

NAXIS Code of Conduct

Version 1.0

Prepared by Sustainable Project Division

CONTENTS

	<u>Page no.</u>
Introduction	4
1. Policy Statement	6
a. Why introduce a code of conduct	
b. Our purpose and principles	
c. Policy expectations	
d. Respect of Human Rights	
2. Policy Content	7
a. Responsible employment	
b. Vision and strategy	
c. Employee voices	
d. Grievance and issues	
e. Diversity	
f. Health and safety	
g. Performance and reward	
h. Work life balance	
i. Talent	
3. Employee Conduct	12
a. Appropriate use of company resources	
b. Intellectual property	
c. Conflicts of interest	
d. Insider trading	
e. Doing business	
f. Customers	
g. Suppliers	
h. Gifts and improper payments	
i. Bribery, corruption and fraud	
j. Compliance with laws	
k. Expenses	
l. Preventing money laundering	
m. Competition	
n. Political contributions	

- o. Exclusion of antisocial groups
- p. Corporate governance and shareholder communication
- q. Company records
- r. Communications
- s. Corporate responsibility
- t. Privacy
- u. Privacy while using company resources
- v. Harassment policy
- w. Maternity protection

4. Applying the Policy

20

- a. References
- b. Publication
- c. Reporting a problem
- d. Annual report

Code of Conduct

Introduction

Our reputation and our brand are affected by what we all do every single day. NAXIS Code of Conduct (COC) is more than a statement on a piece of paper, but by putting our commitment in writing, we clearly set out the business practices that we at the NAXIS Group will operate and set clear standards of behaviour for everyone in our organisation. Management teams have a specific role to play in setting an example, ensuring that this policy is well communicated, understood and applied throughout our organisation. Our COC demonstrates that the NAXIS Group will operate responsibly and in accordance with all relevant laws and regulations. Specifically we will:

- promote responsible business practice
- ensure equal opportunities
- provide a safe and healthy work environment
- value diversity in the workplace
- Fair trade
- provide a safe route for people to highlight non-compliance

These practices sit alongside our principles of trust, integrity, simplicity, agility and innovation and together act at the heart of all our dealings and drive the way we work for the benefit of our people, customers, suppliers, shareholders and other stakeholders. This COC is comprehensive, but it does not cover every possible situation. You are expected to read and understand the guide and use common sense and good judgement to guide you. In addition, in certain areas related to good business ethics, we have published specific policies, and, therefore, you should be aware of all other relevant policies.

If you have a question or concern about proper conduct, you should immediately raise the issue with your manager, another senior manager/ director or use your local whistle-blowing service (in the process of development). Local policies cover more detail on some of the points raised in this document and you should always refer to them and your employment contract, should you be in any doubt.

It is vital that in our own business we operate based on our COC. Therefore it is vital that you play a part in making this happen by reading and understanding this guide and ensuring the continued implementation of responsible business practices in all business

activities.

Should you have any questions about the content of this policy, please contact NAXIS sustainable promotion supervisor.

NAXIS Group sustainable promotion supervisor

Email: sustainable@naxis.co.jp

Available languages for contact are English and Japanese.

(We will use translation software and app for inquiries in other languages, so please note that confidentiality cannot be guaranteed. We appreciate your understanding.)

This COC is approved by the NAXIS Group Board of Directors and signed by its CEO.



Date: 01 August, 2020

Taiho Nakamura

NAXIS Group CEO

Established on: 01 September, 2019