



NITTO KOHKI Group Code of Conduct

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Establishment of the NITTO KOHKI Group Code of Conduct

Since its founding in 1956 under the Corporate Motto “Development provides corporate insurance,” NITTO KOHKI Group has continued its manufacturing based on contribution to society through energy and labor-saving, and enhancement of the work environment.

At the same time, our activities have been made possible through the support of all of our stakeholders, including of course NITTO KOHKI Group employees together with our customers, trading partners, shareholders/investors, and local communities.

Aiming towards our 100th anniversary, even in times of turbulent change in the social environment, we hope to continue as a corporate group that is perpetually necessary to society. To this end, we must continue to accumulate trust by fulfilling our social responsibilities as a corporation.

The NITTO KOHKI Philosophy, comprised of the Corporate Motto, Action Principles and Management Policy, incorporates our sincere wishes in undertaking out corporate activities. In order to further strengthen the relationships of trust with all of our stakeholders, it is important that each person working for NITTO KOHKI Group acts responsibly in a way to realize our Philosophy. Then, we believe that these actions will lead to the building of a sustainable society.

Based on this idea, we have formulated the NITTO KOHKI Group Code of Conduct, that indicates the basic policies we should all comply with. By complying with the NITTO KOHKI Group Code of Conduct, we strive to realize our Philosophy in our day-to-day work and social activities.

Finally, with everybody’s support, we will continue in our corporate activities that contribute to society.

August 23, 2022

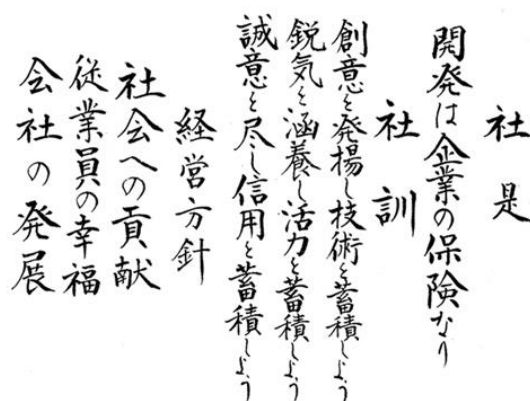
NITTO KOHKI CO., LTD.

Akinobu Ogata Representative Director, President

NITTO KOHKI Group Philosophy and Code of Conduct

Philosophy

NITTO KOHKI Group's Philosophy is comprised of three concepts: Corporate Motto, Action Principles and Management Policy, and indicates our approach towards corporate citizenship.



Corporate Motto : Expresses the company's core values

Action Principles : Establishes the way of thinking that should be put into practice in day-to-day work, based on the Corporate Motto

Management Policy : Establishes the basic policies for management from a higher perspective

Code of Conduct

Code of Conduct : Expresses the basic principles of behavior for everyone in order to realize the Corporate Motto, Action Principles and Management Policy

NITTO KOHKI Group Code of Conduct

1. Pursuit of Manufacturing

(1) Research and Development

- A. We develop products that support customers with the aim to contribute to society through expansion of industry, and manufacturing processes.
- B. We deliver unique, high quality products suited to the needs of customers using the knowledge and technology that we have accumulated.
- C. We meticulously design and validate our products based on the fact that our products may be used in countries with different languages, environments and legal systems to develop reliable products.

(2) Production Control & Quality Assurance

- A. We fulfill our responsibilities in production control and quality assurance in order to provide safety and security to customers worldwide.
- B. We continually conduct ongoing activities for maintenance and improvement of product quality, including application of "4S," *Seiri, Seiton, Seisou, Seiketsu* (organization and cleanliness principles), in the workplace.

(3) Sales Activities

- A. We are an ethical company continually performing honest dealings, never forgetting to be thankful, in order to create more NITTO KOHKI fans among our customers.
- B. We gather information and strive to grasp the issues to propose products that are valuable to customers in order to meet their expectations.

2. Pursuit of Work Style

(1) Mutual Encouragement

- A. Each individual aims for work they can take pride in as a professional.
- B. We strive to ensure that we can share our information, skills and expertise and exercise our abilities to maximum within the team.
- C. We strive for self-improvement, whereby we enhance our knowledge, technique and resourcefulness, through educational programs and interaction with other people at work.

(2) Creating a Work-friendly Workplace

- A. We create and maintain a workplace environment where all management and employees are respected and work with mutual trust.
- B. We constantly apply ingenuity so that each individual works with awareness to ensure that the entire organization runs smoothly.

(3) New Challenges

- A. We consider the changes taking place in the world as opportunities, questioning everything, tackling challenges through repeated planning, devising, discernment and practice.
- B. We pass on the knowledge and techniques we have nurtured to the next generation, passing on the NITTO KOHKI baton towards new challenges.

(4) Health Conscious

We are conscious each day of our physical and emotional health in order to always be able to exercise our intellectual capacity and energy to the maximum.

3. Towards the Future

(1) Sustainability

- A. We do not merely work to reduce the environmental burden of our corporate activities, but also endeavor to develop and provide products and services that contribute to environmental preservation, striving to realize a sustainable society.
- B. We promote activities that take the global environment into consideration, including promotion of green procurement, development of environmentally friendly products, reduction of energy consumption, reduction in use of office paper, and waste reduction.

(2) Local Community

In addition to our social contribution through products and business, each individual actively participates in society and the community, building trusting relationships with local communities.

(3) Emergency Response

When faced with unforeseen circumstances, such as natural disasters, cyber-attacks or other physical threats including terrorism, we take appropriate action to protect human life and ensure continuity of business activities.

4. Compliance

(1) Human Rights & Labor

- A. We respect the diverse values and human rights of all of the people we interact with in business activities.
- B. We do not discriminate or treat unfairly anyone based on their race, creed, gender, religion, nationality, political opinion or disability.
- C. We are not involved in, or do business with or condone any forced labor or child labor in anyway or form.
- D. We participate in a comfortable, harassment-free work environment.

(2) Legal Compliance

- A. We act based on compliance with laws and ordinances, conformance with internal regulations, corporate ethics and social norms, and common sense, while upholding our Philosophy.
- B. We strive to take a sensible approach towards trading partners, complying with competition laws and related rules that apply in all countries and regions, and do not undertake unfair dealings.
- C. We will not engage in inappropriate activities such as bribery or coercion of corrupt practices.
- D. We do not have relations with antisocial forces, and do not use, fund, cooperate or comply with any antisocial forces.
- E. We respect and understand the rights of employees' freedom of association and their right to collective bargaining, based on compliance with international standards, laws and regulations.

5. Information Management

(1) Information Management & Duty of Confidentiality

- A. We manage personal information and information assets created or obtained by the company according to the laws, ordinances and internal regulations pertaining to them.
- B. We will not disclose or leak confidential information internally or externally without the consent of the company.
- C. We are conscious of the link between our own actions and trust in the company and brand, whether at work, in public or online, and will not readily disseminate information.
- D. We disclose information appropriately, undertaking corporate activities with a high degree of transparency.

Related Information

Information on our Corporate Citizenship and Environmental Policy can be found in the Company section of the NITTO KOHKI website. <https://www.nitto-kohki.co.jp/e/>

Supplementary Information

The NITTO KOHKI Group Code of Conduct incorporates policies for realization and continuation of the Ten Principles of the UN Global Compact, in the specified four areas of human rights, labor, environment and anti-corruption.

The Ten Principles of the United Nations Global Compact	Relevant Section in the Code of Conduct
Human Rights	
Principle 1 Businesses should support and respect the protection of internationally proclaimed human rights, and	4. Compliance (1) B
Principle 2 make sure that it is not complicit in human rights abuses	4. Compliance (1) B
Labor	
Principle 3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining,	4. Compliance (2) E
Principle 4 the elimination of all forms of forced and compulsory labor,	4. Compliance (1) C
Principle 5 the effective abolition of child labor, and	4. Compliance (1) C
Principle 6 the elimination of discrimination in respect of employment and occupation	2. Pursuit of Work Style (2) A 4. Compliance (1) A 4. Compliance (1) B

Environment

	Businesses should support a precautionary	
Principle 7	approach to environmental challenges,	3. Towards the Future (1) B
	undertake initiatives to promote greater	
Principle 8	environmental responsibility, and	3. Towards the Future (1) A
	encourage the development and diffusion of	
Principle 9	environmentally friendly technologies.	3. Towards the Future (1) A

Anti-corruption

	Businesses should work against corruption in all its	
Principle 10	forms, including extortion and bribery.	4. Compliance (2) C 4. Compliance (2) D

Cited from "Ten Principles and Four Areas of the UN Global Compact" on the United Nations Global Compact (current as at August 2022).