

# Code of Conduct

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**Established on January 1, 1992**

**Revised on August 24, 2004**

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## Chapter 1. General Provisions

### 1. Purposes of this Code of Conduct

- (1) This Code of Conduct sets forth the manner of conduct and the standards for conduct and judgment under the corporate philosophy setting forth the ideal state of, and the meaning of existence of, JCU Corporation and its subsidiaries (hereinafter referred to as the "JCU Group").
- (2) We, all the officers (including those equivalent thereto; the same shall apply hereafter) and employees (including contract employees, part-time employees, dispatched employees, etc.; the same shall apply hereafter) of the JCU Group commonly recognize, as a member of the society, that the key to enhance a sense of compliance and corporate ethics within the JCU Group is fulfilling our corporate social responsibility in our day-to-day work, and faithfully observe the provisions of this Code of Conduct.

### 2. Basic Positions

- (1) We will always comply with all applicable laws, rules, regulations and in-house regulations including this Code of Conduct, in every aspect of our corporate activities. We will make every effort to ensure that all our corporate activities conform to normal business practices, social ethics and global rules.
- (2) We will respect local cultures, traditions and social standards, as a local citizen with common sense, pursuant to the provisions of this Code of Conduct.
- (3) We will maintain impartial, fair, and open relationships between the JCU Group and its stakeholders, and will conduct business in a fair manner with its stakeholders.
- (4) We will not take any action pursuing our personal or a third party's interests against the JCU Group's legitimate interests.
- (5) We will not take any action whatsoever that may damage the JCU Group's social trust and/or honor.
- (6) With an awareness of our position as a member of society, we will always act in accordance with a good social conscience based on high moral and ethical standards.
- (7) We will act with an awareness that each of us represents the JCU Group, even in case of individual activities.

## Chapter 2. Respect of Human Rights, and Healthy Workplace

### 1. Respect of Fundamental Human Rights

We will respect the fundamental human rights of all people in every aspect of our corporate activities, and will not act in such a way that may offend the dignity of any individual or be prejudicial on the grounds of race, beliefs, thought, gender, sexual

orientation, age, social position, nationality, ethnicity, religion, or physical or mental handicap.

#### 2. Elimination of Harassment

We will eliminate sexual harassment, power harassment, maternity harassment and any other types of harassment in every aspect of our corporate activities.

#### 3. Elimination of Child Labor and Forced Labor

All the labors shall be voluntary, and we will not permit forced labor and child labor.

#### 4. Non-Procurement of Conflict Minerals

We will make every effort not to procure so-called conflict minerals which may result in a violation of human rights, such as inhuman mining and fund/profit provision performed in conflict areas.

#### 5. Securement of Industrial Safety and Health

We will recognize the importance of industrial safety and health, and will make every effort to maintain and improve the workplace safety and to secure the health of employees.

### Chapter 3. Relations with Society

#### 1. Environmental Preservation

To contribute to the building of a sustainable society, we will give consideration to the effective utilization of resources, the management of chemical substances, and the like, and make every effort to reduce any adverse impact on the environment in every process relating to its products.

#### 2. Contributions

We will make contributions only after careful consideration of the necessity and appropriateness.

#### 3. Relations with Politics

We will maintain healthy and open relationships with political activities.

#### 4. Elimination of Anti-Social Forces

We will take determined action against anti-social influences and groups, and all contact with such entities will be strictly forbidden. Further, we will not involve ourselves in any act that would promote the activities of anti-social groups.

### Chapter 4. Relations with Customers, Business Partners, Competitors, etc.

#### 1. Product/Service Safety and Quality

We will always focus on customer satisfaction, and give full consideration to the quality and safety of our products and services.

## 2. Free Competition and Fair Commercial Transactions

- (1) We will conduct good faith commercial transactions based on the principle of free competition.
- (2) We will not undertake any action that inhibits free and fair competition, including collusion and cartel formation.
- (3) We will not participate in meetings or in exchanges of information that may limit free competition or engage in any activity that may be construed as doing so.
- (4) We will always contact customers, business partners and competitors in a fair and equal manner, and will not conduct commercial transactions by abusing any superior position to cause inappropriate disadvantage.
- (5) We will not take inappropriate or unlawful actions including exclusionary measures, discriminatory treatment, and restrictions on their business operations.

## 3. Entertainment and Gifts

- (1) We will conduct ourselves with sound business practices and social norms when we provide or receive entertainment or exchange gifts.
- (2) We will not, under any circumstances, offer bribes to public officials. In addition, we will not provide any benefits to gain unfair business advantage, entertain in a way that could be construed as offering benefits, or offer gifts or any other treatment that lacks justifiable grounds.

## 4. Appropriate Displays, etc.

We will avoid displays and expressions that are not based on facts or that are misleading with respect to the quality, performance, or specifications of our products or services in our sales-related activities.

# Chapter 5. Relations with Shareholders / Investors

## 1. Disclosure and Communication of Corporate Information

We will always ensure the accuracy of corporate information, and will disclose and communicate such information in a timely and appropriate manner.

## 2. Prohibition of Insider Trading

- (1) We will not use non-public information obtained from the JCU Group or other companies through the execution of our duties or business transactions for the transactions at the stock market through any name.
- (2) We will not abuse such non-public information set forth in Item (1) above to provide any form of benefit or convenience to a third party.

## 3. Proper Accounting

We will accurately and fairly maintain all financial, accounting and other records.

## Chapter 6. Information Management

### 1. Handling of Information of the JCU Group

- (1) We will strictly manage the JCU Group's information, and will not disclose such information in a manner that violates the procedures stipulated in applicable in-house regulations.
- (2) We will not use the JCU Group's information improperly or inappropriately.

### 2. Handling of Information of Customers, Business Partners, etc.

- (1) We will not use, for any inappropriate purpose, information on or held by customers, business partners, etc. that was obtained through the execution of our duties. Moreover, we will strictly manage such information so that it is not leaked.
- (2) We will not access or obtain information on or held by customers, business partners, competitors, etc. by improper means.

### 3. Applicable Period

We will comply with the items under this Chapter, not only during our employment at our company but also after our departure from the company.

## Chapter 7. Asset Management

### 1. Management and Proper Use of the JCU Group's Asset

We will properly manage our assets (tangible and intangible assets) and will not use them for private purposes or any other use unrelated to the company's business operations.

### 2. Protection and Utilization of the JCU Group's Intellectual Property Rights

- (1) We will protect and maintain the intellectual property rights (such as patent rights, utility model rights, design rights, trademark rights, and copyrights) that are obtained from our R&D or other intellectual activities, and will try to actively utilize them.
- (2) We will respect and not intentionally infringe upon or illegally use the intellectual property rights of third parties that are legally protected.

### 3. Applicable Period

We will comply with the items under this Chapter, not only during our employment at our company but also after our departure from the company.

## Chapter 8. Implementation Scheme

### 1. Implementation

- (1) The officers will provide guidance and supervision to ensure that all their subordinates observe the matters set forth in this Code of Conduct.
- (2) The divisions concerned in our company will undertake the activities necessary to ensure that our corporate activities are in compliance with this Code of Conduct, including the formulation of in-house regulations and manuals, promotion of thorough awareness of specific rules to observe, and provision of advice and guidance.
- (3) The officers and employees who are aware of acts that are in violation of this Code of Conduct will promptly contact an appropriate contact point at their responsibilities.
- (4) A violation of this Code of Conduct may result in disciplinary action under and in accordance with applicable laws, rules, regulations, and/or in-house regulations.

### 2. Scheme

- (1) The division responsible for this Code of Conduct shall be the Corporate Strategy Office of JCU Corporation, and it will promote the implementation of the matters set forth in this Code of Conduct in cooperation with divisions concerned.
- (2) The compliance with this Code of Conduct will be subject to an audit by the Internal Audit Division of JCU Corporation.

### Supplementary Provisions

1. This Code of Conduct has been revised on April 1, 2021 and shall become effective on that day.
2. The revision and abolition of this Code of Conduct shall be prepared by the General Manager of Corporate Strategy Office, and shall become effective subject to the resolution by the Board of Directors; provided, however, that the company shall hear opinions of a person(s) who represents the majority of workers prior to such revision or abolition.

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