

1. Respect for human rights, prohibition of discrimination and sexual harassment

Human rights issues must be recognized and respected, and discrimination and harassment shall be prohibited.

- (1) Human rights shall be respected and discriminate against, or tolerance of discrimination based on race, color, creed, religion, nationality, age, sex, or mental or physical disabilities shall be prohibited.
- (2) Sexual harassment (favoring or giving disadvantage to employees based on their sexes and reactions to sexual innuendos, or affecting the work environment of other employees through sexual comments) and supervisor pressures (continuous infringement of personal rights using the position or social ladder) shall not be acceptable. In addition, harassment of this kind shall not be tolerated.

2. Compliance with antitrust laws and related laws

Unfair Transactional Restrictions (Cartel) shall not be acceptable.

(1) Prohibition of forming monopoly

Restricting competition in the market by excluding or controlling the business activities of other companies, either by itself or by colluding with other companies shall be prohibited.

(2) Prohibition of unfair trade restrictions

① Prohibition to form a Cartel

② Prohibition of bid collusion

(3) Prohibition of illegal transaction

① Collusion to boycott

② Dumping

③ Controlling resale price

4) Subcontract law compliance

When subcontracting and consigning manufacturing (including processing), such as repair consignment, filling out information products consignment and service delivery, all necessary obligations to provide written information on necessary information as per subcontracting law shall be followed, and delay in payment, unreasonable demands for discounts, and payment using postdated checks shall be prohibited.

3. Prohibition of Unfair Competition

Manufacture and sale of illegal goods, illegal acquisition and use of trade secret shall be prohibited.

- (1) Shall not acquire, use or disclose the trade secrets of others through theft, fraud, coercion or other unjust means. The same shall apply to trade secrets of others that are obtained knowing (or not realizing) that the acquisition was fraudulent in nature.
- (2) Utilization of marks of others (trade name, trademarks and other copyrights) that are widely recognized, or similar marks or logos shall not be permitted.
- (3) False or misleading marks on goods, services or advertisements, such as their origin, quality, content, manufacturing method, usage, quantity shall not be permitted.
- (4) Spreading false information that may harm or offend the reputation of the competition is prohibited.
- (5) Improper gifts or giveaways and claims shall not be permitted.

4. Safety Trade Management

To maintain international peace and security, strict security, trade control, prevention of legal violation and as a global corporation shall not be involved in inappropriate transactions.

Foreign trade law administrative regulations

Under the trade law, the trade subject of which fall under the statutory safety assurance are "export of cargo" and "provision of technology". For this purpose, one must comply with separate notification on the control of import and export of strategic goods, by the Minister of Knowledge Economy.

Trade transactions that require national permits must comply with the notifications on import and export of strategic goods.

5. Safety management of products and operations

In order to ensure product safety, it is necessary to comply with the relevant laws and regulations, perform proper safety management, and ensure safety procedures to prevent labor disasters.

(1) Every day product safety management

In addition to complying with the laws and regulations on product safety, safety evaluations and feedback of products to be handled, collection of information on safety issues, appropriate handling labeling, and maintenance of contracts for product safety should be performed.

(2) Safety management of products in case of safety problems (including product liability)

The user safety is of the highest concern and requires immediate response, and inadequate response is a cause to lose credibility of the company and may even be subject for public boycott.

When safety problem occurs, report immediately to the company and to the corresponding authorities to prevent the spread of the damage, and identification of the cause and measures to prevent recurrence must be investigated.

(3) All efforts to comply with safety and health-related laws and regulations, internal safety and health regulations, safety work standards, and safety manuals, must be performed as well as to prevent industrial accidents.

6. Laws on Intellectual Property Rights

Intellectual property rights of others shall be respected.

(1) In order to manufacture, transfer, import and export goods and services containing patents, designs and other copyrighted markings for newly developed products, investigations on whether the product infringes on other patents and design copyrights must first be done to prevent patent infringements.

(2) Unauthorized use of copyright rights owned by others, such as unauthorized copying or alteration of computer programs must be strictly prohibited (see also "12. Proper use of information systems").

7. Prohibition of bribery and gifts, hospitality, etc.

Bribery, and donations, requests and promises in exchange for profit shall not be permitted. In addition, gifts and hospitality to customers shall not exceed socially accepted norms.

(1) Prohibition of Bribery

- ① Regardless of foreign or domestic, any donations, promises or other economic benefits offered, given or promised to public officials shall not be permitted.
- ② In Japan, no gifts or entertainments that conflict with the ethical law of the public officials, the ethics regulations of public officials, or similar regulations prescribed by each government office shall be given or offered to a civil servant.
- ③ No agents or consultants of the company shall instruct, assist or abet any foreign or domestic government agencies or other customers to provide economic benefits for illegal actions. In addition, commission payments shall not be made while knowing such deals are being made.

(2) Prohibition of excessive hospitality

No money, gifts, hospitality or other economic benefit shall be offered or given to employees of transacting companies over and above the social norms.

8. Prohibition of grant of profit/benefit from anti-social groups

Anti-social activities or groups shall be ignored, and relationships severed.

- (1) No contacts shall be made with any antisocial activities or groups that threaten public order and safety.
- (2) When an unfair demand is received from antisocial groups, financial settlement shall not be contemplated. (Requesting violent activities from violent gangs or taking advantage of exercising shareholder rights may be guilty of illegal activities.)
- (3) Regardless of legal status, anti-social groups shall not be contacted for any reasons whatsoever.

9. Environmental Safety

Be conscious of responsibility as a good corporate citizen in harmony with prosperity of human society while doing best for preservation of earth's healthy environment.

- (1) Observe foreign and domestic environmental laws and regulations and international accords.
- (2) When introducing new business, transactions and introducing new facilities, consideration

shall be given to reducing the environmental footprint. Additional attention to environmental conservation of natural ecosystem and local region shall be considered.

- (3) Offices shall also promote green procurement, energy conservation, saving resources, waste reduction, and work efficiency.
- (4) We should strive for products and services, and social systems that promote conservation and improvement to the environment

10. Insider Trading Regulation

Insider trading rules shall be strictly adhered.

- (1) Important insider information about the Company (or its affiliates) shall be kept strictly confidential until it is released to the public, and trading the stock of the Company using insider information is strictly prohibited.
- (2) Important insider information about the other listed companies (or their affiliates) shall be kept strictly confidential until it is released to the public, and trading the stock of that company using insider information is strictly prohibited.
- (3) When trading stocks of our company, please comply with the rules of advance notification prescribed in the Insider Trading Management Regulations.

11. Proper management of information

Close attention should be paid to managing confidential information. Same attention should be given to confidential information of others

- (1) maintaining confidential information
- (2) disclosure of confidential information
- (3) confidential information of others
- (4) management of confidential information
- (5) retirement confidentiality obligation
- (6) protection of personal information

12. Proper use of information systems

Company information system may not be infringed or used without permission.

- (1) Copyright infringement

The use, copying, modification, or distribution of copyright materials without permission is

prohibited.

(2) Defamation and dissemination of unpleasant materials

Spreading vulgar, insulting information of others, rumors that may hurt others, make people uncomfortable or uneasy, and vulgar jokes shall be prohibited.

(3) Spreading false rumors

Spreading false rumors that undermine the credibility of others or interfere with the work of others shall be prohibited.

(4) Prohibition of unauthorized access

Unauthorized entry to computers using a user ID or password of others, illegal handling of computer information, destruction or malfunctioning computers shall be prohibited.

(5) Virus countermeasures

If our company was to be the cause of virus outbreak, our company would lose credibility. Therefore, all virus protection software must be updated according to the instructions of information systems room or the OA administrator.

(6) Avoid e-mail with suspect contents

E-mails are subject to be sent or received using wrong addresses and must always be checked prior to sending and receiving.

13. Appropriate accounting and tax reporting and fair disclosure of company information

Accounting and tax reporting should be done properly. For important company information, Care must be taken when disclosing

1. Fair accounting

In performing accounting operations, accounting rules and regulations must be followed to include the following:

In addition, the accounting practice shall be clearly indicated, and accounting fraud shall not be permitted.

(1) Principle of account processing

Costs and revenues must be processed according to the period in which they occur.

Income statement shall include all expenses to be incurred.

(2) Recording Principles

All transactions shall be recorded accurately without delay with supporting documents.

(3) Principle of supporting documents

The preservation of the supporting documents shall be for a prescribed period.

2. Appropriate tax reporting

All taxes must be reported according to related laws and regulations.

3. Notification of appropriate company information

As a listed company, important company information regarding business operations and type of business that may affect investment decisions shall be disclosed at appropriate time.

14. Prohibition of conflict of interest

Business shall be conducted in honest and truthful fashion and no actions that may hurt the interest of the company shall be conducted.

1. Prohibition of conflict of interest

(1) No acts or actions that may impair company reputation or credit shall be conducted.

(2) No acts or actions that may unduly annihilate or damage company assets shall be conducted.

(3) No acts or actions that may cause financial, gift, entertainment or other economic benefits that are beyond the scope of social norm, or such that may form a case for collusion with trading partners such as becoming a co-signer of a loan, shall be strictly prohibited.

(4) At the end of employment, company property shall be returned, and cannot be used without permission.

(5) It should be known that acting above the scope of authority provided may become a liability for the company, and no acts beyond the scope of authority shall be exercised.

2. Separation of public from private

(1) Company asset and expenses cannot be used for private use.

(2) Company and private affairs must be separated, and any activities such as religion, politics, student council, volunteer work, social club, etc., shall not be conducted in office without expressed permission.

The end