FURUNO Group Code of Conduct

Basic Principles

To meet and exceed the trusts and expectations from the society, and by conforming to our Management Principles:

We will conduct our business activities in a fair, sound, sincere, and ethical manner.

We will develop and provide products and services with safety and reliability.

We will comply with laws and regulations as well as social ethics of each country and region, international rules, business contracts, and internal rules.

[Mindset of FURUNO Group Employees]

(1) Conduct as a FURUNO Group Employee

◆ We will be conscious that we are a member of society and act with dignity, class and decency as well as observe social morals, etiquette.

(2) Respect for Culture, Custom, and Human Rights, and Work Environment

- ◆ We will do our utmost to understand and respect the local cultures and customs of each country and region, and strive for a harmonious co-existence.
- ◆ We will respect fundamental human rights without discrimination based on their race, nationality, religion, belief, birth, sex, age, social status, mental/physical disability or other factors.
- ◆ In order to sustain and improve our safe and healthy work environment, we will comply with applicable laws and regulations, internal rules and create a workplace environment where anyone can demonstrate their abilities.

[Points to Note Regarding Business Activities]

(3) Products / Services

- ◆ We will provide safe, user friendly products and services to earn customer's trust by valuing the opinions of our clients and working assiduously to develop and improve high quality products and services.
- ◆ We will comply with applicable laws and regulations as well as social ethics of each country and region, international rules, business contracts and internal rules in R&D, manufacturing, sales, and services.

(4) Environmental Conservation

◆ We will promote improvement in energy efficiency, conservation of raw materials, recycling of materials and green procurement, and will develop

- and provide environmentally friendly products and services.
- We will actively promote activities towards the conservation of our environment and improve such activities continuously, and at the same time, comply with international standards, laws, and internal standards relating to the environmental conservation in order to contribute toward realizing a sustainable society.

(5) Free Competition and Fair Trading

• We will comply with applicable laws and regulations of each country and region relating to free competition and fair trading.

(6) Export Control

• We will comply with applicable laws and regulations of each country and region relating to the export control aimed for sustaining international peace and security.

(7) Affiliations with Politics and Bureaucracies

- ◆ We will refrain ourselves strictly from affiliating in a manner that can be perceived as an inappropriate relationship from our society with regard to affiliating with politics and bureaucracies.
- ◆ We will act appropriately in compliance with applicable laws and regulations in order to build sound and fair relationships with political parties and government agencies.

(8) Relationships with Clients, Suppliers, and Business Partners

- We will never offer or accept inappropriate profit or personal benefit through our business activities in any form, in order to maintain sound relationships with our clients, suppliers, and business partners. We will act in a lawful and ethical manner, and therefore will not attract any misunderstandings or criticisms from our society.
- We will never act in a way which contradicts our company's interests or engage in any personal activities that may disadvantage our business activities.

(9) Participation in anti-Social Forces

◆ We will refuse any relationships or affiliations with "anti-social forces" that threatens the order and safety of our society, and adversely affect to our sound business activities.

(10) Accounting Practices, Tax

◆ We will practice fair accounting, and file our tax appropriately in compliance with applicable laws and regulations, accounting standards, and internal rules.

(11) Public Disclosure

- We will disclose and provide the information on our company in a timely, accurate and intelligible manner in compliance with applicable laws and regulations as well as internal rules and thereby improving the fairness and transparency of our management along with our company image.
- We will sincerely engage in corporate public relations activities based on perspective facts, appropriate promotion methods in order to promote correct understandings of our company among clients, investors, and local societies of country and region.

[Company Assets]

(12) Company Assets

- We will recognize that the company assets are necessary and provided to us in order to perform business activities for our company, and we will utilize them appropriately under our responsibility.
- ◆ We will handle the assets which are lent to us by our clients or business partners appropriately in compliance with their contractual conditions.

(13) Intellectual Properties

- We will actively create intellectual properties as important assets to our company. We will appropriately protect them as intellectual property rights and expertise in compliance with applicable laws and regulations as well as internal rules, and utilize them effectively in our business activities.
- We will respect intellectual properties of a third party, and will not infringe them.

[Information Control]

(14) Confidential Information

- ◆ We will properly control and protect information our company holds in compliance with the applicable laws and regulations, internal rules, and their contractual conditions.
- We will be constantly aware that information our company holds are highly important assets for our business activities, and will utilize them appropriately and effectively.
- We will do our utmost to be careful with the confidential information of our

company and third parties from a loss, a theft, an alteration, and an unfair use. We will also adopt information security measures in order to prevent such events.

(15) Personal Information

• We will recognize the importance of the personal information provided by our clients, suppliers, business partners, and our employees and appropriately acquire, manage, utilize and provide personal information in compliance with applicable laws and regulations, internal rules and their contractual conditions.

(16) Insider Trading

• We will appropriately handle the insider information on our company or other companies gained through regular business activities or from other companies in compliance with applicable laws and regulations as well as internal rules, and refrain from engaging in the sales of stocks and bonds of the company relating to such information until it has been publically disclosed.

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