

Sustainability & Compliance Code of Conduct

1. Respect for Human Rights

Under the ITOCHU Group Human Rights Policy, we do not engage in any form of discrimination based on race, gender, religion, beliefs, nationality, physical condition, illness, age, or any other unreasonable reasons in employment or the workplace. In our corporate activities, we respect the human rights of all stakeholders, including those in the supply chain, and contribute to the effective elimination of child labor and the abolition of forced labor.

2. Comfortable Working Environment

We value a work style that respects diversity, personality, and individuality, and create a comfortable work environment that is free from discrimination and harassment, while also ensuring health and safety.

3. Protection of the Global Environment

We comply with environmental treaties and laws and are committed to environmental conservation. In our corporate activities, under the ITOCHU Group Environmental Policy, we promote energy saving, resource recycling, prevention of environmental pollution, conservation of water resources and biodiversity, and endeavor to reduce GHG emissions. Additionally, we actively promote the development of environmentally conscious businesses.

4. Fair Business Practices

As a company engaged in global business, we comply with the competition laws (antitrust laws) and relevant regulations of each country and region, and do not engage in any activities that may raise questions about the fairness of transactions.

5. Prohibition of Bribery

We comply with laws related to bribery and do not offer money, entertainment, conveniences, or other benefits to public officials or similar individuals, or to officers and employees of private business partners, whether domestic or foreign, for the purpose of gaining illicit advantages.

6. Prohibition of Conflicts of Interest

We do not engage in transactions with our company for personal gain, nor do we use company assets or expenses for personal purposes, thereby avoiding any actions that may cause a conflict of interest with our company.

7. Compliance with Industry Laws and Appropriate Import/Export Management

We continuously implement safety measures that meet or exceed the legal requirements related to the products we handle. In trade transactions, we comply with relevant laws, approvals, and procedures. Additionally, recognizing the importance of security trade management, we comply with the laws of Japan and other countries, as well as United Nations Security Council resolutions and other international agreements and do not engage in improper transactions.

8. Prohibition of Misconduct Outside of Work

We always act with the awareness of being members of our company, and even outside of work hours, we conduct ourselves in a manner that does not deviate from social norms or ethics. In the event of being involved in an incident or accident, we promptly report it to our company.

9. Prohibition of Insider Trading

We do not engage in insider trading in violation of the law, such as buying or selling stocks or other securities while in possession of undisclosed important facts related to our company or its business partners.

10. Proper Handling of Information

We ensure the proper handling, management, protection, and maintenance of information.

11. Protection of Intellectual Property

We properly protect and manage the intellectual property rights owned by our company, and we do not engage in business activities that infringe upon the intellectual property rights of others.

12. Social Contribution

Under the ITOCHU Group Basic Activity Guidelines on Social Contribution, we contribute to the development of the local economy through our business activities, and through

social contribution activities in the regions where we operate and around the world, we aim to build mutual trust with stakeholders in both local and international communities.

13. No Involvement with Antisocial Forces or Criminal Acts

We refuse any unjust demands from antisocial forces including an easy compromise using money or other means, and do not have any relationships or transactions with such organizations or individuals. Additionally, we do not engage in terrorist acts, money laundering, or any other criminal activities, and take sufficient precautions to ensure that our transactions are not used for such crimes.

14. Reporting and Consultation

If we discover or personally engage in actions that violate or may violate this Code of Conduct, we immediately report them to our superiors. Furthermore, if these actions constitute or may constitute a compliance issue, we promptly report them in accordance with the compliance program.

Established in June 2024
Itochu Chemical Frontier Corporation