

NICHIAS Group Global Compliance Policy

The Code of Conduct of this Global Compliance Policy

Three Basic Stances Regarding Compliance

We will comply with laws and regulations and carry out fair and sound corporate activities that respect the spirit of the said laws and regulations.

We will respect the human rights, personalities, and independence of our employees and support their growth.

We will maintain a wide range of positive relationships with society through actions and communication from the perspective of our various group stakeholders.

Our Commitment in the Code of Conduct	
1. Compliance with Social	<ul style="list-style-type: none"> ■ We will properly understand and comply with social norms such as laws and regulations and company rules. ■ We will be aware of our responsibility to the demands of society and meet these demands.
2. Prohibition on bribery	<ul style="list-style-type: none"> ■ We will not engage in any bribery or suspected bribery of any public official or the like.
3. Prohibition on Conflicts of Interest	<ul style="list-style-type: none"> ■ We will not sacrifice company profits in an attempt to profit ourselves or third parties.
4. Fair Business Competition	<ul style="list-style-type: none"> ■ We carry out our duties in a manner that maintains free and fair competition in the market. We do not, under any circumstances, make written or verbal agreements with competitors regarding the determination of sales prices and conditions for the provision of products and services nor participate in discussions of such matters by way of meetings or telephone calls.
5. Prohibition on buying and selling of stocks and other securities based on undisclosed corporate information (prohibition of insider trading)	<ul style="list-style-type: none"> ■ We will not buy or sell securities, including shares of listed companies (including NICHIAS), based on “undisclosed” and material information about companies, such as the NICHIAS Group or business partners, that we learn in the course of our work or as an Employee of the NICHIAS Group.
6. Compliance with Trade-Related Laws and Proper Import & Export Procedures	<ul style="list-style-type: none"> ■ We will comply with the import and export laws and regulations of the countries in which we operate. ■ We will carry out proper import and export procedures by complying with the laws and regulations relating to imports and exports of the countries and regions in which we do business, as well as international treaties.
7. Respect for Human Rights and Other’s Personalities	<ul style="list-style-type: none"> ■ We respect the basic human rights of the people we interact with in all different situations. ■ We will not discriminate based on race, skin color, age, gender, sexual orientation, gender identity, ethnicity or nationality, disability, pregnancy, or religion. ■ We will work to create a pleasant workplace by placing importance on greater diversity and the work-life balance of Employees. ■ We will not allow any fraudulent labor practice, such as forced labor, child labor, or debt bondage, in any country or region where we do business.
8. Prohibition on Harassment	<ul style="list-style-type: none"> ■ We do not engage in power harassment (workplace bullying), sexual harassment, moral harassment (psychological abuse), or any other conduct that others may perceive as the foregoing.
9. Safety and quality of products and services	<ul style="list-style-type: none"> ■ In the products and services we provide, we place the highest priority on ensuring safe and appropriate quality in conformity with relevant laws and regulations and contractual commitments to our customers, and we comply with prescribed procedures and protocols to this end.
10. Consideration for the Environment	<ul style="list-style-type: none"> ■ When carrying out our work, we will comply with environmental laws and regulations and give due consideration to the protection of the global environment and resources.
11. Healthy and Safe Work Environment	<ul style="list-style-type: none"> ■ When carrying out our work, we will give due consideration to ensuring the health and safety of our Employees, customers, business clients, and those living locally.
12. Protection and Use of Intellectual Property Rights	<ul style="list-style-type: none"> ■ We understand the value of intellectual property and make use of it properly. We also respect the intellectual property of others. When intellectual property is created through business activities such as research and development, we will immediately notify our company.
13. Management of information	<ul style="list-style-type: none"> ■ We will properly manage our own and our business partners' confidential information in accordance with laws and regulations, our commitments to our business partners, as well as internal rules, will not use it for purposes other than those for which it was obtained, and will not make an unauthorized disclosure of it by any means, including through social networking services. We will not misuse or improperly obtain the confidential information of others. ■ We will properly manage the personal information of customers, business partners, NICHIAS Group Employees, and others in accordance with domestic and international laws and internal company rules relating to the protection of personal information, and will not use it for purposes or under conditions other than those for which it was obtained. We will not improperly obtain personal information and will not take personal information outside the company or leak it without permission.
14. Accurate financial records	<ul style="list-style-type: none"> ■ We will keep accurate, fair, and timely records of the company's financial records and related information, and will properly retain all related documents and other relevant information. ■ We will never claim or receive expenses from our company that are not true. ■ We will work to prevent and detect fraudulent activities such as falsification of financial records and improper claiming of expenses.