

# Tomoku Group Code of Conduct

## 1. Positioning of the Tomoku Group Code of Conduct

We, all officers and employees of the Tomoku Group, strive to realize the Tomoku Group Management Philosophy (hereinafter referred to as the Management Philosophy) and to enhance the Group's economic and social value.

The Tomoku Group Code of Conduct (hereinafter referred to as the Code of Conduct) is a set of standards that we follow in order to realize the Management Philosophy. The Code of Conduct is the foundation of the corporate policies, rules and regulations and serves as the cornerstone for making judgments.

## 2. The Code of Conduct as a guideline for judgments

The Code of Conduct applies to all officers and employees of the Tomoku Group regardless of the type of employment.

All officers and employees shall always be aware that their judgments and actions in performing their duties are in line with the Code of Conduct. When addressing matters not covered in the Code of Conduct, we shall make proper judgments and take appropriate actions guided by the background and basis of the Management Philosophy, the Code of Conduct, and laws.

If an action or situation violates the Code of Conduct, each of us shall respond as we can in order to solve issues without leaving them unsolved.

All officers and managers of the Tomoku Group shall take the lead in complying with the Code of Conduct and ensure that the Code of Conduct is followed as per each employee's job responsibilities, thereby fulfilling their obligation.

When in doubt as to what is the correct course in performing your day-to-day business operation, asking yourself the following basic questions as well as seeking appropriate instructions through consultation with supervisors may help you determine the soundness of your decisions.

\*Is your conduct aligned with laws, guidelines, established social norms, and ethics?

\*Is your conduct in line with the corporate written rules (policies, rules, and regulations)?

\*Can you confidently and convincingly explain your conduct to your family or a third party?

## 3. Respect for human rights

### 3-1 Respect for human rights

\*We fulfill our responsibility to respect human rights, which are the fundamental rights that all people are born with.

\*We respect and do not violate the human rights of all people involved in our business activities.

### 3-2 Prohibition of discrimination

We prohibit all forms of discrimination based on race, nationality, ethnicity, gender, religion, beliefs, personal history, birth, age, disability, sexual orientation, gender identity, or any other personal attributes.

### 3-3 Prohibition of harassment

We comply with laws and corporate rules and prohibit all forms of physical and mental harassment, including power harassment, sexual harassment, and harassment related to pregnancy, childbirth, and childcare leave.

## 4. Honest and fair corporate activities

### 4-1 Respect for clients/customers

We respond to requests and inquiries from our clients/customers sincerely and promptly. We value their voice and provide products and services that deliver satisfaction.

### 4-2 Compliance

Each of us ensures compliance with regulations (1. laws and regulations, notices, guidelines, etc., 2. corporate rules and regulations, and 3. established social norms ) and uphold a high standard of ethics and sense of responsibility in our actions.

### 4-3 Fair and equitable business transactions

\*We comply with laws, including the Antimonopoly Law, and corporate rules and conduct business operations in a fair and equitable manner based on right business ethics.

\*We do not provide false or misleading information that may damage the credibility of our products, services or competitors.

\*We do not request inappropriate business transactions from subcontractors, such as refusal to receive goods, delay or reduction of payment, return of goods, and abuse of buying power.

### 4-4 Relationship with suppliers

We conduct fair, equitable and sustainable procurement activities in compliance with laws and regulations, recognizing social and environmental issues through our business activities.

### 4-5 Anti-corruption and anti-fraud

\*We do not make illegal political contributions to politicians or political organizations. We comply with all applicable anti-bribery laws and regulations regarding any party, including domestic and foreign public officials. We do not engage in acts that cause misunderstanding or distrust by society.

\*We do not engage in giving or receiving gifts (including services or personal favors), entertainment, or any other benefits beyond socially acceptable norms. Likewise, we refrain from accepting personal valuables, loans, or involving others as guarantors.

\*We do not engage in the misappropriation of assets, falsification of reports, or corruption of any kind.

### 4-6 Appropriate financial report

\*We strive to maintain and enhance our social credibility.

\*We prepare financial reports in accordance with accounting standards generally accepted in Japan and overseas.

\*We maintain and operate internal controls to ensure the reliability of financial reporting.

### 4-7 Exclusion of anti-social forces

\*We stand firm against anti-social forces and organizations and do not have any relationship with them.

\*We do not engage in money laundering and remain cautious not to be used for criminal activities.

## 5. Pursuit of safe, reliable and high-quality products and services

### 5-1 Safe, reliable products and services

We strive to provide products and services that our clients/customers can continue to use safely in compliance with domestic and international laws, regulations and corporate standards.

### 5-2 High-quality products and services

We strive to continuously improve quality, delivery and services through close collaboration among all departments, sincerely listening to our clients'/customers' feedback and anticipating their needs.

### 5-3 Management system that pursues high quality

\*Each of us dedicates ourselves to the challenge of quality improvement. We continuously improve our quality management system by pursuing the best possible 4Ms (Man, Machine, Material, Method) that determine quality.

\*We promote the development of Tomoku Group's original products and services and challenge the pursuit of even higher quality through continuous innovation and inheritance of technology.

## 6. Creating a vibrant work environment

### 6-1 Safe work environment

We comply with laws and regulations related to safety and health as well as the corporate standards and work to create a hazard-free workplace without occupational accidents.

### 6-2 Decent working hours

\*We comply with the Labor Standards Act, Industrial Safety and Health Act, and the rules of employment, etc. (hereinafter collectively referred to as the labor-related regulations), and appropriately manage working hours.

\*Officers and managers understand and comply with the labor-related regulations, and appropriately confirm, record and manage the working hours of employees, and instruct employees to report their actual working hours accurately.

\*Managing supervisors appropriately record and manage their actual working hours in accordance with the labor-related regulations.

### 6-3 Open and vigorous work environment

We strive to create a workplace where open and vigorous communication takes place regardless of job positions, attributes, or divisions. We realize sustainable growth of the organization and individuals by improving individual capabilities and demonstrating organizational strength through solidarity.

### 6-4 Healthy work-life balance

We reduce long working hours that adversely affect the mental and physical health of employees and respect their healthy work-life balance so that a diverse workforce can stay committed for a long time.

### 6-5 Mental and physical health care of employees

Recognizing that the health of our employees is the foundation for the sustainable corporate development, each of us maintains and enhances our mental and physical health and we actively support the health enhancement of other employees.

## 7. Social contributions

### Contribution to the development of communities

We contribute to the development of local communities at all of our business locations by building relationships of trust and engaging in dialogue and collaboration to resolve issues.

## 8. Environmental consideration

### 8-1 Reduction of environmental impact and realization of a low-carbon society

\*At every stage of our business activities, we strive to conserve natural capital such as forests and water and save energy usage.


\*We strive to reduce greenhouse gas emissions to prevent global warming.

\*We strive to reduce and recycle waste and appropriately manage hazardous substances.

### 8-2 Development of environmentally responsible products and services

In consideration of the environment, we strive to develop and design resource-saving, energy-saving, and recyclable products and services.

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### 8-3 Conservation of biodiversity

Recognizing that our business depends on natural capital, we conserve biodiversity and conduct business activities in harmony with nature.

## 9. Protection of information

### 9-1 Information security

\* We comply with corporate rules regarding information security and rigorously take preventive measures against unauthorized intrusion, leakage, falsification, loss, etc. of information assets (electronic data, documents, information such as knowledge and know-how, and information systems) to appropriately manage such information assets.

\*We rigorously manage IDs. We do not use information systems such as information equipment and facilities for private purposes or access internet sites that are unnecessary for business.

### 9-2 Protection of information assets

\*We rigorously manage and protect internally stored data and information obtained in the course of business as well as information systems. We use them within the scope of our business duties in an appropriate manner that prevents them from being lost or damaged.

\*We do not use our information for any purposes outside of our business duties. In addition, we do not take information out without permission or leak it to others.

### 9-3 Protection of privacy

We respect the privacy of all individuals and handle the personal information of officers, employees and clients/customers held by the company in accordance with laws and corporate regulations. We do not disclose it in principle except for legitimate reasons under laws and regulations.

### 9-4 Precautions of using social media

When disseminating information on social media, even for personal use, we do not use information that could identify the company, such as information obtained in the course of business or images taken at the workplace, and do not engage in any acts that damage the credibility, honor, and property of the company or other employees.

### 9-5 Prohibition of insider trading

When, through our duties, obtaining material information about our company or other companies that may affect investors' decisions, we do not disclose them to other officers, employees, or third parties and do not trade stocks or other securities of our company or such other companies.

## 10. Management of corporate assets and intellectual properties

### 10-1 Corporate intellectual properties

\*We recognize that intellectual properties are important assets of the Tomoku Group and we manage and utilize them appropriately in accordance with corporate rules.

\*We respect the intellectual property rights of third parties and do not engage in infringing acts such as unauthorized acquisition or unauthorized use.

### 10-2 Corporate assets

We appropriately maintain and manage tangible and intangible corporate assets and use them only for Tomoku Group business purposes. In addition, we strive to protect corporate assets from misappropriation for personal use.

### 10-3 Avoidance of conflicts of interest

We place priority on the interests of the company, not on the interests of individuals, in all our business activities and do not engage in any conduct that conflicts with the interests of the company without prior approvals.

## 11. Actions for violations and recurrence prevention

\*We seek to address violations or possible violations of the Code of Conduct by reporting or consulting with supervisors or relevant departments.

\*If any conduct violates law, regulations or corporate rules, the use of the whistle-blowing system or other means is required to resolve the issue. We do not take any unfavorable action against whistleblowers for reporting.

\*The offender may be subject to disciplinary action in accordance with the rules of employment.

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