

Fuji Kiko Group Code of Conduct

1 Essential Principles

- 1.1 Compliance with domestic and foreign laws, internal rules and controls, company policies and faith toward ethical business practices;
We honor the laws and customs in each country and region where we conduct business. We conduct all of our business affairs faithfully and ethically. All Directors and Employees of the Fuji Kiko Group observe the laws, regulations, internal rules and controls and policies, and strive to understand the requirement of such laws, regulations, internal rules and policies applied to our every activity.
- 1.2 Stakeholder Relations;
We understand that Fuji Kiko Group impacts many and varied stakeholders, directly and indirectly: these include shareholders, customers, employees, and local communities and organizations. With this in mind, Fuji Kiko Group makes our business and management decisions. All Directors and Employees of the Fuji Kiko Group always conduct their business activities based upon this principle.
- 1.3 Respect for Diversity;
The Fuji Kiko Group respects and honors the diverse communities we serve. All Directors and Employees of the Fuji Kiko Group strive to recognize the morals, customs, laws, culture, religious and ethnic heritage, and histories of the communities where we operate. The Fuji Kiko Group does not impose our sense of values on others in this spirit of diversity.
- 1.4 Conflict of Interest Prohibition;
We make our business decisions in the best interest of the Fuji Kiko Group and not any private interest. All Directors and Employees of the Fuji Kiko Group do not conduct activities or transactions which undermine the interest of the organization.
- 1.5 Denial of Anti-Social Activity;
The Fuji Kiko Group does not deal with antisocial forces or organizations. All Directors and Employees of the Fuji Kiko Group strive to understand local laws, share a common sense of fairness and justice, and take actions in support of the business. When met with unreasonable or unethical demands, we do not settle matters with a bribe or similar remuneration.
- 1.6 Ethics Hotline;
All Directors and Employees of the Fuji Kiko Group are required to report suspected unethical behavior through local ethics hotlines. The rights and interests of each person reporting the suspected violation shall always be protected. No Director or Employee who reports a suspected ethical violation in good faith shall be retaliated against.

2 Respect for Human Rights

2.1 Equal Employment Opportunity;

Our policy is to respect the human rights and dignity of every person and do not conduct any action that leads to discrimination. All Directors and Employees of the Fuji Kiko Group do not discriminate on the basis of birth, sex, nationality, academic background, religion, age, or origin.

2.2 Work Environment Principle;

The Fuji Kiko Group strives to maintain a healthy, safe, and productive workplace without discrimination or harassment. All Directors and Employees of the Fuji Kiko Group do not make statements or take actions which create a hostile work environment. Sexual harassment is prohibited. Safety and cleanliness are a first priority here. All Directors and Employees of the Fuji Kiko Group comply with applicable laws, internal rules and policy regarding environmental health, safety and cleanliness.

3 Faithful and Fair Business Operations

3.1 Product Safety ;

Safety is our number one priority. The Fuji Kiko Group verifies the conformity of our products to the local safety laws and regulations in an early stage of design. We make our best efforts to maintain the quality and safety features required by our customers. In addition, we make our best effort to maintain and guarantee the quality of the products in the manufacturing process, whether the customer requires serial production or service parts. When an accident related to our products, or any concern is reported by a customer or user, we take immediate action to acquire the related information and solve the problem as quickly as possible.

3.2 Compliance with Applicable Laws;

We comply with the applicable laws and regulations to manufacture and sell our products and file required applications without delay.

3.3 Environmental Protection;

We give high priority to caring for the environment and conduct continuous improvement activity in this respect. We play a role in promoting a recycling oriented society. In support of this policy, all Directors and Employees of the Fuji Kiko Group strive to observe the treaties, laws, and regulations and conduct our business activities in accordance with the specified environmental policy. We pursue environmental analysis as a principal factor in the planning stages of new projects or businesses.

3.4 Fair Competition;

All Directors and Employees of the Fuji Kiko Group do not take any action which violates the antitrust laws describing cartel, bid rigging, resale price maintenance, and abuse of dominant position, and pursue fair and free inter-corporate competition.

3.5 Disclosure of Corporate Information;

As Fuji Kiko is a publicly held company, we have obligations to comply fully with the security laws and rules, and to disclose the corporate information. We disclose the legal, appropriate, accurate and easy-to-understand corporate information in a timely manner.

3.6 Personal Information;

The Fuji Kiko Group respects the privacy of our customers, suppliers and all Directors and Employees. We use personal information for business purposes only, and keep such information under strict control to prevent any release of individual information.

3.7 Intellectual Property;

The Fuji Kiko Group values all intellectual property including patents, rights of design, brand names, trade secrets, and computer programs. We consider these properties as important company assets, and we use and protect them properly. We file to protect any invention from our production and development activities in a timely manner and preserve these rights as company assets. We do not take any action to infringe upon another person or organization's intellectual property rights. We properly use outside people's intellectual property after conclusion of the appropriate contracts.

3.8 Confidential Information ;

In addition to the confidential information of customers, suppliers and business partners, we securely protect our own confidential information. "Confidential Information" means undisclosed proprietary information, technical information, the information that gives us competitive advantage, or information that damages a person or the company. Generally, these matters include invention, technology or process creation, know-how, trade secrets, financial information, company strategy, sales plan, or information about customer, supplier and business partners. We keep the Confidential Information under strict control, and we do not allow its disclosure, release or use for any other purpose than the original intent without the permission of its legitimate right-holder. We do not steal another person's or company's confidential information or use such information for other purpose than the original intent.

3.9 Fair and Honest Procurement;

The Fuji Kiko Group deals with suppliers in good faith, and treats the suppliers in fair and equitable manner. We select the best suppliers, service providers and contract manufacturers in terms of quality, price competitiveness, delivery performance, development capability, and stability. We do not exploit or leverage advantages toward or away from a specific supplier but try to build partnerships. With full understanding of the commercial laws, we pursue the business without any delay in payment.

3.10 Gifts and Entertainment;

Our policy is to compete by using the superiority of our products, development capability, superior service and price competitiveness. In that respect, we prohibit providing excessive entertainment or gifts to customers. We also prohibit our people receiving the same. In particular, we do not entertain and give gifts to civil authority/government officials.

3.11 Reporting and Records;

It is essential that all records and reports including accounting books and other financial records be made accurately, faithfully and timely without omissions, and that such records and reports represent the facts properly. All Directors and Employees of the Fuji Kiko Group do not take any action which leads to the filing of inaccurate records, or participate in any way in making false or misleading records.

4. **Ethical Action**

4.1 Insider Trading;

Insider trading means stock transactions and other security trading conducted with the knowledge of important undisclosed information (“Inside Information”). All Directors and Employees of the Fuji Kiko Group are not allowed to buy or sell the stocks of Fuji Kiko, its affiliates or other companies concerned, before the known “Inside Information” is officially disclosed. All Directors and Employees of the Fuji Kiko Group are required to check for knowledge of Inside Information (important undisclosed information which could affect investor’s decision, such as issue of new stocks, financial information including profit or dividend plan, alliance with other company, development of new product or advance of research, development), before buying or selling the stocks of Fuji Kiko or other organizations with business relations to the Fuji Kiko Group.

4.2 Company Assets;

The assets of the Fuji Kiko Group are to be used efficiently for their intended business purpose by the Directors or Employees who have the authority to use them. (These assets include the information system and intangible assets such as trademarks, know-how and Confidential Information). All Directors and Employees of the Fuji Kiko Group are responsible for keeping safe these assets from loss, damage, misuse, theft, and destruction. It is prohibited to pursue personal profit using the assets of the Fuji Kiko Group. The Fuji Kiko Group has the right to monitor or inspect the status of the Director’s or Employees’ use of the assets to the extent permitted by the law. This includes the monitoring and inspection of the data or files stored in E-mail, PCs and other network devices.

5. **Supplementary Clause**

5.1 Scope of Application of Fuji Kiko Group Code of Conduct ;

This Code of Conduct is applied to all Directors and Employees of the Fuji Kiko Group companies, and applied mutatis mutandis to temporary staff and part time workers.

5.2 Revisions;

This Code of Conduct may be revised as business needs dictate by the approval of the Fuji Kiko executive committee.

6. **Sanctions**

Directors and Employees who violate this Code of Conduct, or permit others within the organization to violate the Code, are subject to discipline up to and including termination of employment in accordance with the rules and regulations of the local jurisdiction.