

Mitsui High-tec Group Code of Conduct

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Chapter 1. Management through Compliance

Article 1. Purpose

This Code of Conduct provides the code for Mitsui High-tec, Inc. and its group companies (hereinafter referred to as “our Group”) and officers and employees working for our Group (hereinafter referred to as “members” or “we”) to promote business activities through compliance under the guiding principle of “travel a right path”.

Article 2. Compliance

- 2.1 “Compliance” means not only complying with laws and regulations but includes socially common norms of the countries and regions in which our Group conducts its business but also meeting the expectations of various stakeholders surrounding our Group, including customers, suppliers, shareholders and investors, local communities and employees (hereinafter referred to as “stakeholders”).
- 2.2 We should always ask ourselves whether there are any compliance issues based on our actions from the following viewpoints.
- (1) Does the action comply with laws and regulations, socially common norms as well as our Group's internal regulations?
 - (2) Do we act in accordance with this Code of Conduct?
 - (3) If our actions are reported by mass media or shared on social media, does it damage the reputation of our Group?
 - (4) Can we talk openly about our actions to our families and partners?

Article 3. Reporting a Problem

- 3.1 If we see a compliance issue arising out of our members' actions, we will not sit idly by and let it go unnoticed, but will speak up.
- 3.2 We basically report compliance issue to our superior who has the authority to direct and supervise and/or an organization or department in charge of the issue. However, if we find difficulty in reporting through these channels, we can report to the whistle-blowing hotline set up inside and outside our Group.
- 3.3 Our Group protects members who have the courage to speak up (hereafter referred to as the “whistleblower”).
- (1) “Whistleblower” will not face consequences such as dismissal, cancellation of worker dispatch contracts, demotion, reduction in wages, or non-payment of retirement allowance, on the grounds that the whistleblower has made a report.
 - (2) The whistle-blowing hotline does not disclose the name of the whistleblower to anyone other than the parties to whom the whistleblower has agreed to disclose his or her name.

Chapter 2. Preservation of Global Environment

Our Group contribute to the preservation of the global environment and the creation of a sustainable society through the provision of products that are useful to society with the motto “Ultra-precision technology to shape tomorrow”.

Article 4. Carbon-free Society

Wanting to leave the earth in a rich state for our descendant, we aim to achieve sustainable growth by developing technologies and products that contribute to the creation of a carbon-free society and by reducing greenhouse gas in our business activities under the management guidelines of “Save energy, Save earth, Save life”.

Article 5. Recycling-oriented Society

We contribute to the creation of a recycling-oriented society by promoting reduce, reuse and recycle of waste in order to make effective use of limited resources.

Chapter 3. Stakeholders

Article 6. Customers

- 6.1 Our Group build a long-term trusting relationship with our customers based on the principles of mutual benefit and goodwill.
- 6.2 We strive to maintain and improve the quality of our products and to ensure a stable supply. We also do not deliver the products that do not satisfy the quality standard agreed with our customers.
- 6.3 We do not provide entertainment, gifts, money or other forms of benefits to customers and other business partners for the purpose of obtaining or maintaining unfair profits or privilege measures.
- 6.4 Maintaining international peace and safety is also essential for corporate activities. In order to prevent products and technologies that can be diverted to military use from falling into those who may threaten international peace and safety, we check our products to be exported and technologies to be provided in advance as follows:
 - (1) Does it fall under products or technologies with high performance likely to become a weapon or a part thereof, or high performance that can be used in the development of weapons (hereinafter referred to as the “List Control Item”)?
 - (2) Even if it does not fall under the List Control Item, we will check if there’s a possibility that it will be used for the development or manufacture of weapons?
- 6.5 The competition laws of each country and region, such as Anti-monopoly Act

in Japan are the basic laws of economic activity, and no business can be done without complying with them. Our Group does not restrict fair and free competition by restricting business activities (cartels) or collusion in concert with competitor. In addition, our Group does not exchange information with competitor that may lead to restrictions on competition.

Article 7. Suppliers

- 7.1 Our Group's business are made possible with the cooperation and support of our suppliers (hereinafter referred to as "suppliers") for raw materials, parts and components, software, services and so on. Our Group build a long-term trusting relationship with our suppliers based on the principles of mutual benefit and goodwill.
- 7.2 Our Group procure materials and services of appropriate quality, reasonable price and appropriate delivery date. In addition, we do not do business with the following companies:
- (1) Companies suspected of human rights violations such as forced labor and child labor; and
 - (2) Companies suspected of being a source of funds for anti-social forces such as organized criminal groups and inhumane armed groups.
- 7.3 We do fair trade with suppliers without abusing our superior bargaining position. To ensure this, we establish a system for suppliers to report any compliance issue to our Group.
- 7.4 We do not accept entertainment or gifts from suppliers or other business partners that go beyond the boundaries of social common sense.

Article 8. Shareholders and Investors

- 8.1 We disclose corporate information of our Group to shareholders and investors in a timely and appropriate manner in accordance with relevant laws and regulations, to promote understanding of our Group's business. We engage in constructive dialogue with a wide range of stakeholders, including shareholders and investors, to enhance our corporate value.
- 8.2 Accounting irregularity not only causes damage and loss to shareholders and investors, but also threaten the integrity and existence of our Group. We establish and maintain an internal control system for proper accounting procedure and ensure the appropriateness of information disclosure.

Article 9. Prevention of Insider Trading

Insider trading means a transaction in which our members who comes to know in the course of their duties a material fact about our Group or our business partner whose stocks are listed on a stock exchange that could influence investors' investment decisions, involves in purchase or sale of stocks or securities of that company before disclosure of such material fact.

Insider trading interferes with fair securities trading and the offender is punishable by laws and regulations. Our members will not engage in insider trading.

Article 10. Local Community

A company is also a member of society, and society is the foundation of company's existence. Our Group participates in society and contributes to its development as a member of various communities, including the regions where our business sites are located.

Article 11. Political Bodies and Government Agencies

Our relationships with political bodies or government agencies if any, are above board. Hence, we do not engage in any acts that can be misconstrued as collusion, such as benefit offering. To ensure this, we comply strictly with laws and regulations of the countries where our business sites are located concerning the prohibition of bribery, political funds and donations, and the election of public officials.

Article 12. Protection of Personal Information

Personal information should be carefully handled under the vision of respecting the personality of an individual. Our Group properly handles the personal information of stakeholders, including employees, in accordance with laws and regulations of each country and region.

- (1) We, in handling personal information, specify the purpose of utilizing the personal information as explicitly as possible.
- (2) We will not handle the personal information without obtaining in advance a principal's consent beyond the necessary scope to achieve a utilization purpose of specified pursuant to the provisions under the preceding paragraph.
- (3) We take necessary and appropriate action for the security control of personal information including preventing the leakage, loss or damage of its handled personal information.
- (4) We will, except in cases based on laws and regulations, not provide personal information to a third party without obtaining in advance a principal's consent.

Article 13. Management of Intellectual Property and Trade Secrets

Intellectual property and trade secrets (technical or business information useful for business activities, such as manufacturing or marketing methods that is kept secret, and is not publicly known) are the foundation of our business activities and the source of our competitive advantage. Our Group creates intellectual property through constant innovation and effectively utilizes the created intellectual property to develop and provide useful products to society. We establish appropriate system within our Group to ensure that the intellectual property and trade secrets of our Group and our

business partners are properly protected, and comply with relevant laws and regulations to avoid illegally infringing on the intellectual property of others.

Chapter 4. Work Style

Our Group enhances the capabilities of our employees and promotes a work style that respects diversity, personality and individuality.

Article 14. Fair Personnel System

- 14.1 When diverse employees recognize and stimulate each other's diverse ideas and values, it leads to higher labor productivity and creation of innovation. To ensure this, we work to establish and operate a fair personnel system that takes into consideration the employee's job, achievements, contribution to the organization, and expectations for future responsibility.
- 14.2 It is necessary to enhance each and every employee's capabilities and maximize his or her potential in order for our Group to be more competitive and achieve sustainable growth. In employee development, we effectively combine OJT (on-the-job training: guidance and training of subordinates through job) and OFF-JT (off-the-job training) to support employees' voluntary career development.
- 14.3 We promote a well harmonized work-life balance for employees. By maximizing achievements and reducing working hours, we aim to increase the added value of each employee's work, higher labor productivity, and achieve corporate growth.
- 14.4 Good labor-management relations are the source of company's competitive advantage. Even when labor and management have different opinions and views, we exchange ideas with each other and strive to resolve issues through sincere and constructive discussions.

Article 15. Eliminating Discrimination and Harassment

We do not discriminate on the basis of nationality, gender, age, disability, gender identity, sexual orientation, or social status. We respect fundamental human rights and do not tolerate any discrimination or harassment in the workplace (sexual harassment, power harassment, or harassment related to pregnancy, childbirth, childcare, or nursing care).

Article 16. Work Environment

Ensuring the safety and health of employees is one of the top priorities in our corporate management. We prevent work-related accidents and develop a comfortable working environment for employees to maintain and promote their health.

Chapter 5. Role of Top management

Article 17. Commitment

- 17.1 Top management recognizes that it is their role to realize the spirit of this Code of Conduct and strives to raise awareness of the Code's spirit within our Group.
- 17.2 The Compliance Committee is established to promote compliance management in our Group.

Article 18. Risk Management and Crisis Management

- 18.1 Top management promotes group-wide risk management, which involves predicting the frequency and impact of risks that could hinder our business activities, and taking necessary measures to avoid their occurrence and minimize their impact if they do occur. Such risks include, but are not limited to, natural disasters, spread of infectious diseases, cyber-attacks and terrorism.
- 18.2 Top management will take the initiative in resolving the problem, investigating the causes, and preventing the problem from recurring and ensuring systematic crisis management in the event of risks that could hinder business activities or ruin the reputation of our Group.

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