

Compliance Policy for The Japan Steel Works Group

1. Representations

To make the social value and sustainable enhancement of our corporate value at the same time, the Japan Steel Works Group always act in good faith and comply with each of applicable laws, regulations and rules based on The Japan Steel Works Group Basic Sustainability Policy.

We consider that “Compliance” means to fulfill our all social responsibilities widely including but not limited to prevention of fraud, compliance with domestic and offshore laws, regulations and rules, our internal rules, and contracts entered between us and our customers, suppliers and third parties.

We comply with as below.

When there are any conflicts between profits generated to us and “Compliance”, we represent and certificate that we comply with “Compliance”.

(1) Managing Products Safety and Warranty for Products Quality

We are committed to managing quality of our products and services properly.

(2) Our Fair Businesses Practices

In our business activities, we conduct fair transactions (including procurement) based on fair and free competition, and we comply with the relevant applicable laws and regulations of each country regarding fair trade.

(3) Anti-Bribery and Anti-Corruption

We ensure transparency in the relationships between the politics and governments of each country, and commit to preventing all kinds of corruption (including but not limited to conflicts of interests, excessive entertainment and gift-giving). We must not engage in anti-bribery and anti-corruption transactions against public officers, and customers, suppliers and business partners of each country.

(4) Complying with the Trade Laws and Regulations including Security Trade Control

We strictly control import and export transactions, and security trade controls. We comply with the relevant applicable treaties, laws and regulations of each country.

(5) Complying with Applicable Laws and Regulations Relevant to Our Business Practices

We confirm and understand with the relevant applicable laws and regulations of each country that are relevant to our business practices, and comply with them throughout our business practices.

(6) Intellectual Property

We protect our intellectual property and do not infringe it owned by the third parties.

(7) Information Management

We are committed to managing our information that we are required to be protected by implementing

appropriate information management practices to prevent the leakage of confidential and personal information owned by us and received from our customers, suppliers and business partners, and minimizing damage occurred from cyberattacks, natural disasters and other incidents.

(8) Prevention of Insider Trading

We are committed to causing our officers and employees to purchase or sell publicly traded securities (such as stocks) in accordance with the relevant applicable laws and regulations of each country, and our internal rules.

(9) Proper Management of Public Research Funds and Prevention of Research Misconducts

We ensure the proper management of public research funds, and prevent misconducts and inappropriate behaviors in the public research and development activities.

(10) Proper Accounting and Tax Filing

We record and manage accounting reports and its related information correctly, fairly and on-timely, and comply with the relevant applicable tax laws and regulations and its related laws and regulations of each country, and file taxes properly and pay taxes in accordance with the law.

(11) Respect for Cultural Differences and Human Rights, and Prevention of Discrimination and Harassment

We respect the cultures and customs in all countries and regions of the countries involved in our business practices, and must not accept all kinds of discrimination, the infringement of human rights and harassment.

(12) Environmental Protection

We protect the global environment through our products and services by conducting business activities properly such as conserving resources, saving energies, reducing wastes, and promoting recycling that contribute to the prevention of environmental pollution and mitigation of climate change.

(13) No Relationship with Anti-Social Forces

We must not accept the requirements from and respond to all relationships against anti-social forces (whether individuals or groups) that are given a threat to the order and safety of civil society.

(14) Safety and Health in Workplace, and Proper Working Environment

We maintain safety and health in workplace, do not overlook the excessive working hours and prevent not paying salary such as unpaid overtime work.