

# Nitto Denko Group Business Conduct Guidelines



## Corporate Vision

### Creation of New Value

**Guided by 'Open, Fair and Best' as the very basis of our actions, Nitto Denko Group will contribute to people's daily life and industry's future with its power to generate innovative and unique ideas.**

Nitto Denko Group will:

- Swiftly create products and services offering new functions that give satisfaction to customers
- Honor autonomy and originality to enhance the working environment with the total freedom for the employees to take on challenges
- Pursue sound business activities and continually earn shareholders trust through appropriate information disclosures and communications
- Always be mindful of corporate social responsibility including sustainability and community relations

## Guiding Principles

**With the pride and resolve of a Nitto Denko Group employee, we will always act with integrity in accordance with "Open, Fair and Best".**

We will:

1. Provide our customers with the highest quality in products and services
2. Place safety before everything else
3. Always act with a challenging spirit
4. Conduct ourselves with good sense, guided by laws and ethics
5. Keep in mind to help protect the global environment and conserve resources

## Message from the CEO

The Nitto Denko Group aims to become a Centennial Company, sustaining its growth into the future while being trusted by society.

I am always grateful to our shareholders and investors, customers, business partners, members of our host communities, and employees and their families for extending their generous support to the Nitto Denko Group, and I hope that our employees will make continued efforts to achieve their goals.

While seeking business success throughout our day-to-day activities, we believe that as members of society, we must always act with integrity. These Guidelines provide a concrete description of our core values based on our "Corporate Vision" and "Guiding Principles" and, as such, serve as a standard that leads us to make sound decisions everyday.

The Nitto Denko Group operates in many countries and regions, each of which has different laws, regulations, and cultures. These Guidelines have been compiled with the entire Nitto Denko Group in mind. As such, I ask that you follow these Guidelines based on a full understanding of their contents.

Let's make the Nitto Denko Group a company that is trusted by society and that will continue to prosper for many years to come!



**Yukio Nagira**

Nitto Denko Group CEO



## Introduction

As Nitto Denko Group employees, we frequently encounter a variety of ethical and legal questions in our course of business.

Every employee is expected to use the Nitto Denko Group Business Conduct Guidelines (hereafter “Guidelines”) when you face any difficulties in making lawful or ethical business decisions.

### If you are unsure of the appropriateness or ethics of any activity, ask yourself these questions:

- Is this action in line with our core values as laid out in our “Corporate Vision” and “Guiding Principles”?
- Does my action comply with the Guidelines, Nitto Denko Group’s policies and procedures, and the law?
- How would our customers, stakeholders, the general public, or my family look upon it?
- Am I practicing the basic principle of conduct, “Being open, being fair and doing my best”?

If you’re still unsure whether the proposed action is lawful and ethical, you should review these Guidelines or consult with your manager or the “Communication Channel” shown in the Guidelines.

Based on local law or corporate or local rules, any employee who fails to comply with the Nitto Denko Group Business Conduct Guidelines, may be subject to disciplinary action.

## Table of Contents

### Working Environment P.05-09

01. Employment	P.05
02. Health and Safety for Working	P.06
03. Harassment-Free Workplace	P.07
04. Substance-Free Workplace	P.08
05. Employee Privacy	P.09

### Protecting Assets P.10-16

01. Using Time and Assets	P.10
02. Proprietary Information	P.11
03. Inadvertent Disclosure	P.12
04. Communication Systems	P.13
05. Contact from Media, Analysts, Attorneys and Others	P.14
06. Intellectual Property Rights	P.15
07. Leaving Nitto Denko Group	P.16

### Conducting Business P.17-28

01. Reporting, Recording and Retaining	P.17
02. Authority to Make Nitto Denko Group Commitment	P.18
03. Dealing with Suppliers	P.19
04. Competing in the Field	P.20
05. Relationships with Competitors	P.21
06. Acquiring and Using Information about Others	P.22
07. Using Trademarks and Copyrights	P.23
08. Receiving Gifts	P.24
09. Business Amenities	P.25
10. Gift Giving and Entertainment	P.26
11. Relationships with Government Employees	P.27
12. Interactions with the Global Environment and Communities	P.28

### Legal Compliance P.29-35

01. General Legal Compliance	P.29
02. Accounting and Financial Reporting	P.30
03. Competition	P.31
04. Export and Import	P.32
05. The Environment	P.33
06. Public Sector Procurement	P.34
07. Lobbying	P.35

### On Your Own Time P.36-39

01. Assisting a Competitor	P.36
02. Using Inside Information and Insider Trading	P.37
03. Participation in Political Activities	P.38
04. Someone Close to You Working in the Industry	P.39

Communication Channel	P.40
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### Employment

Every employee has a unique role in making the Nitto Denko Group a more inspiring and rewarding place to work. The Nitto Denko Group expects that all employees will treat one another with respect and dignity.

As good global citizens we act in a socially responsible way in the communities where we live and work all across the world.

All Nitto Denko Group facilities are committed to a policy of equal employment opportunity and fair treatment.

#### What kinds of issues are included in our equal employment and fair treatment principle?

All human resource actions such as employment, promotion, rate of pay or other forms of compensation, benefits, training, discipline, and termination will be based on the principle of equal employment opportunity.

We forbid child labor and forced or compulsory labor at all our facilities, and require that employees receive all benefits mandated by applicable laws, regardless of where you work.

We prohibit engaging in activities that do not maintain individual dignity and respect, even if permissible under applicable law.



### Health and Safety for Working

Having a safe workplace is one of the most important benefits for all of us and our families. The Nitto Denko Group is committed to ensuring a safe working environment for all employees. We strive to avoid all injuries from our business activities.

#### What rules and practices do we follow to establish a safe and healthy workplace?

At all times, on company property, we prohibit the possession of any dangerous devices like weapons by Nitto Denko Group employees, contractors, suppliers, and guests.

We do not tolerate any threats of harm or any conduct that harasses, disrupts, or interferes with another employee's work or performance or that creates an intimidating or hostile work environment.

We rigorously adhere to the established safety procedures and regulations concerning the use of chemical substances, following safety practices and avoiding short cuts.

We require every organization of the Nitto Denko Group to have an active safety program that is strongly supported by its management team.

**Harassment-Free Workplace**

All Nitto Denko Group facilities worldwide maintain a harassment-free working environment; they are places where employees act with respect for one another and for those with whom we do business.

In addition to covering employees, our harassment-free workplace policy prohibits employees from engaging in harassment directed toward business associates, such as outside suppliers. Similarly, all business associates are prohibited from engaging in harassment at Nitto Denko Group facilities.

This policy also applies to work-related activities outside of the workplace.

**What behaviors are expressly prohibited in a harassment-free workplace?**

Unwelcome conduct whether verbal, physical, or visual that is based on a person's protected status, such as race, color, religious creed, sex/gender, gender identity or expression, sexual orientation, national origin or ancestry, physical or mental disability, age, medical condition, marital status, or any other protected status.

Abusive language, physical aggression, deliberately causing injury, any disorderly conduct, malicious disturbance, or any intimidation of others.

Unwelcome sexual advances, request for sexual favors, as well as other physical, verbal, or visual conduct based on sex.

**Substance-Free Workplace**

Substance abuse, such as alcohol or drug abuse, poses a serious threat to the safety and health of our employees. The Nitto Denko Group has a drug/alcohol-free workplace policy that extends to locations worldwide and applies to not only employees, but also guests on our premises.

**What behaviors are strictly prohibited in our substance-free workplace?**

The use or possession of alcohol, illegal drugs, and other controlled substances in the workplace.

Being on duty, operating equipment, or driving vehicles while under the influence of alcohol, illegal drugs or any other controlled substance.

In some areas of the world, use or possession of illegal drugs is subject to the death penalty.

**What are exceptions to our substance-free workplace policy?**

Alcoholic beverages are permitted to be served at company-sponsored events with management approval. Even in these cases, all appropriate liquor laws, such as legal drinking age, must be followed. Consistent with our policy, intoxication and excessive drinking at these events is prohibited.

Employees may use physician prescribed medications, provided that the use of such drugs does not adversely affect job performance or the safety of the employee or other individuals in the workplace.

### Employee Privacy

The Nitto Denko Group collects and maintains personal information which relates to employment including compensation, medical and benefit information. Because the Nitto Denko Group is a global company, we may share your personal information with any of the countries and/or other Nitto Denko Group companies where we do business.

In order to protect employees' privacy rights, we protect information wherever it is stored or processed.

#### How is employee privacy protected?

Access to your personal information is restricted to people with a business or legal need to know.

Except for reasonable business or legal reasons, personal information will be released to outside parties only with management approval and/or written employee approval.

You will not be requested to present more personal information than is absolutely necessary.



### Using Time and Assets

The Nitto Denko Group's time and assets are our common property and are to be used for our business activities. We should not use them for our personal use unless specifically approved by management or by local policy.

In order to protect the Nitto Denko Group assets, the company may ask to search an employee's personal property located on or being removed from Nitto Denko Group locations.

#### What is acceptable and not acceptable use of time and assets?

You may not perform non-Nitto Denko Group work or solicit such business while working on Nitto Denko Group time or while on Nitto Denko Group premises.

You are not permitted to use Nitto Denko Group finances or assets, including computers, equipment, telephones, materials, resources or proprietary information for any outside employment, or for any personal use without management or company approval.

Personal use of a corporate car is allowed only when specified in local policy with management's approval.

Personal use of a company distributed commuter pass is allowed when it doesn't interfere with work obligation or cause additional expense to the company.

### Proprietary Information

The Nitto Denko Group's proprietary information is the result of each employee's ideas, hard work, and innovation. This information, particularly Nitto Denko Group confidential information, gives us a competitive advantage in the marketplace, and the Nitto Denko Group would be damaged if competitors discovered it.

As a Nitto Denko Group employee, each of us has an obligation to protect our proprietary information.

#### How do we protect proprietary information?

Our proprietary information includes, but is not limited to, technical data, sales information, customer information, product information, financial data, intellectual property, etc.

You should not disclose or distribute any information that the Nitto Denko Group considers proprietary, or that you think is proprietary, without the approval of your manager.

Outside parties with access to the Nitto Denko Group's proprietary information should be asked to sign a confidentiality/non disclosure agreement prior to starting work on a project.

### Inadvertent Disclosure

To protect the Nitto Denko Group assets, all employees should avoid inadvertent disclosure of proprietary information.

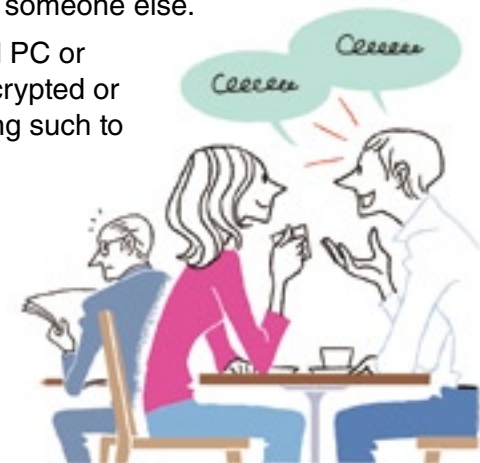
#### What can cause inadvertent disclosure?

Discussing with any unauthorized person information that the Nitto Denko Group considers confidential or which the Nitto Denko Group has not made public.

Discussing or openly viewing proprietary information with authorized Nitto Denko Group employees when you are in the presence of others such as at a trade show, in a public area, in a train or airplane, or when using a cellular telephone or computer.

Discussing proprietary information with family members or with friends, who might innocently or unintentionally pass the information on to someone else.

Losing an unsecured PC or USB memory (unencrypted or otherwise), or allowing such to be stolen.



### Communication Systems

The Nitto Denko Group's communication systems are essential to our business.

Use of the communication systems of the Nitto Denko Group should be for conducting Nitto Denko Group business or for other purposes authorized by management.

Inappropriate use of the Nitto Denko Group communication systems is a misuse of the Nitto Denko Group assets.

#### What is unacceptable use of communication systems?

Use of the Nitto Denko Group communication systems to visit Internet sites that feature chat rooms, sexual content, gambling, or that advocate intolerance of others.

Sending personal e-mail chain letters by the Nitto Denko Group e-mail systems.

Personal use of e-mail or internet systems that conflicts with a Nitto Denko Group company policy or that places an unusual demand on the system storage or transmission capacity.

Illegally copying software, or installing or using software without the permission of the company.

### Contact from Media, Analysts, Attorneys and Others

The Nitto Denko Group's business activities are monitored closely by journalists, consultants, securities analysts, investors, shareholders, investigators and law enforcement officials. You should not initiate or respond to their inquiries without first consulting with your local top management.

If the inquiries are related to the entire Nitto Denko Group, you or your local or division top management should consult with the Nitto Denko Group corporate department.

#### Who is the right contact in the corporate department?

Inquiries from the media – consult with the corporate public relations department/section.

Inquiries from analysts, shareholders or investors – consult with the corporate investor relations department/section.

Inquiries from attorneys – consult with the Corporate Legal Department.



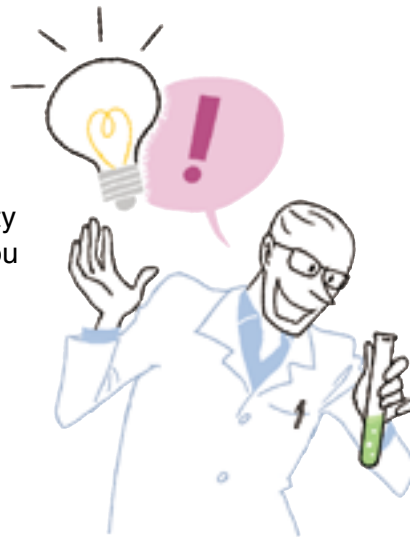
### Intellectual Property Rights

If you should discover an invention, etc. while on duty, you must report the same to the company. You are not allowed to announce such an invention, etc. without the permission of the company.

Any intellectual property, including inventions, etc. created during the performance of your duty will belong entirely to the company.

#### If you have a question about intellectual property rights, what should you do?

If your idea neither falls within the area of the Nitto Denko Group's actual or anticipated business interests, nor resulted from, nor was suggested by, any of your work assignments in the Nitto Denko Group, please consult with your management or local or corporate intellectual property department to assure that you are not infringing on Nitto's intellectual property rights.



### Leaving Nitto Denko Group

If you leave the Nitto Denko Group for any reason, you must return all Nitto Denko Group property and continue to protect the Nitto Denko Group's proprietary information.

#### What property should you return and what is expected after you leave the Nitto Denko Group?

Any documents and media which contain Nitto Denko Group proprietary information must be returned to the company.

Intellectual property that you created while you were a Nitto Denko Group employee continues to belong to the company after you leave.

After leaving the Nitto Denko Group, you must continue to protect the Nitto Denko Group's proprietary information and should not use it to support competitors.



## Conducting Business

01

### Reporting, Recording and Retaining

As a Nitto Denko Group employee, each of us must report and record all information about our business activities accurately and honestly.

In addition, the retention and disposal of such information should follow the Nitto Denko Group record retention and disposal rule or regulations of each local organization, and any applicable laws.

#### What kind of reports and records should you make accurately and honestly?

All reports must be made accurately and honestly. For example, engineering development reports, sales reports and sales orders, accounting revenues and costs, research reports, accident reports and expense reports.

#### Why should we report and record honestly and accurately?

Accurate and honest reporting supports our reputation of being an ethical and honest company; it allows us to operate in accordance with expected standards and legal obligation.

Dishonest reporting can lead to civil or even criminal liability.

## Conducting Business

02

### Authority to Make Nitto Denko Group Commitments

For the purpose of conducting business effectively and safely, each Nitto Denko Group company will define individual authority for pricing and certain other contract terms and conditions.

Commitments and agreements should be made based on rules authorized in each sector or company.

#### What kind of actions are prohibited in making commitments or agreements?

You should not make any oral or written commitments about product pricing to a customer unless you are authorized or have management approval.

You should not make any oral or written commitments that create a new, or modify an existing, agreement with a third party without prior management approval.



### Dealing with Suppliers

The Nitto Denko Group utilizes a fair selection policy to choose suppliers. We select the best supplier based on fair competition including pricing, service, technology, quality, etc. All Nitto Denko Group employees are required to follow fair competition.

#### What considerations are important in supplier selection?

When we decide on a supplier, among competing suppliers, we weigh the facts impartially to determine the best supplier.

You must not exert or attempt to exert influence to give special treatment to a particular supplier.

The prices and other information submitted by suppliers are generally confidential. Nitto Denko Group employees should not use any of this information outside of the Nitto Denko Group without permission.

You should not seek reciprocity from our suppliers; we have to maintain a fair, impartial relationship.



### Competing in the Field

It is the Nitto Denko Group's fair competition policy to sell products that satisfy our customer. To realize customer satisfaction, the Nitto Denko Group expects you to act in the business field not just vigorously and effectively, but lawfully and ethically as well.

#### What factors are important to business competition?

You should not invite disrespect from our customers by making improper, false or misleading statements about competitor products.

You have to be sure that all comparisons to competitors and their products are substantiated, and that they are complete, accurate and not misleading whenever they are made.

You should be aware that comparative advertising is prohibited in several countries.

Consult your local legal representatives or the Corporate Legal Department.

### Relationships with Competitors

It is inevitable that you and competitors will, from time to time, meet, talk and attend the same industry or association meetings. In addition, a company you are dealing with, as a supplier or a customer, can be also a competitor of the Nitto Denko Group. We need to treat these relationships carefully.

#### What should you be careful of in your relationships with competitors?

In all contacts with competitors, it's prohibited to discuss pricing policy, contract terms, inventories, market surveys, production plans, capabilities and any other proprietary or confidential information.

If a competitor raises any of the prohibited issues, even with innocence, you should object or stop the conversation.



### Acquiring and Using Information about Others

During the normal course of business, it is not unusual to acquire information about other organizations including competitors; however, there are limits to acquiring and using this information.

#### What is important about acquiring and using information about others?

Illegal practices such as trespassing, burglary, wiretapping, bribery and stealing, to acquire information are prohibited.

Acquiring a competitor's confidential information by hiring the competitor's employees and improperly soliciting them for confidential information is prohibited.

Even legally-acquired competitor information should be treated sensitively. The Nitto Denko Group remains dedicated to protecting the privacy of personal information of others including our competitors.

We should avoid any questionable actions related to this.

**Using Trademarks and Copyrights**

We are using trademarks to identify and distinguish our products in the marketplace.

It is important that you properly acknowledge and use the Nitto Denko Group's trademarks and the trademarks of other companies. Please note that some texts, charts, and photographs found in books, magazines, newspapers, websites, etc. are protected by copyright, and thus may not be copied or reproduced without permission.

If you find the Nitto Denko Group's trademarks, especially the registered trademarks, are being used by third parties, you should consult your local or corporate intellectual property representatives.

**What kind of trademarks are available in the market?**

Generally, two kinds of trademarks are available in each country.

One is a registered trademark which is registered in the patent and trademark office. It can be indicated by an ®. For example, the Nitto Denko Group's Brand Mark is a registered trademark in multiple countries.

Another is a trademark which has not been registered. The trademark status is indicated by ™.

**Receiving Gifts**

The Nitto Denko Group expects each employee to act not only legally but also ethically. You are expected to adhere to the Nitto Denko Group gift receiving policy shown here.

If you are given a gift which has more than nominal value and is not customarily offered to others, you must tell your manager immediately regardless of whether it arrives at your home or at the office. Appropriate arrangements will be made to return or dispose of what has been received, and the supplier or customer will be reminded of the Nitto Denko Group's gift receiving policy.

You must never accept money or a loan.

**What is acceptable and not acceptable gift receiving?**

Neither you nor any member of your family may solicit or accept from a supplier or customer, a gift, money, or a loan that could improperly influence or give the appearance of influencing the Nitto Denko Group's business relationship with that supplier or customer.

You may accept a gift of nominal value, such as an advertising novelty or candy, when it is customarily offered to others.

Unless otherwise specified by each Nitto Denko Group company or sector, you may accept promotional premiums and discounts offered by credit card companies, hotels, transportation companies, and restaurants, if they are based upon individual or corporate membership in a bonus program.

### Business Amenities

The Nitto Denko Group allows you to accept customary business amenities with management approval.

Customers or suppliers may find it appropriate to provide education or executive briefings; it is all right to accept some services in connection with this type of activity.

#### Why is it important to understand business amenities?

To avoid the appearance of impropriety, you have to receive management approval.

Business amenities must be kept at a reasonable level and should not be prohibited by law or violate a supplier's or customer's business practices.

If the amenities are frequent or do not appear reasonable, you should consult with the Communication Channel.



### Gift Giving and Entertainment

To avoid bribery or undue influence in our course of business, the Nitto Denko Group defines its gift giving and entertainment policy.

You may not give money, or provide a gift or entertainment to an executive or employee of any supplier, customer or any other organization if doing so would improperly influence or give the appearance of influencing the organization's relationship with the Nitto Denko Group.

#### What is acceptable gift giving and entertainment?

You may provide a gift of nominal value, such as an advertising novelty or candy, when it is customarily offered to others.

In the course of business, with management approval, you may invite a customer, supplier or member of another organization, to a nominal lunch or dinner, sports event, or cultural event.

If your customer, supplier, or any other organization is prohibited from receiving a gift or entertainment, you must respect their policy.

### Relationships with Government Employees

Acceptable practices, such as gift giving or providing entertainment or other things, in the commercial business environment may be unacceptable, and may even violate certain laws and regulations, when you are dealing with government employees or those who act on the government's behalf.

#### What is important about relationships with government employees?

You must be aware of and adhere to the relevant laws and regulations governing relations between companies and government employees in every country where we conduct business.

Giving money or a loan to government employees is unacceptable.

It's may be unacceptable to give a gift to an official or an employee of a governmental entity if doing so could affect the Nitto Denko Group's business.

Many countries prohibit such actions in their laws.



### Interactions with the Global Environment and Communities

As humans, we are required to live in harmony with both nature and society at large. As such, the Nitto Denko Group commits itself to environmental preservation and social contributions.

We will also work together to address issues facing local and international communities and we will support the development of society through the supply of products and services.

#### What is important in interactions with the global environment and communities?

Throughout the performance of business and everyday life, you must strive to conserve resources and energy and conscientiously recycle and reuse.

You must work to protect nature and have a full appreciation of biodiversity.

As a member of society, should a disaster or epidemic occur, you must cooperate with others to work toward restoration and reconstruction.

Any conduct that disturbs the order and threatens the safety of society and human rights is unacceptable.



### General Legal Compliance

When we conduct Nitto Denko Group business, each of us may encounter a variety of legal issues. The Nitto Denko Group's policy is to comply with all laws and regulations that apply to our business.

#### How can you be aware of and comply with laws related to our business?

You don't need to understand every detail of each law and regulation related to your business area; however, you need to be sensitive to the fact that there are laws and regulations that affect the way we do business.

The best way to assure legal compliance is to behave ethically in your course of business, anytime and anywhere.

If you have any concern about legal or ethical compliance, you should communicate your concerns to someone in the Communication Channel.



### Accounting and Financial Reporting

The Nitto Denko Group is required to follow strict accounting principles, to report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with applicable laws and general accounting standards.

Violations of laws associated with accounting and financial reporting can result in fines, penalties, and imprisonment, and they can lead to a loss of social trust for the Nitto Denko Group.

#### What should you be careful of when reporting accounting and financial information?

You have to report and record all expenses accurately and completely.

If you have responsibility for these areas, you must understand and adhere to the rules. You must not assist anyone in recording or reporting any information inaccurately or in a way that could be misleading.

You must never provide advice to anyone outside of the Nitto Denko Group, including customers and suppliers, about how they should record or report their own revenues and expenses.

Competition

Competition laws exist in most of the countries where the Nitto Denko Group does business. The purpose of competition laws is to prevent interference with the functioning of a fair competitive market system.

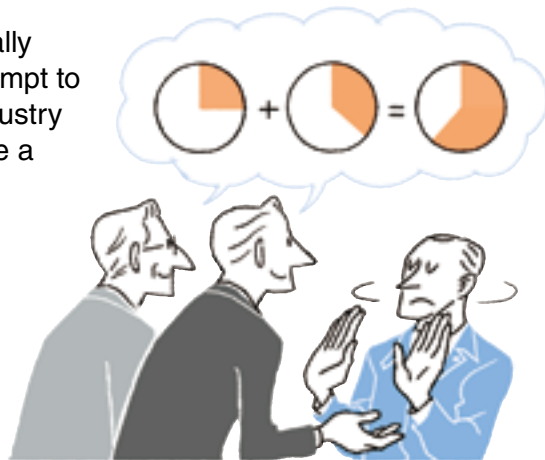
The Nitto Denko Group complies with competition laws throughout the world.

What type of actions are prohibited under competition laws?

Any actions which restrict the functioning of the competitive system, such as unfair trade, monopolies, and cartels, are prohibited.

You must not enter into agreements with other companies that unreasonably restrict the functioning of the competitive system, such as price fixing or dividing customers or territories.

You must not illegally monopolize or attempt to monopolize an industry or unlawfully abuse a dominant position.



Export and Import

We must comply with export and import laws and regulations in each country we do business. Penalties for failure to comply with export or import laws and regulations are severe and can result in fines, loss of export or import privileges and imprisonment.

What is important in export and import controls?

Export and import regulations and laws are complex; you need to be aware of what types of regulations or laws relate to your business area. Please be aware of products, technology, chemical components, technical data, software, design, and use of the products which can be subject to export and import control laws and regulations of each country.

It is against the law to export or import without authorization or to facilitate the unauthorized export or import of Nitto Denko Group products and technologies. We have to obtain an export or import authorization from each government we do business with.

A development process activity requiring other countries' sourcing, and customers activity requiring the shipment of samples to or from your country are subject to export or import implications.

The calculation of product inter-company prices for sales to a Nitto Denko Group location in another country (transfer pricing) is subject to export or import implications.

### The Environment

At all times, we have to comply with environmental regulations and laws everywhere we live and work. To assure compliance with environmental regulations and laws in our course of business, we need to adhere to our Nitto Denko Group environmental policies. Violation of environmental laws may have a serious affect on our business activities.

We make all possible efforts to minimize the environmental impact generated from our operational processes.

#### How should you comply with environmental laws and regulations?

Environmental regulations and laws are complex; you don't need to understand every detail of each law and regulation; however, you need to be aware of what types of laws or regulations relate to your business area.

If you are involved with the process of generating, measuring, recording or reporting environmental discharges and emissions from a factory, you must be sure to comply with environmental regulations and permits, and you must also ensure that reports are accurate and complete.

If you become aware of any violation of environmental law or any action that may appear to conceal such a violation, you should immediately report the matter to your management or someone in the Communication Channel.

### Public Sector Procurement

The purpose of public sector procurement law is to help the public sector, such as country, state, or local governments, get the products and services they want at fair and reasonable conditions.

#### What should you be aware of in public sector procurement?

Since public sector laws vary widely and can be complex, we must be careful to comply fully with those laws.

During the course of a public sector procurement, you should not try to improperly influence the decisions such as obtaining restricted information about the procurement.



### Lobbying

Any contact with government personnel for the purpose of influencing legislation or rulemaking is considered lobbying. Lobbying is a normal, acceptable and useful part of the legislative process.

#### What kind of rules should you follow when lobbying?

Prior to contact with government personnel for the purpose of lobbying, you must obtain approval of your management.

Lobbying varies widely around the world. It is the Nitto Denko Group's policy to strictly comply with all lobbying laws and regulations wherever the Nitto Denko Group does business.



Your private life is your own, but each of us is a Nitto Denko Group employee both on and off the job. You are expected to maintain the Nitto Denko Group's reputation at all times.

### Assisting a Competitor

An obvious conflict of interest between the Nitto Denko Group and your own time is providing assistance to or working for an organization competing with the Nitto Denko Group's current or potential business.

#### Why is it important not to assist a competitor?

You may not work for an organization competing with the Nitto Denko Group because it could divide your loyalty between the Nitto Denko Group and that organization.

If you have any questions, contact someone in the Communication Channel.



**Using Inside Information and Insider Trading**

In the course of your employment with the Nitto Denko Group, you may become aware of information about the Nitto Denko Group or other companies that has not been made public. The use of nonpublic or 'inside' information about the Nitto Denko Group or other companies for your personal financial or other benefit is strictly prohibited.

**Why is it important not to use inside information?**

Improper use of inside information is unethical and may be a violation of the law.

A violation of the law may result in civil and criminal penalties, including fines and imprisonment.

**Participation in Political Activities**

The Nitto Denko Group respects the rights of employees to be informed voters and to be socially responsible, private citizens. The Nitto Denko Group, as a company, will stay in a politically neutral position at all times.

**What should you be careful of when engaging in political activities as a private individual?**

You may not make any contribution of company funds, property, or services to any political candidate or party.

You, as a Nitto Denko Group employee, may not pressure or solicit other employees to make political contributions or participate in support of a political party or candidate.

You must comply with appropriate laws regulating participation in political affairs. This includes contributions to political parties, national political committees, and individual candidates.

### Someone Close to You Working in the Industry

With the growth of the two-career family and the expansion of industry, you may find yourself in a situation where your spouse, domestic partner, or someone else you are close to is a competitor or supplier of the Nitto Denko Group or is employed by one.

While everyone is entitled to choose and pursue a career, we should handle these matters carefully to ensure security and confidentiality in business.

#### Why is it important to be aware of these relationships?

The closeness of the relationship might lead you to inadvertently compromise the Nitto Denko Group's interests.

If you have any concern about your situation, you should contact someone in the Communication Channel.



## Communication Channel

If you know about or have a question about any conduct that goes against these Guidelines, you should immediately inform someone in the Communication Channel. Always contact someone in the Communication Channel unless otherwise specified in the Guidelines.

1. Contacting your manager is a good place to start.
2. Or, you can contact Human Resources or General Affairs section/department of your local or company's organization.
3. Or, you can contact relevant department/section of Corporate Sector.



**If you become aware of any unlawful or unethical matters that could have a major impact on the Nitto Denko Group, please report the same to the following address.**



**You will not be punished or treated unfairly for reporting information according to your conscience. The Nitto Denko Group never allows any kind of threat or retaliation to be made against whistleblowers.**

## **Nitto Denko Group Business Conduct Guidelines**

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