

## The Asahi Yukizai Group Code of Conduct



What we should practice when working for Asahi Yukizai Group and what we keep in mind when practicing.

What to do	
1. Value Creation and Social Contribution	2. Compliance with Social Norms
3. Fair Trade Practices	4. Consideration for the Environment, Safety, and Health
5. Respect for Human Rights and Building a Healthy Work Environment	6. Ensuring of Management Transparency and approach to Risk Management
7. Proper Management of Company Property and Protection and Respect of Intellectual	8. Protection and Management of Information

What to keep in mind
[ Be Integrity ]
[ Be Impartial and Fair ]
[ Accept the Existence of Diverse Values ]

# 1. Value Creation and Social Contribution

Asahi Yukizai Group shall strive to realize the well-being for all stakeholders, such as customers and shareholders as well as employees and entire society, by creating a new value to meet the needs of the current trends, in harmony with society. In addition, we shall proactively make contribution to society.

## 1 Challenge to Create a New Value

We shall always focus on what society will need in the future, enhance our unique technological aptitude to realize such needs, and shall boldly challenge to create a new value that has never existed before.



## 2 Provision of Superior Products and Services that Meet the Needs of Customers.

We shall value communication with our customers to accurately understand their needs and expectations, and develop and improve our products and services while always be aware of constantly changing social expectation level and shall provide superior products and services that meet our customer needs in a timely manner.



## 3 Global Business Development with International Competitiveness

We shall build a marketing strategy for internationally competitive products to realize a global operational presence and contribute to a good life of people around the world.



## 4 Assurance of Safety and Quality of Products and Services

We shall ensure continuous improvements of our quality management system and quality assurance in order to provide safe and high-quality products and services. In addition, we shall provide accurate and easy-to-understand information on our products and their use in order to prevent accidents and trouble from occurring. In the event of an accident or trouble, we shall respond to them promptly and appropriately.



## 5 Contribution to Society

We shall actively engage in the local communities in which Asahi Yukizai Group conducts its corporate activities and shall endeavor to make a contribution to society through our corporate activities and by utilizing our human and material assets.



# 2. Compliance with Social Norms

As a responsible corporate member of society, the Asahi Yukizai Group shall not only comply with all applicable laws and regulations, but also respect the culture and customs of each country and region in which we conduct our business activities.

## 1 Compliance with Laws and Regulations

We shall correctly understand and comply with laws, regulations, international principles, and internal rules including this Code of Conduct applicable to Asahi Yukizai Group's global corporate activities and shall act in a manner that ensures that our corporate activities conform to normal business practices and social ethics.



## 2 Accurate and Proper Account Processing

We shall ensure the reliability of our financial reporting through accurate and proper processing of financial and tax accounting.



## 3 Response to Criminal Organizations

We shall have no relationship whatsoever with criminal organizations that adversely affect social order and safety and we shall take a firm stand against such criminal organizations.



## 4 Compliance with Export-Related Laws and Regulations

We shall comply with applicable export laws and regulations when exporting goods and services and disclosing technical information related thereto.



## 5 Prohibition of Insider Trading

We shall not engage in any conduct that constitutes insider trading, such as the buying or selling of stock using non-public information about Asahi Yukizai Group or other companies that we have learned in the course of our duties or transactions. In addition, we shall not leak insider information to third parties, including family members, nor shall we recommend the purchase or sale of stocks or other securities.



# 3. Fair Trade Practices

Asahi Yukizai Group shall eliminate the pursuit of profits through improper or unfair means and engage in fair trade in its relationships with business partners and other companies in the same industry.

## 1 Fair Trade

We shall always maintain transparent and fair relationships with all our business partners and conduct trade in compliance with relevant laws and regulations, including the Anti-Monopoly Act of Japan and the competition laws of each country. In addition, in our relationships with other companies in the same industry, we shall not engage in any acts that impede fair and free competition, such as bid rigging or cartels, or any acts that may lead to the suspicion thereof.



## 2 Trade Policy with Suppliers and Cooperating Companies

We shall always deal with suppliers and cooperating companies on an equal and fair basis and shall endeavor to earn the high level of trust from suppliers and cooperating companies while securing the interests of Asahi Yukizai Group based on rational judgments that do not involve personal feelings. We shall deal with suppliers and cooperating companies in good faith and in a fair manner in accordance with the Subcontracting Act of Japan and the relevant laws and agreements of each country.



## 3 Guideline on Entertainment, Gift, etc.

We shall not accept any entertainment or gifts from business partners or other parties that are beyond the scope of social etiquette. We will not engage in any bribery of members of the legislature, officers or executives of public offices, local governments, or government-affiliated companies, or foreign public officials in international business transactions, nor will we provide entertainment or gifts for the purpose of gaining improper business advantage.



# 4. Consideration for the Environment, Safety, and Health

Asahi Yukizai Group shall be strongly aware of its corporate responsibility to operate its business with safety as the top priority and to preserve the global environment. We practice corporate activities including product development, manufacturing, and post-disposal disposal.

## 1 Approach to Environmental Protection Activities

We shall comply with laws and regulations applicable to environmental preservation, and shall act in accordance with environmental policies and management programs established by the company, and actively engage in environmental protection activities, including the prevention of global warming.



## 2 Creating a Safety-First and comfortable work environment

We shall understand the laws, regulations, and internal rules pertaining to safety management, and shall act in a manner that gives the highest priority to compliance with such laws, regulations, and internal rules. In addition, we shall also endeavor to improve the efficiency and productivity of the work we are responsible for, thereby preventing overwork and creating a psychologically safe work environment in which employees can work with peace of mind, both physically and mentally.



# 5. Respect for Human Rights and Building a Healthy Work Environment

Asahi Yukizai Group shall respect the human rights of all people in all of our corporate activities. We shall also respect the personality and individuality of all employees working within the company, and endeavor to create a healthy and rewarding work environment that is free from harassment and unjustified discrimination.

## 1 Prohibition of Discrimination

We shall respect the fundamental human rights and diversity of individuals and shall not engage in or tolerate discrimination based on nationality, origin, race, ethnicity, religion, gender, ideology, age, physical characteristics, sexual orientation, employment status, contractual status, or other grounds in all corporate activities.



## 2 Prohibition of Harassment

We shall prohibit all forms of harassment, including sexual harassment, maternity/childcare harassment, and power harassment, and shall take a firm stand against such conduct.



## 3 Fostering a Free and Open Workplace Culture

We shall respect each other's ideas and positions and endeavor to foster a free and open workplace culture in which all people with diverse personalities can openly express their opinions and actions.



## 4 Protection of Privacy

We shall not disclose personal information of others obtained in the workplace or through our work to anyone inside or outside the company without their consent.



# 6. Ensuring of Management Transparency and approach to Risk Management

Asahi Yukizai Group shall communicate not only with shareholders but also with society at large and shall disclose corporate information in a positive and appropriate manner. In addition, Asahi Yukizai Group shall actively work on minimization of possible risks and on crisis measures in the event of an emergency.

## 1 Trust from Shareholders and Investors

We shall strive for sound and highly transparent corporate management and aim to continue to be a company trusted by shareholders and investors. In addition, we shall disclose corporate information to shareholders and investors in a timely, appropriate, and fair manner in accordance with applicable laws and regulations.



## 2 Approach to Risk Management

We shall calculate and evaluate various risks in Asahi Yukizai Group, including business environment risk, disaster risk, strategic risk, and compliance risk, and shall take appropriate countermeasures against such risks. If a risk becomes obvious and a crisis occurs, we shall respond promptly and appropriately to the risk in accordance with internal regulations and prescribed procedures.

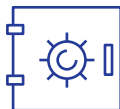


# 7 Proper Management of Company Property and Protection and Respect of Intellectual property

Asahi Yukizai Group shall properly manage its tangible and intangible property, protect the value of company property, and respect intellectual property owned by others.

## 1 Proper Management and Use of Company Property

We shall properly manage tangible and intangible company property in accordance with its internal rules and shall not use them for personal or improper purposes.



## 2 Protection and Respect of Intellectual Property

We shall properly manage Asahi Yukizai Group's intellectual property, including technical know-how, and shall seek to protect it from infringement by others. In addition, at the same time, we shall respect intellectual property owned by others and shall not engage in any act that infringes upon such intellectual property.



## 3 Maintenance of the Company's Credibility and Brand

We acknowledge that the company's credibility and brand are important intangible company property, and we shall not engage in any act that undermines them.



# 8 Protection and Management of Information

Asahi Yukizai Group shall ensure information security, as well as the protection of personal information and proper document management.

## 1 Understanding and Complying with Relevant Information Security Rules

We shall understand and comply with laws, regulations, and internal rules concerning information security and properly manage information assets. In the event of an accident, we shall immediately notify our superiors and relevant departments and follow their instructions.



## 2 Appropriate Management of Personal Information

We shall clarify the purposes for which personal information is to be used and shall use and store personal information within the scope of said purpose of use and in an appropriate manner. We shall not provide or disclose personal information to any third party except as required by law and regulations or with the consent of the individual concerned.



## 3 Appropriate Management of Documents and Data

We acknowledge that all company information, documents, and data created and received in the course of business belong to the company, and we shall properly manage them in accordance with laws and regulations, and internal rules.



## 4 Restrictions on Dissemination of Information

We shall not talk about company business, including confidential information, in public, nor shall we transmit information about company business or mislead society through social networking services (SNS), etc., without permission.

