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## Safe Workplace Policy

(from the Transphorm Injury Illness Prevention Program – IIPP and Updated May 18, 2020)

### A MESSAGE FROM THE CEO

Transphorm has always been, and will continue to strive for, a very safe work environment. It is a responsibility we take seriously and will continue to support. A successful environmental health and safety program assures the protection from harm of all employees while they are at work with us. It also saves the organization unnecessary costs associated with lost time from a teammates' absence, excessive workers' compensation insurance premiums, safety citations, fines, and litigation. To achieve our safety program's mission and goals, everyone's support is necessary and required. The success of our environmental health and safety program is dependent upon the support of all management personnel and employees. **Management and employee support of all adopted safety procedures as detailed in the company's Injury Illness and Prevention Plan.**

Managers and supervisors are responsible for implementing and maintaining the Injury Illness and Prevention Plan (IIPP) in their work areas and for answering their team's questions about the IIPP. A copy of the IIPP is available to each employee online or by asking the IIPP Administrator for a copy.

*MARIO RIVAS, CEO*

The Program Administrator has the authority and responsibility for implementing and maintaining this IIPP as well as other safe workplace initiatives for TRANSPHORM.

### A MESSAGE FROM THE IIPP PROGRAM ADMINISTRATOR

The personal safety and health of each employee of Transphorm is of primary importance to us. The prevention of occupationally-induced injuries and illnesses is of such significance that it will be given precedence over operating productivity, whenever necessary. Management will provide the mechanical and physical activities required for personal safety and health, in keeping with the highest standards. I expect that if any employee is aware of an issue that compromises our commitment to creating and supporting a safe workplace that they will let me or someone on our Safety Committee know about the concern.

*Randy Berg, Human Resources/Environmental Health and Safety*

The Transphorm Injury and Illness Program Administrator is:

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The Program Administrator has the authority and responsibility for implementing and maintaining this IIPP for TRANSPHORM. In addition to supporting the Program Administrator role, the Company,

Transphorm, will maintain a Safety Committee. Names of the individuals on that committee will be posted in public locations of our operating facilities.

### **Injury Illness Prevention Program Policy Purpose**

This IIPP outlines the responsibilities for environmental health and safety and provides general safety requirements. The objective of the program is to prevent losses to employees and the organization.

### **Mission and Strategy**

The mission of the Environmental Health and Safety efforts of Transphorm's as outlined in the IIPP is to maintain a safe, clean, productive and accident-free workplace for our employees.

### **Policy Statement**

This IIPP is applicable to all U.S. based facilities, operations, and employees. Managers and supervisors are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the IIPP. A copy of the IIPP is available from each manager and supervisor.

### **Strategy**

- Develop, implement and manage effective loss prevention programs to assure a safe, healthful and productive workplace, and compliance with applicable state and federal regulations
- Encourage the responsibility and participation of all employees and management in the organization's loss prevention efforts
- Provide training to employees and management such that an understanding of hazards and respective safety requirements are established and supported
- Minimize our workers' compensation insurance costs to enhance the organization's profitability

### **Applicable Documents**

- IIPP/ General Safety and Health Program
- Employee Assistance Program (EAP)
- Emergency Response/Action Plan
- Hazard Communication Program
- Incident Investigation
- Safety Committee Program
- Facility Safety Inspection
- Job Safety Analysis -Hazard Analysis Form
- Safety Suggestion Form
- Workers Compensation Program

### **Reporting of Illegal or Unsafe Dondition**

If any employee knows or suspects the occurrence of any illegal or unsafe behavior they must immediately report it to their supervisor or the company's Safety Officer, or someone on the Safety Committee. Unless the supervisor knows with certainty that the reported behavior is not in fact illegal or unethical, they must report it. If any employee feels a reported potential violation is not being properly handled, they should personally report it to the Transphorm President or the company Ethics Hotline.

There shall be no retaliation against an employee for questioning an action or for making a legitimate and good faith report of a suspected violation of this Business Conduct Practice and Code of Ethics. All employees are required to cooperate fully with any internal investigation of a suspected illegal or unethical activity.

The Transphorm Senior Human Resources leader shall oversee the investigation of all reported potential violations and shall periodically report such investigations and follow up actions to the Transphorm executive team. The Transphorm Human Resources investigator shall refer to the executive team any questions relative to the interpretation or enforcement of the Safe Workplace Policy

### **What to do if you suspect a violation of this Code**

Some violations of laws and this Code of Conduct are obvious, and some are not. The appearance of a violation of safe work practices may be dependent upon the facts at your disposal and may be subject to interpretation and judgment. It may be difficult to recognize or know a violation of this Safe Workplace Policy. It is important that all employees work to achieve prompt investigation of potential violations both to prevent their occurrence and their reoccurrence. Employees should strive to question and bring attention to potential violations. These things should be kept in mind:

Discuss the situation with your supervisor or other responsible manager. To get the full picture and to clarify your own and other's understanding of the situation, discuss it with people who potentially have responsibility for it.

Report the suspected or potential violation. Once you have sufficient information to believe a violation of law of this Safe Workplace Policy has or may have occurred, it is your responsibility to report it. The preferred first report should be to your supervisor. If, for any reason, you do not feel comfortable discussing the matter with your supervisor, you should bring the matter to the attention of the Company's Safety Officer. If neither of these options is practical then you may safely report issues to the Company's Ethics Hotline, which is a third-party service that has confidential reporting options. The contact information for the Ethics Hotline is: Phone: **844-989-1486** or by internet **[www.transphorm.ethicspoint.com](http://www.transphorm.ethicspoint.com)**. The important thing is that you bring the matter to the Company's attention promptly so that any concern of unsafe or illegal practices can be investigated and addressed appropriately. You can feel confident that legitimate and good faith reports will not result in retaliatory actions and if necessary, your confidentiality can be maintained to the extent that it is legally possible.

Speak up if you suspect a violation. If something seems wrong to you it may well be. Your questioning of the situation may prevent the occurrence or reoccurrence of a violation of law or ethics. Do not hesitate to question your own or other employees' actions and to report situations that may be violations.

### **Accountability for Violations**

If the Transphorm Human Resources investigator determines that this Safe Workplace Policy has been violated, either directly, by failure to report, or by concealing information, responsible employees shall be disciplined with penalties up to and including termination.