

NNR Group Compliance Policies

1. Compliance with Laws and Regulations, Social Norms, etc.

【Compliance Policy】

The NNR Group never pursues any profit derived from any illegal or unethical conduct. The NNR Group correctly understands all laws and regulations, industry standards and social norms which are applicable to the countries and regions where the NNR Group operates its businesses (hereinafter referred to as “laws and regulations or social norms, etc.”) and complies with them.

【Principles】

(1) Correct understanding and compliance with laws and regulations or social norms, etc.

① Every officer/employee shall understand laws and regulations or industry standards correctly, and comply with them. Do not engage in any unethical conduct in contravention of the objectives of laws and regulations or industry standards.

② Understand company rules correctly and comply with them as they were established in light of important laws and regulations or social norms, etc. related to business.

③ Do not violate laws and regulations or social norms, etc. through third parties' conduct, such as a client.

(2) Recognition of the effect of violation

Always recognize that violating laws and regulations or social norms, etc. may have a great effect on not only the violator, his/her family, the NNR Group, but also customers or business partners.

(3) Prohibition against drunk driving

The NNR Group is strictly against drunk driving. Understand laws and regulations, etc. regarding drunk driving correctly so that you will never commit drunk driving regardless of whether or not you are on duty. Do not drink alcohol in such a manner that may influence your work.

(4) Prohibition against drugs

It is prohibited to take, sell and purchase, and induce illegal drugs. It is also prohibited to take drugs which may influence you mentally and physically.

(5) Dealing with illegal conduct, etc. by others

If you see or hear of any conduct which violates or may violate laws and regulations or social norms, etc., take appropriate measures, such as reporting

the conduct to your superior or a relevant division.

2. Provision of Safe and Reliable Products and Services.

【Compliance Policy】

The NNR Group will provide safe and reliable products and services to customers. The NNR Group will ensure the safety and reliability of products and services on a regular basis. In the event that a problem occurs, the NNR Group will take appropriate measures which prioritize customers' safety and reliability.

【Principles】

(1) Customers' safety

- ① In developing or providing products or services, you should prioritize customers' safety and reliability over everything. Do not prioritize short-run profitability, and do not neglect the safety of products or services.
- ② To provide safe and reliable products and services, make every effort to prevent accidents and ensure the quality of products and services on a regular basis.
- ③ Take appropriate measures to prioritize customers' safety and reliability in the event that a problem such as an accident and disaster occurs.

(2) Appropriate advertising, labels and full explanations

To make sure that customers can use our products and services without any concerns, every officer/employee must understand the contents of our products and services well, and provide customers with appropriate advertising, labels and sufficient explanations.

3. Appropriate Information Disclosure and Communication

【Compliance Policy】

The NNR Group will disclose necessary information to its stakeholders such as customers, communities, shareholders and clients, and communicate with them.

【Principles】

(1) Fair accounting

- ① Practice fair accounting in accordance with the accounting rules which are generally accredited to be fair and reasonable.
- ② Record transactions appropriately. Preserve evidence until a specified date appropriately.
- ③ Committing intentional falsification, accounting fraud, etc. will betray stakeholders and are strictly prohibited.

(2) Appropriate declaration and tax payment

You should file an appropriate tax declaration and pay tax in accordance with related laws and regulations.

(3) Disclosure of non-financial information

Disclose properly and with integrity not only information related to financial affairs but also non-financial information related to the company, such as a policy regarding corporate social responsibility (CSR).

(4) Prompt and reliable report inside the company

To disclose information properly and with integrity, it is necessary to make prompt and reliable reports inside the company. Even if the information is not beneficial to your company, do not conceal or leave the information as it is. Report the information to your superior or a relevant division.

(5) Communication with stakeholders

Listen to your stakeholders' opinions, etc., and communicate with them appropriately.

4. Fair Trade and Competition

【Compliance Policy】

The NNR Group will neither conduct nor engage in any activities which may impede fair competition in the market. The NNR Group will comply with competition laws applicable to all the countries and regions where the NNR Group operates its businesses.

【Principles】

(1) Prohibition against cartels, etc.

- ① Do not enter into illegal arrangements with other competitors, etc. (cartel) as to the contents, prices, terms and conditions, etc. of your products or services.
- ② Do not exchange any information which may lead to such arrangements.
- ③ Even if you happen to be at the meeting and do not actually join the arrangement, you might be regarded as a member of the arrangement. Always pay careful attention when you contact other competitors, etc.

(2) Prohibition against abusing superior bargaining positions

Do not abuse a superior bargaining position you have over your business partners (e.g., forcing unfavorable conditions on your clients unilaterally).

5. Prohibition against Bribery and Restriction of Gifts and Entertainment

【Compliance Policy】

The NNR Group will not directly or indirectly provide, offer, or promise to

provide/offer money or other valuables unreasonably for the purpose of obtaining or maintaining businesses or business convenience (hereinafter referred to as “offering bribes”). The NNR Group will not receive, request, or promise to receive/request such valuables (hereinafter referred to as “receiving bribes”), either. The NNR Group will not provide or offer gifts and entertainment which will be regarded as unreasonable in light of social perception.

【Principles】

(1) Prohibition against bribery

Do not offer or receive bribes to/from anyone regardless of whether his/her company is private or public.

(2) Prohibition against excessive gifts and entertainment, etc.

① Do not provide or offer gifts and entertainment which will be regarded as unreasonable in light of social perception.

② If you provide or offer gifts and entertainment, make a report of the content, purpose, etc. appropriately, and maintain the record.

(3) Prohibition against offering bribes indirectly

Do not offer bribes indirectly through third parties (business partners) such as agencies and consultants.

(4) Report of violation

If you see or hear of any conduct which violates this Policy or each country's Anti-bribery/Anti-corruption Act in your company, do not hide or neglect the conduct, and report it to your superior or a relevant division.

6. Prohibition against Conflicts of Interest

【Compliance Policy】

The NNR Group will ask all officers and employees to act in accordance with the interests of the NNR Group. They shall not prioritize their interests or third parties' interests over the Group's interests.

【Principles】

(Prohibition against conflicts of interest)

Do not prioritize the interests of yourself, your family, relatives, friends, etc. over the NNR Group's interests. Do not engage in any acts which are adverse to the NNR Group's interests, or cause misunderstandings.

7. Appropriate Handling of Assets and Information.

【Compliance Policy】

The NNR Group will manage and operate all its assets and information appropriately, and protect its rights. The assets and information the NNR Group handles include not only the Group's assets and information but also customers' personal information, and various types of tangible and intangible assets the Group keeps under contracts with clients and business partners, etc.

The NNR Group also respects other parties' rights such as their intellectual property.

【Principles】

(1) Appropriate management of assets and information the NNR Group handles

- ① Manage strictly and appropriately the assets and information the NNR Group handles at each phase of obtaining, storing, using, and disposing of the assets and information.
- ② Do not use unjust means to obtain assets or information.
- ③ Manage assets and information appropriately. Do not use them for personal reasons or for purposes other than the original purpose.
- ④ When you dispose of assets and information, do so appropriately in line with laws and regulations or company rules.

(2) Strict management of personal and confidential information

- ① Personal information (information regarding privacy) should be handled carefully. Do not disclose it without reasonable cause, nor use it for purposes other than the original purpose.
- ② Do not leak confidential information you obtain through work during your tenure and after retirement.
- ③ Always manage information carefully as you might leak personal or confidential information unconsciously due to negligence.

(3) Positive acquisition of intellectual property rights

Acquire intellectual property rights appropriately as your company, and strive to protect them.

(4) Respect for other parties' intellectual property, etc.

Be sure to examine and confirm whether or not other parties have already registered their intellectual property, etc. Be careful not to infringe their rights.

(5) Prohibition against insider trading

Do not engage in selling and purchasing shares, etc. by using unreleased important information you obtain through work (insider trading).

8. Disseminating Information Outside of the Company and Social Media

【Compliance Policy】

When the NNR Group disseminates information outside of the Group, the Group will fully recognize its responsibility and the impact of doing so, and do so appropriately.

【Principles】

(1) Company's dissemination of information outside of the company

When a company disseminates information outside of the company, it should be done by a relevant division in accordance with specified procedures.

(2) Disseminating information as an individual

① When you disseminate information through social media, etc., as an individual, comply with laws and regulations or guidelines, etc. Be careful not to impair the brand of the NNR Group.

② Even if you disseminate information from your own perspective, your information may be misinterpreted as information disseminated by a company representative.

③ Be fully aware of the fact that once the information is disseminated, it may be open to many and unspecified persons, and may not be deleted.

④ If the inquiry you receive from outside is addressed to another employee, do not deal with the inquiry at your own discretion, and refer to the appropriate department.

9. Respect for Human Rights

【Compliance Policy】

The NNR Group will respect the human rights of all the people from both inside and outside of the company. The NNR Group will not engage in any business activities which lead to any kind of discrimination or infringement of human rights.

【Principles】

(1) Prohibition against discrimination and various types of harassment

Strive to understand human rights issues correctly. Do not discriminate or harass people due to race, belief, sex, age, social status, nationality, tribe, religion, disability, disease, appearance, etc.

(2) Prohibition against forced labor and child labor

Do not engage in forced labor or child labor directly or indirectly.

10. Respect for Industrial Safety and Health and Labors Rights

【Compliance Policy】

The NNR Group will comply with work-related laws and regulations and rules, strive to prevent accidents or disasters in workplaces, and provide all employees with a safe working environment.

【Principles】

(1) Prevention of industrial accidents

Each and every officer/employee shall be aware of the importance of safety controls, such as investigations and drills in his/her workplace, and strive to prevent industrial accidents.

(2) Creation of comfortable workplaces

① Try to improve your mental and physical health, and aim to make your workplace comfortable.

② Create workplaces with openness by communicating with each other actively for better mutual understanding.

(3) Prohibition against violent acts

All kinds of violent acts which may endanger the safety of your workplace (acts which may endanger others such as acts of violence and threat) are prohibited.

(4) Respect for labor rights

Comply with work-related laws and regulations, etc. pertaining to minimum wages, work hours, and other labor rights.

11. Harmony with Society and Contribution to the Society

【Compliance Policy】

The NNR Group will live together in harmony with the communities in which its businesses are located as a good citizen, and contribute to the development of the economy, culture, and life of the communities through social activities as well as business activities.

【Principles】

(1) CSR and social contribution

① As a citizen, be aware of the roles and responsibilities of the company, and promote sound business activities. Establish good and trustworthy relationships with the communities through various social activities to develop the communities.

② Participate positively in activities which contribute to the development of communities in your private life regardless of whether they are business related.

(2) Consideration for other cultures, customs, etc.

Deepen your understanding of cultures, customs and religions of all the countries

and regions where you operate your businesses. Be careful not to lose communities' trust due to inappropriate behavior.

12. Efforts concerning Environmental Issues

【Compliance Policy】

The NNR Group will strongly recognize the importance of environmental issues, and aim to conduct business activities in harmony with the environment. The NNR Group will reduce the environmental burden, and contribute to the realization of a recycling society and the prevention of global warming.

【Principles】

(1) Understanding of/compliance with environmental laws and regulations

Understand environmental laws and regulations or restrictions related to business activities correctly, and comply with them.

(2) Reduction of environmental burden

Work to prevent pollution (e.g., noise reduction and appropriate wastewater treatment), and reduce the environmental burden (e.g., reduction of CO₂ emissions) during business activities.

(3) Improvement of environmental awareness

Practice effective use and recycling of resources and energy in your life as well as during business activities.

13. Ask Clients for Cooperation

【Compliance Policy】

The NNR Group aims to establish a long-term trustworthy relationship with all clients, and continue to develop together. To do this, the NNR Group will ask not only its officers and employees but also all clients to understand and cooperate with the intent or concept of the Policies as needed.

【Principles】

(Request for cooperation from clients)

① Explain the intent or concept of the Policies as needed, and request their cooperation to all clients.

② If you receive an inquiry about the Policies from clients, confer with your superior or a relevant division, and deal with it appropriately.

14. Promoting and Improving Compliance

【Compliance Policy】

The NNR Group will always discipline ourselves strictly, and try to promote and improve compliance in line with the Compliance Policies.

【Principles】

(1) Awareness of individual roles and responsibility

① Principle of compliance lies in disciplining yourself strictly first. Every officer and employee is aware of his/her own roles and responsibility, understand the Policies and the Compliance Manual based on the Policies correctly, and behave in line with laws and regulations or social norms, etc.

② If you face any problem which is not mentioned in the Policies or the Compliance Manual based on the Policies, refer to laws and regulations or social norms, etc., and confirm whether your behavior is appropriate or not. If you are not certain of your judgment, consult with your superior or a relevant division for an appropriate judgment or solution.

(2) Correcting violation of compliance, etc.

If you see or hear of any conduct which violates or may violate compliance (e.g., violation of laws and regulations, etc.), try to control the conduct, and also report it to your superior or a relevant division, consult with them, and try to prevent or correct the inappropriate conduct.

(3) Continuous promotion and improvement of compliance

① Circumstances regarding compliance such as laws and regulations or social norms, social/economic environment, and customers' needs change as time goes by. Revise continuously what individual behavior or work should be in light of such a change of circumstances.

② Compliance cannot be promoted only by individual efforts. It is highly influenced by how approachable your superior is for consultation or report, relationships with trust among employees, your superior's awareness of compliance, etc. Always try to foster a good work climate.