

# Our Code of Conduct

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## CEO Message

Go Anzen Ni!,

The Group's globalization is progressing rapidly and the number of countries and regions in which we operate is further expanding. Each country has its own customs and laws and regulations that differ from country to country. However, in order to be a "company that can compete on the world stage", which is one of the goals of Resonac Group, each and every employee of the Group must act with "Solid Vision & Solid Integrity" whenever and wherever we work, even if these standards are not clearly stipulated in the rules. If we cannot do so, we are not qualified to proudly call ourselves a company that "Change society through the power of chemistry".

This Code of Conduct defines the actions to be taken in order to realize the Purpose "Change society through the power of chemistry" and aims to enable each and every one of us to clearly imagine what we should be and what we want to be, and to act autonomously and proactively. As each of us continues to work autonomously and proactively on "materiality for sustainability" based on the Code of Conduct, we will move closer to realizing the Purpose.

In order to "Change society through the power of chemistry", we need to fulfil our responsibilities to all stakeholders. The foundations for the Purpose are safety first and compliance.

Working individuals and people around them can feel happy when they are healthy, both mentally and physically. It is of utmost importance that they return home after work in the same condition as when they left home. When someone is hurt, not only the person who got hurt and his or her family, but also the person's workplace is unhappy. Fraud also brings down the trust that has been built up, and it takes more time than has been built up to restore it. Also, no one feels happy if the profits gained from fraud is spent for the benefit of society, and as a result, it does not provide value to the stakeholders. In order to make our new integrated company a company we can be proud of, we must once again strongly recognize the importance of safety and compliance.

The trust of the international community and the society involved in our business activities is of paramount importance and essential for Resonac Group to continue to exist as a global company.

When Resonac Group is to become an 'excellent company' that operates globally, each and every person working there must take pride and passion to their work. We truly recognize the power of chemistry, prioritize sustainability for future generations and commit to upholding our values of integrity to all stakeholders and ethics in developing chemical technologies. We aim to become a trusted Resonac Group.

## Corporate philosophy

### Purpose

## Change society through the power of chemistry.

We contribute to the sustainable development of global society by creating functions demanded by the times as an advanced material partner.

### Values

#### Passionate & Results-Driven

By taking pride and passion to our work, and

By focusing our strengths and performance,

We will become a globally recognized top player.

#### Open Minds & Open Connections

By showing mutual trust and respect, and

By collaborating openly beyond boundaries,

We will co-create new value with all stakeholders.

#### Agile & Flexible

By learning through trial-and-error, and

By thinking flexibly and acting swiftly,

We will transform into a dynamic organization.

#### Solid Vision & Solid Integrity

We truly recognize the power and potential of chemistry,

We prioritize sustainability for future generations, and

We commit to upholding our values of integrity to all stakeholders and ethics in developing chemical technologies.

### About Code of Conduct

The Code of Conduct is to be followed by everyone who works for Resonac Group and, as a benchmark, it directs us all as one.

Specifically, it defines the actions to be taken in order to realize the Purpose "Change society through the power of chemistry", with the aim of enabling each of us to clearly imagine what we should be and what we want to be, and to act autonomously and proactively.

The background information in the Statements indicates the reasons for each action with a deeper understanding. When each and every one of us acts autonomously and independently based on the Code of Conduct and continues to work on the Materiality for Sustainability, not only will we be closer to realizing our Purpose, but we will also create a standard (characteristic of Resonac) for our behaviour as employees of Resonac Group, which will eventually become part of our corporate culture.

When in doubt, always reflect on the Code of Conduct and use it as a benchmark for your daily actions.

## Chapter 1. Purpose and Four Values

(Background Information)

Technological progress has enriched our lives from the perspective of physical belongings. However, the price for this progress has been paid by the global environment, which is currently in a state of crisis. Society is thus faced with the pressing task of finding a way to continue to progress while protecting the environment. Our goal is to use chemistry to ensure that future generations can find happiness in a healthy global environment.

Accomplishing this goal will require us to predict and create the technologies and functions demanded by the times before they arise, and to use the power of chemistry in a responsible manner.

(Statements)

“Four Values” that constitute our corporate philosophy are crucial for proposing creative resolutions to issues through co-creation founded on autonomous bonds with customers and other stakeholders, and shaped by mutual understanding and resonance of values.

- We will become a globally recognized top player by taking pride and passion to our work, and focusing our strengths and performance.
- We will transform into a dynamic organization by learning through trial-and-error, and thinking flexibly and acting swiftly.
- We will co-create new value with all stakeholders by showing mutual trust and respect, and collaborating openly beyond boundaries,
- We truly recognize the power and potential of chemistry, prioritize sustainability for future generations and commit to upholding our values of integrity to all stakeholders and ethics in developing chemical technologies.

We aim to become a global top-level functional chemical manufacturer by always referring to our Code of Conduct and acting in accordance with the Purpose “Change society through the power of chemistry” and Four Values.

## Chapter 2. Principle: safety and compliance

Article 1. Safety First

(Background Information)

First of all, the foundation of preventing accidents and disasters is for each and every one of us to follow the rules

and protect ourselves. Furthermore, managers and supervisors are responsible for ensuring that people working in the workplaces they manage are protected from accidents and disasters through comprehensive and professional risk management and the creation of a safe working environment for everyone. Subordinates are also obliged to work according to the established rules and the instructions of the supervisor and to suggest improvements to the rules.

(Statements)

We act on the basis of 'safety takes precedence over everything else'.

We will protect our co-workers and our own workplaces from disasters with the strong conviction that all accidents are preventable.

We acknowledge and praise each other for our safety-first behaviour and our commitment to and mutual support of our co-workers.

## Article 2. Ethics and compliance

(Background Information)

The trust of the international community and people involved in our business activities is of paramount importance and essential for Resonac Group to remain a global company.

Once one of us acts against the law or against ethics, the trust we have built up in the international community and among people can be lost in an instant.

(Statements)

- We understand and comply with the laws, regulations and procedures applicable in the countries and regions in which Resonac group operates, as well as the relevant internal regulations.
- We carry out our work honestly, impartially and with integrity, not only in compliance with laws and regulations, but also with high ethical standards and foresight into the future.

## Chapter 3. Management with respect for human rights.

### Article 3. Understanding international human rights conventions and legislation

(Background Information)

Conducting business activities with due consideration for human rights is fundamental to protecting the people we work with and earning the trust of our business partners, customers and local communities, who are working together to build a better society. On the other hand, business activities that do not respect human rights may expose the Resonac Group to serious risks and cause significant damage to its reputation, resulting in the inability to continue its business.

(Statements)

- We comply with the Resonac Group's human rights policy.
- In making business decisions, we comply with all applicable laws, regulations and procedures relating to respect for human rights in the countries and regions in which we operate.

- In the unlikely event that the laws and regulations of the country or region differ or conflict with internationally recognized human rights principles, or when faced with conflicting requirements, we will pursue ways to respect internationally recognized human rights principles.

#### Article 4. Commitment to respect for human rights

##### (Background Information)

Various human rights-related issues have arisen as companies' business activities have become increasingly globalized. They include prohibiting all discrimination and harassment, providing a safe working environment and reducing excessive working hours, ensuring minimum wages, and respecting freedom of association and the right to collective bargaining. Child labor, forced labor or human trafficking for the purpose of labor exploitation are not also allowed.

##### (Statements)

- We will respect human rights in all aspects of our business activities and strive to prevent and mitigate adverse impacts by operating our business in accordance with "the Ten Principles of the UN Global Compact" and "the UN Guiding Principles on Business and Human Rights."
- We also expect all business partners, including our suppliers, to understand and support the content of this policy, and will continue to work to ensure that this policy is respected by them.
- We will not only continue to engage appropriate education and training to all officers and employees (including contract employees) but also work on capability building necessary to put this policy into practice so that this policy will permeate the company.
- We recognize that it is important to understand the adverse impacts on human rights from the perspective of those affected. Therefore, we will endeavor to utilize it in our efforts to respect human rights by continuously conducting dialogues and discussions with our stakeholders.

#### Article 5. Conducting human rights due diligence

##### (Background Information)

In accordance with "the UN Guiding Principles on Business and Human Rights", Resonac Group will establish a process to properly assess the impact of business decision-making and execution on human rights, and identify, prevent and mitigate risks that cause or contribute to serious human rights violations, and strive to provide for remediation.

##### (Statements)

- We reflect human rights due diligence initiatives based on international human rights conventions (risk assessments related to human rights, supply chain tracking, recruitment procedures, establishment of audit and grievance mechanisms, and disclosure of information) in daily procedures and operations.
- When we become aware of any concerns, including negative impacts on human rights, in any aspect of our business activities, we will promptly report them to the workplace manager, the responsible department and other designated reporting contacts.



## Chapter 4. Addressing environmental issues

### Article 6. Responding to climate change

#### (Background Information)

Climate change phenomena are occurring frequently and on a global scale. We must take a long-term vision and tackle it for the sake of future generations, starting with what we can do now.

#### (Statements)

- We commit not only to fulfilling our responsibilities as both a chemical company and an emitter by minimizing the discharge of hazardous substances, waste and pollutants, but also to contributing to environmental conservation based on the appropriate assessment of the impact of our business activities on the environment.
- We will take up new challenges aimed at carbon neutrality, starting with what each of us can do in every situation.
- We will reduce our greenhouse gas emissions and promote energy conservation. Carbon neutrality will also be pursued throughout the entire product lifecycle from design and development to disposal to accomplish the goal of becoming a company that contributes to a sustainable global society as put forth by our long-term vision.

### Article 7. Realization of a circular economy

#### (Background Information)

The concept of circular economy aims to balance the environment and economy through the effective use of resources by promoting waste reduction, re-use and recycling.

In order to continue to use the earth's limited resources and energy for a long time, it is necessary to use resources in a cyclical manner and to improve productivity per resource.

#### (Statements)

- We are committed to the recycling of waste and the efficient use of resources in order to achieve a circular economy.
- Our business activities always take into account the entire product lifecycle, from product design and development to disposal, in order to contribute to a circular economy.
- To realize circular economy, we demonstrate an open mind that transcends boundaries and co-create with various industries, governments, local authorities and international organizations.

### Article 8. Promotion of environmental risk measures

#### (Background Information)

Our goal is to use chemistry to ensure that future generations can find happiness in a healthy global environment. Accomplishing this goal will require us to predict and create the technologies and functions demanded by the times before they arise, and to use the power of chemistry in a responsible manner.

#### (Statements)

- We always consider the risks that our business activities pose to the environment throughout the supply chain and develop and promote environmentally friendly technologies to minimize negative environmental impacts.
- We identify the negative impacts of our past business activities on the environment and work diligently to resolve these issues.

#### Article 9. Efforts for Preservation of Biodiversity

##### (Background Information)

While our daily lives and business activities are supported by the workings of ecosystems, which are the blessings of nature, biodiversity is rapidly being eroded, exposing us to environmental problems.

##### (Statements)

- Based on the recognition that conserving biodiversity is important for the natural resilience created by ecosystems, we assess the impact of our business activities on ecosystems and work towards the sustainable use of natural capital such as forests, soil, water, air and biological resources.
- We will work for biodiversity conservation in collaboration with stakeholders, including governmental agencies and regulatory authorities, giving our support to the initiatives, such as economic organizations, NGOs, researchers, local/national governments and other public organizations which support those business entities' biodiversity initiatives.

### Chapter 5. Contribution to a sustainable global society through co-creation with communities

#### Article 10. Contribution to a sustainable global society

##### (Background Information)

We have entered an era in which it is no longer enough for chemical manufacturers to contribute to the enrichment of people's lives; they also must act in an environmentally responsible manner to contribute to the realization of a sustainable society. Making such contributions will require our actions to spread beyond Resonac Group and even the chemical industry. In this way, we can create value together with internal and external stakeholders and entities that share our ideals as a "Co-Creative Chemical Company" building a better society.

##### (Statements)

- We develop into a company with like-minded partners across the world that realizes its own continuous growth and corporate value improvement, by solving social issues and offering values to society through its technologies and business.
- We become members of "Co-Creative Chemical Company" that is the first choice of, and can choose, partners in creating a sustainable and better society, including future generations of customers, employees, investors, and stakeholders.

#### Article 11. Promoting co-created social contribution activities

(Background Information)

Chemistry is the starting point of all industries and has the power to solve many social problems. As a co-creating chemical company, there is an expectation that we will work together with our business partners to solve issues.

(Statements)

- We promote social contribution activities in collaboration with diverse stakeholders, including customers, business partners, governments, international organizations, NPOs, NGOs and local communities.
- We aim to build good relationships with the local community and gain the trust of the community, through active participation in local activities and working together to solve problems.
- By taking part in social contribution activities, we develop those stakeholders' ability to identify social issues and solve problems, and develop their aspirations to create a better society.

#### Article 12. Co-creation with local communities

(Background Information)

Business activities of the Resonac Group are supported by the trust of local communities, and therefore we must understand local social conditions and give due consideration to local culture, customs and religion in the countries and regions in which we operate.

(Statements)

- Through our business and social activities, we endeavour to build good relationships with and be trusted by the communities in which we operate.
- We are aware that we are a member of the local community and understand the role expected of us and contribute to solving social problems through active involvement in the local community.

#### Article 13. Co-creation with politics and government

(Background Information)

We are expected to engage in constructive dialogue with politics and government, such as making policy proposals and expressing our views, and to actively contribute to strengthening the policy-making and promotional capacity of political parties in order to promote institutional reforms that draw out the vitality of individuals and businesses.

(Statements)

- When cooperating with political and administrative authorities in the countries and regions in which we operate, we comply with the relevant laws and procedures in those countries and regions.
- When carrying out political activities as an individual, such as supporting a political organization, government official or candidate, make it clear that you are acting personally and not as a representative of the company. Activities will not be carried out while at work or at company expense.
- Our board members and high-level management are actively involved in representing Resonac's interests as well as those of the chemical industry generally, and commit ourselves to responsible, honest and transparent action based on our values and regulations.

## Chapter 6. Ensuring safety and security in relation to products and services

### Article 14. Responsible care

#### (Background Information)

Resonac Group works to ensure the safety of chemicals and chemical products by using risk-based methods, not only by checking the safety of its products during the stages of development, design, marketing, manufacture, sales and after-sale services, but also by monitoring how customers use and dispose of the products. By these methods we identify and reduce risks for various product-related items.

#### (Statements)

- We adhere Resonac Group's Responsible Care principles.
- We are always aware that we are handling hazardous materials and products.
- Our business activities are conducted in recognition of the fact that products rarely pass directly to the end consumer, making it difficult for consumers to distinguish between beneficial and harmful effects.
- We strive to improve our credibility with society by clarifying the nature of chemical substances, minimizing risks while maximizing their usefulness, and by deepening dialogue and communication with all stakeholders about these activities.

### Article 15. Business innovation driving growth

#### (Background Information)

Businesses are expected to grow by providing solutions to society's global challenges and contributing to a more prosperous lifestyle.

#### (Statements)

- We anticipate changes in customers and markets, change our own attitudes and behaviour, and pursue innovative business models with innovation as the axis of growth.
- We focus our strength and performance in order to achieve results by taking pride and passion to our work and maximizing the use of the latest technology.

### Article 16. Marketing with a focus on safety and security

#### (Background Information)

The development of social networking and other communication technologies is accelerating the speed at which information transmitted by companies in their sales and marketing activities diffuses and permeates society.

#### (Statements)

- We strive to understand market needs and associated customer issues, and promote marketing activities to solve these issues.
- We will always endeavour to provide factual, fair content and professional wording, and to provide customers with easy-to-understand explanations and avoid misunderstandings.

- We maintain high ethical standards, comply with relevant laws and regulations, and do not discriminate against others or express ourselves in a manner that offends their dignity.

#### Article 17. Developing technologies to enhance safety and security

##### (Background Information)

While further refining a wide range of cutting-edge material, analytical, evaluation, processing and manufacturing technologies from midstream to downstream, which are our fundamental technologies, we will create innovations by anticipating the social values demanded by the times and using the power of chemistry correctly.

##### (Statements)

- We contribute to society by developing products and services that are socially useful and safe and enable our customers to live in security and prosperity in the future.
- We are committed to ensuring safety and health and protecting the environment throughout the product lifecycle, from design and development to disposal, and will implement environmental, safety and health measures.

#### Article 18. Providing safety and security

##### (Background Information)

In order to realize a sustainable society, the quality and safety of the products and services we provide must earn the satisfaction and trust of society.

Therefore, the top management will take the leadership to establish and promote a system within the company that places the highest priority on safety and reliability and guarantees it.

##### (Statements)

- In each country and region where we operate, we ensure that all laws, regulations and safety standards applicable to our products and services are met, as well as internal quality-related standards and rules.
- We strive to ensure safety and security throughout the product lifecycle, from design and development to distribution and disposal.

#### Article 19. Access to information on safety and security

##### (Background Information)

Providing easy-to-understand explanations from the perspective of all stakeholders and continuing to accurately display safe and correct usage instructions not only prevent accidents and problems, but also lead to the trust and satisfaction of society.

##### (Statements)

- We provide accurate indications on the safe and correct use of our products to prevent accidents and problems.
- In the event of an accident or trouble, we will promptly investigate the cause and take professional measures to prevent recurrence, as well as endeavouring to disclose accurate and prompt information.

## Chapter 7. Fair trading

### Article 20. Anti-bribery and anti-corruption

#### (Background Information)

In all countries and regions, we will eliminate acts of corruption, such as breach of loyalty, abuse of authority, forcible transactions using undue influence, bribery, embezzlement, concealment, obstruction of justice, and money laundering as well as other unfair and anti-social actions.

#### (Statements)

- We do not engage in any bribery or corrupt practices and promote sound business practices.
- We understand and comply with applicable national and regional anti-bribery laws and regulations, as well as relevant company rules and procedures.
- We will not directly or indirectly provide, offer or promise to provide any financial benefit to any public official or other domestic or foreign official or employee of a private company for the purpose of receiving any unauthorized business advantage. We will also not, directly or indirectly, receive, request or promise to receive any economic benefit in return for any undue advantage in connection with our own business.
- When we become aware of any potential bribery or corruption, we should promptly report it to the workplace manager, the responsible department or other designated reporting contacts.

### Article 21. Compliance with competition laws

#### (Background Information)

Cartels and other acts restricting competition are prohibited in various countries and regions, as the loss of free and open competition in the market undermines the interests of customers and the healthy development of the market economy as a whole. Violations of competition laws are subject to severe penalties and sanctions.

#### (Statements)

- We never engage in cartels, bid rigging or other acts that unreasonably restrict fair and open competition.
- We understand and comply with applicable national and regional competition laws and relevant internal regulations.
- We do not exchange production volumes, sales prices or other information affecting competition with other companies in our industry.
- When we have even the slightest doubt about the nature of a transaction or the legality of contacts with other companies in the same trade, we should promptly report it to the workplace manager, the responsible department or other designated reporting contacts.

### Article 22. Security export control

#### (Background Information)

As a global company, we are required to contribute to the maintenance of peace and stability in the international community, which requires us to comply with applicable laws, regulations and procedures relating to security

export control and to prevent the export of our cargo or the provision of our technology from becoming an international threat.

(Statements)

- We understand and comply with regulations relating to national and international export controls and economic sanctions.
- When trading in goods, technology, etc., we confirm the client, use, etc., according to the stipulated procedure, and then obtain necessary permits from internal approvals and administrative authorities.
- When we suspect a transaction poses an international threat, we should promptly report it to the workplace management officer or Security Export Control Committee.

#### Article 23. Sustainable procurement

(Background Information)

Sustainable Procurement Guidelines stipulate standards for conduct and activities that our business partners and Resonac Group should cooperatively observe in order to contribute to sustainable society and realize mutual growth.

(Statements)

- We comply with the Resonac Group's procurement policy and sustainable procurement guidelines and practice fair and open trade.
- When selecting suppliers, we open our doors globally and make rational and fair selections by assessing the quality, reliability, delivery time, price, technological development capability and management stability of the materials to be procured, as well as the social responsibility initiatives of the suppliers.
- We co-create with suppliers to solve social issues such as resource and environmental protection, safety and human rights.

#### Article 24. Preventing conflicts of interest

(Background Information)

A conflict of interest describes a situation where the social responsibilities of those engaged in the operation of a company conflict or conflict with the benefits to be gained from external relationships. Conflicts of interest can arise even when there is nothing legally wrong with the company, and the existence of a conflict of interest does not in itself immediately constitute a breach, but it can bring our trust and integrity into question. It is important to disclose conflicts of interest in good faith with high ethical standards and to manage conflicts of interest appropriately.

(Statements)

- We will not act in a manner that could undermine the company's fairness or be suspected by third parties of doing so due to a conflict of interest between the company and ourselves.
- When we become aware of a potential conflict of interest, we should promptly report it to the workplace manager, the responsible department or other designated reporting contacts.

## Chapter 8. Fair and equitable employment

### Article 25. Respect for diversity, equity and inclusion

#### (Background Information)

The dignity of all is ensured and everyone is equally respected is a universal value endorsed by the international community. By respecting diverse values, openly engaging with each other and utilizing individuality, we are expected to create and provide rich value and contribute to the realization of a sustainable society.

#### (Statements)

- By providing fair and equal opportunities tailored to each individual regardless of nationality, race, gender, age, disability, faith, sexual orientation, gender identity or veteran status, as well as by promoting a work environment where each individual's full potential can be realized by eliminating prejudice and ensuring psychological safety that is difficult to recognize on one's own, we promote the creation of a working environment in which each individual's full potential can be realized.
- With an open mindset that recognizes diversity, we promote an inclusive environment that embraces diversity of all kinds, including a wide variety of backgrounds, thoughts, perspectives, demographics, ethnicities, and origin.

### Article 26. Treat people fairly and with respect

#### (Background Information)

Society demands that companies are oriented towards sustainable growth based on fair employment practices, respect international labour principles and are committed to equality of opportunity and elimination of discrimination in employment and promotion.

#### (Statements)

- We will not decide employment and appointment based on nationality, race, gender, age, disability, faith, sexual orientation, gender identity or veteran status.
- We respect freedom of association to form and join trade unions of their own choosing, to conduct collective bargaining and to engage in peaceful assemblies. We also respect the right of workers to refrain from such activities to the extent permitted by the applicable laws of the countries and regions in which we operate.

### Article 27. Respect for human rights in the workplace

#### (Background Information)

In order to maintain a healthy and safe working environment, the Resonac Group creates a working environment where everyone who works for the Group is mutually respectful and respects the dignity and worth of every individual. The management is also responsible for creating such a working environment.

#### (Statements)

- We maintain high professional and ethical standards and treat each other with dignity and respect. We are



open and accept and respect different backgrounds, cultures, experiences and opinions and make the most of diversity.

- We strive to maintain a healthy, safe and productive workplace, free from harassment (behaviour that causes discomfort or disadvantage to others or offends their dignity through words or actions related to attributes or personality), bullying and unfair discrimination.
- We do not tolerate any form of harassment of people working for the Resonac Group, regardless of their employment or employment status. When we become aware of any behaviour that we consider to be offensive or contrary to mutual respect, we will promptly report it to the workplace manager, the responsible department or other designated contacts.

#### Article 28. Talent management

(Background Information)

Each employee has responsibilities to take ownership of his or her own career development, to believe in and develop his or her talents and potential, and to give back to society and the Resonac Group in the form of value.

(Statements)

- We rediscover our own values and strengths through sincere dialogue with people inside and outside the company. Through dialogue with diverse people, we recognize that acting in accordance with our corporate philosophy will require us to secure a diverse staff and to aggregate the insight of these diverse individuals into a greater body of collective knowledge.
- People Managers aim to develop an organization in which all employees can feel tangible growth through the career paths that suit them. It fosters psychological safety in the team and encourages the emergence of ideas and challenges through work, as individual failures are seen as opportunities for team learning and individual successes as opportunities for team praise.
- The company should support people who have career ownership and seek to express their own value in society. We understand that there are diverse life and career aspirations and support them in obtaining learning and growth opportunities tailored to their diverse needs and aspirations.

### Chapter 9. Securing company assets

#### Article 29. Preservation of company assets

(Background Information)

Company assets should only be used for legitimate business purposes. Company assets include not only tangible assets such as equipment, but also intangible assets such as brands, trademarks, patents, know-how, confidential information and information systems.

(Statements)

- We manage any company assets protecting their values from loss, damage, misuse, theft or destruction.
- We will use company assets only for legitimate business purposes in accordance with relevant internal regulations.
- We do not pursue or acquire personal profit from the assets of the Resonac Group that we own or have created, or from the assets entrusted to us by our customers and business partners.

#### Article 30. Respect for intellectual property

##### (Background Information)

It is necessary to recognize that intellectual property such as inventions is a source of competitiveness and a force that contributes to solving social problems. Therefore intellectual property rights are to be respected and customer and supplier information is to be safeguarded.

##### (Statements)

- We promote sustainable growth and corporate value by early acquisition of intellectual property rights.
- We will take a firm action against infringements of the Resonac Group's intellectual property rights by others.
- We respect the intellectual property rights of others, and do not misconduct or improperly acquire or use confidential information.
- We strategically build and utilize a future-oriented intellectual property network.

#### Article 31. Personal data protection

##### (Background Information)

The topic of data protection is one of the greatest priorities to ensure that the personal data of our customers, business partners, shareholders and employees worldwide are handled in accordance with the laws and regulations of the countries and regions in which we do business and of our own country.

##### (Statements)

- We ensure the protection of personal information by understanding and complying with the laws and regulations applicable to the handling of personal information in the countries and regions in which we operate, as well as relevant internal regulations.
- We implement appropriate procedures in accordance with national and regional laws and regulations, such as stipulating the appropriate handling of personal data in the conclusion of a transfer agreement.

### Chapter 10. Responsible disclosure and public relations

#### Article 32. Timely and appropriate disclosure

##### (Background Information)

The status of business activities and financial records prepared as part of the operations are important information for the business decisions and operations of the Resonac Group. The company is responsible for disclosing company information in a timely and professional manner so that it can live up to the trust of shareholders and investors.

(Statements)

- We disclose corporate information at the appropriate time and in the professional manner in accordance with the laws and regulations on the disclosure of corporate information applicable in each country and region, as well as relevant internal regulations.
- We voluntarily and proactively disseminate not only financial information, but also non-financial information such as management philosophy, product and technical information, environmental and social performance data, risk and governance information and donations.

Article 33. Accurate recording and reporting

(Background Information)

Fraud in accounting books and financial records not only causes damage to shareholders and investors, but also results in a breakdown of trust in society and jeopardizes the very existence of the company.

(Statements)

- We book and prepare accounting records of financial-related information in accordance with proper accounting standards and relevant laws and regulations. We assure all records and reports on business activities shall accurately state the facts without omission.
- We keep internal applications, approvals and records for accounting procedures, asset management, etc. by carrying out the procedures where professional internal controls are in place.

Article 34. Dialogue with shareholders and investors

(Background Information)

The Corporate Governance Code requires companies to engage in constructive dialogue with shareholders and investors, and listening to them is also important for achieving co-creation.

(Statements)

- We carry out fair and transparent disclosure of information in a timely and professional manner to ensure sustainable growth and medium- to long-term corporate value.
- Through constructive dialogue with shareholders and investors, we aim to further enhance our corporate value by using the opinions obtained from shareholders and investors to improve corporate activities.

Article 35. Preventing insider trading

(Background Information)

Insider trading, in which securities transactions are conducted using nonpublic material information obtained in connection with business operations, is regulated by the laws of each country and region as it undermines confidence in the securities market.

(Statements)

- We understand and comply with applicable insider trading laws and relevant internal regulations in each country and region.
- When we become aware of nonpublic material information concerning the Resonac Group, our business

partners or customers, we will not trade in shares or other securities in connection with such information.

- When we become aware of any behaviour that could induce insider trading, we will promptly report it to the workplace manager, the responsible department or other designated reporting contacts.

#### Article 36. Media and public relations

(Background Information)

To maintain the trust of the international community, we must be consistent in what we say on behalf of our company. Whatever we post on personal accounts can be a potential risk for our company. And, more importantly, using social media at work can affect productivity and focus. This is one of the reasons we need a company social media policy – to address limitations on what employees can post and to potentially place restrictions on social media use inside the workplace.

(Statements)

- We set the authorized representatives who can speak on behalf of the company and established rules and guidelines for fielding and responding to media inquiries, issuing press releases, and managing media coverage.
- When we respond to enquiries from the media, prior approval is obtained from the public relations, investor relations or other contacts designated to deal with the media.
- We should use social media in both our private and professional lives being aware of our responsibilities as directors and employees of the Resonac Group. We shouldn't state or imply that our personal opinions and content are authorized or endorsed by our company.
- When we discover a site or posting that demands a negative opinion or response about the Resonac Group, we will promptly report it to the workplace manager, the responsible department or other designated reporting contacts.

### Chapter 11. Risk and crisis management

#### Article 37. Risk and crisis management system

(Background Information)

As the risks surrounding business become increasingly complex and diverse, there is a need to manage risks professionally and minimize their impact not only on the company but also on society.

(Statements)

- We prepare for natural disasters, terrorism, cyber-attacks, conflicts and other emergencies, by regularly identifying and assessing risks, and taking measures to prevent or mitigate damage.
- We set a policy and manual on crisis management, and take appropriate action in the event of an emergency to ensure the safety of employees, the community and society, and to maintain order.

#### Article 38. Anti-bribery and corruption

##### (Background Information)

Resonac group has committed to prohibiting bribery and corruption. In order to fulfil its social responsibility to contribute to the formation of a healthy civil society, it must proactively establish and function a system to cut off relations with anti-social forces. Bribery and corruption are unethical and unacceptable and are inconsistent with our values.

##### (Statements)

- We understand that transactions with anti-social forces encourage their activities and pose a significant risk to the business activities of the Resonac Group, and therefore we will cut off all relations with them.
- We comply with the laws and regulations applicable in each country and region and relevant internal regulations in order to promote the severance of relations with bribery and corruption.
- We expect our business partners to abide by the same ethical standards with respect to bribery and corruption that apply to our employees.
- We report any concerns we may have about ethical business practices, including practices which may be suspected of violating anti-bribery and anti-corruption laws, to the workplace manager, the responsible department or other designated contacts.

#### Article 39. Crisis management against terrorist and conflict threats

##### (Background Information)

Employees are required to raise their safety awareness and promote organizational safety measures, bearing in mind that they may be involved in incidents and accidents such as terrorism and conflicts.

##### (Statements)

We understand the risks of terrorism and conflict in the countries and regions where we operate, and proactively gather information and take security measures.

#### Article 40. Ensuring information security

##### (Background Information)

Cyber-attacks, which grow in number and sophistication every year, are a global threat and information security is becoming increasingly important. We protect information assets in accordance with our internal rules on information security, thereby safeguarding the trust society places in us.

##### (Statements)

- We recognize that the information that each of us obtains or generates in the course of our work could, once they are in the hands of a malicious attacker, become a dangerous weapon that seriously affects our competitiveness and business continuity.
- We ensure that information assets cannot be accessed by unauthorized persons in accordance with our internal rules on information security, and that such information is managed safely to prevent loss, damage, alteration or improper disclosure.
- We will not use information obtained in the course of business or stored by the company or take it out of the

company for personal gain.

- When we suspect information security incident, we should be promptly reported to the workplace manager, the responsible department or other designated contacts.

#### Article 41. Disaster risk measures

(Background Information)

In preparation for the event of a major disaster in the country or region in which we operate, it is important not only to make daily efforts to prevent and mitigate disasters, but also to live in harmony with the affected community as a member of the local community since we are supported by the local communities and business partners.

(Statements)

- We implement an effective management system, including the development of a business continuity and recovery plan (BCP), to prepare for possible large-scale disasters and fulfil supply responsibilities to customers, including the continued supply of products necessary to maintain social infrastructure.
- We will actively support the autonomous recovery of local communities, from disaster relief to reconstruction, without forgetting to ensure that the dignity and rights of local people are respected.

## Chapter 12. Consultation and reporting through open communication

It is important for companies to fulfil their social responsibility to report or notify concerns such as legal violations and fraud to a designated reporting contacts or contact point by detecting, investigating and correcting irregularities within the organization at an early stage.

#### Article 42. Consulting and reporting to superiors and colleagues

(Statements)

- In order to protect a safe and secure workplace for our employees, we must, with integrity, promptly report to the workplace manager, responsible department or other designated contacts when we become aware of any conduct that is or may be problematic in terms of corporate ethics or illegal in relation to our work.
- We strive to build open relationships with superiors and colleagues, so that we can discuss and report questions and concerns on a regular basis.

#### Article 43. Respect for open communication

(Statements)

- We will sincerely cooperate, when we asked to cooperate in the investigation or resolution of a problem that has been discussed or reported.
- We ensure confidentiality of information that identifies an individual who consulted or reported and information relating to the content of such consultation or report.

- We will not tolerate any prejudicial treatment of persons who have consulted or reported in good faith or who have co-operated in the investigation or resolution of a problem.

#### Article 44. Whistle blowing system

(Statements)

- Resonac group strengthens internal self-purification and creates the environment in which employees feel comfortable consulting with the company.
- Consultation service is available internally and externally for anyone working for the Resonac Group to consult and report violations of laws, regulations and internal rules, and we respond in good faith.
- We always encourage you to speak up.

### Chapter 13. Role of top management

#### Article 45. Establishing a governance system

(Background Information)

In order to achieve sustainable growth, it is necessary to establish and operate a corporate governance system that enables transparent, fair, speedy and decisive decision-making, thereby gaining the trust and recognition of the international community.

(Statements)

The company is working on improving its corporate governance system to realize sustainable growth, disclosing its status and promoting constructive dialogue with shareholders and investors.

#### Article 46. Management commitment

(Background Information)

The declaration by those responsible for management to stakeholders, including employees, that they actively understand and comply with this Code of Conduct, laws and regulations, not only gains the understanding and trust of society, but also leads to the realization of the Purpose and a sustainable society.

(Statements)

Those responsible for the management of the business:

- are aware that their actions have the greatest impact on shaping the organizational culture, and take the initiative in complying with this Code of Conduct, as well as with laws, regulations and rules, with integrity.
- always base their decisions on whether their own actions are in line with Resonac Group's Purpose and Four Values.
- assure a necessary system is put in place and communicated to ensure that compliance with regulations, laws and regulations, and honest conduct is ensured at all times in the areas and organizations in charge.

#### Article 47. Managerial leadership

(Background Information)

Managers with subordinates have the role and responsibility of managing the organization and setting an example by their own actions to their subordinates in exercising the authority given to them by the company.

(Statements)

- In accordance with the Management Policy and this Code of Conduct, the Resonac Group forms a professional organization whose members are continuously motivated, successful and ethical in order to realize the Purpose of Resonac Group through the implementation of the strategy of the organization for which they are responsible.
- To set an example as professionals who embody our values, managers will continue to lead by example and consistently take the actions they need to take.
- Managers understand the values, strengths, potentials and diverse life and career aspirations of each subordinate and provide the necessary support and learning and growth opportunities for their career development and skill development.

#### Article 48. Commitments at emergency

(Background Information)

In the event of an emergency situation, it is important to promptly investigate the facts, determine the root causes, consider measures to prevent recurrence, and fulfil full accountability in order to restore the trust of society and employees and thereby maintain and enhance the corporate value.

(Statements)

- Leaders prevent misconduct, and assure a necessary system is in place for early detection of fraud risk manifestations and prompt action is taken against any suspicion of fraud.
- Leaders assure legal violations are identified at an early stage, and promptly investigate the facts, identify the root causes and consider measures to prevent recurrence, as well as fulfilling their accountability to society.
- Leaders check whether similar violations or similar compositions exist in other departments, divisions or other Group companies, and if so, resolve common cause issues and improve operations.