

DJK Group Code of Conduct

April 2024



DAIICHI JITSUGYO CO., LTD.

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Message from the President

To everybody working in the DJK Group

As we aim to achieve further growth as a company, in April 2022, Daiichi Jitsugyo established “*Connecting People, Connecting Technology and Enriching the World*” as its new corporate philosophy, and on April 1, 2024, revised the Daiichi Jitsugyo Code of Conduct as the DJK Group Code of Conduct in order to respond to the demands of society arising from the changing times through integrated Group efforts.



Representative Director,
President and CEO



The Code of Conduct sets out a globally uniform basis of judgment for officers and employees for conducting business activities in the DJK Group and indicates the standards of behavior that everyone should practice daily.

By aiming to behave with attention to integrity based on the new Code of Conduct, in addition to our Founding Philosophy and Corporate Philosophy, we - officers and employees - will develop an attitude of respect for others in our work, and with improved relationships of trust, a better organization can be built. In addition, for us to continue our business activities, it is important to respond to the demands of society, including compliance, by responding appropriately to changes and risks in society and the environment, and this, I believe, will lead to sustainable growth and social contribution.

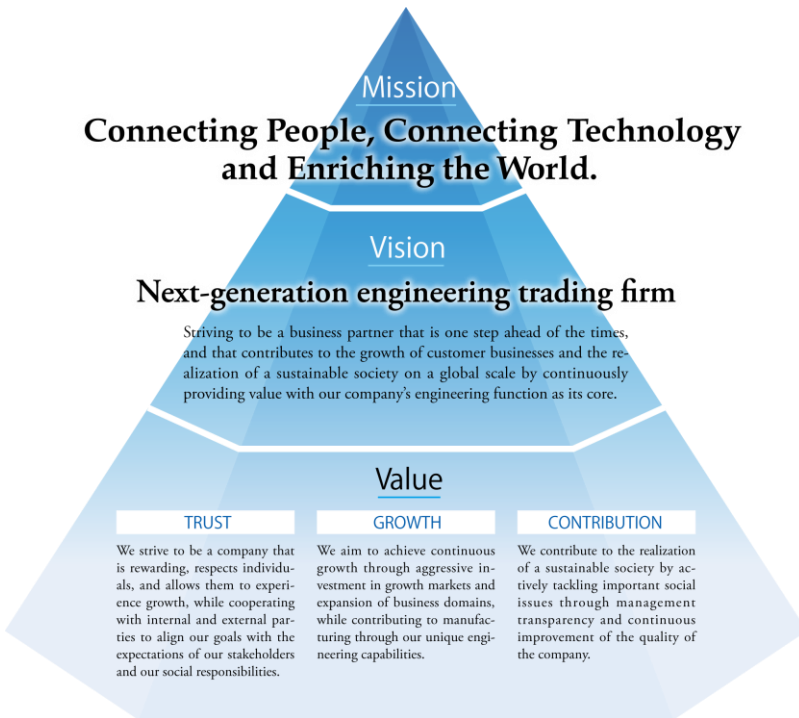
Let us all - DJK Group's officers and employees – conduct our daily work with this Code of Conduct as our cornerstone.

Structure of the DJK Group’s Corporate Philosophy

Founding philosophy

- Founding Spirit
- Corporate Principles

Management Philosophy



Code of Conduct

• Actions every individual must put into practice

The corporate philosophy structure of the DJK Group is shared across the Group. It shows both the values that every individual (all officers and employees) working in the DJK Group should attach great importance to realize the mission in our new corporate philosophy “*Connecting People, Connecting Technology and Enriching the World*” and the Code of Conduct as the standard for our actions and judgments in our daily work.

Structure of the DJK Group's corporate philosophy

Founding philosophy

Founding Spirit

As a trading company, DAIICHI JITSUGYO CO., LTD. strives to facilitate the logistics of an economic society in order to contribute to social prosperity. Corporate activities are based on a proactive approach and spirit of unified cooperation. The company aims for stable growth based on sound management, while striving to improve the lifestyles and welfare of its employees.

Corporate Principles

Encourage successful teamwork

Ensure solid operation

Be proactive and take initiative

協力一致
堅実運営
積極活動
在

Structure of the DJK Group's corporate philosophy

Management Philosophy

Mission

**Connecting People, Connecting Technology
and Enriching the World**

Vision

Next-generation Engineering Firm

Striving to be a business partner that is one step ahead of the times, and that contributes to the growth of customer businesses and the realization of a sustainable society on a global scale by continuously providing value with our company's engineering function as its core.

Value

Trust

We strive to be a company that is rewarding, respects individuals, and allows them to experience growth, while cooperating with internal and external parties to align our goals with the expectations of our stakeholders and our social responsibilities.

Growth

We aim to achieve continuous growth through aggressive investment in growth markets and expansion of business domains, while contributing to manufacturing through our unique engineering capabilities.

Contribution

We contribute to the realization of a sustainable society by actively tackling important social issues through management transparency and continuous improvement of the quality of the company.

Structure of the DJK Group's corporate philosophy

Code of Conduct (Overview)

1. Maintaining a sense of ethics and compliance with laws and regulations

Based on our awareness as members of the international community, we will comply with the laws and regulations established within each country and region and take action at all times in good faith based on high ethical standards.

2. Respect for human rights

We support and respect international norms regarding human rights. We will not take actions that violate human rights in any way. We will act at all times in ways that reflect our respect for the human rights of all those involved in our business activities.

3. Environmental issues

As a valuable partner for the world's industries, we will help to realize a sustainable global environment.

4. Improving the working environment for employees

We will achieve work styles that enhance the capabilities of each individual, in the spirit of respect for diversity, personality, and individuality. In addition, we will create an environment conducive to work that also takes health and safety into consideration.

5. Winning the trust of business partners

We will provide our business partners with pertinent and accurate information concerning our products and services and will conduct communications with them in good faith.

Structure of the DJK Group's corporate philosophy

Code of Conduct (Overview)

6. Mutual development with business partners

We will act in ways that reflect the wishes of our stakeholders, our social responsibilities, and will strive for mutual development with our business partners.

7. Participating in and contributing to local communities

We will work with local communities and contribute to regional development.

8. Engagement with stakeholder

Through stakeholder engagement efforts, we will build lasting relationships of trust and strive to win and maintain stakeholder support for the Group's business activities.

9. Preventing bribery and corruption

We will not engage in bribery or other corrupt actions with respect to public servants or business partners, nor engage in any actions that could be interpreted as such.

10. Dealing with antisocial forces

We will reject antisocial forces or groups in any form that threaten the order and safety of civil society.

What is the Code of Conduct?

The Code of Conduct sets forth in specific terms the values, outlook, and standards of conduct required for the DJK Group to gain and maintain the trust of our stakeholders and to put into practice both its founding philosophy and the new corporate philosophy, “*Connecting People, Connecting Technology and Enriching the World.*” It is a guideline that all officers and employees of the DJK Group must follow.

Put simply, the sum of the business activities of the DJK Group is equivalent to the accumulation of the specific actions taken by each of us.

We will contribute to sustainable growth and to society while demonstrating our individuality and abilities, based on a recognition of our responsibility to future generations under the Code of Conduct.

Code of Conduct (Full text)

1

Maintaining a sense of ethics and compliance with laws and regulations

Based on our awareness as members of the international community, we will comply with the laws and regulations established within each country and region and take action at all times in good faith based on high ethical standards.

(1) Maintaining a sense of ethics

We will maintain high ethical standards and act with common sense and responsibility.

(2) Ensuring compliance

- ① Based on our awareness that compliance with laws and regulations represents the core of our management responsibilities, we will comply with all relevant laws and regulations established within each country and region in which we operate.
- ② We will strive to avoid legal and regulatory violations by gathering information on laws and regulations concerning our business activities, by revising and improving internal rules and manuals, and by organizing briefings, seminars, and other training and education activities.
- ③ We will promote the establishment, maintenance, and improvement of our internal control systems; develop and maintain a compliance system; and undertake audits and training in each company department.

(3) Whistleblowing

- ① By maintaining appropriate operation of our whistleblowing regulations, we will ensure a system for reporting compliance issues, including violations of laws and regulations.
- ② The whistleblowing contact point will rigorously safeguard the confidentiality of informants and promptly investigate the facts of each case.
- ③ Rigorous safeguards are in place to protect the privacy of both those reporting any actions that violate laws, internal rules, or other rules, as well as the individuals who take part in any associated investigations. No disadvantageous treatment shall accrue to these individuals due to such actions.

2

Respect for human rights

We support and respect international norms regarding human rights. We will not take actions that violate human rights in any way. We will act at all times in ways that reflect our respect for the human rights of all those involved in our business activities.

(1) Respect for human rights

- ① We will act under all circumstances in ways that clearly reflect our respect for human rights and for human dignity.
- ② We will comply with human rights laws and regulations established within each country and region and act in accordance with all international norms concerning human rights.
- ③ We will make all due efforts to recognize the impact of our business activities on human rights. We will abstain from transactions, partnerships, or other cooperative actions with companies or organizations that infringe on or contribute to the infringement of human rights.

(2) Prohibition of forced labor, child labor, and human trafficking

Under no circumstances will we condone forced labor, child labor, or human trafficking, as well as any such activities taking place at any point within our supply chains.

(3) Prohibition of discrimination

Under no circumstances shall we discriminate on the basis of gender, ethnicity, place of birth, nationality, religion, ideology, age, physical disability, or any other personal characteristics.

(4) Prohibition of harassment

We shall not tolerate any form of harassment, including power harassment and sexual harassment.

3

Environmental issues

As a valuable partner for the world's industries, we will help to realize a sustainable global environment.

(1) Preserving the global environment

We are committed to handling products that help preserve and improve the global environment. We will draw on our engineering strengths to help mitigate and identify solutions to global warming and other environmental issues.

(2) Initiatives for climate change

In our business activities, we will actively promote initiatives to reduce greenhouse gas emissions and mitigate the impact of climate change, with the goal of helping to achieve a decarbonized society.

(3) Making effective use of resources

We will strive to provide sustainable products and services by making effective use of limited resources, including water and forest resources, through our environmental management system and by conserving resources, reducing waste, and recycling resources.

(4) Biodiversity

Based on the recognition that business activities can affect biodiversity, we will promote activities that duly consider biodiversity.

(5) Compliance with environmental laws and regulations

We will pursue our business activities in compliance with all domestic and international laws, regulations, rules, agreements, etc. concerning the environment. We will require all parties in our supply chain to take appropriate steps to protect the environment.

4

Improving the working environment for employees

We will achieve work styles that enhance the capabilities of each individual, in the spirit of respect for diversity, personality, and individuality. In addition, we will create an environment conducive to work that also takes health and safety into consideration.

(1) Respect for diversity

- ① We will create an organization characterized by workplace environments in which every individual can flourish. We will pursue the appointment of staff without discriminating on the grounds of gender, nationality, or social background.
- ② By instilling the Company's corporate philosophy within each employee, we will establish a powerful sense of unity within the group and a sense of working as part of an organization.

(2) Fair Employment, labor, and treatment

- ① We will work to establish and appropriately operate a fair personnel and compensation system that fully takes into account the nature of the work done by officers and employees, their achievements, their contributions to the organization, and their future potential roles, thereby meeting the diverse needs of our employees.
- ② We will work to establish and appropriately operate a fair personnel and compensation system that fully considers the nature of the work done by officers and employees, their achievements, their contributions to the organization, and their future potential roles.
- ③ To ensure that the principle of equal treatment applies in all cases, we will comply with both the letter and the spirit of the employment and labor laws and regulations established within each country. We will refrain from discrimination on the basis of nationality, creed, social status, or other such factors when setting wages, working hours, or other working conditions.
- ④ Reflecting our respect for the freedom of association and the right to collective bargaining provided for by applicable domestic and international laws and regulations, we will achieve equitable working environments and seek to ensure both the well-being of employees and the sustainable growth of the company.

4

Improving the working environment for employees

(3) Promoting work-life balance and skills development

- ① We will provide support to officers and employees seeking to balance work and personal life, including in the fields of childrearing, nursing care, and medical treatment, thereby creating rewarding workplaces and providing the peace of mind needed to maintain and cultivate their motivation and abilities.
- ② We will promote opportunities to allow each individual to develop their skills and advance their careers by setting up educational programs tailored to each job group and grade and by providing the places needed to acquire the knowledge and skills necessary for their work.
- ③ We will provide our officers and employees with opportunities for skills development and career advancement and provide environments in which they can approach their work voluntarily and proactively with a sense of pride and responsibility and in a spirit of mutual encouragement.

5

Winning the trust of business partners

We will provide our business partners with pertinent and accurate information concerning our products and services and will conduct communications with them in good faith.

(1) Providing solutions that account for the needs of our business partners

As a partner in the manufacturing activities of our business partners, we will provide optimal solutions that draw on our engineering capabilities. We will respond promptly and in good faith to inquiries from all business partners.

(2) Providing safety and quality information

- ① We will provide all required information on the safety and quality of our products and services, as appropriate.
- ② We will avoid falsifying any data.

6

Mutual development with business partners

We will act in ways that reflect the wishes of our stakeholders, our social responsibilities, and will strive for mutual development with our business partners.

(1) Fair and free transactions

We will comply with all antimonopoly laws and regulations governing fair and free competition and trade within the countries and regions in which we operate. We refrain from all actions that may be construed to violate such laws and regulations.

(2) Compliance with laws and regulations concerning imports and exports

- ① We will comply with all laws and regulations established within each country and region when importing and exporting products and services.
- ② To ensure that we do not export products, parts, materials, or information that impair international peace and security, we will carefully consider the potential for their conversion into weapons and their export to restricted areas and take appropriate measures.

(3) Responsible procurement

- ① Based on an awareness that our business activities are predicated on the efforts of many companies and individuals along the supply chain, we will pursue responsible procurement and make every effort to ensure appropriate transactions in good faith.
- ② At all times, we will select suppliers in an appropriate manner and strive to procure the best products and services.
- ③ We will engage in dialogue with our suppliers to ensure that they understand, empathize with, and proceed in compliance with this Code.

(4) Preservation and use of company assets

We will appropriately manage tangible and intangible company assets such as products, equipment, fixtures, information and intellectual property, making no use thereof for personal gain or improper purposes. We will refrain from any actions that impair the value of such assets, including actions that may lead to loss, theft, or unauthorized use.

6

Mutual development with business partners

(5) Respect for and use of intellectual property

- ① We will take all due steps to ensure the sound appraisal of the value of the company's intellectual property and safeguard rights to inventions, ideas, designs, etc. arising during the course of business, expeditiously acquire rights to them and use them appropriately.
- ② We will proceed based on respect for intellectual property owned by third parties and take action to avoid infringing on such rights in research, development, sale, or other actions related to our products and technologies.

(6) Information security

- ① Based on a keen awareness that information security risks pose material threats to the company, we will invest the management resources needed to implement adequate countermeasures, based on sound risk scenarios.
- ② We will rigorously manage access to company information and handle information in accordance with internal rules to prevent unauthorized intrusion, falsification, leakage, loss, destruction, or obstruction of use.
- ③ We will take all due measures to provide adequate safeguards against threats on computer networks and seek to minimize any damage that may occur.
- ④ We will continually review our countermeasures and response systems against cyberattacks and other incidents.

(7) Management of confidential information

- ① We will manage confidential information with rigorous care to prevent leaks of such information to third parties. We will take steps to prevent the use of confidential information for any purpose but appropriate business reasons. We will treat confidential information disclosed by third parties in the same way we do our own confidential information.
- ② We will neither allow leaks of nor disclose such information in violation of established procedures. We will not tolerate use for any but its intended purpose or viewing by any parties other than those authorized to do so.

6

Mutual development with business partners

(8) Protection of personal information

Personal information held by the company will be managed rigorously and used solely for the intended purposes. In addition, absent justifiable reason, such as when permitted by law, we will not disclose such information externally without the consent of its owner.

(9) Prohibition against personal conflicts of interest

We will not abuse our professional position or authority or act in violation of our professional responsibilities to advance personal interests or in ways contrary to the interests of the company.



7

Participating in and contributing to local communities

We will work with local communities and contribute to regional development.

Respect for local cultures, etc.

- ① We will engage in business activities from a global perspective and in ways that reflect our respect for local cultures and customs. Through our business activities, we will strive to contribute to local communities.
- ② We will strive to make not merely economic contributions, but to contribute to local culture and education, including human resource development, and to safeguard local environmental resources.

8

Engagement with stakeholder

Through stakeholder engagement efforts, we will build lasting relationships of trust and strive to win and maintain stakeholder support for the Group's business activities.

(1) Appropriate information disclosure

- ① We will enhance the transparency of our business activities by disclosing the corporate information required by society in a timely and accurate manner, in accordance with applicable laws and regulations.
- ② We will voluntarily and proactively disclose not just financial information, but information on our philosophy and policy, the status of our business activities, our environmental initiatives, and our relationships with stakeholders.

(2) Prohibition against insider trading

We will handle all material information in compliance with laws, regulations and internal rules based on our understanding of the spirit of insider trading regulations. We will refrain from stock trading or other transactions in the event that we gain knowledge of facts about our company or other companies not available in the public domain.

(3) Appropriate accounting treatment and tax compliance

- ① We will strive to ensure accurate and reliable accounting based on our understanding of its role as a foundation for corporate activities.
- ② We will proceed with accounting treatment in a transparent manner, in accordance with corporate accounting principles.
- ③ We will present and disclose business results, particularly financial information, business plans, and other such information in a timely and appropriate manner, ensuring their accuracy and reliability.
- ④ We will proceed with all due emphasis on tax compliance and comply with corporate tax laws and other laws and regulations established within each country and region, with tax treaties, and with international taxation rules.

9

Preventing bribery and corruption

We will not engage in bribery or other corrupt actions with respect to public servants or business partners, nor engage in any actions that could be interpreted as such.

Preventing corruption

- ① We will refrain from offering bribes, gifts, or inappropriate entertainment to public servants or their equivalents, both domestically and abroad.
- ② Gifts and entertainment offered to business partners or their officers, employees, or associates must be such as would be considered reasonable in light of social norms. They shall not be excessive. We will refrain from accepting excessive entertainment or gifts beyond the scope of applicable social norms.
- ③ We will maintain sound and healthy relationships with political and government figures. We will refrain from illicit or improper actions. We will not offer inappropriate donations in violation of applicable laws, regulations, and internal rules.

10

Dealing with antisocial forces

We will reject antisocial forces or groups in any form that threaten the order and safety of civil society.

Dealing with antisocial forces

- ① We will firmly and resolutely respond to antisocial forces to eliminate any relationships that may be understood to constitute opaque collusion for such.
- ② Should an officer or employee unknowingly enter into a relationship with such organization or individual, he or she shall report the facts of the case to his or her immediate supervisor and to the head of Compliance and proceed based on the instructions provided.
- ③ With regard to our response to antisocial forces, we will centrally manage information for their elimination and eradication, grasp approaches from the outside and will evaluate and consider their materiality.
- ④ We will not involve ourselves in organized crime such as terrorism, drug trafficking and money laundering. We will strive not to be used for these crimes.

If a violation of the Code of Conduct occurs

Each individual working within the DJK Group is obligated to comply with laws, regulations, internal rules, and the provisions of the Code of Conduct. Since any violation of any of these rules can damage the trust of our stakeholders and affect the prospects of realizing our corporate philosophy, violators may be subject to disciplinary action in accordance with the rules of employment.

In no cases can the interests of the company or the instructions of a superior justify a violation. Please report to your manager any action that violates or appears to violate laws, regulations, internal rules, or the provisions of this Code of Conduct. Should this pose difficulties, consult with or notify the whistleblowing contact.

We will safeguard the privacy of the consulting or notifying individual and handle information provided to the whistleblowing contact point as confidential, unless otherwise required by laws and regulations. Unless the consultation or notification is made in clear bad faith, the informant will suffer no disadvantageous treatment due to his or her consultation or notification.



DAIICHI JITSUGYO CO., LTD.

Revised April 1, 2024