, respecting the rights of workers to join their category's union or to freely participate in associations.

 Suppliers should have an established and communicated process where their employees can report any concerns or incidents without fear of retaliation.

4.3.6. Management of Hazardous Substances

At Hana Micron Brazil, substance control, aligned with trends in the manufacturing and semiconductor industries, aims to control the use of a range of substances considered harmful to the environment and human health. This is achieved through the prohibition, control, and monitoring of specific substances, following international standards and directives, as well as specific customer requirements.

The HSMS (Hazardous Substances Management System) encompasses various internal processes at Hana Micron Brazil and serves as an interface with clients and suppliers. Therefore, it is important that these stakeholders are informed about how the system works, as described below:

4.3.6.1. Criteria for substance control

Hana Micron Brazil, substance control is based on a classification of the substances to be controlled. The references adopted for this classification are international directives, such as RoHS and REACH, as well as specific standards from the company's clients. From these standards, the most restrictive tolerance limits are applied. The list of substances controlled by Hana Micron Brazil can be consulted in the commitment letter sent to suppliers. This letter also includes the maximum tolerances adopted by the company, as well as the CAS Number for each substance. Furthermore, for some more critical suppliers, analysis reports are required for substances covered by the RoHS Directive.

4.3.6.2. Required Documentation

Depending on the application and criticality of the supplied material, Hana Micron Brazil requests the submission of documents to ensure the non-use of harmful substances at all levels of the process. The required documents, according to the type of material, are as follows:

- a) Raw materials, packaging materials, consumables and wear and tear materials that come into contact with the products:
 - Analytical Test Report (RoHS and Halogen Free)
 - Signed Letter of Commitment
 - SDS of the material
 - Signed declaration of non-use of conflicting materials (if 3TG is involved in the composition)
 - RMI CMRT (if 3TG is in the composition)
 - RMI EMRT (if Cobalt and Mica are in the composition)
 - RMI_AMRT (if additional minerals beyond the 3TG in their products or supply chains. For example: Cobalt, Mica, Lithium, Nickel, Copper, among others).



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- b) Consumable materials that are used in production but do not affect the final product:
 - Signed Letter of Commitment
 - SDS of the material.
- c) Consumer goods in general that may contain restricted substances:
 - SDS of the material.

4.3.6.3. Non-conformities regarding Hazardous Substances

In the event of non-conformities arising in the supplier's production process for any item that is critical regarding the presence of harmful substances, or in any other stage under their responsibility (storage or transport, for example), the supplier must immediately inform Hana Micron Brazil, alerting them to the situation and the scope of the incident. The containment actions taken to address the identified problem must also be highlighted. This process can be documented and communicated using the model adopted by the supplier, without needing to follow specific templates.

4.3.7. Conflict Minerals Policy (3TG)

Hana Micron Brazil , through its policies and procedures, requires its supply chain to commit to promoting the rational use of Tantalum, Tin, Tungsten, and Gold in the products it supplies, and that this supply chain does not directly or indirectly finance or benefit armed groups that perpetrate serious human rights abuses in the Democratic Republic of Congo and neighboring countries. Therefore, Hana Micron Brazil 's suppliers must exercise due diligence, preferably using CMRT (Conflict Minerals Reporting). Template – RMI) in the 3TG supply chain and make their appropriate due diligence measures available to customers upon request.

When applicable, the supplier must complete the declaration of non-use of conflict materials, forwarded by Hana Micron Brazil, attesting to legal compliance and ethics in all our business practices, providing products that do not contribute to trade that finances or benefits, directly or indirectly, armed groups in the DRC and neighboring countries.



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4.4 . Supplier Qualification

Hana Micron Brazil establishes the following technical and general qualification and supply requirements, aimed at ensuring proper quality management, including financial controls, material controls, process and product controls, document and record control, testing and inspections, non-conformity handling, among others, as follows:

4.4.1. Financial

A risk assessment of the supplier's financial conditions will be conducted by Hana Micron Brazil. This assessment can be performed at any time or during audit events. Approval will consider the validity of the information provided, the robustness of the controls, as well as any other due diligence that may be carried out.

4.4.2. Material Control

Materials must be properly identified, handled, and stored in a way that prevents damage. Materials must be subject to expiration date and consumption controls. There must be an established process for reconciling orders from Hana Micron Brazil with production records. There must be a procedure to monitor the actual performance of deliveries in terms of quantities and deadlines requested.

Ensure correct material identification. This includes: Item Code, Part Number, Supplier Code, Date, Serial Number and Revision. Effective traceability of supplied items is required.

For raw materials, when applicable, it is required that the Certificate of Conformity of the material (CofC) be sent with each batch supplied, either in person or by email.

4.4.3. Engineering Controls

There should be an appropriate level of engineering and technical support for design, application, troubleshooting, and testing. The use of preventative tools during the design phase is recommended, such as FMEA and QFD. Changes to drawings or technical specifications should be properly managed, controlled, and communicated. A procedure for analyzing field failure returns should be in place.

4.4.4. Quality Management System

The supplier must establish, document, implement, and maintain a quality management system with defined objectives that seeks to continuously improve its effectiveness, in accordance with the requirements of this manual. The supplier must:

- To identify the process needs for quality management and their application within the organization.
- Establish and maintain a documented Quality Management System, including a
 Quality Policy and objectives, Quality Manual, record keeping, drawings, technical
 standards and other applicable procedures, providing for an appropriate approval
 workflow and revision control.



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- To have an audit process for the Management System and Processes, with a defined procedure for handling any non-conformities found.
- Implement the necessary actions to achieve the planned results and the continuous improvement of these processes.
- There should be a procedure that determines the requirements and training applicable to employees or roles that affect product quality.
- There should be a process for risk management, including identification, assessment, Implementation of appropriate controls to monitor, reduce, or eliminate them.
- They must establish a process for communicating clear and accurate information about policies, practices, expectations, and performance to employees, suppliers, customers, and other stakeholders.

4.4.5. Process Control

Appropriate data on critical characteristics need to be evaluated, controlled, and used for continuous process improvement. Monitoring and improvement plans are necessary in place for processes that fail to achieve expected performance.

Documented process monitoring and other operator work instructions should be prepared and readily available at all workstations. They should be consulted regularly.

Process monitoring and operating instructions should include or reference:

- Name and operation number
- Part name and number
- Current project revision, including date and/or number
- Tools, measuring instruments or other required equipment
- Key control features designated by the Customer
- Key control features designated by the Supplier
- Inspection and testing instructions, including frequency
- Appropriate Reaction Plan
- Date of revision and approval of the Work Instructions
- Appropriate visual aids
- Tool change intervals and setup instructions, whenever applicable

The established process must ensure that no product is released until all planned activities and steps have been satisfactorily completed and that the data generated within this process is complete, documented, and available.

Production and testing equipment, tools, and instruments must be proper for use and in accordance with technical requirements.

A preventive maintenance program should be implemented for equipment related to the manufacturing, testing, and inspection of products.

ESD controls, whenever applicable, should be properly installed and maintained (grounding system, instruments, furniture, etc.).

Environmental monitoring systems should be implemented, such as temperature, humidity, and particle count controls, as applicable.



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The Response Plan for out-of-control conditions should appropriately include:

- 100% containment and inspection
- Timelines and status of corrective actions
- Defining responsibilities
- Document approval by the client, whenever appropriate

Operators need to clearly understand their responsibilities when there is a loss of process control or conditions outside of specifications.

4.4.6. Testing and Inspection

Testing and inspection methods must be planned and documented to ensure they meet product specifications, including:

- The product inspection and testing conditions must be identified in such a way that the conformity condition is recognized and understood.
- Materials received cannot be used or processed until they have been inspected or verified according to the requirements previously specified in documented plans or procedures.
- Product inspections must be conducted and recorded, in accordance with a
 Control Plan, to verify compliance with all specific requirements, including
 packaging. Records must be maintained to provide evidence that the product was
 inspected and/or tested and approved before release.
- Appropriate measuring systems should be used to define the overall tolerance of the product being measured.
- All measuring instruments must be properly identified and calibrated at prescribed intervals, using certified equipment (traceable to standards) and in a controlled environment.
- Whenever applicable, reliability and/or regulatory tests should be performed. For example: drop/vibration, reliability, and safety.

4.4.7. Control of Nonconforming Material or Product

Materials, products, and batches will be considered non-conforming when they do not meet the minimum requirements for their application or customer specifications. To handle these, the supplier must have an established procedure that includes:

- In the event of non-conformities or suspected materials, these must be segregated and identified for technical evaluation and scope assessment, with all parties involved or affected being duly notified. The scope assessment must consider all batches or volumes likely to contain the problem.
- The responsibility for reviewing and the authority for disposing of nonconforming product must be defined.
- Reworked products must be inspected and/or tested in accordance with the Control Plan and/or documented procedures.
- A plan for reducing non-conformities should be established and maintained.
- Formal authorization from Hana Micron Brazil must be obtained prior to shipment for any instance where the product or process differs from the current validated specification.



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4.4.8. Containment and Corrective Actions

A problem-solving method must be implemented, addressing internal and external non-conformities, including: process audits, customer and certification body audits, production process failures, customer complaints, field returns, among others. It should include the use of quality tools for root cause analysis, definition, and monitoring of containment and corrective actions.

Action plans should include, whenever possible, error-proofing devices (*pokayokes*) or other preventive actions to avoid recurrence of the problem, as well as a verification process to ensure the effectiveness of the actions.

4.4.9. Packaging, Storage and Transportation

Controls must be in place to ensure the safety and prevention of damage and deterioration of production materials and finished products, covering handling, packaging, storage, shipping, and transportation.

The supplier, when responsible, must control and ensure the proper transportation of the material or product, respecting its technical characteristics, in addition to complying with all applicable legal obligations.

4.5. Audits

Hana Micron Brazil plans and conducts supplier audits aimed at validating and requalifying them. Suppliers will be notified in advance of the audit, and a date for the event will be agreed upon. Once notified, it is the supplier's duty to receive and cooperate with the audit process, responding transparently and honestly to the items that comprise it, as well as taking corrective or improvement measures within the stipulated deadlines, when necessary.

Audits are conducted based on the items in the self-assessment form, previously completed by the supplier. When necessary, the audit can be carried out jointly with related or user areas. Audits are planned in annual cycles, where the suppliers to be audited are defined based on internal criteria.

The supplier's performance in the audit is classified according to compliance with requirements, into one of three result ranges, as shown in the table below.

Status	Audit result
Satisfactory	Above 70%
Partially Satisfactory	Between 50% and 70%
Unsatisfactory	Below 50%

Suppliers with scores above 70% (Satisfactory) will have their qualification status maintained. In this case, the development of an action plan by the supplier is



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recommended, but not mandatory, with the actions being monitored by Supplier Quality via email and/or verified in the next audit.

Suppliers with scores between 50% and 70% (Partially Satisfactory) will have their continued participation evaluated by Supplier Quality, in conjunction with related and user areas. If the decision is to allow their continued participation, the supplier must present an action plan to improve performance and address non-conformities. Otherwise, they will be disqualified. If there are items requiring immediate implementation for the supplier to remain qualified, this will be communicated upon approval of the plan. If the actions are implemented and approved, the supplier remains qualified. Otherwise, the plan must be revised by the supplier and returned for analysis and approval.

Suppliers with a score below 50% (Unsatisfactory) will be disqualified.

4.6. Supplier monitoring

Monitoring is applicable to suppliers of raw materials and inputs. This process is carried out through inspection at the time of receipt of the material, against preestablished criteria.

If approved, the material is released for use. In case of rejection, Hana Micron Brazil will address the non-conformity with the respective supplier. In this case, a Supplier Corrective Action Report (*SCAR*) is sent to supplier, including issue images and other necessary information. The response to this report, containing the containment actions, root cause analysis, and corrective actions, must be submitted to Hana Micron Brazil within 5 (five) business days.

If the supplier needs to analyze defective samples to develop the plan, the response time is calculated from the date the supplier receives these samples.

The supplier's response time is an item considered in their periodic evaluation, as is their performance in the monitoring phase.

4.7. Periodic supplier evaluations

Every month, Hana Micron Brazil conducts an evaluation of its suppliers, based on their criticality, where they are scored according to their technical and commercial performance, and the quality of their deliveries during the period.

Suppliers who underperform will receive, after each evaluation, the results and the reasons given for the poor performance. Suppliers who underperform for three consecutive months must submit an action plan that will be monitored by Hana Micron Brazil .

Every six months, the evaluated suppliers are informed about their respective performances.



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4.8. Reimbursement s

Any need for reimbursement arising from defects in products, services, or other goods supplied will be handled in accordance with the clauses stipulated in the contract signed with the respective supplier.

Potential costs incurred may include, but are not limited to:

- Need for parts selection activity
- Warranty analysis and field return
- Return shipment or shipment to third parties
- Rework, repair or rejection of product at Hana Micron Brazil and/or at its customers' facilities
- Logistics costs
- Production process shutdowns
- Extra labor costs, including employee overtime
- Changes to the process for using the material, including additional inspections or controls

4.9. Change Notification

Any change that the supplier wishes to make to its production processes or supplied product, which generates any impact on Hana Micron Brazil or alters what was previously approved, must be communicated to and approved by Hana Micron Brazil before its implementation .

Changes made without prior approval will be considered violations of our rules. The supplier may be penalized according to the severity of the violation, in addition to resulting in a negative rating.



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4.10. Communication

Matters related to the items described in this manual, as well as any questions or problems, should be addressed to the Supplier Quality department. Matters relating to contracts and commercial negotiations should be addressed to the Purchasing department, using the following contact information:

Contacts:

Supplier quality: qualidadedefornecedores@htmicron.com.br

Shopping: compras@htmicron.com.br

5. RECORDS

FO074 – Supplier Capability Assessment Questionnaire FO082 – SCAR – Supplier Corrective Action Report

6. ATTACHMENTS

Not applicable.

