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ALPS ALPINE GROUP CODE OF ETHICS

ALPSALPINE

● Message from the CEO

Companies are public entities of society and it is vital that they fulfill their corporate social responsibility (CSR). To ensure that we fulfill our responsibility to society, the Alps Alpine Group has established a set of shared values guiding our business management and actions in the form of the Corporate Philosophy – *Alps Alpine innovates value for humans and society on a brighter planet* – and Management Approach – *Strive for Value; Love the Planet; Contribute to Society; Respect the Individual; and Act with Integrity*.



The Alps Alpine Group Code of Ethics was introduced to help convey the values embodied in the Corporate Philosophy and Management Approach to more than 40,000 colleagues within the Alps Alpine Group worldwide so they may be put into practice. The Code of Ethics covers more than just legal and other forms of compliance. It also incorporates ideas and aspects of conduct that the group has come to embrace over the years, aspects we can view as “Alps Alpine-isms.” Abiding by the Code of Ethics together, we can carry on our pursuit of new value and bring about sustainable growth across the Alps Alpine Group.

We must all abide by this Code of Ethics with strong awareness that every one of us represents the Alps Alpine Group.

This Code of Ethics states aspects of conduct that Alps Alpine Group companies and employees must abide by at the very least in order to actualize shared values embodied in the Corporate Philosophy and Management Approach. Every officer and employee within the Alps Alpine Group (hereinafter “we”) must understand and follow the Code of Ethics to help build social credibility and corporate value and enable smooth business management and operations.

1. Strive for Value We will go all out to create new value	
We will keep putting forward highly appealing and richly unique products and services of benefit to humans, society and the planet; and we will act in good faith, placing top priority on quality and safety.	
1-1. New Value Creation	Possessing flexibility of mind without fear of failure, we will continually endeavor to break new ground with technologies and services and become better at our jobs.
1-2. Safety Assurance and Customer Protection	We will comply with safety-related laws, regulations, standards and in-house procedures in all processes, including product and service development, manufacturing, transportation, sales and maintenance; and we will endeavor to develop technology for improving safety, quality and usability, and engage in the supply of products and services that function safely and users feel safe to use.
1-3. High-Quality Products and Services	We will endeavor to enhance the quality of products and services to maximize customer satisfaction.
1-4. Accurate and Relevant Information on Products and Services	We will provide customers accurate information they require to happily and safely use our products and services.
1-5. Good Faith in Inquiries and After-Sales Service	We will respond to customer requests and inquiries in good faith; and we will provide suitable mechanisms, such as returns, repairs and maintenance, to assist customers in the event of a problem with a product or service sold.
1-6. Fast and Appropriate Response to Incidents	We will swiftly respond to incidents involving a product or service to limit the damage caused; and we will investigate any incident to determine the facts, identify the causes and prevent a recurrence, and disclose or report information internally and externally as required.
1-7. Compliance with International Standards	We will put in place quality management systems and achieve compliance with relevant international standards (ISO 9001/IATF 16949).

2.	<i>Love the Planet</i> We will coexist with the environment as friends of the Earth
	Recognizing the environment as an important management theme, we will strive to create and propagate products and technologies helping to lower the environmental impact of business activities and protect the environment; and we will undertake environmental training and education and consider environmental protection in day-to-day activities.
2-1. Environmentally Friendly Business Activities	We will endeavor to combat climate change and conserve resources in our business activities while undertaking environmental initiatives such as reducing or ceasing use of materials that negatively impact the environment.
2-2. Compliance with Environmental Laws and Regulations	We will gain a correct understanding of, and comply with, regional, national and local environment-related laws and regulations, and pacts entered for the purpose of protecting the environment.
2-3. Compliance with International Standards	We will put in place environmental management systems and achieve compliance with relevant international standards (ISO 14001).

3.	<i>Contribute to Society</i> We will do good for society and help it to flourish
	As sound citizens, we aim to be a corporation that gets involved in the community and contributes to society through business activities, for example by striving for solutions to social problems. As members of the community, we will comply with laws, regulations and other rules, respect local customs and culture, and consider the social impact of our business activities.
3-1. Community and Regional Contribution through Business	The Alps Alpine Group will fulfill its tax obligations and contribute to development in regions, countries and communities where we operate, for example through job creation.
3-2. Coexistence with Society and the Local Community	We will build cooperative relationships with countries and communities where we operate and support the sustainable development of those countries and communities through participation in local cultural and environmental protection activities, assistance and personal development.
3-3. Safe Business Activities	We will strive to keep our business activities safe so as not to undermine the safety of local communities. In the event of a problem or issue occurring, we will respond swiftly, appropriately and in good faith and act to prevent any escalation or recurrence while following the direction of persons in charge internally and competent authorities.

4.	<i>Respect the Individual</i> We will empower the unique energy of every employee
	We will work together to enhance our integrated corporate capabilities while valuing diverse skills, individuality and values.
4-1. Mutual Understanding	We will work together as colleagues with acceptance of diverse attributes and sets of values and mutual respect for one another's character and individuality.
4-2. Human Resources Development	Viewing human resources as a source of value creation, the Alps Alpine Group will provide a broad variety of training programs and assistance for self-initiated development while establishing systems and a corporate culture that encourage employees to take on challenges and let them experience personal growth and satisfaction.
4-3. Independence of the Individual	We will constantly strive to hone and develop our own skills, and we will fulfill our individual obligations in good faith.

5. Act with Integrity**We will act fairly and with integrity as global players**

We will embrace high ethical standards in the running of our business to remain a corporate entity trusted by all stakeholders; and we will comply with international guidelines on human rights, health and safety, and employment conditions, as well as regional, national and local laws and regulations, and endeavor to create good workplaces where employees can stay safe and healthy.

5-1. No Forced or Child Labor	The Alps Alpine Group will employ all of its employees of their own free will, regardless of the style of employment, and will not permit forced or child labor. Employees under the age of 18 will not be made to engage in work potentially hazardous to their health or safety (including night work and after-hours work). *A "child" is someone who has not yet reached the age of 15, the age at which compulsory education ends, or the applicable country's minimum legal working age, whichever is oldest.
5-2. No Inhumane Treatment	We will not engage in abuse, bullying (harassment) or any other inhumane treatment.
5-3. No Discrimination	We will not discriminate against anyone based on race, color, age, gender, sexual orientation, gender identity and expression, national origin, social origin, disability, pregnancy, religion or other status.
5-4. Corruption Prevention and Restriction of Political Donations	We will maintain sound, normal ties with political and government entities and will not engage in bribery, provision of illegal political donations or other corrupt acts; nor will we offer monetary rewards, entertainment or gifts, or any other personal gain or benefit to public officials or other parties in return for securing or retaining commercial business, provision of non-public information, or other business advantage.
5-5. Fair Competition	We will comply with laws and regulations pertaining to fair competition and business transactions established in each region, country or locality, and we will not engage in unfair pricing agreements, collusion, dumping or other conduct interfering with free competition between organizations.
5-6. No Improper Advantage	In all relationships with stakeholders, we will not provide or accept monetary or physical gifts outside the scope of social courtesy, or excessive entertainment.
5-7. No Abuse of Dominance	We will not take advantage of a dominant business position to unilaterally determine or change terms and conditions of transactions with suppliers or other business partners, or to impose unreasonable demands or obligations on business partners.
5-8. Respect for Intellectual Property	We will manage and utilize intellectual property in our possession appropriately; and we will respect, and endeavor to avoid infringing, the intellectual property of others.
5-9. Information Security	The Alps Alpine Group will manage and safeguard confidential information about customers, third parties and employees in an appropriate manner; and we will devise measures to defend against cyber security threats and take steps to prevent information security incidents.
5-10. Privacy Respect and Protection	To uphold and safeguard the privacy of individuals, we will comply with privacy-related laws and regulations and refrain from unnecessary collection of personal information and use of information except for purposes it was intended for; and we will exercise extreme caution when handling personal information to prevent leaks.
5-11. Timely and Appropriate Information Disclosure	The Alps Alpine Group will disclose information as required in a proactive, timely and appropriate manner to gain the trust of the market and maintain high standards of business transparency.
5-12. Conformance with Trade Controls	The Alps Alpine Group will comply with laws and regulations pertaining to security export controls and will not participate in transactions with potential to undermine global peace and security.
5-13. Payment of Taxes	The Alps Alpine Group will comply with laws, regulations and other controls relating to tax and foreign exchange and will contribute to public finances through payment of internationally appropriate taxes.
5-14. No Insider Trading	We will not trade in shares of our own company or other companies or other securities based on undisclosed internal information obtained through the performance of job duties (insider trading). Except in unavoidable work situations, we will not communicate any such undisclosed internal information to parties inside or outside the company.
5-15. No Off-the-Job Use of Company Property	We will not use company property off the job for personal or third-party matters.
5-16. No Illegal Drugs	We will not buy, sell or possess illegal drugs.
5-17. No Conflict of Interest	We will not pursue self-gain or a third party's gain if it will undermine, or potentially undermine, company interests.
5-18. Rejection of Anti-Social Forces	We will refuse all ties with antisocial forces constituting a threat to order and safety in civil society; and we will reject outright any demands made by antisocial forces.
5-19. Emergency Response	The Alps Alpine Group will prepare emergency measures for envisaged eventualities, including disasters, accidents, contagious diseases and environmental contamination, and ensure workplaces are familiar with those measures and conduct drills, as well as act to prevent escalation or recurrence of any such eventuality.
5-20. Work-Related Accidents and Illnesses	The Alps Alpine Group will provide treatment required as a result of work-related accidents and illnesses and implement corrective measures to eliminate the causes.

5-21. Labor-Management Communication	The Alps Alpine Group will respect the rights of employees, complying with laws, regulations and labor agreements; and we will endeavor to maintain and develop trust-based relationships between labor and management through sufficient communication.
5-22. Freedom of Association and Collective Bargaining	The Alps Alpine Group will respect the rights of employees to exercise freedom of association and engage in collective bargaining, complying with labor-related laws and regulations in each country and community where we operate.
5-23. Appropriate Pay and Working Hours	The Alps Alpine Group will pay employees a wage or salary as high as, or higher than, the statutory level that allows them to maintain social and cultural living standards and will comply with working hour limitations established by law.
5-24. Occupational Health and Safety	We will comply with laws and regulations pertaining to workplace health and safety and strive to create environments where people can work safely and in comfort both physically and mentally.

*The Alps Alpine Group Code of Ethics upholds international norms such as the United Nations' *Guiding Principles on Business and Human Rights* and the *OECD Guidelines for Multinational Enterprises*.

● Manager Obligations

Executives and managers within the Alps Alpine Group shall perform the following duties to promote this Code of Ethics.

- (1) Make a conscious effort to abide by this Code of Ethics.
- (2) Routinely direct and advise employees under one's charge to abide by this Code of Ethics.
- (3) Take quick and appropriate action if a problem or issue arises in the workplace.

● Code of Ethics Infringements

Infringements of this Code of Ethics may result in a punishment in line with in-house regulations and rules. Officers and managers who ignore infringements, or who fail to notice serious negligence may likewise receive a punishment in line with in-house regulations and rules.

● Consultation and Reporting

We will promptly consult an immediate supervisor or manager on discovering conduct infringing this Code of Ethics or other questionable conduct. If it is not possible to consult an immediate supervisor or manager, we will report to and consult an internal reporting contact. The Alps Alpine Group will protect the confidentiality and anonymity of reporting and consulting parties and will not permit retaliatory conduct or any other behavior hindering an investigation into matters reported or raised. Except in the case of reports filed for unjustifiable purposes, reporting and consulting parties will not be disadvantaged in any way.

● Basic Approach to Practicing the Code of Ethics

In practicing the Code of Ethics, we will observe the following basic principles.

We will observe these basic principles also in circumstances not specifically included in this Code of Ethics.

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| (1) Legal compliance | We will respect and comply with laws and regulations in each country. |
| (2) Respect for international norms | In addition to the law, we will respect internationally accepted norms. |
| (3) Ethical conduct | We will behave according to ethical values such as fairness and acting in good faith. |
| (4) Respect for stakeholders | We will show consideration toward all the various stakeholders. |
| (5) Transparency | We will ensure transparency of the organization's decision-making and activities. |
| (6) Accountability | We will explain the external impact of the organization's activities. |
| (7) Education focus | We will implement education to deepen understanding of policies and activities. |

● Scope of Application

This Code of Ethics applies to officers and employees within the Alps Alpine Group.