

## **Code of Conduct and Ethics**

We, the JACCS Group, declare that all officers and employees will comply with the articles adopted below to contribute to the realization of “a future inspired by dreams” and “an affluent society”.

As officers and employees, we hold high aspirations as professionals. While exerting our talents—as individuals and through teamwork—our conduct reflects our consciousness as representatives of the JACCS brand.

**Article 1:** We will conduct business activities in compliance with laws and regulations.

We comply with laws, ordinances, regulations and by-laws of the countries and regions in which we carry out our business operations, as a global company.

We establish internal systems, including internal rules and manuals necessary for compliance with laws and regulations. All officers and employees undertake ongoing efforts to thoroughly understand the purpose of laws and regulations and the aim of their enactment .

**Article 2:** We undertake business activities that value people highly.

We respect the human rights of a wide range of stakeholders (people), including officers and employees, customers, business partners, shareholders, investors, and members of local communities. We manage our business in a manner that values people, and by providing safe, secure and highly convenient services, we do our best to live up to the expectations of all people.

We respect the diversity of all officers and employees, and create healthy work environments that are free of all types of discrimination and harassment, and are employee friendly. We promote a balance between career and personal life, and aim to realize a workplace that promotes mental, physical and emotional well-being.

We carefully listen to the opinions of customers, business partners and other stakeholders and respond to these opinions with sincerity.

We strive to create opportunities for constructive dialogue with all shareholders and investors.

**Article 3:** We carry out our business activities in a manner that places a high value on trust.

We fully recognize that our business is based on the trust it gains from society. To maintain and enhance this trust, we abide by our founding philosophy of “Trust is the basis for all”, and honestly undertake our business activities based on a

medium- to long-term, sustainable perspective.

Trust is our most valuable asset, and this cannot be built overnight. We will protect this trust, and continue to seek challenges as we strive to further enhance corporate value.

Article 4: We maintain a fair and transparent corporate culture.

We recognize that a fair and transparent corporate culture is the foundation upon which our trust is built. We proactively disclose the results of our business activities in a timely manner using appropriate methods and communicate the details of our business situation to all people, accurately and equally.

No officers or employees will engage in insider trading under any circumstances. Insider trading includes such acts as trading in stocks based on material facts that have not been publicly disclosed.

Article 5: We carry out business activities in accordance with the principle of social justice.

So as to enhance the trust we receive from society, we carry out our business activities in accordance not only with laws and regulations but also the principle of social justice, while maintaining a high sense of ethics and duty.

We take a vigilant stance with regard to anti-social forces and criminal organizations, and block all involvement with such parties. This includes an absolute ban on business relationships of any kind or providing any funding whatsoever. We also take appropriate measures against the risk of money laundering or terrorist financing.

Article 6: We carry out business activities in a manner that thoroughly protects personal information.

In consideration of the importance of the value of personal information, we appropriately store and use the large amount of personal information obtained through our business activities, and undertake thorough measures to protect personal information so as to prevent any leaks. We will not leak confidential information acquired and held by the Group during the course of duties, and we will not make unauthorized use of information for our own gain or for the benefit of a third party.

We undertake information security measures, including the appropriate management of recording media, user IDs and passwords, and measures to prevent the infection of computer viruses.

Article 7: We carry out business activities while recognizing our corporate social responsibility.

We recognize our corporate social responsibility, and we take the initiative in addressing social issues while undertaking social contribution activities on an ongoing basis. As a good corporate citizen, we foster a corporate culture that encourages all officers and employees to participate in diverse social contribution activities through their own initiative.

We take a proactive approach to dealing with environmental issues to protect the global environment.

Supplementary Provision:

The revision or abolition of this Code shall be carried out by the approval of the Board of Directors. However, formal changes, such as changes to laws or regulations, or organizational changes, may be carried out with the approval of the General Manager of the Compliance Supervisory Department.