

**Meiden Group**  
**Corporate Code of Conduct**

July 1, 2022

**MEIDENSHA CORPORATION**

# Meiden Group Corporate Code of Conduct

## 1 Toward the Realization of a Sustainable Society

We actively embrace the challenges of creating new value and contributing to the realization of a sustainable society through honesty to our planet, society, and people, as well as “the power of co-creation.”

## 2 Sincere and Fair Business Activities

We fully understand the intent of legal regulations, customs, and any other societal norms of countries and regions where we conduct business activities. As we respect and comply with those, we continually hold ourselves to high corporate standards and decent public conduct.

## 3 Respect for Human Rights

We understand and support various international human rights norms and respect the human rights of all people by complying with the legal regulations of each country and region.

## 4 Realization of a Working Environment Enabling Employees to Reach Their Full Potential

We support the growth of employees and promote the cultivation of a workplace where diverse personnel can play an active role.

## 5 Environmental Conservation

To realize a sustainable society, we will deal with issues such as climate change mitigation and adaptation, resource circulation, and biodiversity conservation. We will work on sustainability management and strive for corporate development.

## 6 Cooperation with and Contribution to Society

As a member of the international community, moreover as a member of local communities, we maintain a global perspective of respecting local cultures and customs and develop business activities while striving for cooperation and harmony in each region.

## 7 Information Management

We protect all information assets handled in business activities from threats such as disasters, accidents, crimes, and negligence.

## 8 Appropriate Disclosure of Information

We disclose our corporate information in a timely and appropriate manner according to the rules of legal regulations and other similar guidelines.

## 9 Risk Management

We identify and evaluate all risks associated with business activities and establish company-wide, cross-sectional systems for appropriately controlling these.

## 10 Responsibility of Top Management

Top management recognizes the realization of this Code of Conduct’s intention to be its own responsibility. They make every effort to establish a governance of effectiveness within the Company and Group, as well as to operate business in accordance with this Code of Conduct.

Established: December 1, 1997

Revised: June 1, 2022

# 1

## Toward the Realization of a Sustainable Society

We actively embrace the challenge of creating new value and contributing to the realization of a sustainable society through honesty to the planet, society, and people, as well as “the power of co-creation.”

### (1) Promotion of Innovation

- In addition to embracing the challenge of creating new value that contributes to the solution of social issues, we cooperate with external partners to support the realization of a prosperous and livable society.

### (2) Ensuring Quality and Safety

- We establish policies to guarantee product quality and safety, and offer high-quality products and services that comply with each country and region's relevant laws and regulations.
- We display and disclose product information in an easily understood manner via labeling, instruction manuals, etc. to customers.
- To properly attain our customers' satisfaction and trust, we endeavor to collect and analyze their needs, such as requests and complaints, and make improvements. In the event of a problem, we will respond sincerely and swiftly while thoroughly preventing recurrence by applying the problem data to the subsequent version's development and design.

## **2 Sincere and Fair Business Activities**

We fully understand the intent of laws and regulations, customs, and any other societal norms of countries and regions where we conduct business activities. As we respect and comply with those, we constantly behave with high corporate standards and public decency.

### **(1) Fair and Free Competition**

- We conduct fair business dealings and comply with the competition laws of each country and region where we conduct business activities.

### **(2) Appropriate Transactions**

- We do not engage in acts of bribery or exchanges of gifts that go beyond the limits of socially accepted standards. We comply with the relevant laws and regulations of countries and regions where we conduct business activities, particularly in relation to politics and government, and do not act in any way that could be suspected of collusion or corruption, such as providing favors.
- We protect our intellectual property rights and respect the intellectual property rights of third parties, utilizing them appropriately in our business activities.
- We comply with laws and regulations related to foreign trade security, and do not conduct improper exports nor brokerage transactions of foreign trade, technology, etc.

### **(3) Responsible Procurement**

- Our procurement policy reflects the principles of this code of conduct and is shared with business partners to promote sustainable procurement.
- Together with our business partners, we realize the philosophy of our procurement policy and build a sustainable supply chain.
- We promote environmentally conscious procurement activities and contribute to the conservation of the global environment together with our business partners.
- We reject the use of conflict minerals which fund armed groups who repeatedly commit inhumane acts such as human trafficking, forced labor, child labor, and abuse.

### **(4) Creating a Reporting System**

- We establish systems for reporting business partners and/or employees for violations of laws, rules, etc. to quickly detect and correct illegal and inappropriate acts. We protect informants by strictly maintaining the confidentiality of reports.

### **(5) Rejecting Relationships with Antisocial Groups**

- We reject any relationships with antisocial forces and organizations that threaten the order and safety of civil society, and we endeavor to prevent those groups from making any illegal profit.

## **3** Respect for Human Rights

We understand and support various international norms related to human rights and respect the human rights of all people by complying with the laws and regulations of each country and region.

### **(1) Compliance with International Human Rights Standards**

- We comply with an established basic human rights policy to conduct business activities with respect for human rights in accordance with the international laws and norms of each country.

### **(2) Implementation of Human Rights Due Diligence**

- We introduce processes for human rights due diligence and continually implement them.
- If it is found that our business activities cause or contribute to a negative impact on human rights, we will administer appropriate remedial measures to those affected.

### **(3) Contribution to the Creation of an Inclusive Society**

- To contribute to the creation of an inclusive society in the countries and regions where we conduct our business activities, we collaborate with diverse stakeholders to support the independence of people in socially vulnerable positions.

# 4

## Realization of a Working Environment Enabling Employees to Reach Their Full Potential

We support the growth of employees and promote the cultivation of a workplace where diverse personnel can play an active role

### (1) Human Resources Development

- We clearly state all necessary qualities and abilities for personnel, and we conduct systematic training in order to implement and promote our business strategy. Furthermore, we support employees in their active career development by providing various learning opportunities.

### (2) Creation of an Environment Enabling Diverse Personnel to Demonstrate Their Abilities

- We create systems to foster a corporate culture which enables diverse personnel to fulfill their potential by employees developing a deep mutual understanding of diversity in terms of age, gender, nationality, religion, sexual orientation, disability, etc.
- We create an environment that does not block the careers of motivated employees who face any variety of circumstances such as childcare, family care, or illness.

### (3) Occupational Safety and Health, and Health Management

- We strive to ensure a safe environment that is conducive to work, as well as achieve comfort and affluence for employees by actively performing occupational safety and health activities based on the notions of “safety comes first” and “nothing is more valuable than good health.”
- In order to support the work-life balance of employees, we participate in endeavors to enhance labor productivity, reduce working hours, and promote health.

### (4) Honest Dialogue and Consultation Between Employees and Top Management

- In addition to complying with relevant labor laws and regulations, we respect basic labor rights such as the right of employees to collectively bargain. We endeavor to provide opportunities for regular exchange of opinions between labor and management, as well as create an environment which enables employees to work with peace of mind through sincere discussions.

## **5 Environmental Conservation**

To realize a sustainable society, we will deal with issues such as climate change mitigation and adaptation, resource circulation, and biodiversity conservation. We will work on sustainability management and strive for corporate development.

### **(1) Compliance with Environmental Laws and Regulations**

- We comply with all environmental laws and other constraints related to business activities. As well, we obtain permits and approvals required by the laws and regulations of each country and region where we conduct business activities.

### **(2) Contribution to the Realization of a Carbon-Free Society and a Recycling-Oriented Society**

- In addition to working to reduce greenhouse gas emissions associated with our business activities, we contribute to the construction of a carbon-free society through those business activities.
- We contribute to the formation of a recycling-oriented society by promoting the 3 R's and evaluating the impact on the environment in the entire product life cycle- from the procurement of parts to disposal- striving to develop and design environmentally friendly products.

### **(3) Preserving Biodiversity**

- We conduct business activities that minimize the impact on the ecosystem to preserve biodiversity.

## **6 Cooperation with and Contribution to Society**

As a member of the international community, moreover as a member of local communities, we maintain a global perspective of respecting local cultures and customs and develop business activities while striving for cooperation and harmony in each region.

- We actively participate in local communities and contribute to their sustainable development by conducting active, two-way communication with various stakeholders.
- We support our officers and employees' voluntary and independent activities which contribute to society.

## **7 Information Management**

We protect all information assets handled in business activities from threats such as disasters, accidents, crimes, and negligence.

- We endeavor to prevent incidents and accidents such as information leaks, tampering, theft, and loss by maintaining and improving information management.
- We comply with the legal regulations of countries and regions where we conduct business activities, and appropriately manage and protect all personal information we handle in our business activities such as that on employees, business partners, and customers.
- We take necessary measures to address cyber-attacks.

## **8 Appropriate Disclosure of Information**

We disclose our corporate information in a timely and appropriate manner according to the rules of laws and regulations, etc.

- We endeavor to eliminate risks that may result in the loss of stakeholders' trust by readily disclosing non-financial information.
- We bolster mutual understanding with stakeholders and engage in the resolution of societal issues.
- In order to deter insider trading, we closely manage undisclosed information which would have a significant impact on shareholders' investment decisions.

## **9 Risk Management**

We identify and evaluate all risks associated with business activities and establish company-wide, cross-sectional systems for appropriately controlling these.

- We build systems to address situations such as natural disasters, terrorist attacks, and cyber-attacks under normal circumstances, as well to provide a business continuity plan in the case that a threat to business continuity occurs.



## 10 Responsibility of Top Management

Top management recognizes the realization of this Code of Conduct's intention to be its own responsibility. They make every effort to establish a governance of effectiveness within the Company and Group, as well as to operate business in accordance with this Code of Conduct.

In the event of a violation of this Code of Conduct, top management fulfills their responsibilities by taking the initiative to endeavor to resolve the problem and prevent any recurrences.

Top management, with their responsibility to actualize the intention of the Meiden Group Corporate Code of Conduct in mind, engages in the following matters.

- Creation and operation of effective corporate systems of governance.
- Measures are taken to ensure this code of conduct is instilled throughout the entire Meiden Group and is established as the basis of day-to-day business activities.