

ANA Group Supplier Code of Conduct

The ANA Group drew up the **ANA Group Supplier Code of Conduct**, following on the establishment of the ANA Group Basic Procurement Policy. We would like to have an understanding of all of our suppliers related to the ANA Group's services and products to work together with the ANA Group in complying with this Code of Conduct.

Please read and understand the purpose and contents of the **ANA Group Supplier Code of Conduct**. We ask for your cooperation in working with the ANA Group in realizing a more sustainable world.

1. Quality Assurance and Business Continuity Plan

1.1. Quality assurance and establishment of quality control systems

- Ensure products and services are safe and meet the required standard of quality
We, as a supplier, primarily use quality management systems and third-party certification programs to ensure that our products and services are safe and meet the required quality standards. We also provide accurate information on our products and services.
- Establish quality control systems
We establish systems for appropriately responding to any accident related to our products or services or any distribution of defective products. We take steps to disclose information, notify relevant authorities, recall products, and work with distributors when such an accident or defect occurs.

1.2. Business continuity plan

- We have a business continuity plan (BCP) ready. We draw up plans and set up procedures for responding to, and mitigating damage from, natural disasters, adverse effects from climate change, spread of diseases, political disturbances, and other unforeseen events. In addition, we establish systems for business continuity and early recovery.

2. Compliance and Anti-Corruption Measures

2.1. Compliance

- We comply with laws, regulations, and rules of the countries/regions we operate in.
- We have in place policies, management systems, whistleblower systems, education and training programs, and other mechanisms to ensure compliance.

2.2. Fair trading

- We do not engage in any conduct that may impede fair, equitable, transparent, free competition.
- We do not engage in any private monopolization or unreasonable restraint on trade (such as participation in cartels or bid-rigging).
- We do not use our comparative advantage in bargaining power over other transacting parties to set transaction terms that are unilaterally favorable to our company and detrimental to the other transacting parties.
- Our employees are prohibited from harming the interest of the company for the sake of promoting their own personal interest in circumstances where their interest and the company's interest conflict.
- We deter corporate insiders of a listed company from using nonpublic information about that company for trading the shares. of that company.

2.3. Prohibition of bribery, corruption, etc.

- We do not overstep social norms in terms of providing or accepting entertainment and gift to or from our customers, suppliers, or other transacting parties, or providing or accepting other forms of benefits in the interest of obtaining or maintaining illicit gains or unlawful privileges.
- We maintain transparency and fairness in our relations with politicians and civil servants of the countries/regions we operate in. We do not give bribes or make unlawful donations.

2.4. Elimination of any dealings with antisocial forces

- We do not have any relations with antisocial forces or organizations that are a threat to the safety and order of civil society.

2.5. Management and protection of intellectual property, confidential information, and personal information

- We do not violate the ANA Group's or any third party's intellectual property.
- We maintain rigorous safekeeping and protection business secrets, other confidential information, and personal information of customers and employees entrusted to the ANA Group and our company. We do not use such information for any unlawful purposes. In addition, we hold our subcontractors to a similar duty of confidentiality.
- We implement protective measures against threats on computer networks to prevent harm to our company, business partners, customers, and third parties.

2.6. Prevention and early detection of unlawful conduct

- We implement systems for preventing and detecting unlawful conduct, protect the

privacy of whistleblowers, and respond rapidly and appropriately to remedy unlawful conduct.

2.7. Internal control systems

- We establish systems and mechanisms for sound business management to guarantee that our corporate business operations are effective and efficient, our financial statements are reliable, our business activities are in compliance with laws, regulations, and rules, and our assets can be preserved.

3. Labor Standards

3.1. Respect for human rights and elimination of discrimination

- We uphold and respect internationally recognized human rights.
- In all practical matters related to employment, including wages, promotion, compensation, and retirement, we do not unfairly discriminate against individuals based on their attributes such as race, nationality, ethnicity, color, age, sex, sexual orientation, gender identity, religion, belief, disability, marital status, pregnancy, political affiliation, and labor union membership.
- We respect the traditions and customs of the countries/regions we operate in and the religious traditions and customs of our employees. In particular, we make reasonable accommodation to enable employees to practice their religious customs.

3.2. Elimination of abuse and harassment

- We do not tolerate physical or mental abuse, sexual harassment, verbal abuse, other forms of non-humanitarian treatment, or any other conduct that is injurious to personal dignity or that engenders an unpleasant working environment. Any disciplinary action etc. against such misconduct is implemented in accordance with prescribed policies and procedures that are communicated to the employees.

3.3. Elimination of forced labor

- None of our employees are subject to any work that is forced against their will or to any restrictions on their freedom to vacate or resign from their job. We do not use wrongful means of bondage to impose forced labor or coerce overtime work.
- We, as the employer, do not require employees to leave their passports, official identification documents, or work permits in our custody, compel employees to pay recruitment fees or lodge deposits at the time of, or during, the course of recruitment or employment, or otherwise violate the rights of employees to freely vacate or resign from their job or their rights to freedom of movement. We ensure that similar standards as above apply when using any recruitment agency during the course of recruitment or employment.

3.4. Elimination of child labor

- We do not employ anyone who has not reached either the age of 15, age at which compulsory education ends, or the local statutory minimum age for employment, whichever is the highest.
- We do not engage employees under the age of 18 in work, including night shifts and overtime, that may be detrimental to their health, safety, or morals, or in work that is carried out under circumstances that may be detrimental to their health, safety, or morals.

3.5. Appropriate management of working hours

- We appropriately manage employees' working hours to ensure that their weekly working hours remain within the local statutory limit and in all cases within 48 hours.
- We provide a weekly holiday lasting at least 24 continuous hours and annual paid leave stipulated by the local law.

3.6. Wages and benefits

- We enter into an employment contract with employees in accordance with the local law, and pay minimum wage, overtime compensation, statutory benefits, etc. and make deductions.
- As for the amount of wages and payment date, we pay the full prescribed amount to employees on a set date. We issue a payslip with itemized details of any deductions.
- The wage is either the local statutory minimum wage or standard wage in that industry, whichever is higher. We make efforts to pay wages that are sufficient for the employee and his or her family to meet basic needs in their economic sphere.
- Overtime pay is calculated based on the local statutory rate.

3.7. Respect for freedom of association and rights to bargain collectively

- We recognize and respect employees' rights to freedom of association and their rights to join labor unions, to engage in protests, and to bargain collectively.
- We make accommodations so that employees and their representatives can voluntarily have talks and bargain with the management about working conditions and management practices without fear of reprisals, threats, or harassment.

3.8. Respect for foreign nationals and migrant workers

- We treat foreign nationals and migrant workers fairly and provide them with transparent employment conditions and decent working and living conditions.
- We do not illegally employ foreign nationals or migrant workers.
- We do not require foreign nationals and migrant workers to leave their official

identification documents or work permits in our custody or compel them to pay recruitment fees or lodge deposits.

3.9. Avoidance of aiding in human rights violations

- We take sufficient precautions so that our company's decision-making or business activities do not promote or aid third party's violations of human rights.

4. Safety and Sanitation

4.1. Safe, sanitary working environment

- The buildings we use are designed and constructed in compliance with relevant laws, regulations, and rules, to ensure workplace safety and sanitation of employees. The buildings are, moreover, regularly inspected for safety.
- We take into consideration the employee's age, sex, and other attributes. We identify potential risks, including accidents that may occur during work, hazardous chemical materials, noise, foul odor, etc., and take appropriate safety measures to provide and maintain a safe, healthful working environment and to prevent industrial accidents and occupational diseases.
- We provide a sanitary, pleasant environment for employees. This includes providing a sufficient number of clean toilet facilities, safe drinking water and meals, rest space, and suitable lighting, ventilation, and air conditioning. Our company dormitories and other housing facilities for employees, if any, are held to a similar standard of a sanitary, pleasant environment.
- We provide appropriate health checks on employees' health conditions and make efforts towards prevention and early detection of occupational diseases. We implement measures to prevent health disorders, including mental health disorders, arising from overwork.

4.2. Response to industrial accidents

- We make effort to implement measures to prevent industrial accidents. These measures include introducing processes and procedures for avoiding risks, conducting risk assessments to identify latent risks and systematically respond to identified risks, administering regular inspection and maintenance of machinery and equipment, implementing safety measures for operation of machinery (including physical protection and safety interlocks), providing protective clothing and gear, ensuring safety management of chemical substances, and conducting education and training on safety.

4.3. Response to emergencies

- We prepare for disasters, accidents, and other contingencies by establishing

emergency measures in advance and ensuring those measures are widely communicated in the workplace.

- We implement emergency measures to minimize the effect of an emergency. These measures include processes for reporting an emergency, setting off an emergency alarm, communicating with workers, establishing evacuation procedures, conducting evacuation drills, stockpiling clothing, installing fire alarms and fire extinguishers, ensuring evacuation exits are free of obstacles, securing means of communication with the outside world, and drawing up recovery plans.

4.4. Communication

- We use employees' native language or other languages that employees can understand when providing information on workplace safety and sanitation and when conducting education and training for prevention of industrial accidents and emergency response.

5. Environment

5.1. Establishment of environmental management systems

- We promote environmental protection not merely by complying with environment-related laws, regulations, and rules, but also by voluntarily establishing, operating, and continuously improving on environmental management systems.

5.2. Response to climate change and biodiversity

- We mitigate the impact of climate change by gauging and reducing greenhouse gas emissions from our entire business activities.
- We examine our business's direct and indirect impact on the ecosystem, and promote the protection of biodiversity and sustainable use.

5.3. Efficient use of resources, energy, and water

- We implement efforts to reduce environmental impact by conserving resources, energy, and water among other things, and make our business activities more efficient.

5.4. Management of chemical substances

- We properly manage chemical substances that are used in the manufacturing processes and that are regulated by laws, regulations, and rules.

5.5. Control of contamination and pollution

- In accordance with local laws, regulations, and rules, we make efforts to prevent pollution and appropriately control and manage water discharge, gas emissions, waste materials, noise, foul odor, vibration, light, etc. that may have a negative impact on the health and living environment of people in the local areas we operate

in.

5.6. Green procurement

- We procure materials and products with the least environmental impact and promote 3R (reduce, reuse, and recycle) activities.

6. Contribution to Local Communities

6.1. Local communities

- We try to minimize the negative impact that our business activities may have on the local community and local people's health. We cooperate with local communities to address some of the issues faced by those communities and work towards contributing to the development of those communities.

6.2. Respect for the rights of indigenous peoples

- We respect indigenous people's land rights and their culture, custom, and religion in our business activities. We respect indigenous people's traditional knowledge and genetic resources, and eschew any unilateral acts of exploitation for our own benefit.

7. Information Disclosure

- We properly disclose both financial and non-financial information about our company within and outside our company to secure transparency and accountability. We keep an open attitude and strive to establish and maintain sound relations with our stakeholders.

8. Conflict Minerals

- We prevent the purchase or use of conflict minerals in any product, part, or material that is supplied to the ANA Group. We also conduct surveys and checks on our suppliers.

The ANA Group Supplier Code of Conduct makes reference to international human rights standards, such as the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights (specifically the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), the basic rights at work and the core labor standards set out in the International Labour Organization Declaration on Fundamental Principles and Rights at Work, other international treaties on the human rights of workers that also cover such matters as wages and working hours, and the United

Nations Declaration on the Rights of Indigenous Peoples.

In the implementation of the **ANA Group Supplier Code of Conduct**, we ask all of our suppliers to take the following steps:

[Implementation]

- We ask our suppliers to draw up policies and establish management systems to promote understanding and propagation of the Code of Conduct within your companies and to work on continuous improvement of the situation in your companies to ensure compliance with the Code of Conduct.
- If services and products supplied to the ANA Group are subcontracted, please make sure that the Code of Conduct is properly understood by the subcontractors and propagated within the subcontractors' organizations. We additionally ask for your cooperation in any inspection conducted to ascertain the level of compliance at the subcontractors if such an inspection is deemed necessary by the ANA Group.
- If there is a discrepancy between the Code of Conduct and internationally recognized standards or principles or between the Code of Conduct and the local country's laws, regulations, or rules, you are requested to seek ways that would respect to the maximum extent the more stringent of the two.
- The level of compliance with the Code of Conduct will be one of the criteria used by the ANA Group to decide whether to continue to transact with suppliers.

[Compliance assessment]

- To ascertain the level of compliance to the Code of Conduct, you may be requested to answer questionnaire surveys or to accept inspection by the ANA Group or a third party. The inspection may be carried out without prior notice. You will need to permit the ANA Group or the third party to enter all facilities, including production facilities related to services and products, housing facilities, dining halls, and waste management facilities; to access related documents and records; and to talk to any workers, including regular and non-regular workers working in those facilities. This set of inspection processes will also apply to your subcontractors.

[Reporting and remedy]

- If you notice any conduct that is in breach of the Code of Conduct, please promptly report it to the ANA Group.
- If issues are identified through the questionnaire surveys or onsite inspections, you

are requested to draw up a plan for improvement and remediation. Please report progress made and results achieved to the ANA Group without delay.

- Failure to report a material breach or to take any action for executing a plan to remedy the breach may result in the termination of a contract with the ANA Group.