

Oji Group "Behaviour Standard"

Stand: December 2020

The Oji Group "Behavior Standard" applies as a behavioral guideline for the daily work of management and all employees in order to deepen the Oji Group "Corporate Code of Conduct". Each individual is responsible for and obliged to follow this code of conduct.

Relationship with Society

1. Compliance with Relevant Business Laws

We will comply with business laws of each country related to our business activities, and appropriately perform the legally stipulated procedures for licensing, notification, and reporting, etc.

2. Ensuring Safety in Business Activities

At all stages of our business activities, we will always consider safety to be the top priority, and reliably ensure the safety of our products and services, appropriately control chemical agents, and manage the security and disaster prevention of our operating facilities and equipment. When a problem is discovered, we will respond by ensuring safety as the top priority.

3. Practice of the Oji Group Environmental Charter

In addition to complying with the laws and regulations related to the environment, we will proactively promote contributing to a recycling-based society, responding to climate change by countering global warming, and reducing environmental impact.

4. Acting with a Sensible Manner

We will always use good sense in our actions, being aware of our relationship with society. As a good member of society, we will endeavor to participate in a variety of activities aimed at the development of society.

5. Wholesome Relationship with Politics and Government

We will always maintain a proper, wholesome and transparent relationship with politics and the government. We will not engage in illegal contributions, donations or bribery and will work to prevent corruption in all its forms.

6. Severance of Relationships with Antisocial Groups and Organizations We will maintain a firm attitude against antisocial groups and organizations and will resolutely refuse all relationships with them.

7. Corporate Activities that Contribute to the Realization of a Sustainable Society Through innovation, we will consider the global environment, create innovative value, develop and provide useful materials, products and services that contribute to a sustainable society.

8. Coexistence with International society

As a member of international society, we will respect the culture, customs and values of each country and region, and work together sincerely to develop our business.



Relationship with Customers, Business Partners, and Competitors

9. Seeking a Relationship of Trust with Customers

We will improve customer satisfaction through our commitment to product quality and improving quality of services. We will appropriately manage information related to the customer, including corporate secrets and personal information.

- **10. Maintenance of an Honest, Wholesome Relationship with Business Partners** Along with honest interactions, we will maintain moderate, wholesome relationships with our business partners and local communities. We will not provide benefits that are suspected of bribery to the other party, and we will not receive benefits that are suspected of bribery to the other party.
- 11. Compliance with Laws and Regulations Related to the Anti-monopoly Act and the Act Against Delay in Payment of Subcontract Proceeds Etc., to Subcontractors We will comply with the Anti-Monopoly Act and other related laws and regulations, and will engage in fair trade without committing illegal actions such as participating in cartels or collusion, etc.

We will comply with the Act Against Delay in Payment of Subcontract Proceeds, Etc., to Subcontractors and other related laws and regulations, and will maintain appropriate trade relations with subcontractors.

12. Prohibition of Unfair Competition

We will comply with the Unfair Competition Prevention Act and other related laws and regulations, and will not make unauthorized use of the corporate secrets of other companies or engage in sales activities that would damage the trust of others. We will respect the patents, copyrights, and other intellectual property of third parties.

13. Proper Import/Export Management

We will comply with laws and regulations related to import and export such as customs law and international treaties, and conduct proper import and export transactions.

14. Responsible Raw Material Procurement

We will comply with Oji Group Partnership Procurement Policy regarding raw materials and conduct fair and appropriate transactions and responsible procurement.

Relationship with shareholders and investors

15. Disclosure of Management Information

Along with improving for transparency in our management, we will disclose our management policy, business activities, and other corporate information related to economic, social, and environmental issues in a timely and fair manner.

16. Prohibition of Insider Trading

We will not engage in insider trading using unreleased company information or actions that would evoke suspicion.



Relationship with Employees

17. Ensuring Safety and Health in the Workplace

With "safety as the top priority," we will ensure safety and health in the workplace, engage in safe behavior, and ensure the safety and health of all parties involved in our business. We will develop the work environment by paying sufficient attention to mental and physical health management.

18. Prohibition of Discrimination and Protection of Human Rights

We will respect the fundamental human rights of all people, and will not unfairly discriminate against individuals according to their race, nationality, ethnicity, birthplace, philosophy and beliefs, values, religion, age, sex, sexual orientation, gender identity, disability, social status, and status within the company, etc.

We will never engage in the utilization of child labor or forced labor.

19. Prohibition of Harassment

We will not conduct acts of harassment such as power harassment (abuse of authority) and sexual harassment, etc. will not invade their privacy, and will not allow others to do so.

20. Fulfillment of Responsibilities and Self-Development

We will fully understand the spirit of the Corporate Code of Conduct and comply with its standards, diligently work to fulfill our individual duties, and always pursue better performance. We will strive for self-development to gain more knowledge and improve skills.

We will also try to develop human resources so that all executives and employees can fully demonstrate their abilities.

21. Preparing for Various Risks such as Natural Disasters

Against unexpected disasters such as natural disasters and the spread of infectious disease, as well as intentional illegal acts such as fraudulent access to information systems, we always work to ensure the protection of human life and prepare for business continuity based on our various risk management regulations.

Relationship with the Company

22. Compliance with Company Rules

In the execution of duties, we will comply with relevant laws and regulations, the Articles of Incorporation, and other company rules which include various our regulations, employment regulations and other regulations related to human resources, operating procedures, and working manuals.

23. Appropriate Records and Accounting

We will correctly record the company's transactions and activities, and appropriately manage and store the records in accordance with relevant laws and regulations and company rules. We will conduct accounting in accordance with generally accepted accounting standards.



24. Maintenance of Company Assets

We will keep necessary records of company assets (equipment, intellectual property, supplies, money, and information, etc.), regardless of whether they are tangible or intangible, and use and manage them appropriately. We will not utilize such company assets for personal purpose.

25. Thorough Information Management

In addition to the company's customer information, confidential information regarding sales, manufacturing, research and development, and others are important assets of the company. We will manage such information appropriately and will not provide it to third parties or use it for non-work purposes without authorization. We will respect the confidential information disclosed by third parties and handle it in the same manner as the company's confidential information.

26. Appropriate Use of Information Devices and Communication Means

We will properly use information devices and communication means in accordance with our information system-related regulations.

We will not destroy, tamper with, or alter data, make unauthorized use of software, or engage in other such misconduct.

27. Prohibition of Conflicts of Interest

We will not engage in behavior that would adversely affect the profit of the company, using our duty-related position or authority, or based on knowledge we have acquired in the course of the execution of duties. We will not engage in or be involved in activities that have a possibility of adversely affecting the profit of the company, without the authorization of the company.

28. Prohibition of Private Political Activities, Etc. in the Workplace

We will not conduct activities in the workplace to solicit participation in political or religious organizations or request voting in elections, etc., without the authorization of the company.

Proactive communication

29. Open Working Environment

We will respect each person's individuality and diversity regarding assignment and workplace issues, and always do our best to achieve and maintain a working environment that makes it possible to openly discuss the issues. All management and employees are encouraged not to withhold issues that cannot be resolved in the workplace, and to consult with supervisors and relevant departments in order to strive toward a resolution.
