



## Code of Conduct



### The Corporate Code of Conduct

- I. We, the management and employees of the GSPP, hereby adopt the Oji Group Corporate Code of Conduct, as detailed below, as guiding principles for corporate activities based on awareness of our responsibilities as a corporate citizen, and on high ethical principles appropriate for an organization that enjoys the trust of society.
- II. We, the management and employees of the GSPP, will strive at all times to implement this Code, and to contribute to the genuine enrichment of society.

#### **1. Compliance with the Law**

We will comply with the letter and spirit of the law in Japan and other countries, respect corporate ethics and all social standards, including common sense, and ensure that our business activities are fair and honorable.

#### **2. Harmony with the Environment**

We will promote forest recycling and paper recycling and maintain and develop business activities that are in harmony with the environment from a global perspective.

#### **3. Supply of Safe, Useful Products and Services**

We will contribute to society and culture by developing and supplying products that will allow us to gain the satisfaction and trust of customers, with proper consideration for usefulness and safety.

#### **4. Communication with Society**

We will establish relationships of trust with all stakeholders, including customers, shareholders and local residents, through an active commitment to good communication with society.

#### **5. Participation in Social Contribution Activities**

We will contribute to the development and improvement of society through active participation in social contribution activities.

#### **6. Coexistence with the International Community**

We will respect the culture and customs of other countries and contribute to local communities.

#### **7. Contribution through Manufacturing**

We will express our pride in our role as a manufacturer by contributing to local communities through production activities guided by a commitment to safety and protecting the environment, and by contributing to the advancement of industry through technology development and innovation.

#### **8. Achievement of Employee Satisfaction**

We will take all possible steps to ensure employee health and safety, and we will strive to give employees opportunities to achieve happiness and prosperity and realize their potential as individuals.



## Code of Conduct



### The Oji Group Behavior Standard

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- I. Toward the materialization of the spirit of the Oji Group Corporate Code of Conduct, the Oji Group Behavior Standard is adopted as a standard to be followed in the daily activities of all management and employees.
- II. All management and employees should recognize to be responsible for following this Behavior Standard and must not act against this standard.

**Relationship with Society** (See also paragraphs 13 and 15.)

#### **1. Compliance with Relevant Business Laws**

We will comply with business laws related to our business activities, and appropriately perform the legally stipulated procedures for licensing, notification, reporting, etc.

#### **2. Environmental Conservation**

In addition to complying with the laws and regulations related to the environment, we will implement the "The Oji Group Environmental Charter."

#### **3. Ensuring Safety**

At all stages of our business activities, we will always consider safety to be the top priority, and reliably ensure the safety of our products and services, appropriately control chemical agents, and manage the security and disaster prevention of our operating facilities and equipments. When a problem is discovered, we will respond to it with ensuring safety as the top priority.

#### **4. Sensible Action**

We will always use good sense in our actions, always being aware of our relationship with society. We will strive to participate as good members of society in activities designed to contribute to make a better society.

#### **5. Wholesome Relationship with Politics and Government**

We will always maintain a proper and wholesome transparent relationship with politics and government. We will not engage in illegal contributions, donations or bribery.

#### **6. Severance of Relationships with Antisocial Groups and Organizations**

We will resolutely refuse all relationships with antisocial groups and organizations.

#### **7. Coexistence with the International Community**

In addition to complying with the laws of each country, we will respect the norms, culture, and customs of that society, and contribute to the development of the local community. We will never engage in the utilization of child labor or forced labor.



## Code of Conduct



### The Oji Group Behavior Standard

**Relationship with Customers, Business Partners, and Competitors** (See also paragraphs 3, 4, and 15.)

#### **8. Seeking a Relationship of Trust with Customers**

We will do our best for the customer and protect the bond of trust with the customer through honest interaction. We will appropriately manage information related to the customer, including corporate secrets and personal information.

#### **9. Maintenance of an Honest, Wholesome Relationship with Business Partners**

Along with honest interaction, we will maintain moderate, wholesome relationships with our business partners and local communities. We will limit gifts and business entertainment to a sensible level, whether they are given or received.

#### **10. Compliance with Laws and Regulations Related to the Anti-monopoly Act and the Act Against Delay in Payment of Subcontract Proceeds Etc., to Subcontractors**

We will comply with the Anti-monopoly Act and other related laws and regulations, and will engage in fair trade without committing illegal actions such as participating in cartels or collusion, etc. We will comply with the Act Against Delay in Payment of Subcontract Proceeds, Etc., to Subcontractors and other related laws and regulations, and will maintain appropriate trade relations with subcontractors.

#### **11. Prohibition of Unfair Competition**

We will comply with the Unfair Competition Prevention Act and other related laws and regulations, and will not make unauthorized use of the corporate secrets of other companies or engage in sales activities which would damage the trust of others. We will respect the patents, copyrights, and other intellectual property of third parties.

#### **12. Compliance with laws and regulations related to importing and exporting**

We will comply with laws and regulations and international treaties related to trade, as well as company rules related to the procurement of raw materials, and conduct appropriate import and export transactions.

### **Relationship with shareholders and investors**

#### **13. Disclosure of Management Information**

Along with striving for transparency in our management, we will disclose our management policy, business activities, and other corporate information related to economic, social, and environmental issues, in a timely and appropriate manner.

#### **14. Prohibition of Insider Trading**

We will not engage in insider trading using unreleased company information, or actions which would evoke such suspicion.



## Code of Conduct



### The Oji Group Behavior Standard

**Relationship with Employees** (See also paragraphs 1 and 3.)

#### 15. Respect of Human Rights

We will respect the fundamental human rights of all people, and will not unfairly discriminate or harass individuals according to their philosophy and beliefs, nationality, birthplace, religion, sex, social status, status within the company, etc., and will not invade their privacy. We will not allow others to do so.

#### 16. Ensuring Safety and Health in the Workplace

With "safety as the top priority," we will ensure safety and health in the workplace and engage in safe behavior, and ensure the safety and health of all parties involved in our business. We will be fully mindful of mental and physical health control.

#### 17. Fulfillment of Duties and Self-development

We will fully understand the spirit of the Corporate Code of Conduct and comply with its standards, diligently work to fulfill our individual duties, and always pursue better performance. We will strive for self-development to gain knowledge and to improve skills.

### Relationship with the Company

#### 18. Compliance with Company Rules

We will comply with employment regulations and other regulations related to human resources. In the execution of duties, we will comply not only with relevant laws and regulations and articles of incorporation, but with, regulations, working manuals, and other company rules.

#### 19. Management of Company Secrets

In addition to the company's customer information, confidential information regarding sales, manufacturing, research and development, and others are important assets of the company. We will manage such information appropriately and will not provide it to third parties or use it for non-work purposes without authorization. We will respect the confidential information disclosed by third parties and handle it in the same manner as the company's confidential information.

#### 20. Appropriate Records and Accounting

We will correctly record the company's transactions and activities, and appropriately manage and store the records in accordance with relevant laws and regulations and company rules. We will conduct accounting in accordance with generally accepted accounting standards.

#### 21. Appropriate Use of Computer Systems

We will use company computer systems appropriately, in accordance with company rules. We will not destroy, tamper with, or alter data, make unauthorized use of software, or engage in other such misconduct.



## Code of Conduct



### The Oji Group Behavior Standard

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#### **22. Maintenance of Company Assets**

We will keep necessary records of company assets (equipment, intellectual property, supplies, money, etc.), regardless of whether they are tangible or intangible, and use and manage them appropriately. We will not utilize such company assets for personal use.

#### **23. Prohibition of Conflicts of Interest**

We will not engage in behavior which would adversely affect the profit of the company, using our duty-related position or authority, or based on knowledge we have acquired in the course of the execution of duties. We will not engage in or be involved in activities which have a possibility of adversely affecting the profit of the company, without the authorization of the company.

#### **24. Prohibition of Political and Religious Activities in the Workplace**

We will not conduct personal activities in the workplace to solicit participation in political or religious organizations, request voting in elections, etc., without the authorization of the company.

### **Proactive communication**

#### **25. Open Working Environment**

We will always do our best to achieve and maintain a working environment which makes it possible to openly discuss work and workplace issues. We will not keep to ourselves problems that cannot be resolved in the workplace, but we will consult with supervisors and relevant departments and strive toward a resolution.