

## **Code of Ethics**

### **1. Management's Responsibilities**

- i. All Officers of the Company will recognize compliance with laws and regulations and the Code of Ethics as an important task for them personally and will play a leading role in putting compliance into practice. They will also prepare for unanticipated situations by monitoring feedback from within the Company and across the Group to promote full compliance with ethics and provision of an effective framework for that purpose.
- ii. Should a situation violating the Code of Ethics occur, all Officers will be ready to act swiftly and unerringly to investigate the causes, release information, clearly indicate sincerity in addressing the issue, take strict action to deal with it (including action involving themselves), publicize the results of such measures, and ensure measures to prevent reoccurrence are fully implemented.

### **2. Creating Sound Environments Conducive to Work**

#### **(1) Mutual respect**

- i. We will be considerate of each other and respect each individual's point of view and ideas. We will not discriminate based on nationality, ethnicity, religion, ideology, beliefs, education, gender, age, physical disability, or any other attribute. We will reject all prejudice and stereotyping.
- ii. Should a situation violating laws and regulations or social norms occur, we will act swiftly and unerringly to investigate the causes and ensure measures to prevent reoccurrence are implemented fully.
- iii. We will strive to maintain sound workplace environments and create workplaces that are conducive to working with peace of mind. We will not perpetrate harassment of any kind, including speech or actions that cause someone to feel uncomfortable, harm a person's dignity, place someone at a disadvantage, or constitute a threat. This includes bullying, sexual harassment, abuse of authority, moral harassment, or pregnancy-related harassment. Furthermore, we will not tolerate any such conduct.

#### **(2) Creating a transparent corporate climate**

- i. We will create transparent workplace environments in which communication flows freely, and the more difficult a subject may be, the quicker employees apprise managers of it to enable everybody to share the same information.

#### **(3) Ensuring health and safety**

- i. We will observe requirements relating to health and safety and strive to prevent or prepare

- for disasters, while also striving to manage the health of employees on a day-to-day basis.
- ii. We will create healthy and safe workplace environments by endeavoring to ensure neatness, tidiness, cleanliness, hygiene, and discipline.

(4) Maintaining a relationship of mutual trust between employees and management

- i. We will cooperate as employees and management based on a mutual understanding that the long-term stable development and growth of the Company leads to job security and the maintenance and improvement of employment terms for employees through work regulations, employment contracts, and collective agreements.

### **3. Conduct Following Social Convention and Rules**

(1) Conduct complying laws and regulations, and social convention

- i. In addition to complying with laws and regulations and eschewing all illegal conduct, we will act following ethics and social convention and etiquette. We will be careful not to attract criticism from the general public or cause inconvenience for others, and will strive to earn the trust of society at large.
- ii. We will not conduct political activities or other activities on Company premises that might disrupt order within the Company or impede work.

(2) Compliance with work regulations

- i. Work regulations are rules for corporate life mutually affirmed by employees and management, and they define the relationship between the Company and its employees. We will ensure that we understand the regulations fully and will act in accordance with them.

(3) Prohibition of conduct that undermines the Company's interests

- i. We will not engage in conduct that undermines the Company's interests. Furthermore, we will not engage in conduct that exceeds the authority vested in our position, nor will we use our status or position in the Company to engage in conduct intended to accommodate our own convenience, or that of people associated with us.

### **4. Ethics in Business Activities**

(1) Creating a commitment-based culture

- i. We will free ourselves of passivity and challenge ourselves to reach higher goals. Each of us will take on a role and responsibilities, following our commitments through to completion without giving up.

(2) Contributing to the Company

- i. We will strive to ensure the Company's growth and to increase corporate value by cooperating with the Company's policies and actively participating in its activities.

**5. Ethics in Production Activities**

(1) Complying with standard operating procedures

- i. We will perform our work in accordance with predetermined standard operating procedures.
- ii. Should any problem occur, we will, first of all, suspend operations, and then promptly report the matter to our manager, asking for instructions.

**6. Ethics in Transactions with Customers**

(1) Quality control

- i. We will supply safe, good-quality products and services. Should any problem occur, we will promptly report the matter to the customer, investigate the cause, and implement measures to resolve the problem.
- ii. We will correctly indicate the quality, content, and other details of the products and services we supply to customers.

(2) Complying with delivery times

- i. We will keep to the delivery times we promise. Should any exceptional event or situation occur, we will always promptly contact the customer.

(3) Protecting customer information

- i. We will properly protect customers' development information and other confidential information.

(4) Fair transactions

- i. We will engage in fair and free competition with other companies and we will not engage in conduct that violates the Anti-Monopoly Act (such as bid-rigging). We will ensure that any entertainment of customers and gifts presented to them remain within the limits of social convention.

**7. Ethics in Procurement Activities**

(1) Fair transactions

- i. We will take a broad, world-wide view and offer business partners open, impartial opportunities to start supplying to us, regardless of nationality, size of the business, or

- whether they have a past track record of doing business with the Press Kogyo Group.
- ii. We will always demonstrate restraint when interacting with our business partners and will comply with the contracts exchanged with them. We will rigorously refrain from receiving entertainment or gifts exceeding the limits of social convention, or demanding such entertainment or gifts.
  - iii. We will not abuse our advantageous status or position as a purchaser and we will comply with laws and regulations including the Anti-Monopoly Act and the law relating to subcontracting. We will aim to develop and grow together with our business partners by building mutual trust through free, fair, and transparent transactions based on economic rationality.

## **8. Ethics in R&D Activities**

### (1) Promoting R&D

- i. We will provide customers with products and services that meet their expectations by endeavoring to create new value that anticipates challenges through unceasing research.

### (2) Protecting intellectual property

- i. We will strive always to protect the Company's patents, utility models, and other intellectual properties to prevent them from being infringed. At the same time, we will respect other companies' intellectual property, taking care not to infringe on it.

### (3) Manufacturing safe, useful products

- i. We will pay careful attention to the safety of our products during development to supply safe, useful products that customers can use with peace of mind.

## **9. Overseas Business Activities**

### (1) Complying with laws and regulations

- i. When conducting international business activities, we will comply with laws and regulations in each country, as well as with international rules.

### (2) Consideration for the environment

- i. When conducting business activities overseas, as well as in Japan, we will show consideration for the environment and comply with environmental standards, targets, and other requirements in each country.

### (3) Respect for diverse cultures

- i. We will endeavor to conduct ourselves appropriately as international citizens and will demonstrate understanding and respect for the culture, rules, etiquette, and customs in each country and region.

(4) Ensuring safety

- i. We will endeavor to ensure our own safety, as well as that of family members and associates when seconded to overseas subsidiaries or when taking business trips overseas. We will also prepare ourselves by establishing a reliable emergency communication network and procedures for dealing with emergencies in advance.

## **10. Treatment of Company Property**

(1) Protecting company property

- i. We will exercise adequate care when using or administering company property to ensure that it is not lost, damaged, stolen, or used for unauthorized purposes. Furthermore, we will not use company property for personal purposes unrelated to work, nor will we remove such property from company premises without permission.

(2) Managing confidentiality

- i. We will strictly manage the Company's confidential information as well as that of other companies toward which we have a duty of confidentiality; we will not disclose such information to third parties.
- ii. We will prevent software and internal data from being damaged or leaked by strictly guarding against intrusion by hackers, viruses, spyware, or other malware.

(3) Inventions during the course of work

- i. Patents, utility models, designs, trademarks, and copyrights resulting from inventions during the course of work belong to the Company. We will not use these intellectual properties for unauthorized purposes.

## **11. Management of Information**

(1) Protecting personal information

- i. We will respect personal privacy and handle personal information appropriately. We will prevent loss, manipulation, or leakage of personal information we acquire knowledge of during the course of our work, and we will not use such personal information for purposes other than as required to perform our work.

(2) Sharing information

- i. We will promptly report to our manager any important information we acquire knowledge of during the course of our work. Moreover, we will share the information by communicating it to the relevant department(s) in accordance with our manager's instructions.

(3) Restrictions on the extent to which information is communicated

- i. When transmitting information, we will check the extent to which the information is to be communicated, and if restrictions exist, we will always take steps to limit access. When transmitting information electronically, we will set access rights or passwords, or otherwise, limit access.

(4) No unauthorized acquisition, use, reproduction, or removal of information

- i. Under no circumstances will we engage in conduct involving an unauthorized acquisition or use of another company's trade secrets. Moreover, if we acquire such information from an external research agency, we will exercise adequate care to ensure that no unauthorized conduct was involved in supplying the information to us.
- ii. If somebody from outside the Company attempts to sell us a technical proposal or information, we should not accept the proposal or information in question unless we have adequately confirmed that it does not infringe on another party's intellectual property or comprise another company's confidential information.
- iii. When using a computer, we will not copy or install commercial software in violation of the software's terms and conditions of use or licensing agreement.
- iv. We will not reproduce or make copies of important information belonging to customers, individuals, or companies for purposes other than the performance of our work, nor will we remove such information from company premises without permission.

## **12. Protecting the Environment**

(1) Consideration for the environment

- i. We will promote resource and energy conservation, and strive to preserve the environment.
- ii. We will strive to reduce our environmental impact resulting from oil, dust, and noise pollution.
- iii. We will promote waste-related 3R activities. The 3 R's are (a) reduce, (b) reuse, and (c) recycle.

(2) Complying with laws and regulations

- i. We will comply with environment-related legislation and regulations.

- ii. Should any problem or accident occur, we will immediately report the matter to the relevant department and swiftly take appropriate steps to minimize the impact on the environment. Also, we will promptly submit any necessary reports or notifications to the administrative authorities.

### **13. Ethics in Local Communities**

#### (1) Living in harmony with the community

- i. As good corporate citizens, we will strive to contribute to society in a range of ways, for example, by interacting more closely with local communities and participating in community-based activities.

#### (2) Preserving the environment

- i. As members of our local communities, we will strive to conserve resources and energy, for example, by sorting recyclable garbage for disposal and saving water and electricity. Also, we will endeavor to participate actively in local activities aimed at making living environments more attractive and increasing greenery.

### **14. Ethics in our relationships with shareholders and other stakeholders**

#### (1) Return to shareholders

- i. We will ensure that we achieve our target profits by striving to improve performance through sound business activities. The profits thus acquired will be allocated to growing the Company and enhancing corporate value, as well as providing a return to the shareholders and investors who gave us valuable funding.

#### (2) Promoting investor relations activities

- i. We will supply information appropriate to the needs of our shareholders and investors accurately, promptly, and proactively. Also, we will strive to deepen understanding of the Group's management and activities among shareholders and investors by responding sincerely to their questions.

#### (3) Risk management

- i. We will identify risks to the continuation of the Company's business and implement preventive action and countermeasures. The results of such action and countermeasures will be assessed as a means for further reducing, avoiding, and diversifying risk.

#### (4) Appropriate and accurate accounting

- i. We will conduct appropriate and accurate accounting in accordance with the relevant laws and regulations and internal rules. We will monitor whether accounting is being conducted appropriately through internal and external audits.

(5) Open shareholder meetings

- i. We will conduct general meetings of shareholders in an open manner, responding impartially and sincerely to shareholders' questions. We will resolutely respond to any approaches made by *sokaiya* (extortionists who threaten to disrupt shareholder meetings); under no circumstances will we supply *sokaiya* with any benefits.

(6) Prohibition of insider trading

- i. During the course of work and related activities, we may acquire knowledge of material non-public information (insider information) belonging to the Company, its affiliated companies, or business partners. If we should acquire such knowledge, we will not communicate the information or recommend related trading to any third party, nor will we buy or sell the shares or other securities of the company or companies in question until that information is made public. In addition, we will strive to ensure that the information is not leaked before it is made public.

**15. Relationships with Politicians and Government Officials**

(1) Demonstrating restraint in relationships

- i. We will not supply illegal benefits to politicians or government officials or provide inappropriate entertainment or gifts exceeding the limits of social convention. We will rigorously refrain from any behavior that might be misconstrued as indicating a collusive relationship with politicians or government officials, and will strive to build sound, transparent relationships.

**16. Responding to Anti-social Forces**

(1) A resolute response

- i. We will resolutely respond to anti-social forces that threaten the social order and sound corporate activities; for no reason whatsoever will we ever maintain any relationship with such groups.

**17. Road Safety**

(1) Complying with traffic rules and etiquette

- i. Aware that our company is part of the automotive industry, each individual will strive to take the initiative in promoting road safety. We will comply with traffic rules and etiquette,



and in particular, we will ensure that we never drive under the influence of alcohol.

(2) Considerate driving

- i. We will strive to protect vulnerable road users such as senior citizens and children and to drive with kindness and consideration. Should we be involved in, or witness, an accident, we will strive immediately to assist those who have suffered harm.