



NS United Kaiun Kaisha, Ltd. “Code of Conduct”

1. Compliance with Laws and Regulations

- Comply with laws and regulations domestically and overseas and act in accordance with social norms and the Group Corporate Philosophy.

2. Respect for Human Rights

- Respect the personality, diverse values and individuality, and respect all basic human rights.
- Respect the human rights of all stakeholders involved in our business activities.
- Comply with applicable laws and regulations in each country or region in which we operate.
Where laws, regulations and international human rights standards differ in the country concerned, we pursue ways to respect internationally recognized human rights.
- Strive to create a safe and comfortable working environment in which the human rights of each employee are respected.
- Provide a healthy and safe working environment free from harassment, and respect the minimum wage, proper management of working hours, and privacy protection.
- No forms of forced labor, child labor and human trafficking are permitted.

3. Prohibiting conflict of interest

- Do not engage in acts that result in conflict of interest with the company.
- Do not assume the post of director or employee of any other business enterprise without the company's order or approval.
- Do not look after one's own interests during the course of business.
- Do not receive individual reward obtained as a result of related business matters without the company's approval.

4. A Relationship with Stakeholders

- Refrain from offering excessive entertainment to business stakeholders that deviates from socially accepted idea and from giving and receiving goods because it is skeptical of illegal transactions.
- Do not offer any bribes or give unfair profits, or make an illegal offer and promises to civil servants.

- Do not borrow, use or give or receive money from others by taking advantage of your business position, or by improper or unfair means.

5. The Working Environment

- Respect individual's basic human rights and make efforts to enhance comfortable working conditions.
- Do not cause mental or physical suffering to anyone or act in a way that negatively affects the working environment by ignoring a person's human rights or speaking or acting in a way that does not respect an individual's human rights by using your position or authority in the workplace or exceeding the appropriate scope of your delegated authority.
- Moderate empty formalities and develop relationship in workplace that can be considered admissible in terms of common sense.

6. Respect Intellectual Property Rights

- Handle books, articles of newspaper, software duplication and photocopying with great care.
Persons that violate intellectual property rights such as patent rights, utility model rights, trademark rights, trade secrets, know-hows shall be called to administrative or criminal liability.

7. In relation to Tax Regulations

- Endeavor to organize account records and vouchers adequately for appropriate accounting and tax processing

8. Information Management

- Manage important and confidential company information (hereinafter referred to as "internal information") obtained during the course of business such as personal data of clients, information of trades, systems and managements in order to prevent the leakage of information.
- Employee who comes to know a material fact about the business of a Listed Company specified by the Financial Instruments and Exchange Act shall not sell or purchase shares of the company, until such information is released publicly (Acts Prohibited for a Company Insider).
- Do not disclose internal information even after termination of employment.

9. Proper use of company assets

- Do not use a company expenses for personal gain.
- Strictly prohibited the private utilization of the company's furniture, equipment and office supplies.
- Do not conduct personal activities in the company facilities and work places without prior consent of the company.

Helpline

- Consult with a Rules of Compliance consultation system without delay in case of encounter suspicious behavior or a possible violation of the Code of Conduct.

Punishment

- A person who violates laws and the Code of conduct shall be subject to punitive action based on laws or regulation of the company, and liable for the damage if caused.

Established in November 2003

Amended in July 2006

Amended in July 2018

Amended in October 2021