

FUJIKURA FIBER OPTICS VIETNAM LTD			
RISK ASSESSMENT FORM OF LABOR AND ETHICS			
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No.	Item	Risk	Possibility of the Risk	Risk assessment		Action to be taken to avoid this Risk
				Likelihood of Occurrence	Impact	
I	Labour and Human Rights					
I.1	Forced Labor	Risk of involuntary servitude or human trafficking, especially among migrant workers.	Force labor occurs during recruitment: - Receiving original documents from applicants & keeping it under factory custody during employment period. - Recruitment fee & security deposit is charged to applicants. - Keeping undertaking from applicants. - Works have to pay in advance for necessary tools & PPE prior to join in employment.	Low	Low	- Needs to be developed Recruitment policy including force labor issues & documented in place. - Recruitment team needs to be well aware of force labor. - Develop a monitoring mechanism to avoid the occurrence of force labor.
			Force labor occurs in the work-place: - Workers always work with threat or violence. - Overtime work is not performed voluntarily by the worker. - Workers cannot leave their employment without penalty in spite of resigning complying with labor law - 2019. - Workers do not get recess time, weekend, leave as per labor law - 2019	Low	Low	- Needs to be developed Force Labor policy & documented in place. - Management employees & workers, both need to be well aware regarding force labor. - Develop a monitoring mechanism to avoid force labor occurrence. - Develop a mechanism in place to remediate all incidents regarding force labor.
I.2	Child Labor	Risk of employing minors below the legal working age, particularly in rural areas or informal settings.	Child labor is available in the factory.	Low	Low	- Needs to be developed recruitment policy & documented in place. - Recruitment team needs to be well aware on how to detect applicant's age. - Strictly screening all age verification documents of the applicant. - Develop a mechanism of cross-verification to avoid any misapplication of recruiting policy during recruiting.
			Improper treatment of inadvertently recruited child labor in the workplace.	Low	Low	- Needs to be developed Child Labor Remediation policy & documented in place. - All concern personnel as well as worker (Such as - recruiting team, HR, Administration, production, Security, top management, etc.) should be well aware about this policy. - Develop a mechanism of monitoring & feedback to be assured regarding proper implementation of the policy.

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I.3	Working Hours	Risk of excessive overtime, forced overtime, or hazardous working conditions, especially in production facilities.	<ul style="list-style-type: none"> - Workers do not get 1 day rest after every 6 working days. - Regular hours of work are not complying with legal limits per week (60 hours per week). - Workers cannot refuse overtime without any penalty. - Workers do excessive overtime under any circumstances. 	Medium	Medium	<ul style="list-style-type: none"> - Needs to be developed Working Hour policy & documented in place. - Production Planning / Capacity Procedure need to be made considering legal limits of working hour (60 hours per week). - Management employees & workers, both need to be well aware regarding abuse & harassment. - Design production planning process / capacity managing process considering the legal limits of daily & weekly working hours. - Develop a strong monitoring mechanism to avoid excessive overtime & off-day work. - Increase worker's skill through training to get maximum output from them. - Ensure all logistic supports (Machinery & accessory) in timely manner to avoid wastage time of production. - Develop a mechanism in place to control working hour as per legal limit. - There is a dedicated person or team accountable for the implementation of the working hour's procedure at the work-place.
			<ul style="list-style-type: none"> - Workers do not receive leave facility as required by law. - Workers do not receive maternity leave as required by law. - Workers do not receive festival leave as required by law. 	Low	Low	<ul style="list-style-type: none"> - Needs to be developed Leave policy complying with all risk factors & legal requirements & documented in place. - Management employees & workers, both need to be well aware regarding leave facility. - Develop a strong monitoring mechanism to ensure that all workers will enjoy leave facility as per law, when required.
I.4	Wages and Benefits	Risk of non-payment or delayed payment of wages, and inadequate benefits, including social insurance and health care.	<ul style="list-style-type: none"> - Workers do not receive at least the minimum wage for all regular hours worked as required by law. - Workers do not receive their wages within the time- frame, as required by law - Workers are not provided with a pay slip in local language each time they are paid that contains details of their wages. - All payment related information, such as - attendance record, wage premium, overtime premium, deferent kinds of benefits & deduction, leave record, etc. are not mentioned in the salary sheet. - Workers do not receive information on base wages, overtime, incentives, benefits, bonuses, etc. 	Low	Low	<p>Ensure timely and accurate wage payments, comply with minimum wage laws, and offer appropriate benefits.</p> <ul style="list-style-type: none"> - Needs to be developed Compensation & Benefit policy complying with all risk factors & legal requirements & documented in place. - Management employees & workers, both need to be well aware regarding compensation & benefit. - Develop a strong monitoring mechanism to ensure that all workers will receive all compensation & benefits as required by law. - Designate 1 individual / department as accountable to ensure compensation & benefits are provided to workers as per company policy as well as law.
			<ul style="list-style-type: none"> - Workers do not receive wage premiums for overtime and work performed on weekends & holidays, as required by law. - All deductions to wages are not legally allowed & those deductions to wages are not explained to the worker. - Worker's attendance record is not maintained properly, as required by law & it is not acknowledged by the worker. - Worker's performance appraisal is not done regularly/performance appraisal record is not documented. - Pregnant workers do not receive maternity benefit as required by law. - Pregnant workers do not receive maternity benefit within the required time-frame, as required by law. 	Low	Low	

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			<ul style="list-style-type: none"> - Workers do not receive all benefits (Such as - service benefit, death benefit, earn leave encashment, etc.) as required by law during final settlement. - Workers do not receive compensation while they are terminated from employment by the employer instantly without any notice, as required by law. - Workers do not receive all benefits, as required by law during all type of termination, such as dismiss, resign, discharge, retrenchment, lay-off, etc. - Workers do not receive insurance premium & compensation regarding injury as required by law. 	Low	Low	
I.5	Non-Discrimination/Non-Harassment/Humane Treatment	Risk of discrimination based on gender, age, ethnicity, or disability, especially in recruitment, promotion, and wages.	Discrimination occurs during recruitment: <ul style="list-style-type: none"> - The recruitment screening process does not allow for applicants of any age, nationality, religion, gender etc. to have equal consideration for open positions. - Recruitment team is biased during recruiting screening process. - Medical testing is done in order to determine pregnancy. - Wages & benefits and designation are fix based on age, gender, color, localism, religion, nationality, political influence, marital status, affiliation with trade union or workers organization, etc.; not based on skill & qualification. 	Low	Low	<ul style="list-style-type: none"> - Needs to be developed Recruitment policy including the discrimination criteria & documented in place. - Recruitment team needs to be well aware of discrimination criteria & equal treatment. - Develop a strong monitoring mechanism to establish fair & neutral recruiting process.
			Discrimination occurs in the work-place: <ul style="list-style-type: none"> - Workers always treated differently based on age, gender, color, localism, religion, nationality, political influence, marital status, affiliation with trade union or workers organization, etc. to be selected or allotted for the following: <ul style="list-style-type: none"> + Promotion, Increment & Empowerment + Training + Residence & transport facility + Other benefit or facility, if any - Workers always treated differently regarding: <ul style="list-style-type: none"> + Grievance & Disciplinary Actions + Voting + Chronic Illness + Others, if any - Migrant workers are not receive equal treatment as like local workers. - Temporary workers are not receive equal treatment as like permanent workers. - Workers are treated differently based on the production/manufacturing processes. 	Low	Low	<ul style="list-style-type: none"> - Needs to be developed Prohibition of Discrimination policy considering all risk factors & documented in place. - Management employees & workers, both need to be well aware regarding discrimination criteria. - Develop a mechanism in place to remediate all incidents regarding discriminative or unequal treatment among the workers.
			People may be abused & harassed during recruitment: <ul style="list-style-type: none"> - Demeans, belittles or miss-behaves with the applicant during recruiting. - Gender or cultural sensitivity is not considers during medical test. - Asking applicants' irrelevant question which will be fall into abuse & harassment criteria. 	Low	Low	<ul style="list-style-type: none"> - Needs to be developed Recruitment policy including the abuse & harassment criteria & documented in place. - Recruitment team needs to be well aware of abuse & harassment criteria. - Develop a strong monitoring mechanism to ensure that no applicant will be harassed or abused during recruitment process.

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		Risk of abuse & Harassment in recruitment and working place	Worker may be abused & harassed at work-place: - Workers are abused or harassed by the superior. - Workplace violence. - Security practices are not gender appropriate. - Workers cannot recognize harassment or abuse. - Cultural sensitivities is not considered during dealing with worker. - Workers are not trained to respond with proper actions when there is suspicion of harassment or abuse. - There is no system in place for confidential reporting. - Workers are not communicated with respect. - Workers with chronic illnesses (HIV/AIDS) are not given the flexibility & the means to perform their duties while caring for their illness.	Low	Low	- Needs to be developed Prohibition of Abuse & Harassment policy & documented in place. - Management employees & workers, both need to be well aware regarding abuse & harassment. - Develop a strong monitoring mechanism to avoid abuse & harassment occurrence. - Action fast against any grievance occurs regarding abuse & harassment. - Initiate for not further repetition of any harassment issue. - Develop a mechanism in place to remediate all incidents regarding force labor.
		Disciplinary Actions	- Disciplinary actions does not comply with law & standards. - Top management & workers do not well aware about disciplinary actions procedure as per law.	Low	Low	- Needs to be developed Disciplinary Action procedure complying with all risk factors & legal requirements & documented in place. - Management employees & workers, both need to be well aware regarding disciplinary action procedure. - Develop a strong monitoring mechanism to ensure that all disciplinary actions are taken in timely manner & complied with law.
I.6	Freedom of Association	Risk of interference with employees' right to form or join trade unions, particularly in rural areas or areas with limited labor rights protections.	- Worker Representatives are chosen by the management, not workers. - Workers are not allowed ways to collectively bring concerns, needs, views, and requests of workers. - Workers are treated differently based on their affiliation with a trade union or other worker associations. - Worker representatives are not allowed time off with pay to carry out their duties. - Workers are not allowed to establish a Collective Bargaining Agreement.	Low	Low	Respect employees' right to form or join trade unions, and avoid interference with union activities. - Needs to be developed Freedom of Association & Collective Bargaining policy complying with all risk factors & legal requirements & documented in place. - Management employees & workers, both need to be well aware regarding freedom of association & collective bargaining policy. - Develop a strong monitoring mechanism to ensure that worker representative can perform freely in the work-place.
		Grievance Mechanism	- Workers cannot inform their grievance to the management & highest level. - No complaint or grievance box in the work-place. - Workers cannot know about their grievance is addressed or not. - Worker representatives are not allowed time off with pay to carry out their duties. - Workers are not allowed to establish a Collective Bargaining Agreement.	Low	Low	- Needs to be developed Grievance policy complying with all risk factors & legal requirements & documented in place. - Active Participation Committee to work for worker well-being. - Management employees & workers, both need to be well aware regarding grievance mechanism. - Develop a strong monitoring mechanism to ensure that all grievances are addressed in timely manner & worker can know about the actions taken by the management.
		Communication Procedure & Channel	- Worker cannot understand the expectations of the management. - Worker cannot communicate their requirement/ expectations to the management.	Low	Low	Needs to be developed communication channel in the work-place complying with legal requirements & documented in place
II	Ethics and Integrity					

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II.1	Bribery and Corruption	Risk of engaging in corrupt practices or bribery, especially in obtaining permits, licenses, or government contracts.	<ul style="list-style-type: none"> - Receiving/offer gifts/business entertaining in violation of the law or internal guidelines - The business dealings shall not be transparently performed and accurately reflected in Facility's business books and records. 	Low	Low	Develop anti-corruption policies, provide training, and conduct regular audits.
II.2	Conflict of Interest	Risk of conflicts of interest among employees or management, particularly in procurement or decision-making processes.	<ul style="list-style-type: none"> - Use Company business information or information obtained in the course of working for the Company for your own business purposes or that of friends or relatives. -Taking advantage of position and authority within the Company to transact with third parties not entirely for the benefit of the Company 	Low	Low	Implement conflict of interest policies, require employees to disclose potential conflicts, and establish procedures for managing conflicts.
II.3	Intellectual Property	Risk of infringement of intellectual property rights, such as patents or trademarks.	<ul style="list-style-type: none"> - Personal information/ business information is collected, stored, processed, transmitted, or shared without approval by employees or customers. -Confidential information disclosed by suppliers/ partners/ employees working at the factory. - Employees are not aware of the value of protecting confidential information and intellectual property of the business and customers 	Low	Low	Protect intellectual property through patents, trademarks, and copyrights, and enforce rights against infringement.

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