



USUI CODE OF CONDUCT

2026/4 revision

Management Planning Department, Usui International Industrial Co., Ltd.

USUI CO., LTD. Management Planning Dept

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Introduction

The Usui Group (Usui International Industry Co., Ltd. and its subsidiaries) is committed to contributing to society through creation and harmony. To realize this mission, we are working to fulfill our social responsibilities in every aspect of our business activities, as a member of a global society, in accordance with our corporate policy and employee drills.

This Code of Conduct defines the actions to be taken by all officers and employees of the Usui Group (including contracted employees, temporary staff, and part-timers). All officers and employees of the Usui Group will understand and comply with this code of conduct, and will behave honestly and fairly with a high degree of ethics.

Unless the aim or essence of this Code of Conduct is impaired, each Group company is allowed to modify its contents according to the laws, regulations, habits and business forms in each region.

Management philosophy, policy, and employee training

Usui Kokusai Sangyo Co., Ltd. and its subsidiaries (collectively, the Usui Group) practice CSR based on the management philosophy of "contributing to society" based on the principle of "putting customers first" and aim to become a company trusted by customers and other stakeholders.

Management philosophy

Contributing to society through the spirit of creativity and harmony

Policy

Company that is trusted by customers around the world

Management philosophy, policy, and employee training

Employee Training

1. Consistent with Wa Kyowa to emphasize belief and sympathy
2. Develop healthy physical and mind, deepen knowledge, and refine technologies
3. Let's respect the spirit of creation and move forward with a renewed spirit every day.
4. Observe workplace discipline and work cheerfully and happily
5. Strive for the local community and make efforts to develop our business

CSR management

CSR activity declaration

In order to realize the Management Philosophy, the Usui Group, as a member of the global community, promotes CSR activities in all aspects of its business activities in accordance with this philosophy and the Company Policy.

In order to further enhance CSR activities within the Usui Group, we will formulate the "Usui CSR Policy" and make all employees of the Usui Group fully aware of the "Usui CSR Policy." In addition, we have positioned quality, human rights, occupational safety, the environment, compliance, risk management, and social contribution as key areas for our CSR activities, and we will implement active CSR activities.

CSR management

Basic CSR policy

1. Based on the "Management Philosophy," the Usui Group aims to contribute to the stable and sustainable development of the global society through its business activities as a member of the global society.
2. In accordance with USUI Action Guidelines, the Usui Group conducts sincere business activities in compliance with laws and regulations, ethical practices, and human rights in each country.
3. As a member of a global society, the Usui Group contributes to solving various social problems and responds to stakeholders' expectations.

CSR management

CSR-Our Standpoint

As a corporate citizen, the Usui Group aims to fulfill its social responsibility and acquire a wide range of trust from society.

1. In every business activity, we observe international rules, related laws and regulations, our internal regulations, and other internal regulations, as well as our understanding of national and regional culture and customs, and behave in good faith in accordance with our social norms based on high ethics.
2. We will always respond to the demands of society with humility and sincerity, and contribute to the development of local economies, culture, and education through corporate citizenship activities that are closely related to our business and local communities.
3. Stakeholders maintain fair, fair, and transparent relationships and do not conduct fraud, including corruption, rigging, threats, impetus, and fraud.
4. We will not engage in any act that may damage the Company, such as acting in the interests of oneself or a third party against the Company's legitimate interests, or acting in a manner that may damage the credibility or defamation of the Usui Group.

CSR management

CSR action guidelines

臼井国際産業(株)経営企画部

USUI CSR行動指針

		USUIグループの一員として
		私たちは、USUIグループの一員として、すべてのステークホルダーから信頼を得るために、常に「誠実さ」をモットーに行動します。
大項目	中項目	行動指針
1 品質	『品質方針』 「世界の顧客に信頼される企業」 私たちは、お客様が満足する世界一の製品を以下の要件で生産し、Q M Sの有効性を継続的に改善することにより、顧客満足度100%を達成する。 1-1 安全で人にやさしい環境の工場 1-2 お客様が満足する品質を確保 1-3 年度品質目標の達成 1-4 必要な法令を含め全ての要求事項に適合	1. 高品質で安全性の高い製品の提供 (1) 製品の開発・設計・製造・検査・輸送の各段階において、安全への細心の配慮を行うとともに、品質の確保に努めます。 (2) 製品不良やお客様からのクレームに対し、迅速かつ誠実に対応するとともに、その原因を徹底的に追究し再発防止に努めます。 (3) 適切な品質マネジメントシステムを構築・運用し、必要十分かつ正確な製品情報の提供に努めます。
2 人権・労働	2-1 差別撤廃（雇用機会の均等化） 2-2 人権尊重（ハラスメント防止） 2-3 児童労働の禁止 2-4 強制労働の禁止 2-5 賃金 2-6 労働時間 2-7 社員との対話・協議 2-8 安全・健康な労働環境 2-9 人材育成	2. 人権の尊重、安全・快適な職場環境づくり (1) 人権を尊重し、国籍・性別・障がい等による差別や、児童労働・強制労働・ハラスメント行為などを行いません。 (2) 心身の健康維持・管理や安全な作業に努めます。 (3) 安全・衛生関係法令および会社のルールを守り、安全・衛生が確保された職場環境づくりに努めます。 (4) 労働関係法令および就業規則等の会社ルールを遵守することはもとより、社会的良識に従い自己の職務を誠実に遂行します。 (5) 自己の知識・能力向上を図るため、社内外の研修への参加や自己研鑽に励み、習得した技術・知識を活用することにより、業務の改善や生産性の向上に努めます。
3 環境	『環境方針』 臼井国際産業株式会社は、自動車部品の設計、開発及び生産活動において、企業の社会的責任の一環として、地球環境保全が人類共通の最重要課題の一つであることを認識し、持続可能な社会の構築に向けて、企業活動のあらゆる面で「人の健康維持」と「地球環境保全」に努力を払い、また貢献することに努めます。	3. 環境問題への配慮 (1) 環境に関わる法令や自社基準を遵守し、業務の遂行に努めます。 (2) 工場および事務所における環境汚染と地球温暖化の防止、資源の循環的な利用、化学物質の管理に積極的に取り組みます。 (3) 環境問題の発生防止に努めるとともに、環境問題が発生した場合、環境負荷を最小限にするよう適切な処置を迅速に講じます。 (4) 職場における省エネ活動、廃棄物の削減やリサイクルなど、会社が推進する各種環境活動にも積極的に参加します。
4 コンプライアンス	4-1 法令の遵守 4-2 競争法の遵守 4-3 腐敗防止 4-4 機密情報の管理・保護 4-5 輸出取引管理 4-6 知的財産の保護	4. コンプライアンスの強化 (1) 独禁法・取適法・不正競争防止法・個人情報保護法その他法令・社内規則・社会規範を遵守します。 自由な企業活動を制限する談合・カルテル行為等を行いません。 (2) お取引先から開示された機密情報は、自社機密情報と同様に、適切かつ厳重に管理します。 (3) お取引先に個人的な利益や便宜を図ったり、要求することはいたしません。 (4) 法令で求められている行政機関への報告および届出は、適切に行います。 (5) 反社会的勢力・団体に対しては毅然とした態度で臨み、一切の関係を遮断します。 (6) 海外のお客様と取引をするにあたって、輸出入に関する規制（外為法等の輸出管理法、関税法等）や国際ルール（貿易協定、租税条約等）、現地法令（反ダンピング法等）を遵守します。 (7) 他社の特許権・商標権・著作権などの知的財産権を尊重し、権利侵害しないように十分留意します。
5 リスクマネジメント	5-1 全社的なリスク管理の仕組み 5-2 BCPの策定	5. リスク管理 (1) 職場で発生する可能性のあるリスクを洗い出して把握し、リスク発生の未然防止を心がけます。 (2) 万一リスクが発生しても、ダメージを最小限にするために、迅速かつ適切に対処します。 (3) サプライチェーンのグローバル化に伴い、調達先と生産体制の対応強化を図ります。 (4) 震災リスク対応を強化するため、事業継続計画（BCP）の策定に着手し、その改訂と運用を継続的に実施していきます。
6 社会貢献	6-1 地域（コミュニティ）への貢献	6. 社会への貢献 (1) 当社の企業活動を通じて、社会に貢献することに努めます。 (2) 地域社会や国内外社会の様々な課題に問題意識をもち、ボランティア活動等の社会貢献活動にも積極的に参加します。 (3) 災害発生等による社会的危機状況の際は、被災地域への復旧・支援活動への参加に努めます。
7 CSR推進体制	7-1 社内におけるCSR活動の仕組み・展開 7-2 自社→取引先（主に仕入先）に対するCSR活動の仕組み・展開 7-3 ステークホルダーへの情報開示	7. CSRの実践 (1) 私たちは、社会の一員として、会社及び社会の中で自己が果たすべき役割を常に意識し、全てのステークホルダーからの期待に応えられるよう行動することに努めます。 (2) 私たちは、当社の「経営理念」をよく理解し、全社および各職場の方針に定める目標に向かって、日常業務に取り組みます。 (3) ステークホルダーへの説明責任を果たすことにより、社会との円滑なコミュニケーションを図ります。

Human rights and labor

Human Rights and Labor

Declaration

As a member of society, the Usui Group recognizes the importance of respecting human rights in all activities. We consider this to be one of our social responsibilities in developing sustainable corporate activities, and have formulated our basic policy on human rights and labor.

Human rights and labor

Human Rights and Labor

Basic Policy

The Usui Group is confident that human rights are an important issue. In order to build a secure, safe, and prosperous society, we are working to understand international standards on human rights, including the World Declaration of Human Rights, support the 10 principles of the UN Global Compact, and establish a corporate structure that respects human rights.

In order to fulfill our responsibility of respecting human rights, we have established a mechanism for human rights due diligence to identify and prevent risks affecting human rights,

Implement mitigation efforts.

1. Prohibition of discrimination
2. Prevention of harassment
3. Prohibition of child labor
4. Prohibition of forced labor and trafficking in persons
5. Wages and benefits
6. Working Hours
7. Freedom of association, dialogue and consultation with employees
8. Safe and healthy working environment
9. Development of human resources
10. Rights of indigenous peoples

Human rights and labor

Human Rights Work Behavior Guidelines

1.Prohibition of discrimination

Of nationality, race, ethnicity, age, sex, religion, political opinion, social status, presence or absence of a spouse or child, disability
We will not discriminate in any way on the grounds of inclusion.

2.Prohibition of harassment

Harassment, Sexual Harassment, and Power Harassment Related to Pregnancy, Childbirth, and Childcare Leave in the Workplace
It does not allow any form of harassment or any other non-anthropomorphic treatment, such as violence, rumor, physical or mental pressure.

3.Prohibition of child labor

Engaging in hazardous work for young workers under 18 years of age, age at which compulsory education can be worked, or age at which compulsory education is terminated by law
Does not cause.

4.Prohibition of forced labor and trafficking in persons

All labour is voluntary and guarantees that employees are free to leave and all forms of forced or compulsory labour
Do not allow any form of modern slaves, including human or personal trading.

5.Wage

We will comply with the legal minimum wage, and strive to realize the payment of wages exceeding those required for living.
We will comply with laws and regulations concerning minimum wages, overtime, wage deductions, and other benefits.

Human rights and labor

Human Rights Work Behavior

Guidelines

6. Working Hours

By complying with laws and regulations and appropriately managing the work hours, holidays, and annual paid holidays of employees
Excessive working hours are prohibited.

7. Freedom of association, dialogue and consultation with employees

Respect the freedom of association (including the right not to associate) and the right to collective bargaining of employees and their representation or

Consult and talk with employees in good faith.

8. Safe and healthy working environment

Physical health of workers by identifying and evaluating risks to safety and health at the workplace and by using appropriate design, technology, and management measures

To ensure mental safety and health.

9. Development of human resources

To the development of high-quality human resources so that each and every employee can realize their own growth and demonstrate their capabilities to the maximum extent possible

Take action.

10. Rights of indigenous peoples

Observe the UN's Declaration of the Rights of the Indigenous People.

*Regarding the items 1 to 10 above, we will constantly monitor (internal and external reporting system).

Human rights and labor

Implementation of human rights due diligence

1. Continuous implementation of human rights due diligence

Based on the UN Guidance Principles on Business and Human Rights, the Usui Group will establish a framework for human right due diligence to fulfill its responsibility to respect human rights, identify and evaluate negative impacts on human rights, and continually work to prevent and mitigate impacts, monitor them, and disclose information.

2. Remedy

If it becomes clear that the Usui Group has caused or has been involved in a negative impact on human rights, it will take action through appropriate procedures to remedy it.

3. Training and education

The Usui Group provides appropriate education to its employees.

4. Observance of law to be applied

The Usui Group complies with national laws and regulations in each region where business activities are carried out.

5. Dialogues with stakeholders

The Usui Group engages in ongoing dialogue and discussions with internal and external stakeholders in order to understand the negative impacts on human rights that may arise or arise from its business activities and to address their impacts.

6. Information disclosure

As part of its human rights due diligence activities, the Usui Group will regularly disclose information on its human rights initiatives.

Corporate ethics

Corporate Ethics

Declaration

In accordance with its Corporate Philosophy, the Usui Group complies with laws, regulations, and business rules, and implements its business activities with the highest ethical standards.

Corporate ethics

Basic corporate ethics

policy

The Usui Group regards the practice of compliance as the most important management issue, and recognizes that thorough implementation of compliance leads to the strengthening of the management foundation. We will conduct our corporate activities in a fair and transparent manner in accordance with social norms as well as complying with laws and regulations required for corporate activities.

Action Guidelines for

Corporate Ethics

1. Compliance with Laws

- 1) We will comply with all relevant laws and social norms in our business.
- 2) Being aware of being a member of society, we take moderate actions.

2. Trust with customers

- 1) We will strive to acquire customer satisfaction and trust by accurately grasping customer needs at all times and by providing appropriate first products and services.
- 2) In carrying out our operations, we will not take any action that will damage our customers' trust or fame, as well as disciplined actions.
- 3) Concerning entertainment and delivery of gifts, we will take action in accordance with sound commercial habits and social common sense.

3. Relationship with suppliers

- 1) We maintain free and structured relationships with our suppliers and do not require unreasonable requests.
- 2) We will compete in a healthy manner with our peers and comply with the Antimonopoly Act and other trade laws.
- 3) We will not engage in transactions with anti-social forces such as organized crime groups.

Corporate ethics

Action Guidelines for Corporate Ethics

4.Employee Relations

- 1)Strive to comply with labor-related laws and create a fair and honest corporate climate.
- 2)We will strive to maintain a highly moral working environment in an effort to prevent harassment.
- 3)We respect the individuality of our employees and create an attractive working environment.

5.Respecting human rights

activities 1)Appropriately in the event of an adverse effect on human rights that does not cause or encourage an adverse effect on human rights through corporate

Take action.

age, physical disability, etc. 2)In respect of the human rights of employees and in respect of employment, remuneration, and promotion due to race, creed, gender, religion, nationality,

We will not engage in unfair discriminatory treatment.

3)Respect the personality and individuality of employees and determine reasonable and fair personnel systems and working conditions.

suppliers 4)Make adverse effects on human rights not only within the Usui Group but also among other parties deeply involved with the Usui Group such as

We will collect information on whether there is any risk and strive to prevent the occurrence of risk.

5)Facilitate dialogue with stakeholders and be sincere when there is a risk of adverse effects or human rights.

Take a discussion.

Corporate ethics

Action Guidelines for Corporate Ethics

6.Information management

- 1)Information acquired through operations is strictly controlled in compliance with related laws.
- 2)We construct an advanced information security environment and handle information properly.
- 3)We will strictly comply with the laws governing the protection of personal information.

7.Environmental conservation

1)To the establishment of an environmental management system, setting goals for business activities, and periodically reviewing and continuing improvements

We make every effort.

2)We will strive to raise the level of environmental conservation by accurately assessing the demands of society as well as related laws and regulations, and by establishing our own standards.

3)We are conscious of minimizing the environmental impact of our products and services from the planning and design stages to the procurement, manufacturing, logistics, and sales stages

We will promote manufacturing.

4)Enhance environmental management system from a global viewpoint, and implement continuous reforms in order to reduce the impact on the environment.

8.Accurate recording control

- 1)The Usui Group prepares and stores accurate and non-false records (for the prevention of falsification and tampering of records).

Corporate ethics

Action Guidelines for

Corporate Ethics

9. Fair trading

1) Prohibition of Bribery

The Usui Group is direct or to others for the purpose of acquiring or maintaining business or business convenience for the Group
I will not, indirectly, accept any money, offer any other benefit or benefit, promise, offer, or any other act of bribery.

2) Dealing with third parties

The Usui Group does not tolerate bribery of government officials carried out through third parties such as agents or consultants.

3) Prohibition of conflicts of interest

Employees of the Usui Group must not, contrary to the company's interests, behave, act, or use information.

4) Anti-money laundering

The Usui Group deals with trustworthy customers and business partners to comply with anti-money laundering laws and regulations.

5) Strict Export/Import Controls

The Usui Group has established a system for controlling import and export, and violates the laws and regulations in terms of articles and technical data subject to the regulations.

We are thoroughly committed to not taking such items out of countries or bringing them in from abroad.

6) Control of Records

The Usui Group strictly complies with the legislation related to candidacy in each country, accurately records accounting books and other items based on the facts, and properly stores the relevant books.

7) Prohibition of insider trading

The Usui Group knows the unpublished important facts of listed companies and does not permit the buying and selling of stock or other equities prior to the announcement.

Human Resource Development and Human Resource Development

Human Resource

Development and

Development Declaration highly qualified human resources in order for all employees to realize their own growth and maximize their abilities.

Human Resource Development and Human Resource Development

Human Resource Development

and Human Resource

In order to maximize the capabilities of our employees,

Development Policy Improvement of education system and reinforcement of training system

- Development and construction of human resources infrastructure to realize global strategies
- Achieve human resource allocation for global optimization.

Action Guidelines for Human Resource

Development and Human Resource

1. In order to improve our knowledge and capabilities, we will strive to improve our operations and improve productivity by participating in internal and external training, encouraging self-training, and using the skills and knowledge we have acquired.

2. In order to maximize the capabilities of our employees, we will develop our education system and strengthen our training systems, develop and build human resources infrastructure that realizes global strategies, and realize human resource allocation that aims for global optimization.

Environmental conservation

Environmental conservation

declaration In our corporate social responsibility in the design, development, and production of automotive parts, Recognizing that conservation of the global environment is one of the most important issues for all mankind, we are committed to building a sustainable society.

We will make every effort to maintain human health and protect the global environment in every aspect of our corporate activities.

Environmental conservation

Environmental

preservation policy

The Usui Group contributes to the sustainable development of society and the earth by reducing environmental impact through all areas of its business activities.

Environmental action

1. guidelines

1. We will endeavor to reduce environmental impact and prevent pollution by reducing the use of natural resources and energy, reducing waste, recycling, reducing the amount of chemical substances used, preventing environmental pollution, and protecting the environment.
2. In order to improve the global environment and pass it on to the next generation, we will work to build a low-carbon society and a recycling-oriented society, as well as to protect the environment and realize a society that harmonizes with nature.
3. Comply with applicable legal requirements and other requirements to which the organization agrees in relation to the environmental aspects of the organization.
4. We will promote manufacturing with an awareness of minimizing environmental impact at every stage, from product and service planning and design and development to procurement, production, logistics, and sales.
5. We will determine environmental objectives and targets based on our policy, review them, and continually improve our environmental management system.
6. Enhance environmental management system from a global viewpoint, and implement continuous reforms in order to reduce the impact on the environment.

Safety and health

Safety and Hygiene

Pledge

The Usui Group considers ensuring the safety and health of all employees as a corporate social responsibility under the fundamental philosophy of human respectation, based on the principle that "safety is all a priority," and recognizes this as an important priority issue.

Safety and health

Safety and health

policy

Safety considers the danger

Without continuing to eliminate hazards

Be unable to

achieve safety

Safety and health action

guidelines

In order to prevent the recurrence of occupational accidents that have occurred in the past, we will confirm whether the measures for tigers in the past are continuing and firmly established, and all employees will be aware of this.

To educate and improve the understanding of safety and health.

1.To reconfirm countermeasures against past troubles

The past disasters are stratified to the originating objects, and the status of countermeasures is checked and the system is installed.

2.Activities to improve employee understanding

Daily meetings and regular education are held.

Safety and health

Guidelines for health and safety at workplace

1.Safe and healthy working environment

In addition to complying with relevant laws and regulations, identify and evaluate risks to safety and health in the workplace, and properly design, engineer, and manage them

Ensuring physical and mental safety and health of workers with means.

2.Industrial Accidents and Diseases

In order to prevent occupational accidents and occupational diseases, in the event of an accident or trouble, we must accurately understand the status of the occurrence.

Take appropriate measures.

3.Emergency preparedness

Action procedures required to avoid or minimize damage in case of emergency that could compromise life or physical safety

Preparation and safety measures will be implemented to ensure that all employees are aware of this issue.

4.Industrial hygiene

Identify and properly manage conditions in contact with chemicals, noise, offensive odors, etc. that may have a harmful effect on human health.

5.Task of adding to the body

Identify work that may cause physical damage and health hazards, and prevent work-related injuries and illnesses.

Properly manage it.

Safety and health

Guidelines for health and safety at workplace

6.Safety measures for machinery

Identify hazards related to machinery and equipment used in the workplace and take appropriate safety measures.

7.Safety and health communication

With the opportunity to educate and train workers about hazards that could harm their safety and health
We provide.

Quality

Quality activity

declaration

The Usui Group has acquired IATF16949 certification, which is the "Standard for Automotive Industry Quality Management Systems and Requirements for Quality Management Systems for the Organization of Manufacturing Components and Related Service Components in the Automotive Industry," and aims to become a company that is trusted by customers worldwide by raising customer satisfaction.

Quality

Basic quality

assurance policy

The Usui Group will achieve 100% customer satisfaction by continuously improving the effectiveness of QMS by producing the world's best products that satisfy customers in accordance with the following requirements.

- Safe and human-friendly factory
- Ensuring Quality Satisfaction by Customers
- Achievement of annual quality targets
- Comply with all requirements including necessary laws and regulations.

Quality action guidelines

1. We will endeavor to ensure the quality required by our customers at every stage of product development, design, manufacturing, inspection, and transportation, without tampering or falsification of all data.
2. We will respond quickly and sincerely to product defects and complaints from customers, and strive to prevent recurrence by thoroughly pursuing the causes.
3. Strive to establish and operate an appropriate quality management system and provide necessary, sufficient, and accurate product information.

Responsible procurement

Procurement activity

declaration

The Usui Group procures the best in the world at the lowest, most timely, and the most stable. We aim to build a procurement infrastructure with an organic network in order to ensure that this is achieved in our global wells.

At the same time, we will strive to maintain a healthy society by building strong partnerships with our suppliers on the basis of transparency and fairness, and fulfilling our social responsibilities together.

Responsible procurement

Basic Procurement Policy

1. Regardless of nationality, enterprise size, or trading performance, we provide our suppliers with fair and fair opportunities without unreasonable requests. To this end, we will cultivate a wide range of business partners worldwide and strive to maintain competition.
2. When placing an order, we evaluate and select suppliers appropriately and objectively from the viewpoint of their competitiveness in terms of quality, supply, price, technology, management, legal and social norms, respect for human rights, elimination of unjust discrimination in employment and occupation, elimination of child labor and forced labor, environmental conservation, and social contribution activities. Comply with applicable legal requirements and other requirements to which the organization agrees in relation to the environmental aspects of the organization.
3. Share objectives with suppliers from a long-term and global viewpoint, deepen relationships of trust through close communication, and strive for co-existence and co-prosperity through mutual refinement. We will determine environmental objectives and targets based on our policy, review them, and continually improve our environmental management system.

Responsible procurement

Basic Procurement Policy

4. Contribute to international and local communities by complying with various laws and regulations, corporate ethics, internal regulations, etc., conserving the global environment, and reducing the impact on ecosystems.
5. We will not engage in transactions with anti-social forces such as organized crime groups.
6. Positioning green procurement activities as an important role in environmental management activities, we will share information with all suppliers and strengthen and promote environmental initiatives together.

Responsible procurement

Policy on Response to Conflict

Minerals

The Usui Group does not trade or use materials (materials, components, etc.) that contain 3TG that may be harmful to human rights, environmental destruction, etc. in the Democratic Republic of the Congo and in neighboring countries. In order to establish a more responsible supply chain, we will also develop and investigate our suppliers.

Action Guidelines for Responding to

Conflict Minerals

We will conduct surveys when purchasing materials and parts, and conduct procurement activities that consider the impact on local communities of the use of raw materials (e.g., conflict minerals, cobalt, natural rubber, etc.) that can cause social problems such as human rights and the environment. We will also cooperate in the related surveys and work closely on responsible procurement activities, such as not purchasing if the supplier has not yet been confirmed.

Information Security

Information security

declaration

The Usui Group manages information safely, in perfect condition, efficiently at any time, and inexpensively. We aim to build and operate a global information infrastructure, a global information management system, and a global core system to realize this.

We aim to achieve this goal, including stakeholders who share information.

Information Security

Basic Information Security Policy

1.SECURITY

The Usui Group maintains the confidentiality, integrity and availability of information assets in compliance with the International Standards (ISO27000 Series). For this reason, we will take appropriate measures systematically and technically.

2.COMPLIANCE

The Usui Group complies with laws and regulations related to information handling.

3.OPEN

The Usui Group maintains the confidentiality, integrity and availability of information assets in compliance with the International Standards (ISO27000 Series). For this reason, we will take appropriate measures systematically and technically.

4.COLLABORATION

The Usui Group builds and operates procurement/production/logistics in accordance with the International Industry Standards (MMOG/LE) to increase the effectiveness of individual processes. In addition, by sharing information in an optimal way in collaboration with stakeholders, we will perform overall optimization of collaborative work.

5.INNOVATION

Considering that information technology is constantly evolving, the Usui Group will be able to incorporate and use the most suitable information technology.

If that technology requires the renovation of the information base, we will proceed with the reform so that the renovation of the system is completed at the optimal time.

Information Security

Information Security Action

Guidelines

SECURITY

- ・ ISO27000(ISMS)に準拠した情報管理
機密管理
BCM (情報)

COMPLIANCE

- ・ ISO27000(ISMS)に準拠した情報管理
法律遵守 (情報)

OPEN

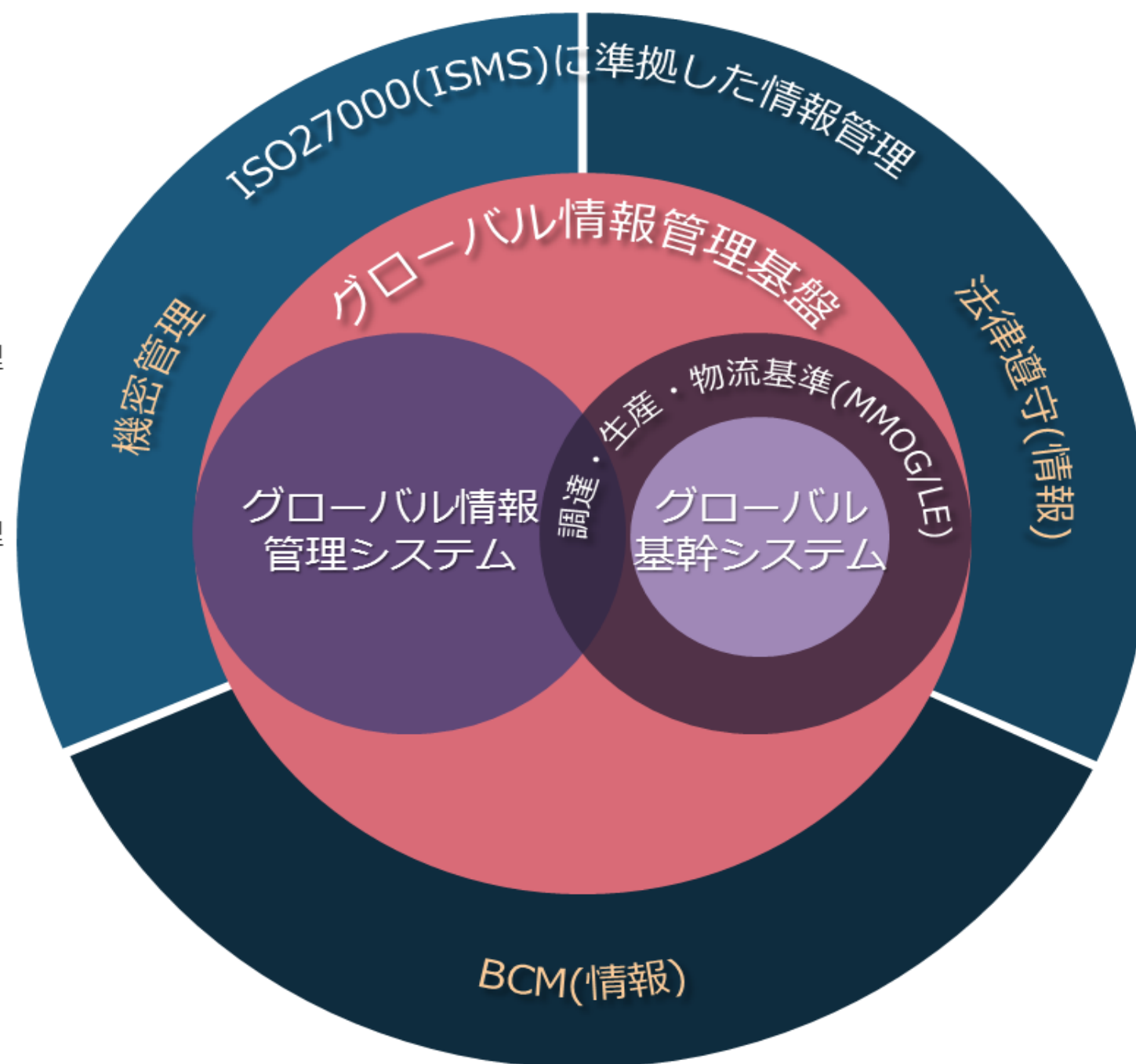
- ・ ISO27000(ISMS)に準拠した情報管理
- ・ グローバル情報管理基盤
- ・ グローバル情報管理システム
- ・ グローバル基幹システム

COLLABORATION

- ・ グローバル情報管理システム
- ・ グローバル基幹システム

INNOVATION

- ・ グローバル情報管理基盤
- ・ グローバル情報管理システム
- ・ グローバル基幹システム



グローバル 情報管理基盤

情報機器、通信機器、通信、ソフトウェア、データベース等グローバルに情報を管理する基盤を指す。

グローバル 情報管理システム

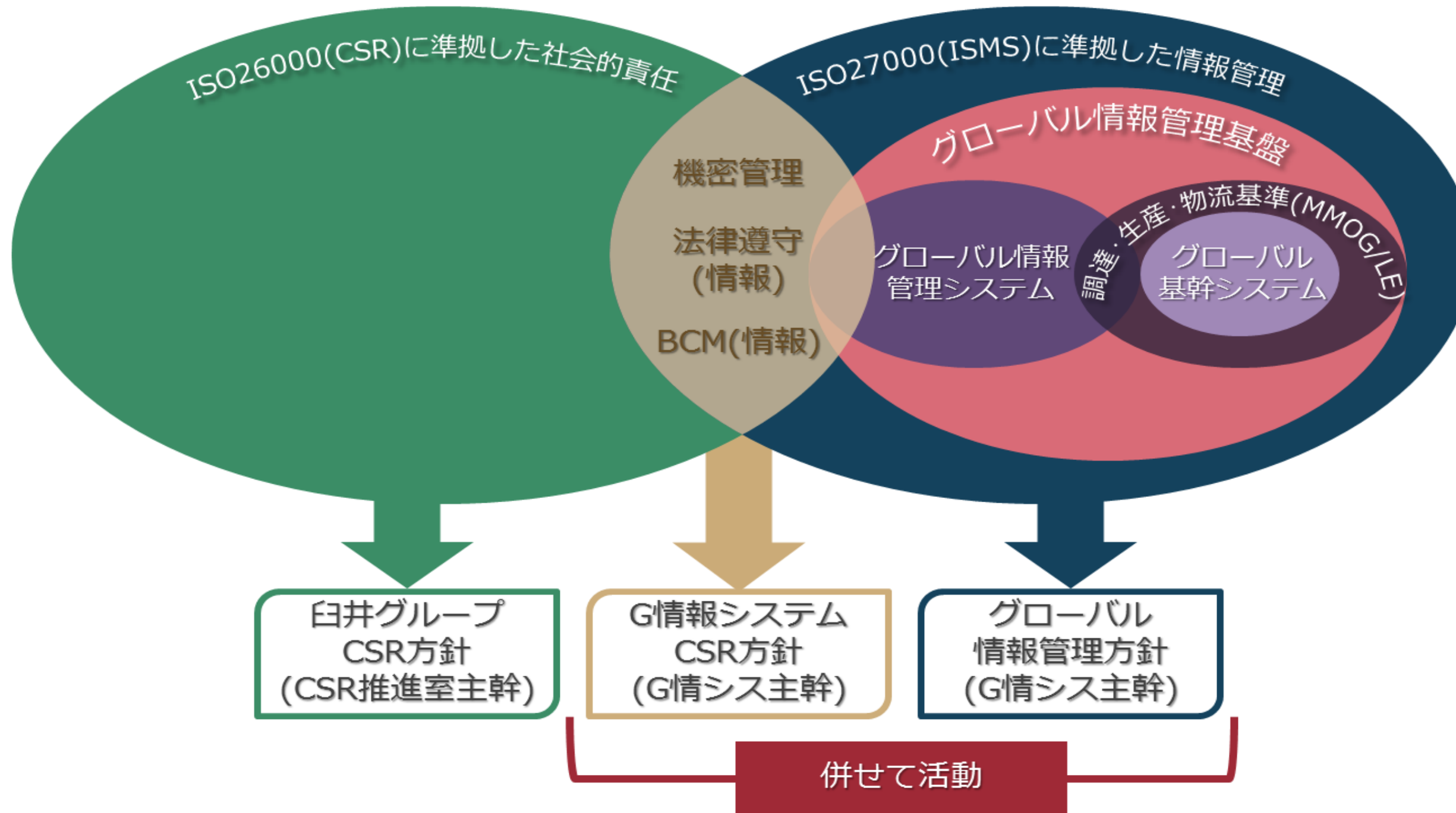
電話、メール、テレビ会議、情報共有等、主に非定型業務向けシステムを指す。

グローバル 基幹システム

生産管理、購買管理、受注出荷管理、財務管理、原価管理、人事管理等の定型業務向けシステムを指す。

Information Security

Information Security Action Guidelines



Protection of Personal Information

Declaration of personal

information management

In accordance with the Privacy Policy, the Usui Group will appropriately handle information that identifies a specific individual in compliance with the Act on the Protection of Personal Information and other relevant laws and regulations.

Protection of Personal Information

Basic Policy on the Management of

Personal Information
Based on the Privacy Policy, the Usui Group complies with laws related to the protection of personal information, EU regulations on the protection of general-purpose data, and other related laws and regulations, and properly handles the personal information provided by customers and suppliers.

Personal Information Management

Action Guidelines 1. Appropriate acquisition of personal information

Personal information shall be obtained by legal and fair means to the extent necessary for business. In obtaining sensitive information, prior consent shall be obtained from the employee unless otherwise stipulated by law.

2. Clarification of the purpose of use

Process personal data only for the purposes described below.

- Order processing, delivery of products and services, provision of support, and issuance of quotations/invoices in meeting contracts with customers and suppliers
- Service, product and various events of the Usui group
- Questionnairing aimed at developing new products and improving services in the Usui Group
- Response to inquiries about services, products, and applications for adoption by the Usui Group
- Gratitude, congratulations, sympathy, and greetings for our customers and business partners
- Execution of other business incidental thereto

Protection of Personal Information

Personal Information Management Action Guidelines

3. Disclosure and provision to third parties

The Usui Group does not disclose or provide personal data to third parties unless either of the following applies:

In addition, the Company will not disclose or provide any personal data containing sensitive information to any third party under any circumstances other than as stipulated by laws and regulations or where the applicable person has expressly agreed to such information.

Provided, however, that the disclosure or provision of personal data to a third party shall not be applicable if the Usui Group shares the personal data and, to the extent necessary for the achievement of the purpose of use, entrusts the handling of the personal data in whole or in part, provides the personal data to the outsourcer.

- With the consent of the principal
- When required to disclose or provide information in order to fulfill legal duties
- When it is necessary to protect a person's life, body, or property and it is difficult to obtain consent from the person
- When it is necessary for the national government or a local government to cooperate in the implementation of public affairs and there is a risk that obtaining consent from the person may hinder the execution of the affairs.
- In the event of a merger, company split, transfer of business, or other event of business succession

Protection of Personal Information

Personal Information Management Action Guidelines

4. Entrustment of Business

The Usui Group may provide individual data to the subcontractor within the range necessary to achieve the intended use of this Action Guide. In this case, the management and supervision of the outsourcee shall be conducted appropriately, including the conclusion of an agreement with the outsourcee concerning the processing of personal data.

- The handling of personal data may be partially entrusted to a forwarding agent for warehousing, delivery, or other logistics operations.
- For the purpose of quality assurance, some of the processing of personal data may be entrusted to the vendor conducting the inspection.
- Since general communications tools such as e-mail systems, business card management systems, and WEB conferencing systems are used for business talks, meetings, and contact management with suppliers, part of the process of personal data may be outsourced to cloud service providers.
- In order to satisfy contracts with customers and suppliers, part of the processing of personal data may be outsourced to subcontractors engaged in product manufacturing, shipment inspections, etc. within the Usui Group premises.

Protection of Personal Information

Personal Information Management Action Guidelines

5. Transfer outside EEA

When personal data is transferred to a third country outside EEA region, including subcontractors and joint users, the Usui Group takes the required and appropriate action according to the standard data protective matters in accordance with GDPR stipulated by EU.

6. To ensure accuracy

The Usui Group will endeavor to keep personal data up to date and correct any errors or shortfalls.

7. Storage period

The Usui Group does not store collected personal data beyond the limits necessary for the purpose of collecting the data.

8. Security

In order to ensure the accuracy and safety of personal data, the Usui Group shall take reasonable measures against the risk of unauthorized access to personal data, leakage, loss, or damage of personal data, etc.

Company property

To continue our business, we must protect the company's property while avoiding and overcoming various risks.

The Usui Group will use and properly manage all assets of the company only for its performance and proper purpose.

We will also systematically work to ensure that the value of our products is not impaired, and take appropriate measures against all risks.

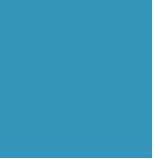
Company property

Basic policy on respect for intellectual property rights

The Usui Group recognizes the importance of intellectual property rights, respects the intellectual property rights of others, and promotes the proper protection and utilization of its own intellectual property rights.

Action Guidelines for Respecting Intellectual Property Rights

1. We will actively acquire patent rights and other intellectual property rights to protect them from a global perspective and make their use throughout the Group.
2. In developing new products and technologies, we will investigate whether or not we have infringed the intellectual property rights of other companies and strive to avoid infringing the rights. In addition, intellectual property rights of other companies that have been rightfully obtained shall be used only to the extent specified in the contract.
3. We do not imitate the products of other companies and do not conduct their development, manufacture, or sale.
4. We will exercise appropriate and legitimate rights against third party infringements.



Company property

Risk management policy

In response to natural disasters such as earthquakes, tsunamis, and floods, cyber attacks, and other physical terrorism threats, organizational efforts will be made to maintain the safety of employees and the continuity of corporate activities, and appropriate responses will be taken.

Risk Management Action

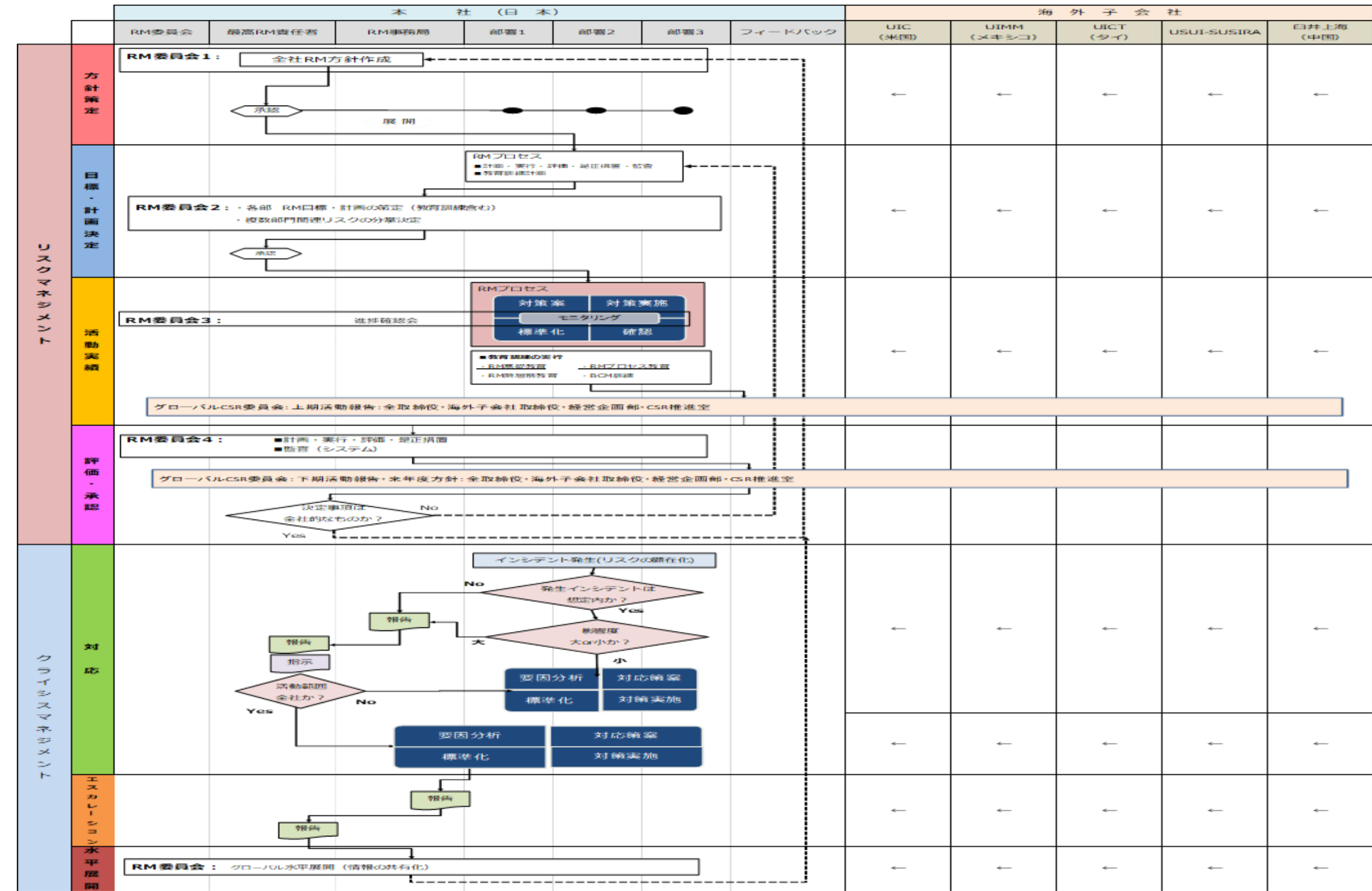
Guidelines

1. Identify and identify risks that may occur in the workplace, and take precautions to prevent such risks.
2. In the unlikely event of a risk, respond quickly and properly to minimize damage.
3. Along with the globalization of the supply chain, we will strengthen our response to suppliers and production systems.
4. To strengthen our response to earthquake disasters, we have formulated a Business Continuity Plan (BCP) and will continuously revise and implement its operation.

リスクマネジメント基本規程	
第1条 目的	
本規程は当社、国内・海外の全子会社におけるリスクマネジメントについて基本的考え方を定めるものである。	
第2条 適用範囲	
本規程の適用範囲は、当社、国内・海外の全子会社(以下、「当社グループ」という)とする。	
第3条 対象	
当社、子会社の社員（役員、社員、契約社員、他社からの出向者、パート、アルバイト、派遣社員、期間社員を含む）は、本規程を順守しなければならない。	
第4条 用語定義	
リスク：当社グループの事業活動に及ぼす様々な影響 リスクマネジメント：リスクを特定の上、分析、評価し、全員参加の下で未然防止と発生を前提とした準備を講じること	
第5条 基本方針	
「当社グループは、持続的な成長を通じて社会的責任を果たすにあたり、常に損失の最小化と利益の最大化を図るため、リスクの適切な管理を行う。」	
第6条 行動指針	
1 「私は、リスクの発見に努め、発見したリスクを速やかに報告します。」 2 「私は、自らリスク低減のために行動します。」 3 当社グループは、リスク発生時には、社員の総力を結集し、速やかな対応と復旧を図る。 4 当社グループは、継続的に社員全員に対して教育訓練を実施する。	
第7条 組織体制	
1 リスクマネジメント委員会：	当社の取締役会や経営会議の下部にリスクマネジメント委員会を置く。 構成メンバーは、最高リスクマネジメント責任者、リスクマネジメント責任者、リスクマネジメント事務局とし、各部署からのリスクマネジメントに関する課題分析と対処案などについて必要に応じ審議し、結果を取締役会・経営会議へ報告する。
2 最高リスクマネジメント責任者：	代表取締役社長が務め、リスクマネジメント委員会の召集ほか、当社のリスクマネジメントにおける指揮を執る。 但し、不測の事態発生等により、最高リスクマネジメントの責務を果たせない場合、代表取締役社長は下位の取締役へ権限を委譲することができる。
3 リスクマネジメント責任者：	各リスクに関し、経験・知識のある専門部署長で、責任・権限を持って実行推進する役割を担う。統括部署のリスクマネジメント責任者は主管する子会社のリスクマネジメント責任者も担う。
4 リスクマネジメント事務局：	リスク管理部署はリスクマネジメント委員会の事務局を担い、推進役としてリスクマネジメント責任者と連携し、各部署で行われている活動の取りまとめや、教育・訓練の実施や情報提供等の働き掛けを行う。
5 リスクマネージャー：	リスクマネジメント事務局主管部署所属の者で、事務局関連業務を主管するほか、当社におけるリスクマネジメント実務を推進する。
6 各部署（各子会社）担当者：	リスクマネジメント責任者である所属部署長の指示に従い、平時／有事の自部署内でのリスク対応を行う役割を担う。
第8条 リスクマネジメントプロセス	
1 リスクマネジメント委員会は、リスクマネジメント責任者を召集の上開催した委員会会議により、全社リスクマネジメント年度方針を策定・決定し、社内に通達する。 2 リスクマネジメント責任者は、リスクマネジメント委員会で決定したリスクマネジメント年度方針を受けて、主管する各部署と子会社の機能・事業に関する様々なリスクを適切に管理するための計画・実行・評価・セルフチェック・是正措置という一連のリスクマネジメントプロセスを実施する。 3 リスクマネジメント委員会は部署をまたがる問題や、重大リスクなどについて審議・決定し、必要に応じて取締役会・経営会議へ上申する。 4 リスクマネジメント委員会は、実際に発生したインシデントに対応し、結果を各部署に展開共有するとともに、次年度 RM 方針策定にフィードバックする。	
第9条 リスクアセスメント	
リスクアセスメントとして実施する事項は、リスクの特定、リスクの分析、リスクの評価とし、別に定める運用細則に則って実施する。	
第10条 リスク対応	
各部署（各子会社）は、リスク発生の未然防止と発生を前提とした準備を講じる。	
第11条 教育訓練	
リスクマネジメント事務局は、リスクマネジメント責任者と連携し、リスクに関する教育訓練計画を立案し実施する。	
第12条 リスクマネジメントシステム監査	
経営企画部は、リスクマネジメント委員会に対し定期的にリスクマネジメントシステムの有効性について監査を行い、問題がある場合は是正勧告を行う。是正状況についても勧告に従い実施されているかをチェックする。	
第13条 規程体系	
本規程に加え、別に要領および細則を定める。	
付則	
1. この規程の改正は、リスクマネジメント事務局がリスクマネジメント委員会へ上程し、リスクマネジメント委員会にて審議・決定する。 2. 本規程は、2018 年 1 月 6 日に制定、施行する。	
以上	

Company property

Risk Management and Crisis Management Structure



Contact for consultation and reporting

If you have any doubts about the Code or the Company's internal rules or related laws and regulations, or if you become aware that a violation of the Code has been committed, do not leave the code as it is, but consult with your superior or the relevant department and try to resolve the problem. In addition, if cooperation with the survey is requested, the company will respond sincerely to the consultation and declaration.

Contact for consultation and reporting

Consultation and reporting on questions and concerns regarding compliance

1. Strict confidentiality

From the viewpoint of protecting persons who have consulted or reported and those who have cooperated in the investigation, we guarantee strict confidentiality of the facts and contents of the consultation or report.

2. Prohibition of Retaliation

We will not tolerate disadvantageous treatment or retaliation against persons who have consulted or reported or cooperated with the investigation.

3. Inquiries

Tel: +81-55-972-2111 (typical)

Web: <https://www.usui.co.jp>



USUI CO., LTD.