

Code of Conduct of the Hirata Group

In implementing the “Sustainability Basic Policy,” we (officers and employees of the Hirata Group) establish the Code of Conduct of the Hirata Group (hereinafter referred to as the “Code”) and comply with international rules, and laws and regulations, etc., applicable to the relevant countries and territories as well as act in good faith in accordance with high ethical standards.

1. Relationship with persons and employees <ul style="list-style-type: none">● Respect for human rights● Safe and healthy working environment● Human resource development
2. Relationship with customers and suppliers <ul style="list-style-type: none">● Fair competition and transactions● Fair and sincere procurement● Improvement of product safety and quality● Prohibition of bribery and response to business entertainment and gifts
3. Relationship with society <ul style="list-style-type: none">● Compliance with laws, regulations and social norms● Technical innovation● Environmental awareness● Security export control● Exclusion of anti-social forces● Social contribution
4. Relationship with shareholders and investors <ul style="list-style-type: none">● Disclosure of management information● Prohibition of insider trading
5. Management and protection of corporate assets and information <ul style="list-style-type: none">● Management of confidential information and personal information● Protection of intellectual property rights● IT security● Prohibition of transactions involving conflicts of interests
6. Reporting of and measures against violations
7. Responsibility of management

1. Relationship with persons and employees

- **Respect for human rights**

We prohibit harassment, discrimination, child labor, forced labor, and any other similar acts based on the “Human Rights Policy” in order to respect the basic human rights of all people involved in our business activities.

In addition, we recognize the value of diversity and differences between individuals and respect their privacy.

- **Safe and healthy working environment**

Based on the “Health and Safety Policy,” we will give top priority to maintaining a safe and healthy working environment for our employees and people involved in our business activities while striving to develop and improve our occupational health and safety management system.

- **Human resource development**

Under our management philosophy of “Brings Out the Best in Every Person,” we will develop an environment in which each and every employee can grow and maximize their abilities.

2. Relationship with customers and suppliers

- **Fair competition and transactions**

We will comply with the competition laws, etc., applicable in the relevant countries and territories and promote fair and sincere transactions.

- **Fair and sincere procurement**

Based on the “Procurement Basic Policy,” we as an equal partner with our suppliers will comply with relevant laws, regulations and ethics, develop just and fair relationship and engage in procurement activities giving due consideration to human rights and reduction of environmental impact.

- **Improvement of product safety and quality**

We will strive to improve quality and productivity and manufacture safe and high-quality products that satisfy our customers.

- **Prohibition of bribery and response to business entertainment and gifts**

We will comply with the laws and regulations on prevention of bribery and have no tolerance for bribery.

We will not provide to or accept from our suppliers, public officials and other business partners, any business entertainment, gifts and money, etc., for the purpose of acquiring unjust profits or in deviation from general business practices or commonly accepted norms.

3. Relationship with society

- **Compliance with laws, regulations and social norms**

We will comply with relevant laws and regulations, the Code, and internal regulations, etc., in every aspect of our business activities.

- **Technical innovation**

We will work toward technical innovation from day to day and ensure as a member of society to achieve sustainable economic growth and solve social challenges.

- **Environmental awareness**

For the purpose of achieving a sustainable society, we will comply with environmental laws and regulations and strive to reduce environmental load in every aspect of our business activities and products and services, thereby contributing to preservation of the global environment.

- **Security export control**

In the course of export and import transactions, we will comply with relevant laws and regulations and internal regulations and conduct proper procedures.

- **Exclusion of anti-social forces**

We will take a firm stand against anti-social forces and will never associate with them. Furthermore, we will not get involved in improper money-laundering, etc.

- **Social contribution**

We, as a good corporate citizen, will contribute to the development of the local community through our business activities and social contribution activities.

4. Relationship with shareholders and investors

- **Disclosure of management information**

We will proactively communicate with stakeholders, including shareholders and investors and

proactively listen to the voices of stakeholders and strive to build a relationship of trust with them. We will disclose management information in a timely and appropriate manner.

- **Prohibition of insider trading**

We will comply with laws and regulations on insider trading and will take all the proper precautions whenever handling non-disclosed corporate information and prevent insider trading.

5. Management and protection of corporate assets and information

- **Management of confidential information and personal information**

We will appropriately manage our confidential information and personal information and strive to prevent unauthorized use and leakage. If leakage or another issue occurs, we will deal with such issue appropriately and promptly.

- **Protection of intellectual property rights**

We will properly protect and effectively utilize our intellectual properties. In addition, we respect intellectual property rights of others and strive to avoid infringement of those rights.

- **IT security**

We will comply with the “IT Security Basic Policy” and take sufficient security measures in accordance with their importance, thereby ensuring the safety of IT assets.

- **Prohibition of transactions involving conflicts of interests**

We will avoid any act that may conflict with interests of the Company. Furthermore, we will not engage in any act that may damage the credibility and interests of the Company for our own or for any third party's personal interests.

6. Reporting of and measures against violations

We will implement our business operations in accordance with the Code, and if we become aware of any violation of the Code, we will promptly report it through our superiors or the whistleblowing system. Whistleblowers shall not be treated disadvantageously because of such whistleblowing report. We recognize that any act contrary to internal regulations, etc., including the Code will be subject to disciplinary action.

7. Responsibility of management

The management will engage in corporate management, recognizing that its role is to implement the Code, and will build effective governance and promote awareness about it across the Group. If any event occurs that is contrary to the spirit of the Code and causes loss of trust from society, the management will, on its own initiative, strive to solve problems, investigate the cause thereof, and take measures to prevent recurrence, etc., and fulfill its responsibility.

Enactment	Entry into Force	Related Notice
09/21/2005	09/21/2005	05-0025C
Amendment	Entry into Force	Related Notice
12/15/2023	01/01/2024	