

Code of Conduct

I Overview

(1) Objective

This code provides the fundamental rules to be complied with in our everyday business operations, in accordance with the recognition that compliance with laws and internal company rules including this Code, as well as the conduct of fair and just business activities increases our corporate value by winning the trust and understanding of society, and, that at the same time, these behaviors completely agree with our own best interests.

(2) Scope of Application

This Code applies to all individuals (“we”) engaging in any operation of Mitsubishi Engineering-Plastics Corporation and its Group companies (“Company”) under the Company’s supervision, including directors, employees and dispatched staff of the Company.

II Compliance in Business Activities

(1) Quality, Safety, and Environmental Protection

Issues of quality, security and accident prevention, occupational health and safety, chemical and product safety, and environmental protection are of the highest priority to the Company.

(i) Quality of Products and Services

We are committed to provide products and services with the highest levels of safety and reliability, by maintaining and guaranteeing determined standards of quality in our products and services.

(ii) Process Safety and Accident Prevention; Occupational Health and Safety

We must establish and maintain all necessary measures to prevent industrial injuries and accidents in the processes of production, storage, sale, transport, delivery and disposal of our products and services. In the unlikely event that a workplace injury or accident should occur, we must work to contain and control the situation.

We must maintain constant awareness of health and safety issues and disaster prevention in our daily operations.

(iii) Chemical and Product Safety, and Environmental Preservation

We must appropriately manage chemical products throughout all the processes of development, production, transport, storage, sale and disposal while working to conserve energy and resources, and must reduce to a minimum the effect of these processes on people's health and on the environment.

(2) Legal Compliance

Rules for business activities are stipulated by law to protect the vulnerable and ensure that business activities are fair, equitable and in the public interest. We must understand these laws correctly and comply with them at all times.

(i) Compliance with Industrial and Other Laws

We must adequately check, understand and comply with the details of all industrial and other laws, and standards established by each industry, including the necessary permit approval and notification procedures.

(ii) Compliance with Antitrust Laws and Laws for Other Unfair Business Practices

In our business activities, we must comply with laws such as the Antitrust Act and other laws prohibiting private monopolies, unfair transaction limitations and unfair transactions, which include for example cartels, restrictions on resale prices, cross selling, dumping, conditional sales and abuse of dominant bargaining positions.

(iii) Compliance with Unfair Competition Prevention Act

We must comply with the Unfair Competition Prevention Act, which prohibits the use of the brands and trade descriptions of other companies to cause confusion in the market, the unfair acquisition and use of the trade secrets of other companies, actions intended or likely to damage the reputation of other companies, and actions intended or likely to cause misconceptions about the quality or contents of products.

(iv) Protection of Intellectual Property

We must comply with the Patent Act and other laws relating to intellectual property and must not unfairly infringe the intellectual property rights of others.

(v) Compliance with Laws Relating to Imports and Exports

We must comply with domestic and foreign laws relating to imports and exports, as well as

international treaties, and follow the appropriate procedures for imports and exports. In addition, we must comply with laws relating to the export of cargo and technology that may be used in the manufacture or use of weapons of mass destruction and conventional weapons.

(vi) Compliance with Laws related to Accounting and Tax and Appropriate Disclosure of Information

In order to ensure appropriate disclosure of information, we must understand the accounting standards and tax laws that apply to the Company, and process and report accounting and tax matters in a timely and legal manner in accordance with relevant laws and regulations.

(3) Ensuring Fairness

We must conduct fair transactions with all our client companies following the principles of free competition. To this end we must comply not only with established laws, but also with general social rules and ethics as well as international rules.

(i) Settlement of Procurement and Purchase Transactions

In selecting procurement and purchasing partners we must always follow appropriate procedures by evaluating their quality and cost in terms of economic feasibility on an equal footing and with the assumption of long-term and stable purchasing transactions. We must promote procurement activities that take into consideration their social impact in areas such as human rights and environmental preservation, particularly with respect to conflict minerals.

(ii) Entertainment, Gift-Giving, Bribery

We must limit entertainment and gift-giving to those conducted for legitimate business purposes and within the boundaries of applicable laws and socially accepted norms, so that such practices do not influence our business decisions.

In dealings with public officials or other interested parties, the offer of financial rewards or favors (bribes, etc.) for the purposes of inappropriate or unfair financial gain is not to be engaged in or tolerated.

(4) Information Disclosure

In order to conduct fair and transparent business activities, we must appropriately disclose all material information, including that required by our stakeholders such as investors,

clients, regional communities and employees, excepting disclosure of confidential or sensitive company information.

(i) Disclosure of Operating Information

We must timely and impartially disclose accurate information regarding our business activities and operating situation in accordance with all applicable laws.

(ii) Duty of Accountability

We must properly fulfill our duty to publish and explain information necessary for society, particularly any information that will have a major effect on society, even if such disclosure is not required by law.

(5) Recording of Business Activities

We must prepare and store records that accurately reflect our business activities in order to ensure appropriate declaration, reporting, and disclosure.

(6) Activities as a Member of Society

We must maintain good relations with society throughout our wide range of business activities at home and abroad, while recognizing our social responsibilities and always contributing to the growth of regional communities.

(i) Donations

In making any donation, we must thoroughly consider in advance whether, as part of the performance of our company's social responsibilities, it is in the public interest.

(ii) Political, Government Relations

We must maintain a healthy and normal relationship with politics and government. We must comply with the relevant laws in engaging in political contributions, election campaigns, and other political activities. In engaging in gift-giving to or entertainment of public officials and individuals deemed to hold similar positions, regardless of whether they are domestic or international, we must not only comply with the relevant laws and regulations but also improve our understanding of the ethical standards applicable to such public officials and individuals and extend cooperation in ensuring compliance with such standards.

(iii) Anti-social Forces

We must maintain a resolute stance against anti-social forces which disturb peace and order, such as extortionists and crime syndicates, and must refuse to have any contact with them.

III Respect for Human Rights and Diversity

We must respect fundamental human rights and diversity, and maintain fair, healthy and non-discriminatory workplaces and business operations.

(i) Prohibition of Discrimination

We must not engage in actions that would damage the dignity of others or discriminate against them based on race, gender, nationality, age, religion, or place of origin.

(ii) Prohibition of Harassment

We must not engage in distasteful behavior that involves exploiting a position or power, which coerce others, cause a feeling of repulsion, or damage others' dignity (i.e., sexual harassment or, so-called, power harassment).

(iii) Respect for Privacy, and Protection of Personal Information

We must respect the privacy of the individual and act with the utmost caution in the management of personal information.

(iv) Prohibition of Inhumane Labor Practices

We must not tolerate inhumane labor practices, such as forced labor, child labor, or slavery, which are violations of human rights.

(v) Global Activities

In conducting our global business activities, we must respect the customs and cultures of all countries and regions, and work on deepening mutual understanding.

IV Obligations of Mitsubishi Engineering-Plastics Group Employees

(1) Prohibition on Actions Involving Conflict of Interests

We must not, without permission from the Company, gain profit either ourselves as individuals or for the benefit of third parties at the expense of the Company's interests.

(i) Prohibition on Transaction Involving Conflict of Interest

We must not, without permission from the Company, engage in transaction as a competitor or private transaction that would involve a conflict of interest.

(ii) Prohibition of Insider Trading (of Securities)

We must not use inside information learned during the course of our duties to engage or encourage others to engage in the sale or purchase of the parent company's shares or the shares of other companies.

(iii) Prohibition of Personal Gain

We must not use our assigned position to achieve personal gain or advantage.

(2) Other General Items of Compliance

(i) Obligation of Confidentiality

We must, both during the time of our employment and following retirement, resignation or termination, strictly manage and keep confidential all confidential information learned during the course of our duties and must not use such information for any purpose other than for the benefit of the Company as authorized by the Company or leak or otherwise disclose it to third parties without permission.

(ii) Protection of Company Assets

We must protect both tangible and intangible Company's assets from damage, loss, theft, etc. and use them only for their intended purpose in our operations.

(iii) Violation Contact

In the event of an infringement of human rights or violation of relevant laws, or when faced with the danger of such occurring, we must bring the matter promptly to the attention of our superiors or the Compliance Consultation Desk.

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