

FUKOKU Group Employee Code of Conduct —

1. Supply safe and high-quality products

- 1) We will comply with applicable laws and safety regulations when we develop and manufacture our products.
- 2) We will supply safe and high-quality products in accordance with customers' needs.
- 3) We will rapidly take corrective actions and measures to prevent recurrence whenever a problem occurs.

2. Conducting sales and other corporate activities fairly and transparently

- 1) We will establish a relationship of mutual trust with our customers, suppliers and other business partners.
- 2) We will conduct transactions fairly in accordance with applicable laws and regulations such as antitrust laws.
- 3) We will not be engaged in any acts of bribery. We will not give and/or receive any business entertainment, gifts, or anything beyond socially accepted common sense.

3. Prompt disclosure and communication of corporate information

- 1) We will promptly and actively disclose our corporate information to shareholders and investors to enhance transparency of management.
- 2) We will promptly disclose the necessary corporate information to other stakeholders.
- 3) We will collect and manage the latest and most accurate information.

4. Creating a cheerful, safe and pleasant work environment

- 1) We will respect the individuality of every associate and promote everybody's creativity.
- 2) We will strongly prohibit discrimination and harassment.
- 3) We will comply with labor laws and regulations; our objective is to keep proper employee management as well as health and safety.
- 4) We will develop our personnel system with fair evaluations and treatments, creating an open and energetic corporate culture based on this system.
- 5) We will extend the above to our overseas operating sites and business partners, which may have different laws and/or social conditions.

5. Taking actions for environmental protection

- 1) We will comply with environmental protection laws and regulations and prevent environmental pollution.
- 2) We will actively commit to carrying out business activities with a low environmental impact.

6. Protection of intellectual property rights and treatment of confidential information

- 1) We will execute an adequate preliminary survey to avoid infringement of a third parties' intellectual property rights.
- 2) We acknowledge the company's management of confidential information from sales, engineering (including know-how and processes), and other areas, and our obligation to keep them in a strictly controlled condition.

7. Contributions to society

- 1) Our company's objective is to coexist with and grow together with society.
- 2) We will actively engage in positive activities to contribute to our community.
- 3) We will properly perform our duty to pay taxes as a responsible taxpayer.
- 4) We will not have any relation with any antisocial organizations and will take a firm stand against them.

8. International Business Activities Objectives

- 1) We will import and export in accordance with applicable laws and regulations and under appropriate procedures.
- 2) We will comply with local laws and regulations and respect local culture when we conduct operations overseas.

9. Building Compliance Office

- 1) We will develop a compliance system to ensure that corporate activities be conducted in accordance with this code of conduct.
- 2) We will promptly report a violation of this Code of Conduct to the corresponding consultation contact as soon as we identify the violation. We fully understand that retaliatory measures to the whistleblowers who report violations are prohibited and will protect them.