

Compliance Charter

Article 1 – Objectives

This Charter defines essential compliance items that all officers, employees and equivalent personnel of Mitsui High-tec, Inc. and the Mitsui High-tec Group (referred to collectively below as MHT) must observe in the performance of their daily duties, so that they will remain proud to be working at MHT, will comply with all applicable laws and regulations in all phases of corporate activity and will carry out their duties in accordance with social ethics, making a continuing contribution to society through the corporation.

Officers and employees realize the importance of observing this Charter, of leading through example, and of ensuring that the Charter is fully understood throughout the organization and made a part of corporate culture on every level.

Article 2 – Compliance

MHT shall follow the local laws & regulations.

All of the employees do the corporate guideline of the company.

Their corporate activities must be fair and sound to contribute to the society

1. Officers and employees shall observe laws, regulations, corporate guidelines and this Charter at all times and in every phase of corporate activity, striving to ensure that corporate activity is in accordance with accepted practice and complies with social ethics.

2. Managers shall provide concrete guidance, advice, education, supervision, etc. as necessary to ensure that all subsidiary employees observe this Charter.

3. Violations of laws, regulations and this Charter are covered by the Employment Regulations, and subject to sanctions under it.

Article 3 – Obligation of Officers and Employees to Observe Charter

Officers and employees shall respect each other's rights and dignity, and carry out their duties to ensure a safe and cheery workplace environment.

1. Respect for human rights

(1) Prohibition against prejudice and harassment, or tolerance for such acts

- Officers and employees shall not engage in any acts of prejudice or harassment, or acts infringing on the rights of others, for reasons including race, belief, skin color, gender, age, religion, citizenship, ethnic group, language, bodily characteristics, disabilities, financial worth or place of birth, and shall strive to maintain a safe, cheery and sound workplace. In addition, any use of child and forced labor shall not be tolerated in any form.

- In the event any personnel discovers an event which could hurt or upset that person or other personnel, that person shall immediately notify his or her immediate superior or the reporting contact set forth in Article 13.

(2) Respect for individuality and human dignity, and the construction of strong interpersonal relationships

- The corporation shall work to implement and improve personnel systems and labor conditions that respect the dignity and individuality of all officers and employees, allow each person to work to his or her full ability, and to gain a feeling of personal worth and achievement. Officers and employees shall work to maintain a cheery workplace and good interpersonal relations, with consideration

for other people and daily greetings.

(3) Protection of privacy

- Officers and employees shall respect the privacy of others, shall exercise caution in the handling of personal information and shall manage it appropriately.

(4) Prohibition against sexual, power and other types of harassment

- Acts of physical or verbal abuse (sexual harassment) shall not be tolerated in any form.

- Abuse of authority in the workplace, mental abuse through verbal means, inappropriate handling of personnel and denial of human dignity (power harassment) shall not be tolerated.

- Any harassment related to pregnancy, childbirth, childcare leave and care leave, as well as other types of harassment shall not be tolerated in any form.

- In the event of a problem an investigation shall be made promptly, and positive steps taken to aid the injured party and prevent recurrence.

- In the event any personnel discovers a harassment violation affecting that person or other personnel, that person shall immediately notify his or her immediate superior or the reporting contact set forth in Article 13.

2. Socially acceptable behavior

Officers and employees shall always behave in socially acceptable ways. Anti-social or illegal actions, regardless of situation or intent, are prohibited and should not be permitted in others.

3. Attention to duty

(1) Officers and employees shall carry out their duties faithfully, observe laws, corporate policy, employment and other corporate regulations, and correctly understand and implement the instructions and orders of their superiors.

(2) In the event a superior gives an incorrect instruction or order, that instruction or order should not be implemented instruction or order violence laws, corporate policy, employment and other corporate regulations without first pointing out the perceived problem to the superior and obtaining confirmation.

(3) It is crucial to continue to observe issues that have already been agreed upon. If this is not possible or appropriate, determine exactly what the problem is and work to superiors and underlings to develop a mutually agreeable better solution.

(4) Employees shall not engage in activities outside the authorized scope of their work, and shall promptly report situations requiring action to their superiors.

(5) Managers shall constantly keep track of the work-related activities of their underlings, and shall provide guidance as needed to ensure that they do not perform unethical or illegal acts.

4. Prohibition against conflict of interest

(1) Officers and employees shall faithfully carry out corporate business, and shall not engage in acts against the best interests of the corporation.

(2) Officers and employees are forbidden from holding multiple employments. Officers and employees shall not engage in any for-profit work (including self-employment), or serve as officers or employees of other corporations or offices, while employed by the corporation, without authorization.

(3) Officers and employees shall not accept cash, gifts, entertainment or other benefits from firms engaging in business with the corporation, their officers or employees. However, exemption from this prohibition may be granted in special cases by the corporation.

(4) Officers and employees shall not accept loans from firms engaging in business with the corporation, their officers or employees, have them serve as guarantors, or otherwise establish relationships that could be construed as inappropriately personal with business partners.

5. Separation of corporate and personal affairs

The separation between corporate affairs and personal affairs shall be made clear. Personal affairs shall not be introduced into the workplace, and vice-versa.

6. Health and safety

(1) Efforts shall be made to ensure health and safety for all officers and employees, and all officers and employees shall make efforts to improve physical and mental health on a daily basis. In the event of a work-related accident the appropriate procedures shall be implemented promptly and as specified, the cause determined, and efforts made to prevent a recurrence.

(2) To help eliminate work-related accidents, applicable laws and regulations shall be followed, and the Health and Safety Management Regulations, Health and Safety Committee Operational Guidelines and other company rules and regulations followed.

7. Healthy living

(1) Officers and employees shall gain an accurate understanding of consumer financing, credit and related issues. Consumer financing obtained without a realistic repayment plan, excessive credit card charging and similar activities can result in severe financial damage or bankruptcy. Officers and employees shall live properly and in a planned fashion, and work to achieve and maintain a harmonious household.

Article 4 – Preservation of Corporation Assets and Information Management

Officers and employees shall strive to preserve corporate assets, and preserve information confidentiality.

1. Corporate assets

(1) MHT assets (tangible and intangible) shall be appropriately managed, and shall not be used for personal purposes, or any purpose other than corporate business. When tangible corporate assets are removed from corporate sites for business activities, the authorization of the person in charge of managing those assets is required.

2. Intangible assets (intellectual property)

(1) Intellectual property rights, primarily industrial property rights, held by MHT must be protected. Officers and employees shall exercise caution to ensure that such property is not used inappropriately by other parties. The corporation shall receive all intellectual property and other applicable rights to inventions, and published or unpublished works created in relation to the corporation's business.

(2) MHT shall exercise the same caution with respect to the intellectual property rights of other companies. Caution is required because any infringement of confidential information received inappropriately from another company would not only violate intellectual property laws, but also possibly be subject to punishment under laws related to unfair competition, or civil suits.

3. Confidential information

The leakage of confidential corporate information can damage MHT profitability and corporate reputation. Corporate information is not limited to documents, but

also includes electronic media, objects, and oral communication. Observe the corporate regulations, document control procedure, preventive stipulation of insider trading, information security control procedure and other corporate regulations, the protection of corporate confidentials shall be striven. Also, any leakage of the corporate confidentials shall be prohibited during or after while employment.

4. Handing of information

Much of the information held by MHT, such as financial reports and major personnel changes, must be disclosed in accordance with the regulations of securities exchanges. Officers and employees who are aware of this information prior have an obligation to preserve its confidentiality until disclosure. This is defined in the Information Disclosure Regulations and Insider Trading Prevention Regulations. Insider trading utilizing internal information is prohibited. Important information obtained from corporate business partners (customers, suppliers, etc.) in the course of business shall be treated in the same way.

5. Accurate creation and storage of records

All business documents, printed materials and other records (including electronic media) shall be created accurately and with no false information. Records shall be stored and disposed of in accordance with the Document Management Regulations.

If a superior, officer or employee requests the entry of false information into a record, a superior or the contact point set forth in Article 13 shall be notified. Any person who is aware of such false information and does not notify a superior or the reporting contact, and is found to have been therefore involved in the falsehood, shall be subject to the same sanctions as the person requesting the inclusion of the false information, under the Employment Regulations.

Article 5 – Responsibilities to Customers (Keeping Promises Made to Customers)
Contributing to society through the provision of superior products and services.

1. High quality, reasonable price and on-time delivery

(1) Officers and employees shall work under the basic approach that it is a crime to ship a defective product or fail to meet a promised delivery date, and shall make every effort to improve product quality and precision, and ensure a stable supply at a reasonable price.

(2) Maintenance of the high MHT reputation requires to observe quality criteria of customers. Products which do not meet customer’s standards shall not be shipped. If a defective product were shipped it would damage both the customer and MHT.

2. Handling of confidential customer information

Officers and employees shall handle customer information in the same way as confidential corporate information is handled.

3. The doctrine of good faith

Officers and employees shall operate under the doctrine of good faith, building strong, long-term relationships with customers.

Article 6 – Assurance of Fair Business Dealings

All business dealings shall be fair.

1. Establishment of a fair business relationship

(1) Officers and employees shall always be polite and act with humility. Methods of selecting business partners and determining transaction details shall be clarified internally in advance, and effort made to ensure fairness and transparency, to ensure the acquisition of competitive materials, facilities, etc.

2. Legal and ethical business practice

(1) Business partners shall be selected in accordance with the Supplier Management Regulations, and orders shall provide maximum benefit to MHT based on evaluation under the Procurement Guidelines.

(2) Officers and employees shall not misuse the strength of MHT in the market to directly or indirectly demand advantageous business terms, the disclosure of knowhow or other inappropriate acts from business partners. Officers and employees shall not engage in acts violating laws concerning restraint of monopoly (misuse of advantageous position, reciprocal dealing) or subcontracting (refusal to issue purchase orders, demanding unreasonable prices or discounts unreasonable returns).

(3) Officers and employees shall not engage in acts that restrict fair and free competition, such as cartels and bid rigging prohibited by the Antimonopoly Act (competition laws).

Officers and employees shall strive to compete fairly with competitors, and shall refrain from exchanging information, making any agreement, or performing coordinated conduct that may lead to illegal competition restrictions.

(4) Internal (confidential) information of business partners shall not be used in stock trading (insider trading).

3. Handling of entertainment and gifts

The reception of entertainment or gifts from business partners is, in principle, prohibited. In situations where they cannot be refused, for reasons of business situation or custom, the advance authorization of the department manager is required. Gifts received without advance notification from the sender shall be reported to a superior, and refused or returned at an appropriate time.

4. Duty of the corruption prevention

Inappropriate entertainment, gift and bribery are not allowed to not only domestic or international government officers, but also business partners.

5. Conflict Mineral Policy

MHT shall undertake initiatives not to use conflict minerals that have directly or indirectly contributed to the financing of armed groups engaging in human rights violations in Republic of the Congo and its adjoining countries.

Article 7 – Relationships with Shareholders and Investors

Appropriate information shall be disclosed at appropriate times to establish and maintain good relations with shareholders and investors.

1. Disclosure of appropriate information at appropriate times

(1) MHT information, including information on management and business activities, shall be disclosed to shareholders and investors in a timely manner, in accordance with applicable laws and regulations.

(2) Officers and employees shall ensure accuracy in accounting and financial data, in accordance with appropriate accounting standards, shall strive to ensure

confidentiality, and shall disclose data fairly and in a timely fashion so as to avoid any possible misunderstanding.

Article 8 – Contribution to Society

Personnel shall contribute to the regional community, establishing a good relationship with it, and shall observe all application laws and regulations.

1. Regional community

The corporation shall strive to maintain a good relationship with the regional community and work in cooperation with it, and participate fully in interchange with it.

2. Political activity

All laws and regulations pertaining to fundraising, campaigning and elections, with respect to financing, donation and other political activities, shall be observed.

Article 9 – Preservation of Corporate Stance Opposing Anti-Social Activities

The corporation shall resist anti-social individuals and organizations.

1. Resolute opposition

The corporation shall not engage in any interaction with anti-social forces or organizations having an adverse effect on social order and corporate soundness. Officers and employees shall be resolute and unafraid of such individuals and groups.

2. Organizational approach

The corporation shall respond to any intrusion of organized crime into civic life as an organization, providing complete support for individual officers or employees involved. It shall also cooperate with the police and external expert organizations.

Article 10 – Commitment to Protection of the Global Environment

The corporation shall contribute to protecting the global environment, and creating a richer, more comfortable society.

1. As an environmentally advanced company since its foundation, MHT shall strive to harmonize business activity with protection of the global environment and preserve a rich natural environment for our children, under the basic philosophy of “an environmentally aware company”, with the slogan of "Ultra-precision technology to shape tomorrow" and a core management policy of “Save energy. Save earth. Save life.”

Under our environmental policy, the corporation shall strive to conserve energy, reduce waste, and promote reuse and recycling, while developing technologies and products that will assist in the protection of the global environment.

2. Officers and employees shall observe all applicable laws, regulations and guidelines related to environmental protection. In the event that a violation or accident occurs, a superior or the pertinent department shall be notified, and the appropriate reports shall be submitted promptly to the appropriate government agencies (including local governments).

3. The above shall be implemented faithfully, contributing to the protection of the global environment, and the creation of a richer, more comfortable society.

Article 11 – Sanctions

Malicious or unintentional but severe violations of this Charter are covered by the

Employment Regulations, and are subject to sanctions under it. In the event that MHT suffers any monetary loss as a result of such violations, the responsible parties may be requested to pay compensation.

Article 12 – Compliance Committee

The Compliance Committee handles the duties, appointments and dismissals, and other activities defined in the Compliance Committee Regulations, with the objective of promoting the observation and implementation of this Charter.

Article 13 - Whistleblowing Hotline and Protection of Whistleblower

Officers and employees who become aware of violations of this Charter, or situations which may result in violations, shall notify the reporting contact set forth in the Internal reporting System (Hotline) Operational Regulations directly or via their superior. MHT keeps the reports confidential and takes responsibility for protecting such whistleblowers from actions not to their benefit made in response to the reporting of such violations.

Article 14 – Interpretation of the Charter

All questions related to this Charter, such as questions of interpretation should be directed to the Legal Affairs Group, Legal department, General Affairs Management Department, Administration Division. The manager of the Administration Division shall be responsible for resolving questions of the interpretation of this Charter.

Appendices

1. This Charter was put into effect on July 1, 2002.
2. This Charter was revised on May 1, 2008.
3. This Charter was revised on June 10, 2009.
4. This Charter was revised on February 15, 2010.
5. This Charter was revised on September 1, 2012.
6. This Charter was revised on August 19, 2014.
7. This Charter was revised on April 1, 2016.
8. This Charter was revised on January 1, 2017.
9. This Charter was revised on October 1, 2018.
10. This Charter was revised on October 25, 2019.