

## JIC Group - Code of Conduct

On September 24, 2014, the Board of Directors of Japan Inspection Co., Ltd. adopted this JIC Group Code of Conduct.

This JIC Group Code of Conduct sets forth the basic internal standards to be observed by all directors, officers and employees of JIC Group (“Personnel”).

Definition: For the purpose of this code, “JIC Group” means : ( i) *Japan Inspection Co., Ltd.* ;( ii) *any company in which Japan Inspection Co., Ltd. owns directly ,or indirectly, more than 50% of its outstanding stocks or interests with voting rights.;* and ( iii) *other companies that will from time to time be determined by the Board of Directors of Japan Inspection Co., Ltd. to be included.*

Any amendment of this JIC Group Code of Conduct will be subject to the approval of the Board of Directors of Japan Inspection Co., Ltd..

JIC Group commits itself to be bound by this JIC Group Code of Conduct. Furthermore, all Personnel are required to know, understand and comply with this JIC Group Code of Conduct.

### 1 Compliance with Laws, Internal Rules and Policies

The policy of JIC Group that makes it a principle to play fair is to comply with all applicable laws and regulations of the countries and regions in which it operates and to conduct its business activities in an honest and ethical manner.

All Personnel are expected and directed to know, understand and comply with all applicable laws and regulations as well as all internal company rules and policies relating to their business activities.

### 2 Honest and Fair Business Conduct

#### 2.1 Provision of Fair and High Quality Services

Japan Inspection Co., Ltd. was founded as a third-party inspection agency. JIC Group will endeavor to provide fair and high quality services by firmly inheriting its founding spirit.

#### 2.2 Fair Trade

##### (1) Elimination of Unfair Trade

JIC Group eliminates any action that impedes fair trade and fair competition, such as that involving collusion and price adjustment.

##### (2) Bribery and Entertainment

①When it directly affects, or is likely to be seen to directly affect the business relationship with the other party, JIC Group prohibits the giving of any payment or gift to individuals employed by customers, business partners or other related companies.

No bribe or entertainment for public officials, either in Japan or abroad, which is specifically prohibited by law, may be given in principle.

②In case of entertaining customers, etc., it is done in an appropriate range within the bounds of social acceptability.

③Personnel must not request any payment or gift to business partners. Also, if there is an offer of entertainment, cautious handling, such as reporting to or consulting with supervisors, etc., is required.

##### (3) Elimination of Antisocial Forces

JIC Group rejects any connection and dealings with antisocial forces and organizations in any way. In addition, JIC Group takes a resolute stand against antisocial forces and organizations and denies any unreasonable demands.

#### 2.3 Confidentiality

Information is a valuable corporate asset. JIC Group will safeguard its own confidential and proprietary information including personal information, and information that customers or other related business partners entrust to JIC Group.

Definition: *Confidential and proprietary information is information that has not been disclosed to the general public or that gives an enterprise an advantage over its competitors or that could harm an enterprise if released prematurely or inappropriately. Common examples include know-how, trade secrets as well as corporate strategy and information about customers and business partners.*

No Personnel may disclose or distribute any proprietary or confidential information unless specifically authorized by the company. Personnel are also required to use such information only for the purpose permitted by the company in connection with their duties at JIC Group and are not permitted to use it otherwise.

### 3 Ethical Personal Conduct

All business activities must be conducted in the best interests of JIC Group. Personnel are under a continuing obligation to promptly disclose to their supervisors any situation that may appear to present the possibility of conflicting interests between Personnel and JIC Group. Disclosing this in advance is the key to remaining in full compliance with this policy.

#### 3.1 Personal Conflicts of Interest

Personnel should avoid any action which may involve, or may appear to involve, a conflict of interest with JIC Group.

#### 3.2 Corporate Assets

JIC Group's assets are to be used only for legitimate business purposes and only by authorized Personnel or their designees. This covers both tangible and intangible assets, including brand, know-how, confidential or proprietary information, etc.. The private use and unauthorized use of corporate assets are strictly prohibited by JIC Group.

#### 3.3 Whistle-blowing System

JIC Group maintains a hotline system to facilitate communication concerning illegal, unauthorized or inappropriate conduct (JIC Whistle-blowing System).

In the event of an actual Whistle-blowing incident, JIC Group will investigate the facts and take corrective measures where and if necessary. Personnel who come forward to report issues will not be treated in a disadvantageous manner unless it is slander based malice.

### 4 Respect for Human Rights, Development of Employment Environment

#### 4.1 Respect for Human Rights

JIC Group, which respects and upholds human rights, diversity and different values, eliminates any discrimination or harassment based on nationality, race, ethnicity, sex, age, religion, belief, social statuses, disability or other factors.

#### 4.2 Development of Sound Employment Environment

JIC Group strives to provide equal employment opportunities and to build a sound employment environment for Personnel to demonstrate their maximum abilities.

### 5 Environmental Conservation

JIC Group is always conscious of responsibility towards environmental conservation and works on environmental issues positively.

### 6 Harmony with Each Country and Region

JIC Group respects the culture and custom, etc. in each country and region where it carries out its business activities. It strives to act fairly in accordance with the relevant laws and regulations and contribute to the economic, social and environmental progress from a development point of view in each country and region.

Date : 1<sup>st</sup> October 2014