



NOF Group

Corporate Code of Ethics

From the Biosphere to Outer Space
 **NOF CORPORATION**

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What is the Corporate Code of Ethics?

The NOF Group's Corporate Philosophy and Guiding Framework serves as the compass for our growth.

Our Corporate Code of Ethics is the foundation for the entire Framework.

It outlines the judgment criteria for conduct that employees should adhere to as part of a company with a proper sense of ethics.

We are committed to sincerely practicing this Code in order to contribute to humanity and society as a corporate group that creates new value through the power of chemistry, from the biosphere to outer space.

Corporate Philosophy

Contributing to humanity and society as a corporate group that creates new value through the power of chemistry, "from the biosphere to outer space"

Values

Harmony

Fairness

Challenge

Code of Conduct

Principles,
Commitments,
and Policies

- 1 Provide the highest quality products and services globally for the development of humanity and society.
- 2 Leverage the group's collective strengths to develop advanced technology and products that create new value across a wide range of fields.
- 3 Take on ambitious challenges to achieve personal growth and a fulfilling lifestyle.
- 4 Respect diversity and act fairly with high ethical standards and good sense.
- 5 Be conscious of safety and being in harmony with the environment, while solving social issues by bringing everyone's strengths together.

**Corporate Code
of Ethics**

NOF's Three Values

Under our Corporate Philosophy, we uphold three core values:

"Challenge," "Fairness," and "Harmony".

To ensure appropriate conduct in all situations as members of the NOF Group, we will uphold these values as our creed and ensure the company continues to create new value for society.

Harmony

We join forces to build a sustainable future in harmony with the global environment while keeping in mind safety and mutual respect.

We continue to grow into our best selves through collaboration and mutual inspiration, undauntedly adapt to new realities, and tirelessly pioneer new frontiers.

Challenge

Fairness

As responsible members of society, we maintain high ethical standards, act in good faith, and cultivate a corporate culture that embraces diverse values.

Message

Message from the President



The NOF Group conducts daily development of innovative products and technologies to address the diverse challenges faced by the world under our Corporate Philosophy which states, "Contributing to humanity and society as a corporate group that creates new value through the power of chemistry, 'from the biosphere to outer space.'"

Amid the rapidly changing environment surrounding companies, our Code of Conduct requires us to act with a high level of ethics and integrity based on the values of our Group.

We position the NOF Group Corporate Code of Ethics as the foundation supporting the Group's Corporate Philosophy and Guiding Framework. It outlines ethical standards to be upheld daily so we can continue to be a sustainably developing corporate group. Each standard outlined in the NOF Group Corporate Code of Ethics is deeply connected to the values of our Corporate Philosophy and Guiding Framework: "Challenge," "Fairness," and "Harmony." Our Group's values are embodied as concrete actions through our adherence and practice of these standards.

By understanding this Code and applying it to our daily operations, let's earn the trust of society, our supply chain, and our colleagues, and foster a flexible and robust corporate culture and mindset within the NOF Group.

April 1, 2025 President and Chief Executive Officer **Koji Sawamura**



For Challenges

In a society where “uncertainty is the norm,” we take on challenges in new domains as a robust and continuously growing corporate group.

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diversity of our employees 06

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work environment 07

We respect the individuality and diversity of our employees

We embrace diversity and support people as they take on challenges.



Respect for Individuals

- We provide employees with fair access to education, experience, and opportunities to acquire the skills required for their duties.
- We evaluate and treat employees fairly based on their experience, skills, and achievements.
- We listen to each other, and respect and accept diverse perspectives, ideas, and thoughts.
- We do not tolerate any discriminatory behavior, acts of violence, power harassment (abuse of authority, workplace bullying), sexual harassment, invasions of privacy, defamation, or any other actions that harm individual dignity.

Respect for Diversity

- We accept and respect each other's individuality, personality, values, and opinions.
- We promote diversity of human resources and work to create a workplace environment where everyone can demonstrate their abilities while maintaining mutual respect.
- We strive to create a better corporate culture by fusing the capabilities that our diverse human resources can fully demonstrate.

Promotion of Collaboration

- We understand the importance of combining individual strengths, have high expectations for the outcomes of such efforts, and value mutual cooperation.
- While respecting each other's individuality, we unite our efforts to achieve organizational goals.

We strive to create a comfortable work environment

We build up a comfortable environment and culture that serve as the foundation for taking on challenges.



Workplace Enhancements

- We comply with occupational safety and health laws, creating a workplace where all employees can maintain their physical and mental well-being and work healthily.
- We provide a workplace where human rights and privacy are respected, enabling all employees to work with peace of mind and motivation.
- We take into account various opinions and perceptions of employees regarding their work and the organization, implementing measures to create a more comfortable workplace and striving to enhance employee engagement.

Work-Life Balance

- We emphasize harmony between work and life outside of work, striving to create a workplace environment where employees can work with motivation.
- We flexibly accept diverse working styles and work to enhance various systems, promoting work-life balance.
- We actively engage in health maintenance and improvement initiatives, creating a workplace that promotes physical and mental well-being.

Occupational Safety and Health

- We comply with occupational safety and health laws, employment regulations and other workplace regulations, and safety procedures, and actively implement education and training.
- In the event of accidents or illnesses, we promptly report them and take appropriate responses, such as preventing the spread of damage and planning recurrence prevention measures.
- We work to create a safe workplace enabling mutual cooperation by identifying and addressing hidden workplace risks.



For Fairness

We conduct sincere and honest business activities, and walk the right path as a corporate group that contributes to society.

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We do not engage in unethical conduct

Recognizing that we are all members of the NOF Group, we make fair judgments at all times.



Establishment of Ethics as Company Members

- We take action to further enhance social trust by ensuring that all employees conduct their duties sincerely while emphasizing corporate ethics with good conscience and integrity.
- We take the initiative to sincerely comply with the matters outlined in this Code and thoroughly instill this approach throughout the organization.

Compliance with Laws and Regulations

- To ensure the company's continued existence, we are conscious that all employees have responsibility for promoting compliance, and we adhere to this Code, relevant laws, and internal company rules.
- We comply with social standards, various work-related laws and regulations, and internal company rules.
- We do not pursue profits or operational efficiency at the expense of compliance.

We do not violate human rights

We build fair relationships with all individuals in society.



Respect for Human Rights

- We support and understand international human rights standards, such as the Universal Declaration of Human Rights, as well as the laws and regulations of countries and regions. We are committed to always acting with respect for human rights, and never engage in any form of human rights violations.
- We respect human rights in all aspects of our business activities and do not tolerate child labor, forced labor, slave labor, or human trafficking under any circumstances.
- We do not tolerate any form of discrimination in employment or treatment based on race, ethnicity, nationality, gender, religion or beliefs, place of origin, social status, gender identity, sexual orientation, physical characteristics, or disabilities.
- We respect basic labor rights, including freedom of association, workers' rights to organize, and the right to collective bargaining.

We do not impose unfair labor practices

Prohibition of Harassment

- We respect the human rights of all stakeholders, including employees, and do not tolerate any acts that disregard the personhood of others, such as harassment, slander, defamation, violence, or coercive behavior.
- We are constantly aware of how our words and actions are perceived by others and those around us, and we respond appropriately.
- When we witness harassment or discrimination, we take action to address and resolve the situation, without avoiding or turning a blind eye to it.

We conduct labor management appropriately under fair rules.



Management of Working Hours and Proper Wages

- We strive for appropriate management and implementation regarding wages, other forms of pay, working hours, breaks, and holidays in compliance with relevant laws and internal company rules.
- We accurately report and record working hours.
- We pay appropriate wages and benefits based on work-related reports in accordance with labor-related laws and employment regulations.

We do not engage in unfair business transactions

We engage in fair transactions with all stakeholders in the supply chain.



Relationships with Trading Partners and Business Partners

- We value all trading and business partners as important partners, engage with them sincerely, and aim for mutual growth.
- We maintain equal and fair relationships with all business partners, conducting transactions in good faith while complying with relevant laws and contracts.
- We do not cause unjust disadvantages to business partners, nor do we accept improper benefits or favors.

Compliance with Competition Laws

- We contribute to economic development by maintaining and promoting fair and free competition.

- We comply with competition laws and do not obtain any unfair benefits through bid-rigging or cartel activities. We do not engage in information exchanges with competitors that could lead to bid-rigging or cartel activities.

Avoidance of Unfair Competition

- We do not engage in inappropriate labeling that could cause confusion or misunderstanding regarding other companies' well-known product names or business labeling, origin, quality, or other such attributes.
- We do not obtain, use, or disclose other companies' trade secrets through improper means.
- We do not communicate or disseminate false information to third parties or the public that could harm the credibility of competing companies.

Appropriate Procurement Activities

- We build mutually beneficial relationships with business partners through fair and equitable transactions.
- We achieve sound development by adhering to international standards, laws, and social norms, as well as activities for human rights, occupational safety and health, and environmental conservation across the entire supply chain.

Security Trade Control

- We comply with relevant laws, internal company rules, and procedures for appropriate export management to ensure that our products, technologies, and information do not fall into the hands of countries, regions, or organizations that threaten the peace and safety of the international community.
- To promote appropriate export and import management, we continually update our management methods based on information on relevant laws and changes in international conditions, and share this internally.

Anti-Corruption Measures and Prohibition of Bribery

- In all countries and regions where we conduct business activities, we do not engage in any bribery, excessive wining and dining, or other such inappropriate monetary or material exchanges.
- We do not engage in gift-giving or wining and dining with the purpose of securing improper favors in business transactions. If such requests are made, we resolutely refuse them.
- When engaging in gift-giving or entertaining guests, we ensure they are within reasonable monetary limits, and that all expenditure is accurately recorded and reported after application and approval is granted according to internal company rules.

Prohibition of Insider Trading

- We ensure strict management of internal information handling to prevent the leakage of non-public information.
- We do not engage in the trading of securities using non-public information.

Prohibition of Money Laundering

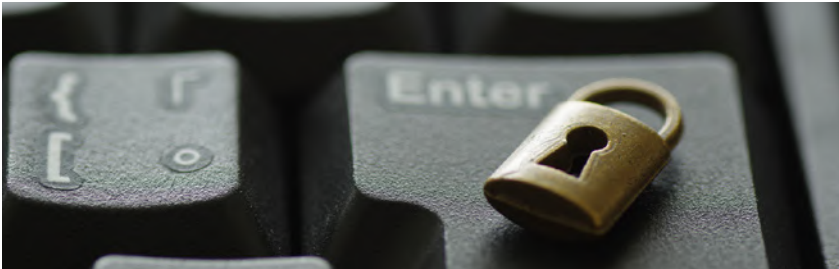
- We ensure vigilance against transactions suspected to be money laundering, including questionable monetary exchanges or deposits, and monetary transfers disguised as legitimate transactions.
- If we become aware of any suspicious transactions, we promptly share the information with the relevant department and take appropriate measures.

Donations and Political Activities

- We actively engage in donations and support activities that extensively contribute to society, focusing on objectives such as fostering the next generation of human resources, supporting people with disabilities, conserving the global environment, and providing disaster relief.
- We do not make donations or sponsorships with the intent of securing improper favors.
- If we make political donations, we make proper judgments by fully considering the necessity and appropriateness in accordance with laws and internal company rules.

We do not misuse corporate assets or information

We make fair judgments regarding the handling of the assets and information we possess.



Respect for Stakeholders

- We appropriately disclose management information, including financial details and business activity statuses, to shareholders and other stakeholders in accordance with the laws of the countries and regions where we conduct business activities and our internal company regulations.
- We enhance trusting relationships by actively communicating with a variety of stakeholders, including shareholders, institutional investors, customers, business partners, employees, and local communities.
- To ensure transparency in management and fulfill our accountability to society, we disclose both financial and non-financial information, such as CSR activities, at the appropriate timing.

Conflicts of Interest Between the Company and Individuals

- We do not engage in activities that conflict with the company's legitimate interests or harm the company's reputation and credibility for personal or third-party benefits.
- We do not intervene in company transactions in a personal capacity or use information obtained through our duties to gain personal benefits.

Handling of Company Assets

- We take care to prevent embezzlement, misuse, diversion, theft, or loss of any company assets, whether tangible or intangible, and do not use those assets for personal purposes or non-business-related purposes.
- We confirm and soundly implement necessary measures to protect assets, such as confidential information, data, and IT systems, from risks of external threats.
- In our private lives, we refrain from actions that deviate from the laws and social norms of the countries and regions we reside in, as well as any behavior that could harm the company's reputation or credibility or cause damage.
- We do not improperly use company assets, either during or after employment.

Accurate Recording and Reporting

- We accurately record information necessary for business activities and report it without delay within an appropriate timeframe.
- In addition to financial and accounting records and reports, we ensure accurate recording and reporting in accordance with relevant laws and internal company rules, and properly store these records and reports.
- We appropriately conduct transactions related to business activities, such as procurement, sales, and expense usage, in accordance with laws, accounting standards, and internal company rules.

Protection of Intellectual Property Rights

- We respect the intellectual property rights of third parties and do not engage in unauthorized use or infringement.
- To ensure that we do not infringe on the rights of third parties, we conduct thorough prior investigations related to our products and take necessary measures depending on the situation, such as avoidance or obtaining licenses.
- We appropriately protect and manage the intellectual property rights resulting from our business activities and promote their effective use in our business.

Prohibition of Leaking of Confidential Information

- We strictly manage confidential managerial information we acquire in accordance with relevant laws and internal company rules.
- We do not acquire or misuse other companies' trade secrets through improper means from third parties.
- In using and handling information systems, we comply with internal company rules and always foster a very high level of security awareness through necessary education and training.
- In using and handling information systems, we ensure that company assets, including trade secrets, are not leaked, and we refrain from activities that violate public and social order.
- We do not use or disclose trade secrets that we acquire, both during and of course after our employment.

Handling of Personal Information

- We strictly manage and appropriately use personal information in accordance with relevant laws and internal company rules.
- When acquiring personal information, we collect, use, and retain it in accordance with relevant laws and internal company rules, and implement safety measures to prevent unauthorized access, leakage, loss, or alteration of the information.
- We do not use or disclose personal information that we acquire, both during and of course after our employment.

Media and PR Activities

- We provide necessary information to a wide range of stakeholders in a timely and appropriate manner, in accordance with relevant laws and principles of information disclosure.
- We disclose substantiated information only after obtaining company approval. We do not make statements on social media that disclose internal information or could damage the company's reputation.
- In disclosing information, we protect the confidential information of employees and business partners.

We do not engage in antisocial behavior

We reject actions that disrupt social order or fairness and conduct our business activities with integrity.



Elimination of the Influence of Antisocial Groups

- We strive to maintain social order, do not establish any relationships with antisocial groups, and do not engage in transactions with them or actions that foster their activities.
- If we receive demands from antisocial groups, we resolutely reject them and do not provide any benefits.
- We enter into contracts with business partners that clearly stipulate that they are not antisocial groups, as well as measures to be taken if they are antisocial groups.



For Harmony

As a corporate group that contributes to the realization of a sustainable society, we strive for harmony with the environment and society.

We strive for harmony with the environment and society 17

We strive for harmony with the environment and society

We conduct sound management across all areas and continue to be a company in harmony with society.



Conservation of the Environment

- We comply with environmental conservation laws, keep in mind international environmental standards as well as goals led by countries and industry organizations, and strive to reduce our environmental impact.
- We work to reduce energy and resource consumption, decrease waste generation, and promote reuse and recycling.
- We make every effort for the appropriate use and management of chemical substances and minimize their release into the natural environment. In the event of an issue that impacts the environment, we implement measures to prevent the effects from spreading and strive to prevent recurrence.

- We understand the importance of the global environment and biodiversity, and voluntarily and actively engage in environmental conservation activities for harmony with nature.

Ensuring Product Safety and Quality

- We meet customer expectations and earn their trust by providing products of high quality and safety that meet the standards set by laws and internal company rules, ensuring they fully satisfy the specifications agreed upon with customers.
- To ensure products are used safely and appropriately, we provide warnings, caution labels, and handling instructions via proper means in accordance with relevant laws and internal company standards.
- During the design and development stages, we clarify relevant laws, industry standards, and customer demands, and we adhere to procedures to ensure product quality and safety in the production process.
- We measure quality data via methods in accordance with customer specifications, store and confirm it appropriately, and provide it using the method requested by the customer.
- In the event of a problem with product quality or safety, we promptly verify the facts, take appropriate corrective measures, and strive to prevent further damage and recurrence.

Contributions to Society

- We recognize the importance of close engagement with local communities through the continuation of employees' livelihoods and safe operations, and earn the support and trust of those communities.
- Through our initiatives for regional and social contribution activities, we contribute to the realization of a sustainable society while earning the trust and meeting the expectations of various stakeholders.
- As a "good corporate citizen," we work to realize a sustainable future by addressing environmental conservation, community support, and the resolution of social issues.

Respect for Customs

- We respect international standards as well as the cultures, customs, and histories of each country and region where we conduct business activities. We recognize that actions permissible in one country or region may not be acceptable in another.

Ethics and Compliance Promotion System

We not only maintain ethical conduct but also strive to strengthen the Code's standards in response to societal changes.

Establishment of Ethics and Compliance Committees

Each company within the NOF Group has established an Ethics Committee or Compliance Committee. These committees work to thoroughly enforce the Corporate Code of Ethics, deliberate on acts that violate the Code, and consider measures to address such actions. The committees also review and update the Code as needed to align with changes in the social environment and the demands of the times.



Whistleblowing and Harassment Consultation Contact Points

We have established internal and external contact points for reporting or consulting on actions that violate or may violate this Code. Whistleblowers and those who cooperate with whistleblowing are not subject to retaliation or unfair treatment due to their reporting or cooperation.



Ethics and Compliance Education Activities

The NOF Group companies ensure that all employees are thoroughly familiar with the Corporate Code of Ethics through appropriate opportunities and methods, and continuously communicate the intent behind enacting this Code and the importance of compliance.



Responsibility to Uphold the Corporate Code of Ethics

All employees understand the significance of the Corporate Code of Ethics and fulfill their responsibilities as members of the NOF Group.

- All employees sincerely comply with the company's values and the matters described in this Code, and act based on judgments that align with social ethics. Employees in executive and managerial positions lead by example to ensure thorough implementation within their organizations, while also guiding and supervising employees under their management.
- We execute our duties with deep awareness that thorough ethics and compliance are the foundation for the company's survival.



Measures to Address Incidents of Misconduct

If any misconduct occurs, appropriate measures are taken.

Measures

- If an individual engages in misconduct that violates laws, various standards, internal company rules, or this Code, they may be subject to disciplinary measures in accordance with relevant laws and internal company rules.

Judgment Criteria

- If you are uncertain or concerned about the judgments or actions you should take, please consider the following criteria.
 1. Does the judgment reflect laws, the values of the NOF Group, and this Code?
 2. Have you gathered sufficient information and exercised suitable caution?
 3. Can you proudly explain your decision to your family or friends?
 4. Are you trying to deceive your conscious by making excuses like "It's just a little," "It is for the company," or "We have always done it this way"?
- Always work with the mindset of never doing anything that contradicts the NOF Group's values, this Code, or your own professional ethics, and have the courage to oppose inappropriate actions. If you notice or witness any inappropriate situations, you must never avoid involvement or turn a blind eye to them.

