



# Wanotec Group Code of Conduct

FY2025 Edition

**Wanotec Japan Co., Ltd.**

**Wanotec Co., Ltd. Wanotec (Suzhou) Electronics Co., Ltd.**

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# Introduction

Wanotec Group believes that by contributing to customer growth based on our management philosophy, “We create mental and physical abundance and joy. We study and train to improve our human capital. We are passionate about providing service to clients.” while valuing relationships with stakeholders and addressing their impact, we must create a sustainable society, fulfill our social responsibility, and enhance trust.

Wanotec’s name embodies “technology in harmony,” the technology essential for human progress achieved through harmony between people. We strive to be a company where all employees can work with peace of mind while valuing their individuality by reforming working practices, embracing diversity in our workforce and creating an environment where everyone respects diverse values and can thrive. We firmly believe that diverse human resources can contribute to realizing a better society by creating added value. Based on Wanotec’s corporate creed, management philosophy, and Corporate Ethics Regulations, we hereby establish this Code of Conduct.

This Code of Conduct must be observed by all officers and employees of the Wanotec Group. Similarly, we ask all suppliers conducting business with the Wanotec Group to cooperate in adhering to this Code of Conduct with integrity and responsibility in all aspects of their operations.

# 1. Honest and Fair Business Practices

## 1-1 Providing High-quality and Safe Products and Services

- (1) We guarantee the quality of our products and services not only by meeting customer needs and specifications and complying with laws and regulations concerning quality, safety, and the environment, but also by setting voluntary standards as necessary. Furthermore, to ensure that our customers can use our products and services with peace of mind, we strive to ensure safety with the goal of zero accidents.
- (2) We will respond promptly and sincerely to defects and customer complaints, investigate their causes, and strive to prevent recurrence.
- (3) We will build and operate an appropriate quality management system.

## 1-2 Business Activities

- (1) We will understand precisely what our customers seek from their perspective and provide products and services that earn customer trust and satisfaction.
- (2) We will act appropriately as a member of society based on conducting ourselves in accordance with the law and sound corporate ethics, and fair, transparent, and free competition, while strictly complying with domestic and international competition laws.
- (3) We will not engage in any conduct that places undue pressure on customers in our business activities.
- (4) In advertising, promotional activities, and business activities for the company, its products, and services, we will comply with laws and regulations as well as internal company rules and regulations, eliminate improper expressions, and adhere to social ethics and public order and morals, ensuring fair and appropriate representations and expressions.
- (5) We will collect information in a fair and appropriate manner through legitimate means, and strive to maintain the confidentiality of our customers' confidential information, personal information, and other sensitive data.
- (6) We will enter into contracts that are lawful, appropriate, reasonable, and clearly defined.
- (7) When concluding contracts, we will assess the associated risks and costs as a prerequisite, review specific transaction terms with the cooperation of relevant parties and experts, and conduct the conclusion process in accordance with internal procedural rules.

### **1-3 Procurement Activities**

- (1) We will build strong partnerships with our suppliers and strive to maintain and enhance mutual understanding and trust from a long-term perspective.
- (2) We will take a broad view of the world, develop optimal purchasing partners, and strive to maintain competitiveness.
- (3) We will prohibit the manufacture of mercury-containing products and the use of mercury and mercury compounds, dispose of mercury waste in accordance with the Minamata Convention, and prohibit the manufacture and use of specific chemicals defined under the Stockholm Convention.  
Furthermore, when tantalum, tin, tungsten, gold, cobalt, or similar minerals are present in products manufactured and sold by the Wanotec Group, we aim to procure these conflict minerals in a manner that does not directly contribute to the activities of organizations involved in risks or wrongdoing related to: (1) conflicts, (2) human rights abuses such as child labor, (3) poor working conditions, environmental destruction, or corruption in the Democratic Republic of the Congo, neighboring countries, and high-risk regions. Therefore, we also request that our business partners refrain from engaging in such procurement practices within their supply chains.
- (4) We will properly and fairly select purchasing partners based on supplier's material quality, reliability, delivery times, and price, as well as their management stability and technological development capabilities. Additionally, such selection takes into consideration on whether suppliers fulfill their social responsibility through fair and transparent information disclosure, compliance with laws and social norms, respect for human rights, elimination of unfair discrimination in employment and occupation, exclusion of child labor and forced labor, environmental conservation activities, social contribution activities, creation of a good work environment, and sharing a sense of social responsibility with business partners.
- (5) Regarding purchasing transactions, we do not accept personal benefits from suppliers.
- (6) We treat all suppliers fairly and equitably. We will also strive to maintain the confidentiality of our suppliers' confidential information, personal information, and other sensitive data.
- (7) We will conduct procurement activities in accordance with internal rules and proper procedures.

### **1-4 Respect for the Wanotec Brand**

- (1) We position the brand as a vital management resource and take actions to protect and enhance the value of the Wanotec brand, ensuring its recognition by society.

## 1-5 Compliance with Engineering Ethics

- (1) When an engineer is faced with a situation that is judged to be contrary to the mission of the engineer during the course of performing duties, the safety, health, and welfare of the public shall be given the highest priority. We will also strive to ensure product safety to prevent any product liability issues arising from our products, systems, or services, while working to guarantee superior functionality, performance, and high reliability.
- (2) As engineers, we will strive to maximize the sustainability of human society through the effective use of resources and the preservation of the global environment.
- (3) As engineers, we will always make judgments and take action objectively, based on truth, with honesty, integrity, and fairness, and with a sense of responsibility. When resolving an issue is deemed difficult for a single engineer, we will seek input from relevant parties within and outside the company, as well as knowledgeable third parties and experts, and strive to address the issue collaboratively.
- (4) As engineers, we will strive to enhance transparency and provide accurate and prompt information regarding impacts on the public, society, and the environment, working in cooperation with internal and external stakeholders.
- (5) As engineers, we will comply with the obligation to maintain confidentiality. However, if such information includes details that could have a significant impact on the public, society, or the environment, we will strive to disclose it in a timely and appropriate manner.
- (6) As engineers, we respect the intellectual achievements of others as much as our own. We will also strive to build fair market environments while building smooth cooperative relationships with others.
- (7) As engineers, we respect the diversity of cultures, religions, customs, systems, and values of others, other countries, and other regions, and strive to share joy with people around the world through technology.
- (8) As engineers, we will strive for self-improvement and continue to lead the world in technology into the future.

## 2. Environmental Conservation

### 2-1 Promotion of Environmental Management

- (1) To realize a sustainable society in harmony with the environment, we recognize our respective roles and fulfill them to pursue manufacturing that aims to reduce environmental impact throughout the entire product lifecycle from material procurement and production to distribution, use, and proper disposal.
- (2) We will comply with environmental laws, regulations, and voluntary standards, and strive to conduct our business operations and perform our duties accordingly.

### 2-2 Promotion of Environmentally Conscious Business Activities and Environmental Management

- (1) We will actively develop products and services that take into consideration the prevention of global warming, the circular use of resources, and the conservation of ecosystems.
- (2) We will actively work to prevent global warming, promote the circular use of resources, and conserve ecosystems in factories, offices, and other facilities.
- (3) We will assess the potential for environmental issues, strive to prevent their occurrence, and promptly take appropriate measures to minimize environmental impact should any environmental issues arise.
- (4) For substances the inclusion of which in products is prohibited or restricted by laws, regulations, or other rules, we will ensure they are not included in products as specified by such laws, regulations, or rules, or that they do not exceed the prescribed amounts, and we will also comply with any required labeling obligations.
- (5) Volatile organic compounds, aerosols, corrosive substances, particulate matter, ozone-depleting substances, and combustion byproducts generated during operation shall undergo necessary characterization, periodic monitoring, control, and treatment before being released into the atmosphere. We will regularly monitor the performance of the atmospheric emissions management system.
- (6) We will document water usage and discharge, conduct characterization and monitoring, explore opportunities for water conservation, and implement water management to control pollution pathways. We will regularly monitor wastewater treatment and control to ensure optimal performance and regulatory compliance.

### 2-3 Dialogue with Stakeholders

- (1) We will disclose information and engage in dialogue regarding environmental activities to build a sustainable society together with our stakeholders.

## 3. Relationship with Society

### 3-1 Disclosure of Corporate Information

- (1) We will promote two-way communication with society by valuing dialogue processes with a wide range of stakeholders regarding information required by society, listening to diverse opinions and negative information, and responding sincerely and proactively.
- (2) We will respond sincerely to any crises that arise and also disclose negative information in a timely and appropriate manner.

### 3-2 Contributions to Local Communities

- (1) We will conduct social contribution activities centered on nurturing individuals who will lead the next era of transformation to maximize the use of available resources and realize a vibrant society. Furthermore, through our social contribution activities, we aim to become a respected and trusted global enterprise of the 21st century.

### 3-3 Relationship with Politics and Administration

- (1) We will build sound and proper relationships with politics and administration. In particular, we will comply with ethics code for public service officials.
- (2) We will not offer, promise, or provide bribes or similar improper benefits to public service officials (including quasi-public service officials and foreign public service officials). Furthermore, we will refrain from any actions that could give rise to such suspicions.
- (3) We will not engage in any conduct that undermines the fairness of public bidding.
- (4) We will conduct charitable donations and membership in external organizations fairly and appropriately.

### 3-4 Prevention of Anti-social Transactions (Note)

- (1) We will maintain absolutely no relationship with organized crime groups or other antisocial forces and never engage in antisocial transactions.
- (2) We will prevent anti-social transactions through self-verification of transactions.
- (3) We will take a firm stance against organized crime groups and other antisocial forces, and reject all unreasonable demands.

(Note) Transactions with antisocial forces such as organized crime groups

### **3-5 Gifts, Entertainment, etc.**

- (1) Neither employees nor their family members shall solicit money or gifts from business partners or customers.
- (2) We will not give money or gifts to business partners, customers, or employees of other companies if doing so directly affects, or may be perceived as affecting our business relationship with them.
- (3) When entertaining clients or others, we will do so within socially acceptable norms.
- (4) If a business partner or customer offers hospitality, report and consult with your supervisor and respond with caution.  
Hospitality, the nature of which appears to be excessively lavish or costly beyond the bounds of common sense, shall be declined on the spot.

### **3-6 Respect for the Cultures and Customs of Each Country and Region and Compliance with Laws and Regulations**

- (1) In conducting business activities in each country and region, we will respect their cultures and customs, comply with their laws and regulations, and strive to act with integrity and fairness. Furthermore, we will contribute to economic, social, and environmental progress with an eye toward the sustainable development of such countries and regions. In countries and regions where laws or their enforcement conflict with the International Code of Conduct, we will strive to respect the International Code of Conduct to the greatest extent possible.
- (2) We will not engage in or participate in illegal business transactions in any country or region. We will also exercise due diligence to avoid any involvement with criminal organizations and comply with the laws and regulations of each country and region governing money laundering (the process of illegally concealing the origin of money obtained from illicit activities).

## 4. Respect for Human Rights

### 4-1 Toward Respect for Human Rights

- (1) We will respect international human rights norms and exercise due care to avoid engaging in actions that interfere with or impede human rights.

### 4-2 Elimination of Discrimination

- (1) In all corporate activities, including employee recruitment, treatment, and business transactions, we will respect the personality and individuality of each person involved. We will not engage in discrimination based on gender, age, nationality, race, ethnicity, ideology, beliefs, religion, social status, lineage, illness, disability, or any other such factor, nor will we engage in any act that violates an individual's dignity.

### 4-3 Respect for Human Rights in Information Management

- (1) To prevent new problems such as personal information leaks, computer viruses, and unauthorized access before they occur, we will establish an information ethic based on respect for human rights and consideration for safety when handling information.

### 4-4 Respect for Fundamental Rights at Work

- (1) We will promote employment practices mindful of corporate social responsibility. We will comply with the laws and regulations of each country and region when hiring employees. We will not engage in child labor involving children below the minimum working age or subject employees to unfair labor practices against their will.
- (2) We will promote socially responsible procurement and will not source from companies that engage in child labor or forced labor.
- (3) We will respect the fundamental rights of employees as outlined in the principles of the United Nations Global Compact, taking into account the laws and labor practices of each country and region. Through genuine and constructive dialogue between management and employees, we will strive to better understand each other's concerns and work together to resolve issues.
- (4) We will ensure the confidentiality, anonymity, and protection of suppliers and employee whistleblowers, unless prohibited by law, and maintain a communication process that allows our employees to raise concerns without fear of retaliation.

### 4-5 Labor Unions

- (1) Wanotec Group respects the fundamental right of employees to freely choose to form and join labor unions and similar organizations in accordance with the laws and regulations of each country. We equally respect the right of employees to refrain from such activities.

## 5. Management Foundation

### 5-1 Management and Use of Information

- (1) We will properly manage all processes related to the lifecycle of confidential information, including creation, acquisition, confidentiality management, sharing and disclosure, storage and retention, utilization, and disposal. To prevent incidents caused by information leaks or unauthorized use, we will comply with the safeguarding of confidential information and the proper use of information devices.
- (2) We will protect information assets in accordance with the Information Security Policy.
- (3) We will manage confidential information appropriately in accordance with internal rules.
- (4) We will fully respect the rights and value of confidential information belonging to others and our own company. We will strictly adhere to this Code of Conduct and related regulations to ensure the appropriate management and handling of both confidential information disclosed by others and our own confidential information, preventing its leakage from causing damage to others or ourselves, or resulting in breach of contract or violation of laws and regulations.
- (5) When disclosing our company's confidential information to others, we will do so only after taking appropriate confidentiality measures, such as concluding a confidentiality agreement, following the prescribed procedures.
- (6) Confidential information owned by others shall only be obtained when necessary for our business operations, and only through fair and appropriate means (such as contracts) consistent with fair business practices. We will never obtain such information through improper means. Furthermore, if we obtain confidential information belonging to others, we will manage it in strict compliance with the contract and continue to take necessary measures even after the contract ends.
- (7) We recognize the importance of protecting personal information and will handle such information appropriately in accordance with our company's personal information protection policy.
- (8) We will organize and store records and information such as documents and electronic files, properly retain such materials after their processing is complete, and appropriately dispose of those the period of retention of which has expired.

## 5-2 Use of Inside Information and Points to Note

- (1) We will always exercise caution to prevent the leakage of company information and will not disclose important information concerning our company, affiliated companies, business partners (including related companies, investee companies, companies with contractual relationships, and companies currently in contract negotiations), customers, or other parties to third parties.
- (2) If we become aware of undisclosed information (insider information) that relates to our company, its affiliates, business partners, or customers and that could influence investors' investment decisions, we shall not engage in any transactions involving our company's stock or that of its affiliates or business partners until such insider information is publicly disclosed. When it is unclear whether information constitutes insider information, we will exercise caution in transactions involving stocks and other securities.

## 5-3 Management and Preservation of Company Assets

- (1) We will actively create intellectual property, protect it appropriately, and strive for its effective utilization. We acknowledge that all intellectual property rights pertaining to created works produced in connection with company duties belong to the company within the scope permitted by relevant laws and regulations, and will comply with relevant company rules and instructions to appropriately protect and utilize the company's rights.
- (2) We will respect the intellectual property of others. To prevent infringement of the intellectual property rights of others and ensure smooth business operations, we will conduct prior investigation of potential intellectual property rights of others during the research, development, design, production, and sales of new products and technologies and, should any concerns arise, we will implement appropriate countermeasures.
- (3) With respect to the use of resources such as the Internet and software, we will not infringe upon the copyrights of others, nor copy, install, or use software in violation of the terms and conditions of license agreements. We will strive to manage software so that it is used correctly as a company asset.
- (4) To efficiently utilize the company's tangible assets (e.g., land, buildings, facilities, equipment, products, office equipment, cash and deposits, securities) for business activities and prevent unauthorized use, loss, or theft, we will comply with the rules and regulations established by the company.
- (5) We will not engage in any acts that impair the value of company assets, including financial assets, whether tangible or intangible, through improper use, private use, or similar actions.
- (6) All business decisions and activities shall be conducted in such a way as to ensure that they represent the best choices for the company. We shall not engage in any financial or other transactional relationships that conflict with the company's interests with suppliers, customers, or competitors.

- (7) We will implement fair accounting practices and ensure the proper recording and reporting of information. Additionally, research reports, various inspection data, and performance reports shall accurately and clearly record and report information based on facts.

#### **5-4 Creating an Environment That Brings out the Best in Employees**

- (1) We will comply with all relevant labor laws and regulations concerning employment, personnel, working conditions, wages, and other labor-related matters.
- (2) We respect the human rights of each and every employee and exercise the utmost care in strictly managing the protection of personal information and privacy. Furthermore, we absolutely will not engage in sexual harassment, power harassment, or any other form of harassment that violates human rights.
- (3) We will strive to ensure workplace safety based on the fundamental principle that protecting safety and health takes precedence over all else.
- (4) We will strive to promote physical and mental well-being. We will also take care not only of our own health but also the health of those around us.
- (5) We will strive to create a workplace where each and every employee can work with a sense of purpose and fulfillment. We will support achieving a work-life balance by enabling diverse workstyles and utilizing various leave systems. Furthermore, for employees who require time for pregnancy, childbirth, childcare, or family caregiving, we will strive to create a workplace environment that allows them to focus fully on such responsibilities.
- (6) We will always strive to give our utmost effort and constantly pursue self-improvement so that we can maximize our abilities.  
Supervisors shall manage, guide, and develop their subordinates fairly and appropriately, striving to enhance their capabilities.

#### **5-5 Safety and Health**

- (1) We will identify, evaluate, and mitigate potential occupational health and safety hazards for employees, including hazards related to chemical substances, electrical and other energy sources, fire, vehicles, and falling objects.
- (2) We will identify and assess potential emergencies and crises, and minimize their impact by implementing emergency plans and response procedures, including immediate reporting, employee notification and evacuation measures, and employee training and education. Disaster prevention drills shall be conducted at least once a year.
- (3) We will encourage reporting by employees to prevent, manage, and track occupational accidents and illnesses, maintain records of such occupational accidents and illnesses, investigate cases, and implement corrective actions to eliminate root causes.

- (4) The chemical, biological, and physical agent exposure conditions of employees shall be identified, evaluated, and managed based on hierarchy of controls. When potential hazards are identified, we will explore opportunities for their elimination or mitigation. If such hazards cannot be eliminated or mitigated, they shall be controlled through the implementation of appropriate design, engineering, and operational management. If it is still not possible to adequately control such hazards, employees will be provided with properly maintained protective equipment at no cost. Protection manuals for use will be provided at regular education and training sessions.
- (5) We will identify, evaluate, and manage hazards associated with physically demanding tasks that place strain on employees, such as manual handling of raw materials, lifting heavy objects or repetitive lifting, prolonged standing work, and assembly work involving extremely repetitive or strenuous movements.
- (6) Production machinery and other equipment shall be evaluated for safety hazards and, where hazards exist that could cause injury to employees, physical guards, interlocks, or barriers shall be installed and properly maintained.
- (7) We will provide employees with clean toilet facilities, access to potable water, and facilities for the hygienic storage and consumption of food.
- (8) We will provide employees with appropriate workplace safety and health information and training in their native language or a language they understand regarding all identified workplace hazards to which workers may be exposed (e.g., machinery, electricity, chemical substances, fire). Safety and health information shall be clearly posted within the facility or displayed in locations where workers can check and access it, and regular education and training shall be provided to all employees.

#### **5-6 Compliance with Import and Export Laws and Regulations**

- (1) We will comply with export-related laws and regulations when exporting products, all types of goods, and technology.
- (2) We will implement effective export controls in accordance with internal rules, paying close attention to confirming end-use and end-users, including when selling domestically.
- (3) When importing goods, we will comply with all relevant import laws and regulations.

## 6. Mechanism for Compliance with the Code of Conduct

### 6-1 Strict Enforcement of Rules

- (1) We will always strive to provide our subordinates with the knowledge of relevant laws and regulations and internal company rules necessary for the performance of their duties. Additionally, the relevant departments responsible for each applicable law and regulation and internal company rules shall provide employees with training and other education regarding such laws and regulations and internal rules. We will revise internal regulations as necessary in response to changes in relevant laws and regulations, expansion into new businesses, or the development of business in new countries and regions, and communicate such revisions to employees.
- (2) We will comply with laws and regulations under all circumstances and act fairly in accordance with this Code of Conduct.
- (3) If an employee suspects that relevant laws, regulations, or internal rules have been violated, they shall immediately report and consult with their supervisor or the relevant department, and take necessary measures to rectify the situation. Additionally, if an employee becomes aware that the actions of another person are not in compliance with relevant laws, regulations, or internal company rules, they must similarly report and consult with their supervisor or the relevant department immediately.  
We will also conduct assessments of the ethical practices of our business partners within the supply chain, not only within the Wanotec Group, and strive to encourage improvements.
- (4) We will always be mindful that rules change with the times, and act in accordance with common sense, adhering to the principles of fundamentals and the right path.
- (5) Should an employee violate relevant laws, regulations, or other rules, strict disciplinary action, including punitive dismissal, will be taken in accordance with the disciplinary provisions of the work rules.

### 6-2 Self-Checks

- (1) We will conduct self-checks to verify that all internal procedures are being properly carried out in accordance with relevant laws and regulations and internal rules.

### 6-3 Internal Reporting System

- (1) We have established a system that allows employees and others to report illegal, improper, or inappropriate conduct related to the operations of our company and group companies. When a report is made, we will investigate the facts and implement corrective action if warranted. This enables us to ensure strict compliance with laws and regulations and conduct business operations with a high ethical standard.

- (2) Except where a report is based on malicious slander or defamation, we will not subject reporting employees to any disadvantageous treatment for having made the report. If the reporter is personally involved in the illegal activity, they will not be exempt from liability for making the report. However, the fact that they reported the matter will be considered as an extenuating factor.
- (3) Reports should be submitted to the employee representative and the general manager of General Affairs Department, and may be submitted by telephone, letter, email, or in-person meeting.

## 7. Business Continuity Plan (BCP)

- (1) When setting target recovery periods following a disaster, we will identify and evaluate potential risks and critical business resources (personnel, equipment, materials, and information), and develop countermeasures for issues that could hinder their achievement. The BCP clearly defines elements such as the organizational structure during a disaster and the response procedures from initial response to recovery, and also involves conducting regular training exercises and improving the plan on an ongoing basis.

## 8. Responsibility of Top Management

- (1) Top management shall take the lead in adhering to this Code of Conduct and strive to ensure that business operations are conducted with a focus on corporate ethics and legal compliance. Should any situation arise that violates this Code of Conduct, top management will personally implement corrective measures and strive to prevent recurrence. We will ensure prompt and accurate disclosure of information and fulfill our accountability obligations, while imposing strict disciplinary measures on any violations, including our own. Furthermore, we encourage our business partners and the entire supply chain to operate their businesses based on corporate ethics and legal compliance.

### **Regarding Application**

The Code of Conduct shall be established or revised at meetings of decision-making bodies such as the Board of Directors, and appropriate measures shall be taken to ensure that all officers and employees of the company understand this Code of Conduct.

The specific Code of Conduct may be modified to reflect the laws, regulations, and social customs of each country or region, or the characteristics of each business. Provisions not included in this Code of Conduct may also be added. However, no specific provision shall conflict with or relax the requirements of any provision of this Code of Conduct.

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