

COMPLIANCE GUIDE BOOK



We will respect human rights and diversity, and will not act to harm the dignity of individuals.

- By respecting the human rights, which all human beings naturally possess, and dealing with people with respect, we will create a sound and rewarding workplace environment in which all can demonstrate their abilities proactively and creatively and form favorable interpersonal relationships.
- We will not criticize others, make derogatory remarks about them, unfairly treat them or engage in other discriminatory actions on the basis of their race, ethnicity, creed, religion, nationality, age, gender, gender identity, sexual orientation, origin, education, social status, mental or physical disability or other such reasons, and will not tolerate such discrimination.
- We will try to recognize each other's individuality, respect diversity, and create opportunities for each individual to demonstrate their full potential.
- Recruitment and performance evaluation will be fairly conducted based on each concerned individual's abilities and aptitude.



We will not engage in harassment inside or outside our workplaces.

- We will not engage in harassment through words or deeds that make others feel uncomfortable both inside or outside of our workplaces, including during banquets.
- With a superior position, we will not cause mental distress to colleagues and subordinates, interfere with the execution of work, or cause discomfort to the workplace environment by comments or attitudes beyond the scope of instruction required for work.
- No employee will be subjected to disadvantageous treatment such as dismissal, demotion or salary decrease because they have refused sexual advances from those in decision-making positions.
- By making our workplace uncomfortable with sexual speech and behavior, we shall not do anything that would negatively affect the work performance of colleagues or subordinates.
- We will not engage in mental harassment for pregnant or postpartum women, such as making thoughtless remarks. We will not take unfair treatment, such as preventing employees from taking childcare leave or forcing employees to resign due to pregnancy, childbirth, or childcare.



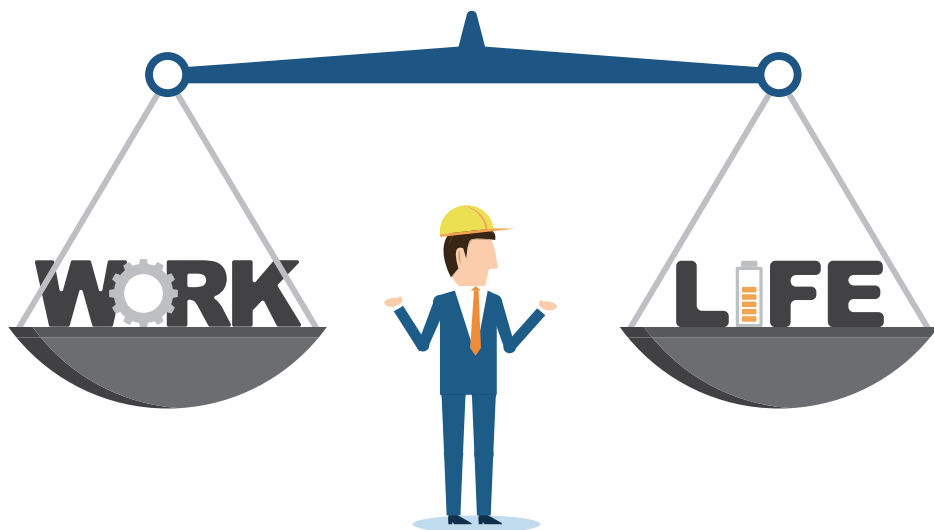
We will make constant efforts to realize a free and fair workplace environment in which superiors and subordinates work in cooperation.

- ◆ Legal rights granted to workers will be respected, and labor disputes involving strikes and other legitimate activities conducted by labor unions will not be obstructed; workers will not be treated unfairly because of their participation in such activities.
- ◆ Illegal and unfair working practices such as unpaid overtime work and excessively long working hours will not be imposed; employees requested to work outside their regular working hours or on holidays will be compensated with an appropriate consideration in compliance with the applicable law.
- ◆ We will accurately report our working hours and will not make false reports such as excessive claims for overtime or holiday pay.
- ◆ We recognize and understand that various employment types (full-time, part-time, dispatched employee, temporary, subcontractor, etc.) coexist within the Company and respect this diversity so as to work together toward the realization of the Company's management principles regardless of these differences.
- ◆ Work instructions shall be given in accordance with the laws and regulations set forth for each type of employment. We will not give instructions directly to subcontractors, and will not give instructions to dispatched personnel on duties that are not specified in their dispatched contract.



We will prevent occupational disasters, ensure workers' safety and health in their workplaces, and strive to realize a comfortable workplace environment.

- We will conduct thorough workplace safety management and education to eliminate occupational disasters.
- We will eliminate stress-causing factors from the workplace, prevent mental diseases among employees, and establish a system that covers the process from taking leave of absence to returning to work so as to create a workplace environment in which all employees are free from excessive anxiety or trouble.
- We will actively tackle problems with the workplace environment, working hours, interpersonal relationships, culture, etc., once such problems are detected, so as to develop a corporate culture that is conducive to open and frank communication.



We will appropriately manage the Company's and other companies' confidential information and will not release it to external parties or use it for purposes unrelated to work.

- ◆ We recognize the importance of technical and business information that the Company manages and classifies as confidential, and we will appropriately manage such information in accordance with the internal regulations so that it will not be released to unauthorized parties. Confidential information we receive from other companies will also be handled in the same way as the Company's confidential information.
- ◆ We will not release confidential information to outside parties or use it for purposes other than determined ones during or after our employment with the Company. We will not obtain confidential information from within the Company or external parties in illegal and unfair manners and will not use information thus obtained to our own or others' advantage.
- ◆ We will not disclose any information of the Company's internal situations or business partners in public places such as public transportation vehicles or restaurants, with external people including our family and friends as well as colleagues who are not required to know of such information.



We will appropriately and carefully manage and handle personal information on our customers, suppliers, shareholders and other related parties that we know through work.

- We will use personal information strictly within the scope of use that the Company publicly announces and will not release such information to other parties without the consent of concerned persons or legitimate reasons.
- We will handle personal information in our possession in the same way as the Company's confidential information by, for example, refraining from removing it from its designated place of storage so as to prevent its loss, destruction, alteration or leakage.



We will not leak unpublished information of great importance (insider information) and not engage in insider trading.

- ◆ We will completely refrain from buying or selling, whether in our own or family member's name, stocks of the Company or its affiliated companies, customers, suppliers, etc. on which we have obtained insider information until such information becomes publicly known.
- ◆ We recognize that facts that may significantly influence investors' decisions, such as matters related to new products or mergers that have not yet been officially announced by the Company, constitute insider information, and we strictly maintain confidentiality until such facts are made public.
- ◆ We will follow the applicable internal regulations and notify by submitting prescribed forms when buying or selling the Company's stocks.





As we acknowledge that the Company's internal information system is our Company asset, we will use it strictly for work-related purposes and will not use it in violation of internal rules.

- We will not unnecessarily disclose or inform others of our ID codes or passwords that are used to access the information system.
- We will not send or receive private e-mails or browse the Internet unrelated to our business using the Company's computers, smartphones, or tablets. In addition, we will not damage the reputation or trust of the Company by talking bad about the Company on social media.
- We will not take out the Company's computers from the Company premises without applying for permission by submitting prescribed forms.
- We will not connect personally-owned USB memory or other electromagnetic memory devices to the Company's computers to prevent possible transmission of computer viruses or other forms of damage to the information system.
- We will not use personally owned computers, smartphones, tablets, etc. for business unless permitted.
- We will recognize that the inappropriate use of the Company's internal information system may lead to the leakage of confidential information and personal information, and always use the Company's internal information system in accordance with internal rules.



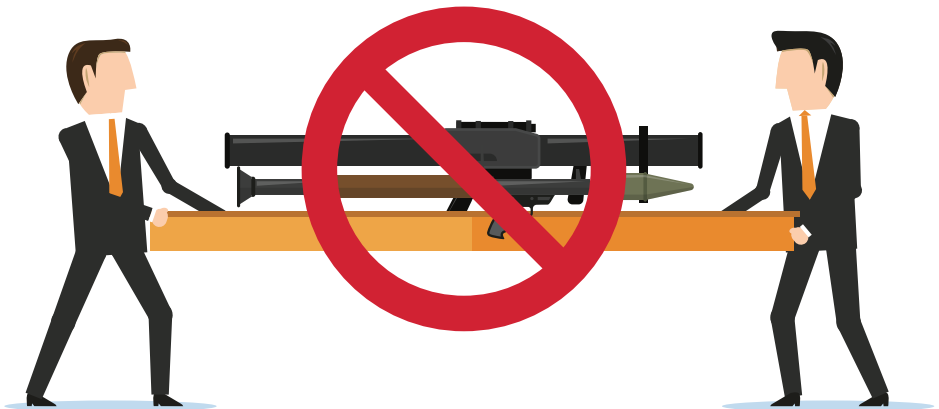
We will acquire, preserve and utilize intellectual property rights as the Company's important managerial asset and respect other companies' intellectual property rights.

- ◆ Employees who have made an invention or designed a new device will promptly notify the Company to cooperate with the Company in formalizing and preserving the ownership of intellectual property rights according to the Company's decision or preserving the related information as know-how (confidential information).
- ◆ In developing, manufacturing and selling products, we will carefully examine the status of intellectual property rights (patent, design and trademark rights) owned by other parties and verify the absence of violation of rights.
- ◆ We will promptly inform the Intellectual Property Division of any cases of confirmed or suspected violation of the Company's intellectual property rights by other parties.
- ◆ We will not use, copy or install works whose copyrights belong to other parties (including computer programs) without obtaining permission, by violating the terms and conditions of use or in any illegal manner or by surpassing the permissible scope of use.



We will strictly manage and regulate exportation from the standpoint of international peace and security and the prevention of proliferation of arms and mass destruction weapons.

- We will conduct export of goods and transfer of service (technologies) only after applying for and undergoing strict transaction screening.
- We will obtain, in accordance with applicable laws, export license deemed necessary as a result of screening and conduct exportation strictly under the conditions and within the scope defined by the license.
- We shall closely investigate and verify the countries and companies to which we export whether directly or not, and shall not be involved in any transactions where use of our exports for military purposes is suspected.
- We will obtain all required licenses or permits for importation and exportation in accordance with applicable laws and appropriately conduct declarations for customs clearance and other formalities.



We will use our originality and ingenuity to engage in free competition and fair trade in order to contribute to the sound development of the markets surrounding our company.

- ◆ We will not engage in discussions (cartels), such as adjusting prices and quantities or dividing business partners or sales areas with other business operators, to be committed to fair and free competition.
- ◆ Whenever we have any contact with a person in charge of a competitor, such as by telephone, e-mail, or even just a casual chatting, we will keep a record as proof that we are conducting sound business activities.
- ◆ We will not engage in any acts that restrict competition such as dominating other business operators or excluding them from the market by using unfair means such as being involved in the determination of the sales price of a customer or imposing conditions that unreasonably restrict business partners.
- ◆ We will not use our dominant status or position to impose unreasonable business terms on our business partners or force them to do anything they are not obligated to do.



We will prepare accounting and tax-related documents, make necessary declarations and complete account settlements in accordance with prescribed standards.

- We will promptly and correctly process revenue and expenditure as they arise as part of our business activities following the purchase of equipment, supplies, etc. and remuneration for labor and service and so forth, and will not falsely declare the timing of occurrence or sum of revenue and expenditure.
- We will conduct our daily book-keeping truthfully without posting fictitious sales, maintaining off-the-book assets or falsifying records or reports in any way, and we will retain our accounting records for the period prescribed by the applicable law and the internal regulations.
- We will comply with tax-related laws, international tax guidelines, and the Company's internal rules with respect to taxes payable by corporations, such as corporate tax, consumption tax, customs duty, stamp duty, etc., and file accurately any tax return, and will not prepare any form that differs from the facts, falsify reports, nor act in a manner that would impede proper tax payment for the purpose of illegally avoiding tax payment.



We will not give, offer or promise to give bribes to public officials and will not resort to cash or material gifts or entertainment as a means to cement ties with public officials.

- ◆ We will not give, offer or promise to give money or goods or other economic benefits to public officials or those in equivalent positions in Japan or overseas.
- ◆ We will not provide money, goods or entertainment to public officials with whom we have or are likely to have a business interest in connection with authorization, licensing or commercial transactions.
- ◆ Even if the interested public officials bear their own costs, we will limit eating and drinking to a simple degree, and will not participate in travel, golf, or playing games together with them.



We will deal with our trade customers and suppliers with restraint and conscience in accordance with society's commonly accepted ideas.

- We will select suppliers of raw materials, products or services on the basis of objective criteria by carefully evaluating our prospective suppliers in terms of their product/service quality, performance, price, technical expertise, reliability, delivery time, management soundness, environmental consideration, and so forth.
- We will not engage in any collusive practices with our business partners, including giving, receiving or requesting money, goods or services that surpass society's commonly accepted courtesy scope between business partners. We will not favorably treat specific business partners because of their gestures of courtesy even when they are within the commonly accepted scope.



We will always act in a dignified manner, execute our work-related duties in all honesty and will not engage in any act that compromises the Company's interest or damages the Company's assets.

- ◆ We will use the Company's assets, equipment and supplies in an appropriate and efficient manner and strictly for work-related purposes without decreasing their value or damaging them.
- ◆ We will not take out or use the Company assets or equipment for any purpose other than business, such as for the benefit of oneself or others.
- ◆ We will pay travel and expenses only efficiently and reasonably for that purpose, and make correct reimbursements based on the facts.



We will face anti-social activities or forces with a resolute attitude and refuse to have any association with them.

- ◆ We will not comply with any requests or demand from anti-social forces for purchase of goods, facilitation or favorable treatment, and will confront anti-social forces that challenge social order and safety.
- ◆ We will not have any dealings with anti-social forces in the form of donations, membership, magazine subscription, commercial transactions and so forth whether or not they are legal, and will not resort to these means in our problem-solving.
- ◆ We will establish a system of cooperation with police, legal consultants and the like in anticipation of problems deriving from anti-social forces and promptly consult or report to the police in the case anti-social forces approach us for unfair demand, etc.



We will accurately record the results of inspections and measurements in accordance with established standards and criteria in order to provide safe and high quality products and services. We will not change the standards for inspecting and measuring our products for our convenience, nor cover up or falsify the results of such inspections and measurements.

- ◆ We will create excellent technology and develop new products with high originality emphasizing on both quality and safety.
- ◆ We will provide easy-to-understand instructions and eye-catching warnings so that our customers can use our products correctly and safely.
- ◆ In case of serious safety or quality-related problems with our products or services, we will promptly communicate accurate information to our customers and immediately take appropriate measures to minimize damage and prevent recurrence.
- ◆ In the event of a complaint or accident regarding our products or services, we will respond with the highest priority. In addition, we will make efforts to remedy the damage, fulfill our product liability, investigate the cause, and prevent recurrence.

