



GS Paperboard & Packaging Sdn Bhd
(A member of Oji Group)

CODE OF CONDUCT



OJI
Beyond the Boundaries

To all members of the Oji Group

Since its founding in 1873, the Oji Group has continued to grow by expanding its business domain. In 2012, we made transition to a pure holding company system and established the slogan “Beyond the Boundaries.” In addition, we established the management philosophy “Creation of Innovative Value,” “Contribution to the Future and the World” and “Harmony with Nature and Society” in 2014. Based on our management philosophy, we will improve corporate value over the medium to long term and will aim to contribute to a sustainable society.

Compliance is positioned at the top of management issues, and it means not only complying with laws and regulations, but also complying with social norms and promoting corporate activities with high ethical standards that meet the trust and demands of society. The Oji Group's strategy and actions must be consistent with compliance.

However, following the improper handling of operational data at hydropower facilities and thermal power plant smoke generating facilities in 2007, and the falsification of used paper mixing ratio in 2008, there were cases where the Fair Trade Commission issued a surcharge payment order and a cease-and-desist order over price cartels in 2013 and 2014. These are extremely regrettable, and we need to reflect deeply.

Compliance issues affect the survival of the Oji Group itself. I would like you all to be fully aware once again that Compliance as well as Safety and Environment is the basis of corporate activities.

Businesses have responsibilities to society. We do not simply conduct economic activities, but co-exist with society and have responsibilities to people. In order for the Oji Group to be deemed important and accepted by the society, each member of the Oji Group must respond to requests from the society with integrity. Loss of integrity may lead to loss of trust from society and forced withdrawal from the market. In addition, it might cause great inconvenience for all stakeholders such as shareholders, employees and their families. To avoid such incidents, all officers and employees of the Oji Group must remember the following:

“Sound common sense”

“The ability to notice when something is not quite right”

“The courage to act when required”

Always keep this with you, read it occasionally and put effort into ensuring thorough compliance.

Masatoshi Kaku
President and Chief Executive Officer

THE OJI GROUP CORPORATE CODE OF CONDUCT

(Established January 1, 2004; Revised October 1, 2020)

- I. We, the management and employees of the Oji Group, 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 in international society, and on high ethical principles appropriate for an organization that enjoys the trust of society.
- II. We, the management and employees of the Oji Group, will always strive to implement this Code and to contribute to realization of the genuine enriched society.

1. Compliance with laws and regulations and fair business activities

We will comply with the letter and spirit of the law in Japan and other countries, respect corporate ethics, all social standards including common sense and anti-corruption, and develop fair business activities.

2. Developing a rewarding work environment with consideration for safety and health

We will develop a comfortable work environment which enhances the abilities of all employees and gives consideration to workstyles that respect diversity and individuality, and to safety and health.

3. Supply of safe, useful products and services

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

4. Addressing environmental issues

In order to develop corporate activities that are in harmony with the environment from a broad global perspective, we will work to further improve the environment and actively advance forest recycling, paper recycling, and global warming countermeasures, etc.

5. Contribution to the realization of a sustainable society

Through innovation, we will provide innovative value, try to solve social issues, and contribute to the realization of a sustainable society.

6. Respect for human right

We respect the human rights of all people, do not discriminate or act with prejudice. In addition, we will not tolerate human rights violations of anyone involved in our business activities.

7. Communication with society and participation in social contribution activities

We will obtain satisfaction and trust by providing appropriate information regarding corporate activities and communicating sincerely to all stakeholders such as customers, shareholders, and local residents. We will contribute to the development and improvement of society through active participation in social contribution activities.

8. Coexistence with the international society

We will respect the culture, customs and values of each country and region, and act as a good corporate citizen to meet the demands and expectations of society.

9. Promotion of crisis management

In preparation for various risks that threaten citizens' lives and corporate activities such as natural disasters, infectious disease, terrorism, cyber-attacks, information leaks, and activities of anti-social forces, etc., we will implement risk management and thorough information security.

OJI PAPER GROUP BEHAVIOR STANDARD

- I. Toward the materialization of the spirit of 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 as a member of international society.
- II. All management and employees should recognize responsibility for following this Behavior Standard and must not violate it.

Relationship with Society (See also paragraphs 14, 15, 18 and 21)

1. Compliance with relevant business laws

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

2. Ensuring safety in business activities

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 equipment. When a problem is discovered, we will respond by ensuring safety as the top priority.

3. Practice of the Oji Group Environmental Charter

In addition to complying with the laws and regulations related to the environment, we will proactively promote contributing to a recycling-based society, responding to climate change by countering global warming, and reducing environmental impact.

4. Acting with a sensible manner

We will always use good sense in our actions, being aware of our relationship with society. As a good member of society, we will endeavor to participate in a variety of activities aimed at the development of society.

5. Wholesome relationship with politics and government

We will always maintain a proper, wholesome and transparent relationship with politics and the government. We will not engage in illegal contributions, donations or bribery and will work to prevent corruption in all its forms.

6. Severance of relationships with antisocial groups and organizations

We will maintain a firm attitude against antisocial groups and organizations and will resolutely refuse all relationships with them.

7. Corporate activities that contribute to the realization of a sustainable society

Through innovation, we will consider the global environment, create innovative value, develop and provide useful materials, products and services that contribute to a sustainable society.

8. Coexistence with the international society

As a member of international society, we will respect the culture, customs and values of each country and region, and work together sincerely to develop our business.

Relationship with Customers, Business Partners, and Competitors (See also paragraphs 2, 4, 7, 18, 19 and 21)

9. Seeking a relationship of trust with customers

We will improve customer satisfaction through our commitment to product quality and improving quality of services. We will appropriately manage information related to the customer, including corporate secrets and personal information.

10. 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 not provide benefits that are suspected of bribery to the other party, and we will not receive benefits that are suspected of bribery to the other party.

11. 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.

12. 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 that would damage the trust of others. We will respect the patents, copyrights, and other intellectual property of third parties.

13. Proper import/ export management

We will comply with laws and regulations related to import and export such as customs law and international treaties and conduct proper import and export transactions.

14. Responsible raw material procurement

We will comply with Oji Group Partnership Procurement Policy regarding raw materials and conduct fair and appropriate transactions and responsible procurement.

Relationship with Shareholders and Investors

15. Disclosure of management information

Along with improving 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 fair manner.

16. Prohibition of insider trading

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

Relationship with Employees (See also paragraphs 1, 2 and 29)

17. Ensuring safety and health in the workplace

With "safety as the top priority," we will ensure safety and health in the workplace, engage in safe behavior, and ensure the safety and health of all parties involved in our business. We will develop the work environment by paying sufficient attention to mental and physical health management.

18. Prohibition of discrimination and protection of human rights

We will respect the fundamental human rights of all people, and will not unfairly discriminate against individuals according to their race, nationality, ethnicity, birthplace, philosophy and beliefs, values, religion, age, sex, sexual orientation, gender identity, disability, social status, and status within the company, etc.

We will never engage in the utilization of child labor or forced labor.

19. Prohibition of harassment

We will not conduct acts of harassment such as power harassment (abuse of authority) and sexual harassment, etc. will not invade their privacy, and will not allow others to do so.

20. Fulfillment of responsibilities 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 more knowledge and improve skills.

We will also try to develop human resources so that all executives and employees can fully demonstrate their abilities.

21. Preparing for various risks such as natural disasters

Against unexpected disasters such as natural disasters and the spread of infectious disease, as well as intentional illegal acts such as fraudulent access to information systems, we always work to ensure the protection of human life and prepare for business continuity based on our various risk management regulations.

Relationship with the Company (See also paragraphs 21)

22. Compliance with company rules

In the execution of duties, we will comply with relevant laws and regulations, the Articles of Incorporation, and other company rules which include various our regulations, employment regulations and other regulations related to human resources, operating procedures, and working manuals.

23. 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.

24. Maintenance of company assets

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

25. Thorough information management

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.

26. Appropriate use of information devices and communication means

We will properly use information devices and communication means in accordance with our information system-related regulations.

We will not destroy, tamper with, or alter data, make unauthorized use of software, or engage in other such misconduct.

27. Prohibition of conflicts of interest

We will not engage in behavior that 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 that have a possibility of adversely affecting the profit of the company, without the authorization of the company.

28. Prohibition of private political activities, etc. in the workplace

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

Proactive Communication

29. Open working environment

We will respect each person's individuality and diversity regarding assignment and workplace issues, and always do our best to achieve and maintain a working environment that makes it possible to openly discuss the issues. All management and employees are encouraged not to withhold issues that cannot be resolved in the workplace, and to consult with supervisors and relevant departments in order to strive toward a resolution.

Operation rules

(1) Responsibility to consult and report

- If it is felt that an element of the execution of duties violates laws and regulations or this Behavior Standard, or if it is difficult to make judgment, the supervisor shall be notified and consulted without fail. If a violation of laws and regulations or this Behavior Standard occurs, or if there is the danger of such a violation occurring, the supervisor shall be notified without fail.
- If it is judged that there is an obstacle to reporting or consulting through the above normal route, the notification and consultation shall be made through the liaison office (HR Department). When a notification or consultation has been made through the liaison office (HR Department), the secrecy of the notification and consultation shall be strictly managed, and the individual shall be protected from adverse effect resulting from the fact of making the report or consultation. (This may not apply to groundless, malicious reports and consultation.)

(2) Handling of violations

If laws & regulations or this Behavior Standard are violated, and there has been behavior which is a problem from the standpoint of compliance, disciplinary action may be taken toward the individual in accordance with employment regulations, etc., and the individual may be held liable according to laws and regulations. The violation shall be promptly rectified and measures shall be taken to prevent recurrence.

(3) Activities to establish the Standard

To establish this Behavior Standard, regular training and other activities shall be conducted in the workplace.

(4) Revision of the content of the Standard

To accommodate changes in circumstances, this Behavior Standard shall be revised as necessary, in accordance with input from the workplace, surveys.

OJI GROUP ENVIRONMENTAL CHARTER BASIC POLICY

The Oji Group Environmental Charter requires the Oji Group to help create a truly enriched and sustainable society by developing business activities that harmonize with the environment from a global perspective. The Charter calls for the Oji Group to make autonomous efforts to achieve further environmental improvement, and aggressively drive its forest recycling, paper recycling, and global warming countermeasures forward.

Action Guidelines

1. Promotion of forest recycling

We will promote green procurement of resources grown in sustainably managed forests. We will use the results of the broad research activities of our forest research, and achievement made to date in the silviculture and management of our company-owned forests in Japan, for the planned development of overseas Tree Plantation Projects. We will work to secure wood raw materials, which will result in global environmental conservation.

2. Promotion of paper recycling

We will seek to advance the utilization of recovered paper, making the most of the benefits of our comprehensive manufacturing of paper and paperboard. We will blend recovered paper in rations that are economical and suitable for intended uses, giving due consideration to the environment. In particular, as well as working on increasing the recovered paper usage in the paper area, we will work on the development of technologies for recycling types of used that are hard to recycle.

3. Promotion of global warming countermeasure

In the area of global warming countermeasure, we will strive to reduce carbon dioxide emissions. As high-priority issues toward that end, we will promote energy conservation and conversion to non-fossil fuels. We will also contribute to sequestration of carbon dioxide by proactivity pursuing the development and maintenance of forests.

4. Reinforcement of Environmental Improvement Measures and Environmental Management Systems

We will comply with environmental laws and regulations in our business activities and work to further reduce the environmental impact of our businesses. We will also continue to improve the quality of our group-wide environmental management system.

5. Development of production technologies and products that minimize

Environmental Impact By using the accumulated results of the paper-related basic research area, we are working on the research and development of environmental friendly production technologies and new products with the aim of helping to create a recycling oriented society.

Also, we work to use environment-friendly materials, as well as ensure production safety based on our company's "Product Safety Charter" when we purchase materials.

6. Reduction and effective utilization of waste

We will reduce the amount of waste for final disposal by enhancing measures such as the reduction of waste generation from the production process and effective utilization of waste.

7. Transfer of environmental protection technology to other countries

In our international operations we are actively promoting international transfers of environmental technology, as well as observing environmental standard of the relevant countries.

8. Building relationships of trust with stakeholders

We will carry out our active PR and educational activities inside and outside the company and engage in dialogue with stakeholders concerning our environmental management initiatives. All of our offices, both in and outside Japan, will work to protect the environment of local communities and contribute to their development.