

Yokohama Metal Group Code of Conduct

Human rights

- ◆ We shall not engage in any acts of discrimination in aspects including citizenship, race, ethnicity, complexion, sex, age, religion, belief, social position, lineage, assets, presence or absence of physical or mental disability, and political opinions.
- ◆ We shall not engage in any child labor or forced labor.
- ◆ We shall not engage in any harassment, insult, abusive speech, undue coercion using organizational position (power harassment), or other such acts.
- ◆ We shall not engage in any sex-related speech or behavior against the wishes of the other person or those around (sexual harassment), or other such acts.
- ◆ We shall not libel or slander companies or individuals.

Labor practice

- ◆ We shall place top priority on respect for human life and observe laws and regulations related to occupational safety and health.
- ◆ We shall understand the importance of organized and continuous activities for safety and health, and shall actively promote them.
- ◆ We shall understand the danger related to our own work and the physical and mental hazard it presents, make preparations for response in the event of emergencies, provide related training, and strive to prevent accidents and disasters from occurring.
- ◆ We shall respect the basic labor rights of our employees.
- ◆ We shall provide proper benefits to our employees.

Environment

- ◆ We shall observe environment-related laws and regulations, regional/local agreements, and in-house rules.
- ◆ We shall promote the rigorous control and reduction of chemical substances that exert a harmful impact on the environment.
- ◆ We shall promote the conservation of energy and resources, and the reduction of CO₂ emissions and waste.
- ◆ We shall take active approaches to the recycling of precious metals (i.e., their transformation back into resources).

Fair business practices

- ◆ We shall observe laws and regulations, and engage in fair and free competition.
- ◆ We shall see that gift-giving, client entertainment, donations, and political contributions do not exceed the level that is permissible under the social norms and business conventions in the countries and regions in question, and shall perform them in a reasonable manner that is in conformance with laws, regulations, and in-house rules.
- ◆ For cargo and technology we import and export, we shall perform procedures that are both reasonable and requisite, in conformance with international treaties, laws, regulations, and in-house rules.
- ◆ We shall not engage in any acts that constitute unilateral change of transaction conditions, forced purchase, or other such conduct using a position of advantage.
- ◆ We shall respect and not infringe upon intellectual property rights.
- ◆ We shall not engage in any transactions with any anti-social forces or other parties engaged in illegal activity involving criminal proceeds and other such impropriety.
- ◆ We shall contribute to the construction of relationships of mutual cooperation and trust with other companies.
- ◆ We shall manage and safeguard trade secrets in accordance with our corporate rules. In addition, we shall not leak or divulge trade secrets, or make use of them without permission.
- ◆ We shall not engage in individual acts, conduct, etc. that is contrary to the corporate profit, or any acts that are problematic in the context of corporate ethics.
- ◆ We shall properly manage corporate assets (information, products, commodities, equipment, machines, expendables, intellectual property, brands, and other tangible and intangible assets), and not make improper or wrongful use of them.
- ◆ We shall not engage in insider transactions based on information that was obtained through a transaction relationship and had not yet been announced to the public at the time.
- ◆ To prevent compliance violations, we shall prepare an internal reporting (whistle-blowing) system and protect whistle-blowers to see that they do not incur any disadvantage.

Consumer issues

- ◆ We shall observe all laws and regulations applied to products, commodities, and services.
- ◆ We shall not violate competition law and any laws, regulations, etc. related to indications.
- ◆ We shall protect any personal information obtained from customers, transaction partners, employees, etc.
- ◆ In advertising etc., we shall provide indications based on substantial, objective grounds, and shall not engage in advertising that makes false or exaggerated claims.
- ◆ We shall provide information on the functions, features, etc. of our products, commodities, and services, and information concerning the correct mode of use, cautions in use and application, and other items.
- ◆ We shall disclose corporate information and heighten the transparency of our management. We shall also fulfill the requirements of corporate accountability.
- ◆ We shall engage in truthful and honest sales and service activities.
- ◆ We shall not engage in sales with excessive premiums or in deceptive sales methods.
- ◆ We shall make a proper response to any occurrence of quality problems affecting our credibility.
- ◆ In response to inquiries and complaints from customers, we shall take action in accordance with our in-house rules and guidelines, provide proper feedback, and prevent any recurrence of problems.
- ◆ We shall actively work to develop products, commodities, and services that reduce our use of resources to the minimum, make extensive use recycled materials, and conserve energy.
- ◆ Community participation and advancement
- ◆ We shall engage in activities of social contribution in areas including scientific research, education, environmental preservation, culture and the arts, and community service, and strive for harmony and co-existence with local communities.

Responsible mineral sourcing

- ◆ While establishing management rules based on our policy for responsible mineral sourcing and clearly specifying conflict-affected and high-risk areas (CAHRAs), we shall continue to uphold policy providing reasonable assurance that our sourcing is not benefiting or funding, directly or indirectly, armed groups committing serious violations of human rights. In addition, we shall perform due diligence for the sites of mineral production and the distribution process, and disclose the related means to customers, in response to any such requests.

Standards of employee conduct

- ◆ We shall acquire a good understanding of the in-house rules, and execute the targeted plans set for our work with sincerity, a desire to contribute, and a sense of responsibility.
- ◆ Promotion of ISO 9001 quality control activities and response to problems (Yokohama Metal Co., Ltd.)
While putting safety first as the foundation of our activities, we shall place top priority on product quality and promote activities to ensure quality, in accordance with the stipulations of ISO 9001. In the event that a problem occurs with our products, we shall promptly and accurately report the facts and take proper measures to solve the problem, in accordance with the rules. We shall also elucidate the causes of the problem, take steps for rectification, and strive to prevent recurrence.
- ◆ Reduction and prevention of environmental risks in accordance with ISO 14001, and response to problems (Environment & Recycling Division, Yokohama Metal Shoji Co., Ltd.)
We shall incorporate environmental management into our business activities as part of our environmental policy, prepare and execute plans based on this policy, and strive to reduce and prevent environmental risks. If we find a problem in our activities, we shall promptly and accurately report the facts and take proper measures to solve the problem, in accordance with the rules. We shall also elucidate the causes of the problem, take steps for rectification, and strive to prevent recurrence.
- ◆ Favorable human relations
We shall strive to build human relationships based on mutual recognition, aid, and enhancement, while respecting each other's individuality, listening to each other's views, and engaging in two-way communication.
- ◆ Rewarding corporate culture
The Yokohama Metal Group shall create a rewarding corporate culture by practicing fair and just treatment of its employees based on transparent standards of personnel assessment, and by providing them with opportunities to learn and take up challenges. It shall also strive to prepare workplaces with pleasant environments that show consideration for employee safety and health.
- ◆ Respect for human rights
We shall respect basic human rights and shall never engage in harassment or improper discrimination based on differences in respects including citizenship, race, sex, religion, and thought. We shall also respect individual privacy.
We shall not engage in speech or behavior that hurts the other person, or any type of harassment, and shall not permit other employees to do so either.
- ◆ Management of corporate information
We shall properly manage and use information in accordance with the rules established by the company. In particular, we shall strictly manage personal information and any other confidential information, to see that it is used only for business and is not leaked to external parties, lost, or tampered with.
- ◆ Maintenance and use of corporate assets
We shall carefully handle corporate assets and efficiently make maximum use of them. We shall not appropriate any asset, however small, for personal use.
- ◆ Respect for intellectual property rights
We shall remain aware that intellectual properties are important corporate assets and do everything we can to protect them. We shall also respect the intellectual property rights of others.
- ◆ Response to emergency situations
In the event of fires, disasters, factory accidents, and other emergency situations, we shall place top priority on human life, take action in accordance with our in-house rules and disaster prevention manual, and strive to curtain damage to the minimum.

Rooting of and rigorous adherence to the Yokohama Metal

Group Code of Conduct

- ◆ With the members of the executive committee serving as promoters in accordance with the Code, we shall continuously work for rooting of the Code and adherence to it among each and every director and employee, on their own initiative.

Response in the event of deviation from the Yokohama Metal

Group Code of Conduct, employment rules, and in-house rules

- ◆ In the event of deviation, or apprehension about deviation, from the Yokohama Metal Group Code of Conduct, employment rules, or in-house rules within the company, we shall not overlook the problem but instead take action for its resolution by steps such as consultation with superiors or colleagues.
If we feel that it would be difficult to resolve the problem within the workplace, we shall consult or contact personnel through the whistle-blowing system and take proper action in good faith.
In the event of deviation from the Yokohama Metal Group Code of Conduct, employment rules, or in-house rules, the personnel in question shall receive the appropriate punishment based on the rules.