

IBIDEN Standards for Employee Behavior

August 2017

 **IBIDEN Co.,Ltd.**

IBIDEN WAY



IBIDEN Group Charter of Behavior

Article 1: Compliance with laws, regulations, and ethics

We comply with laws, regulations and ethical requirements of the countries and regions where its business operations are based. We work against corruption in all its forms, and carry out open and fair corporate activities with the intention of becoming a company that enjoys the confidence of the international community. We also protect and properly manage personal and customer data and other types of information.

Article 2: Development together with our stakeholders

We develop together with our stakeholders, so we enhance the transparency of management and build a trustworthy relationship through communication. We also actively engage in community-based activities that contribute to society as a good corporate citizen.

Article 3: Providing customer delight

We provide customer delight, so we have a good understanding of social trends, future needs and develop. We provide safe and secure products and services to maximize our customer's satisfaction by growing IBI-TECHNO.

Article 4: Management based on global standards

We manage our group based on global standards. We respect human rights and other international norms of behavior. Also, we respect culture and customs in each country or region concerned when carrying out our corporate activity.

Article 5: Harmony with nature

We harmonize with nature in all areas of our corporate activities. We manage to develop technologies to achieve good balance between the environment and business, and we provide environmentally friendly products and services by promoting energy and resource conservation activities.

Article 6: Attractive and vibrant company

We aim to become an attractive and vibrant company on the basis of fair, equitable and result oriented employee evaluation personnel system. We aim to have a safe and comfortable working environment. We create a rewarding corporate culture that the employee can respect for each diversity, and fully exercise their skills and abilities.

Introduction

If you were to make a choice between "ethics" and "the company's interests," would you choose "ethics"?

The company's brand image depends to a large degree on this choice, no matter how small the matter in hand may seem.

Before choosing a course of action, ask yourself the following questions:

- * Do you think it is against the law?
- * Would you feel comfortable when talking about it with your family members or friends?
- * Could you recommend your children to do the same?
- * Could you retain your composure if it were to be reported in the newspapers or on TV?
- * Are you trying to persuade yourself that you have no other choice because you are supposed to follow your superior's instructions?
- * Does the choice you are making allow somebody to take advantage of you?
- * Are you trying to take a shortcut at the expense of others?

If you are not sure how to answer any of the above questions, it is imperative that you read the Ilden Standards for Employee Behavior (here in after "Behavior Standards") below.

Use of the Behavior Standards

* These Behavior Standards are intended to act as a compliance guide for Ilden's officers and employees as defined in Ilden's Work Regulations. The Standards, however, also apply to persons working within Ilden's premises on a regular basis under a personnel dispatch agreement, a service agreement, an agreement for part-time employment, or any other similar arrangement. Each division that has employed any such person is responsible for communicating the full purport of the Behavior Standards.

Each Ilden group company (consolidated subsidiary) is required to establish without delay its own behavior standards that are in accordance with these Behavior Standards or that serve as a complement to these Behavior Standards.

* Should you be in any doubt as to what to do to ensure compliance with company expectations and norms when carrying out day-to-day operations, base your judgment on the Behavior Standards. If any ambiguity remains after following this procedure, seek consultation along the functional lines to which your superior is connected or consult the divisions concerned (listed below for each topic). If you consider these lines incapable of functioning properly, discuss the matter at the consultation counters described later.

* If you discover any violation of the Behavior Standards, if you are under instructions from your superior that will result in any such violation, or if you have committed any violation inadvertently, do not hesitate to report it.

* If any part of the Behavior Standards runs counter to the local laws, regulations, or ethical requirements of each country or region, officers and employees shall consult the personnel in charge of legal affairs or lawyers in order to make an impartial and reasonable determination on what course to follow and to act accordingly.

Preface: General rules on compliance

Ibiden Co., Ltd. hereby establishes the Standards for Employee Behavior as its compliance standards. The company's officers and employees ("we") shall comply with the standards in choosing a course of action for their own benefit or on behalf of the company.

(1) Behavior Standards

(a) Basic attitude

We need to have a full appreciation of the company's social responsibility as a business enterprise and shall exercise a highly developed sense of ethics with regard to our conduct. In carrying out business activities, we shall respect the spirit of the Constitution and comply with general laws and regulations (including the Civil Code, the Commercial Code, the Criminal Code, the Anti-monopoly Law, and tax laws), business-related laws and regulations, and corporate ethics requirements.

In carrying out business activities overseas, we shall comply with local laws, regulations, and ethical requirements and shall respect local cultures and customs.

(b) Free and fair competition

In carrying out business activities, we shall comply with the Anti-monopoly Law, fair competition rules, the competition laws and the anti-corruption law (including Unfair Competition Prevention Act, Foreign Corrupt Practices Act, Bribery Act) of the countries where our business activities take place to ensure that the company is able to participate in market competition freely and fairly.

(c) Compliance with the articles of association, internal rules, etc.

We shall comply with domestic and foreign laws and regulations and with corporate ethics requirements. In addition, we shall understand and comply with the Behavior Standards and with the articles of association and internal criteria (such as manuals, regulations, rules, standards, guidelines, and procedures), which have been laid down in accordance with the proper procedures employed by the company.

If any internal criteria (excluding the articles of association) are inconsistent with or contradictory to the provisions of the Behavior Standards, the provisions of the Behavior Standards shall take precedence.

We perform our own tasks by following necessary procedures such as inspections, approvals and resolutions in accordance with our responsibilities and authorities provided in the internal rules.

(d) Adequate bookkeeping and accounting records, and compliance with accounting- and tax-related laws and regulations

In connection with corporate accounting, we shall keep accurate records of the company's transactions in the form of account books and accounting records in accordance with accounting principles and practices generally regarded as fair and reasonable. We shall also comply with the Commercial Code, the Securities and Exchange Law, the Foreign Exchange and Foreign Trade Control Law, business accounting principles, and other accounting-related laws and regulations.

In carrying out business activities, we shall always remain conscious of and comply with domestic and foreign tax laws.

(e) Restriction of directors' transactions that may be in competition or conflict with the company's interests

Directors shall comply with the provisions in the Companies Act prohibiting transactions that may be in competition or conflict with the company's interests.

(f) Contract and document control

In affixing a signature (whether handwritten or electronic) to a document such as a written contract (including electronically stored documents), or in requesting a corporate seal to be affixed, we shall not cause a signature or a corporate seal to be affixed without undertaking the procedures specified in advance. In addition, we shall not forge a signature or counterfeit a corporate seal stamp.

If officers and employees intend to enter into a contract or reach some kind of agreement with somebody, they shall discuss and negotiate appropriately taking into consideration related laws and regulations, internal rules, and the principles of fairness and reasonableness.

We shall prepare, handle, store, and destroy documents appropriately.

(2) Divisions concerned/to be consulted

(a)-(f) Division in charge of Legal Control,

(a) (c) Division in charge of Environment/ Occupational Health and Safety, (d) Division in charge of Finance,

(f) Division in charge of General Affairs/ Contract, Division in charge of Business Planning [in each Business Operation],

Article 1: Compliance with laws, regulations, and ethics

We comply with laws, regulations and ethical requirements of the countries and regions where its business operations are based. We work against corruption in all forms, and carry out open and fair corporate activities with the intention of becoming a company that enjoys the confidence of the international community. We also protect and properly manage personal and customer data and other types of information.

In doing business, each one of us is required to act with high level of sense of ethics as a member of an honest company, aiming at observance of laws and regulations in each country and each region. Moreover, we must protect the corporate assets and valuable in our conduct of business, so that they will not be used improperly or stolen. Corporate assets include a variety of information such as personal information or customer information, so we will thoroughly perform management thereof.

1-1. Compliance in various scenes

(1) Behavior Standards

(a) Development activities

If the company (i) licenses technology to or (ii) carries out joint research and development with partners in Japan or abroad, we shall not restrict the business activities of such partners except for legitimate purposes, which include the legitimate exercise of rights (such as intellectual property rights) and the protection of the company's secret information. We shall not make any arrangements designed to preclude certain business enterprises from entering the marketplace.

(b) Purchasing activities

We shall comply with domestic and foreign anti-monopoly laws and subcontracting-related laws to ensure the fairness of our activities in relation to purchasing from business partners.

We shall neither take advantage of their functional status or authority to derive socially unacceptable personal gain¹⁾ from business partners nor misuse trade secret information held by business partners for the purpose of insider trading.²⁾

(c) Sales activities

We shall comply with domestic and foreign anti-monopoly laws. We shall not, with competitors or through meetings of trade associations in which the company holds membership, make any arrangements that may affect product sales prices or conditions (including sales prices, production quantities, and sales territories). We shall not participate in any associations or meetings that may make such arrangements.

We shall not impose on the company's sales subsidiaries or others any restrictions intended to maintain the

¹⁾ Gifts (of money and other articles), entertainment, convenience, etc.

²⁾ See "1-2. (g) Prohibition of insider trading."

resale prices of the company's products. In addition, we shall not ask any of the business partners of the company's sales subsidiaries to impose such restrictions.

(d) Proper export and import

We shall comply with export control laws and regulations (including the Foreign Exchange and Foreign Trade Control Law) and internal trade-related rules to ensure the proper export and import of products.

(e) Environmental conservation activities in manufacturing

We shall comply with laws, ordinances, regulations, and the like relating to environmental protection. In the event of a violation or an accident, officers and employees shall immediately report it to their superiors or the divisions concerned.

In response to such a report, the divisions concerned shall submit the statutorily required report or notification to the competent public agencies (including local governments) without delay, and we shall urge service providers on the company's premises as well as business partners to ensure strict compliance with laws and regulations.

(f) Payoffs to stockholders

We shall comply with the provisions of the Companies Act that prohibit payoffs to stockholders and shall act in conformance with socially accepted standards of decency, and shall deal with "sokaiya," or corporate racketeers, in a resolute manner and shall never offer them any payoffs.

(g) Relationships with political parties and public agencies

We shall comply with the Public Office Election Law, the Law to Regulate Money Used for Political Activities, and other applicable laws and shall refrain from behaving in a way that misleads or potentially misleads others and leads to a suspicion that any bribery, payoff, illegal political contribution, or collusion with a public agency is taking place.

(2) Divisions concerned/to be consulted

- (a) Division in charge of Intellectual Property
- (a)-(f) Division in charge of Legal Control, (b) Division in charge of Purchasing,
- (c) Division in charge of Business Planning [in each Business Operation]
- (e) Division in charge of Environment
- (f) (g) Division in charge of Corporate Planning/ General Affairs

1-2. Ethics as Honest Company

(1) Behavior Standards

(a) Fair and equitable standards for transactions

In selecting a supplier from two or more business partners, we shall compare and evaluate various conditions in an impartial manner to decide which one is best suited to the company's needs. We shall make a selection in the same impartial manner regardless of the quantity of goods to be purchased.

We shall not use the company's advantageous position as a purchaser to (i) coerce business partners to disclose their transaction conditions or know-how, or to (ii) preclude certain suppliers from participating in the selection process.

(b) Relationships with customers and suppliers

We shall not accord customers and suppliers or potential customers and suppliers any preferential treatment on account of an existing relationship with ourselves, fellow officers or employees, or our relatives. Any of us finding ourselves involved in this type of special relationship shall consult our immediate superior or related divisions in advance and shall act in the best interests of the company.

(c) Giving and receiving of gifts

We shall not offer gifts to business partners or clients if such an offer is considered inappropriate in the light of common social awareness.

We shall not suggest to customers and suppliers who influence or appear likely to be able to influence business relations that we will offer any gifts of money or other articles as inducements. In addition, we shall not behave in a way that might be construed as an implicit request for gifts. We shall also not receive and/or give gifts through the third party and/or agent

If any of us have been offered, by a customer, supplier, or any other person, a gift considered inappropriate in the light of common social awareness, we must report the fact to our immediate superior and ask for instructions.

(d) Entertainment

We socialize with our customers and business partners with specific business purposes, within the scope of social common sense, and with approval in accordance with internal rules.

(e) Measures against antisocial elements and groups

We shall deal with antisocial elements and groups in a resolute manner.

Any of us contacted by, or alarmed about the potential for trouble with, an antisocial element or group shall immediately consult the divisions concerned without attempting to respond in a personal capacity.

(f) Donations to public agencies, political contributions, gift giving, and entertainment

We shall follow internal approval procedures in making donations or political contributions³⁾ in the name of the company.

We shall exercise moderation in showing courtesy to or socializing with persons involved in politics or government administrations.

We shall not give, propose to give, or promise to give parties including public servants and persons designated by special laws any benefits (such as money, goods, entertainment, or special favors) in violation of the National Public Service Ethics Law, the National Public Service Ethics Code, or other similar provisions and the like made by public agencies or organizations. In addition, we shall firmly decline any and all requests for the aforementioned benefits.

(g) Prohibition of insider trading

If we have acquired inside information⁴⁾ held by the company, any of its subsidiaries, or any other business enterprise in connection with our duties, we shall not trade in its securities in a personal capacity or in the name of the company (Ibiden) before the official release of such information. In addition, we shall not trade the aforementioned securities in the name of any one of our family members or any other person.

We who have acquired inside information shall not communicate it to anyone except in cases where such communication is necessary for the performance of operations.

Officers and employees shall comply with the regulations of the Securities and Exchange Law that prohibit insider trading, and officers shall comply with the regulations on restriction of trading the company's own stocks.

(2) Divisions concerned/to be consulted

(a) (b) Division in charge of Purchasing

(a)-(g) Division in charge of Legal Control, (f) Division in charge of Corporate planning/ Finance

(c) - (f) Division in charge of General Affairs

(c) Division in charge of Business Planning [in Each Business Operation]

³⁾ Political contributions from business enterprises are prohibited by law in some overseas countries; therefore, behave prudently in accordance with the local laws and customs in each country.

⁴⁾ Inside information means undisclosed information that is defined as such by laws including the Securities and Exchange Law and that may exert an influence on individual investors attempting to make a decision on their transactions in stocks and other securities (this type of information is also called "material facts"). For example, such information relates to business collaboration, the development and announcement of a new product, financial performance (sales, profits, dividends, etc.), and other information on activities and the like having a significant influence on the company. The information is classified as inside information until its official release by the company. When in doubt, consult the divisions concerned for legal definitions of and management methods for inside information (laws and the company's rules on insider trading management contain some applicable provisions).

1-3. Protection of Corporate Assets⁵⁾

(1) Behavior Standards

(a) Good understanding of the company's asset management policy⁶⁾

We shall exercise due caution in using and managing the corporate property placed in our charge. In addition, we shall gain a good understanding of the company's asset management policy.

(b) Prohibition of the misuse of tangible property

We shall use the company's tangible property for the sole purpose of performing the duties assigned to us and shall not embezzle or use any of the property for the benefit of ourselves or a third party. We shall not claim expenses improperly or use our functional status or authority to confer improper benefits upon ourselves or a third party. We shall comply with internal rules in handling tangible property to prevent it from being lost or stolen.

(c) Intellectual property

We shall record and manage the company's intellectual property appropriately and shall exercise due caution to prevent it from being misused by other business enterprises or persons. In addition, we shall not use the company's intellectual property for the benefit of ourselves or a third party, whether during our employment with the company or after retirement.⁷⁾

We shall not acquire other persons' or companies' intellectual property by improper means. Even if such property has been acquired by proper means, we shall not use it without permission. In addition, we shall not reproduce software illegally.

(d) Use of trademarks

⁵⁾ The company's assets include tangible property such as land and equipment as well as intangible property such as intellectual property rights (patent rights and the like), trade secrets (technical information, trade information, and the like), and know-how. This property is highly valuable and important in the conduct of the company's business activities.

Tangible property includes land, buildings, facilities, equipment, products, work in process, raw materials, OA equipment, office supplies, cash equivalents, and securities.

Intangible property includes intellectual property (such as patents, utility models, designs, trademarks, publications, know-how, and technical information), trade information, personnel information, accounting information, electronic information (such as program data), and other trade secret information.

⁶⁾ The company's asset management policy stipulates as follows: The company must carefully manage such corporate property to ensure that it is used efficiently and to prevent it from being lost, stolen, or misused. If any part of the company's property is stolen or misused, the company shall employ every possible means (including legal action) to safeguard its assets.

⁷⁾ Information held by the company and considered innovative and original in nature is placed under similar legal protection given to intellectual property rights (such as patent rights). Intellectual property rights and all other rights to inventions, devices, publications, and the like produced by officers or employees in the performance of their duties shall be held by the company.

Officers and employees shall correctly recognize and use the trademarks of the company or other business enterprises.⁸⁾

(e) Promotion, notification, etc. of inventions, devices, etc.

With the intention of contributing to the prosperity of society, we encourage the production of novel and useful inventions, devices, and designs.

If we have produced, within the scope of the company's operations, an invention, device, or design through our duties or resulting experience, we shall give notification in accordance with internal rules that apply to the handling of inventions, devices, or designs.

Any of us who have produced an invention, device, or design shall endeavor to maintain the secrecy of our invention, device, or design. In addition, we shall obtain approval for so doing in accordance with internal rules before making a public announcement.

(f) Intellectual property of other business enterprises

We shall exercise due caution to avoid infringing on the intellectual property of other business enterprises.

We shall exercise due caution and refrain from stealing ideas from other business enterprises or unfairly diverting the use of trade secrets belonging to other companies.

(2) Divisions concerned/to be consulted

(a)-(f) Division in charge of Legal Control, (a) (b) Division in charge of Finance/ General Affairs

(c) (e) (f) Division in charge of Intellectual Property

⁸⁾ The company holds trademark rights to character strings, names, symbols, and the like relating to the company's operations and uses them to distinguish the company's own products from other business enterprises' products. For example, "IBI-TECHNO" is a registered trademark as indicated by the ® sign. Trademarks yet to be registered are indicated by the "TM" sign. Trademarks must be displayed correctly (for instance, with the correct spelling) in exactly the same way as they are displayed by the parties holding trademark rights to them.

1-4. Thorough Protection and Management of Information

(1) Behavior Standards

(a) Protection of personal information on officers and employees

We shall not obtain unauthorized access to personal information on fellow officers and employees.

We, who are authorized to access personal information in the performance of duties, shall keep personal information secret, and shall not disclose personal information to parties outside the company unless the officers or employees whose personal information has been accessed give their consent or the request is justifiable. Personal information shall not be disclosed even within the company except to those performing official duties for which the acquisition of such information is deemed essential.

(b) Trade secret information

We shall endeavor to prevent trade secret information⁹⁾ from leaking out. We shall not disclose or disseminate trade secret information held by the company or any of its subsidiaries to outside parties without permission. Trade secret information shall not be disclosed even within the company except to those in charge of operations for which the acquisition of such information is deemed essential. In addition, such information shall be used solely in connection with the company's business activities. We shall act in accordance with the obligations described above, regardless of whether or not we ourselves have developed such information.

When anyone outside our business may be exposed to our information such as talking on a smartphone, information exchanges through internet¹⁰⁾, conversing in a public place, etc., we shall exercise caution to avoid inadvertently rising topics related to trade secret information. We shall not make any mention of trade secret information when in conversation even with our family members and friends. When we resign or retire from the Company, we will return materials and media (USB memory, SD memory card, etc.) including trade secret information of the Company, and all other assets of the Company. After retirement or resignation, we will not leak business secrets acquired during service.¹¹⁾

(c) Information processing and network systems

We shall use the company's computers, internal information processing systems, and network systems adequately and effectively, and shall avoid using them for improper purposes.

We shall manage electronic information appropriately to prevent the leakage, theft, and destruction of trade

⁹⁾ Much of the information held by the company must be managed as trade secret information. Trade secret information is the valuable outcome of the collective performance of many officers and employees. Trade secret information also represents the outcome of the company's heavy investment in research and development. Since trade secret information gives the company an advantage in terms of market competitiveness, disclosing this information to competitors will cause damage to the company.

¹⁰⁾ including posting to social networking services, bulletin board systems and/or blogs.

¹¹⁾ Title to all intellectual property developed by officers and employees during their service with the company remains with the company even after their retirement.

secret information, computer virus infection, and other damage. It is especially important for us to exercise the utmost caution by ensuring password management and conducting regular checks using antivirus software and the like. In the event of possible damage, the divisions concerned shall be informed without delay.

(d) Protection and proper acquisition/use of information on other business enterprises

We shall ensure that the purposes and methods of our use of information on other business enterprises are appropriate (or that the use is within the scope defined in an agreement or a similar legal instrument, if any). We shall not disclose such information to parties outside the company without the consent of the business enterprises concerned. Such information shall not be disclosed even within the company except to those in charge of operations for which the acquisition of such information is deemed essential.

If a third party offers to provide information potentially constituting secrets belonging to a party other than the third party, we shall not accept any such information unless we are sure that the third party is a legitimate holder of the information and that the offer of disclosure does not involve improper acquisition or disclosure of information. If we have acquired information on other business enterprises from a legitimate holder of the information by a proper method, we shall then record the fact (in a daily sales report or minute book to show, for example, the timing of the acquisition and the source of the information).

(e) Prevention of copyright infringement

We shall exercise due caution in handling information acquired from the Internet, newspapers, magazines, references, or other sources to prevent copyright infringement problems such as plagiarism and falsification. In using computers, we shall not reproduce or install commercially available software in violation of contractual conditions for use or licensing agreements.

(f) Inside information and its management

We shall gain a good understanding of the company's rules on insider trading management to ensure that unfair leakage of inside information is prevented.

(2) Divisions concerned/to be consulted

(a)-(f) Division in charge of Legal Control, (a) Division in charge of Human Resources

(d) (e) Division in charge of Intellectual Property

(d) (e) Division in charge of Business Planning [in Each Business Operation]

Article 2: Development together with our stakeholders

We develop together with our stakeholders, so we enhance the transparency of management and build a trustworthy relationship through communication. We also actively engage in community-based activities that contribute to society as a good corporate citizen.

We will send out correct information by appropriate means to stakeholders including shareholders, transaction partners, consumers and local communities aiming at being "a company trusted by society," and strive to increase our corporate value. We will actively promote social contribution activities so that the local community will become more prosperous and livable.

(1) Behavior Standards

(a) Trusted business enterprise

In an effort to secure and retain the confidence of the local community in the company's activities, we will attempt to improve the company's image by, for example, participating in local events and holding events.

We assume the role of public relations officer by judging and acting in compliance with these Behavior Standards.

We will work to improve the image of the Company by participating in local events and holding events, etc. to gain the trust of the community for the activities of the Company. By observing this Code of Conduct in our decision-making and actions, each of us will play a role as a PR person for Ividen.

(b) Providing accurate information, and careful use of expressions and terms

We shall provide parties inside or outside of the company with any documents and information based on accurate information, and shall not counterfeit any records and/or documents which causes damage to the trust of our stakeholders. We also shall avoid using expressions that may defame other business enterprises or persons, or terms that lead to social discrimination. We fully recognize that some words in casual daily use are of a discriminatory nature and we endeavor to refrain from using misleading expressions and terms.

(c) Promotion of IR activities

To live up to the expectations of stockholders and investors all over the world (expectations of increased profits), officers engage in management activities and efforts to increase management efficiency with a good understanding of the legal functions and responsibilities of general meetings of stockholders, the Board of Directors, directors, and auditors.

We acknowledge the importance of IR activities (public relations activities targeted at investors and stockholders) and endeavor, through timely disclosure, to make the company's corporate management and activities understood.

We remain receptive to views and criticisms expressed in response to the disclosure above and endeavor to reflect them in future business activities.

(d) Participation in social contribution activities

Through the social contribution and volunteer activities in which the Company engages, we will participate in efforts for “Protecting the global environment” “Fostering the next generation” “Contribution to social welfare and local communities” and “Disaster relief activities”

(e) Cultivation of a relationship of mutual trust with the local community

We will participate in local administrative, cultural and educational activities actively, and engage in activities to respond to community needs.

(2) Divisions concerned/to be consulted

(a)-(e) Division in charge of General Affairs, (a)-(c) Division in charge of Corporate Planning,

(b) (c) Division in charge of Legal Control, (c) Division in charge of Finance

Article 3: Providing customer delight

We provide customer delight, so we have a good understanding of social trends, future needs and develop. We provide safe and secure products and services to maximize our customers' satisfaction by growing IBI-TECHNO.

In order to provide the products and services that customers expect, we will make efforts to improve product quality. We will engage in product development activities to provide products that are beneficial to society, by striving to develop new technologies with originality, ingenuity and enthusiasm – with "IBI-TECHNO" at the core – and boldly taking up the challenge of new fields. Moreover, in our efforts to contribute to a prosperous society, we will continue from the development stage to give thorough examination where environmental preservation and product safety are required.

(1) Behavior Standards

(a) Efforts to adopt new technologies

We shall seek to adopt superior technologies from a broad range of sources in Japan and abroad, to meet various demands by customers, and shall work at research and development of cutting-edge technologies with "originality, ingenuity and enthusiasm."

(b) Customer handling

We shall always serve the company's customers in good faith, and shall promptly provide products and services requested by customers in accordance with basic agreements, and the like.

(c) Ensuring environmental preservation and product safety at development stage

We will produce and provide products that satisfy environmental preservation standards and safety standards as stipulated by the law. In product design, we will create designs that can ensure safety adequately, and provide proper and accurate information relevant to products.

(d) Reliable work performance and efforts to improve work performance

We shall standardize work procedures and make improvements in terms of materials and production to enable work to be performed reliably, free from strain, waste, and inconsistency, thereby ensuring and improving product quality.

If any problem or suspected problem arises with respect to product quality, we shall undertake a thorough survey to discover the facts and causes without delay and by so doing, facilitate rapid response and improvement.

We endeavor to improve our abilities, skills, and work efficiency. We shall use "originality, ingenuity, and enthusiasm" as a guide to improving working methods and process steps.

(e) Cost improvement and delivery date management

We will attempt to reduce costs with cost consciousness at all times, ensure delivery date management, and

conduct business swiftly, as well as making progress improvements in the workplace through TPM activities and improvement proposal activities.

(2) Divisions concerned/to be consulted

- (a) (c) Division in charge of Design Development, (b) Division in charge of Legal Control
- (a)-(e) Division in charge of Business Planning [in Each Business Operation]
- (c) Division in charge of Environment, (d) (e) Division in charge of IPM Promotion

Article 4: Management based on global standards

We manage our group based on global standards. We respect human rights and other international norms of behavior. Also, we respect culture and customs in each country or region concerned when carrying out our corporate activity.

Ibiden has extended into business globally, has respect for the cultures and customs of various countries and regions, and supports and respects the protection of human rights¹²⁾ as internationally declared, and will not aid in the infringement of human rights. We respect basic principles and rules in labor¹³⁾, observe the employment related laws and work regulations in each country, including the Labor Standards Law, and act in accordance with social conscience and rules.

(1) Behavior Standards

(a) As a member of global company

In transactions with overseas customers and transaction customers, and in business with overseas bases, we will needless to say observe the related local laws, and besides will observe international rules as well as acting respectfully toward the cultures and customs of the various countries and regions.

(b) Respect for human rights

We shall show consideration for others and endeavor to improve the atmosphere of their workplace and human relations. In addition, we shall respect human rights so as not to subject others to unfair discrimination or harassment on the basis of their race, color, age, gender, sexual orientation, gender identity, ethnicity, nationality, disease, disability, pregnancy, religion, creed, social status or marital status, and shall exercise appropriate care to prevent such discrimination and harassment.

(c) Inhumane treatment

We shall refrain from subjecting others to harsh or inhumane treatment such as any harassment¹⁴⁾ abuse, corporal punishment, mental or physical coercion, verbal abuse, etc., and shall exercise necessary managerial care to prevent and eliminate such treatment.

¹²⁾ The IBIDEN Standards for Employee Behavior reflects the gist of major international principles or guidelines, such as the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the United Nations Global Compact and the United Nations Universal Declaration of Human Rights, etc.

¹³⁾ These principles and rights mean "Freedom of association and the effective recognition of the right to collective bargaining", "Elimination of all forms of forced or compulsory labour", "Effective abolition of child labour" and "Elimination of discrimination in respect of employment and occupation", which are declared by the International Labour Organization (ILO).

¹⁴⁾ Harassment includes power harassment and sexual harassment. Sexual harassment consists of two types: quid-pro-quo harassment and hostile environment harassment. The former is the type in which an employee is advantaged or disadvantaged with regard to his or her working conditions by reason of the employee's compliance or otherwise with sexual advances from someone in the workplace. The latter is the type where an employee's working environment is adversely affected due to sexual speech or behavior.

(d) Prohibition of forced¹⁵⁾ and child labor

We comprehend that all work is voluntary. We shall not therefore use any form of forced or involuntary labor. In addition, we shall not employ children aged under the legal minimum age for labor. We shall ensure that workers under the age of 18 (Young Workers) do not perform work that is likely to jeopardize their health or safety.

(2) Divisions concerned/to be consulted

(a)-(d) Division in charge of Human Resources, (a) Division in charge of Legal Control

¹⁵⁾ Forced labor includes bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons.

Article 5: Harmony with nature

We harmonize with nature in all areas of our corporate activities. We manage to develop technologies to achieve good balance between the environment and business, and we provide environmentally friendly products and services by promoting energy and resource conservation activities.

Environmental issues are positioned as important tasks in performing the Company's business activities, and we make efforts to develop ecologically-friendly products at all stages of the product life cycle -- from production, to use, to disposal.

In addition to product development and production and distribution activities oriented to wide-ranging environment and resources protection, such as the introduction of resource and energy saving production systems, countermeasures against polluted factory effluent (including stormwater), odors, noise and dust, and packaging oriented to recycling, etc., each of us will consciously engage in activities to respond to international environmental standards actively.

(1) Behavior Standards

(a) Environmental friendliness

In carrying out product development, production, and logistics activities as an integral part of business activities, we shall give consideration to such matters as environmental impact, resource conservation, waste reduction, and energy conservation. We shall carry out environmental protection activities in our own capacity by, for example, limiting the use of paper and by promoting recycling.

(b) Appropriate management of chemical substances

Chemical substances may affect the human body and environment. We are familiar with the characteristics of the chemical substances we handle in our workplace, and observe the prescribed procedures in their use and management. In emergencies, we will perform proper handling based on chemical safety sheets.

(c) Participation as a member of society

Each of us shall endeavor, as a member of our community, to ensure sorted collection and disposal of garbage, water saving, power saving, and the like. In addition, we shall play an active role in beautification activities and other similar activities carried out in and around our community.

As part of energy-saving activities, we shall drive automobiles in an environmentally friendly manner by, for example, avoiding unnecessary idling, revving, and sudden acceleration.

(2) Divisions concerned/to be consulted

(a)-(c) Division in charge of Environment, (c) Division in charge of General Affairs

Article 6: Attractive and vibrant company

We aim to become an attractive and vibrant company on the basis of fair, equitable and result oriented employee evaluation personnel system. We aim to have a safe and comfortable working environment. We create a rewarding corporate culture where our employees can respect each other's diversity, and fully exercise their skills and abilities.

We will actively seek self-development so that each of us can create prosperous and pressure-free lifestyles. Each of us will respect the personalities and characteristics of others so that each of us will be fairly and properly evaluated.

We will aim at creating a safe and healthy workplace, to realize plants that are friendly to working persons and the environment.

(1) Behavior Standards

(a) Fair and proper personnel evaluation and management

We shall make impartial evaluations of results of work performed by fellow officers and employees to ensure fair and proper personnel management. In connection with recruitment, evaluation, personnel transfer, promotion, education, and the like, we shall not accord any preferential treatment to any individual on account of an existing relationship with ourselves, fellow officers or employees, or their relatives.

(b) Emphasis on education and self-development

We shall engage in self-development activities to enhance our own performance and the performance of our colleagues, thereby fostering the desire to rise to new challenges and inculcating the social values expected in full-fledged members of society.

(c) Assurance of safety and health

We shall comply with safety and hygiene related laws and internal regulations, as well as paying attention to conservation of the environment. Moreover, we shall place the highest importance on occupational safety and hygiene, maintaining machinery, equipment and facilities in a safe and sanitary state, and use them in accordance with the prescribed procedures.

We shall only start to work after receiving the appropriate health and safety training relevant to each workplace and/or each specified operation, and wearing the necessary personal protective equipment (PPE). Manager and Supervisor shall provide workers with appropriate workplace health and safety training and PPEs before they start working.

(d) Creation of a safe and healthy workplace

We shall endeavor to create a safe and healthy workplace through the all-employee-participating "5S" principles (Seiri [Organization], Seiton [Neatness], Seiso [Cleaning], Seiketsu [Cleanliness], and Shitsuke [Morals]) and safety circle activities in the workplace. We shall pay attention to the safety of our own and other people, and shall avoid any action which possibly threatens such safety. We shall also take care to maintain

and improve our mental and physical health. At the same time, we shall take all due care to protect ourselves from any physical or mental damages caused by long-hour/excessive work and to protect the health and safety of the persons around us, to maintain a good workplace environment which may provide work-life balance, and to improve it.

(e) Conversation and Communication

We will emphasize conversation and communication to build a vigorous corporate culture. We will be conscious of daily communications, starting from greetings, actively offering help when colleagues or subordinates in the workplace have difficulties, and resolve problems by teamwork. We also will work together to achieve the results by communicating expressly and correctly in the workplaces about policies, measures, expectation, progress and achievements.

(f) Prohibition of illegal drug use and restriction on alcohol consumption

We shall not use illegal drugs or consume alcoholic drinks in the workplace.

(2) Divisions concerned/to be consulted

(a) (b) (d) (e) (f) Division in charge of General Affairs

Energy & Environment Operation [(c) (d) Division in charge of Occupational Health and Safety

Behavior Standards governing employees' private life

1. Political or religious activities and consumption behavior

The company encourages officers and employees to participate in politics. Political activities, however, represent a part of an individual's personal life. For this reason, political activities may not be carried out on the company's premises without the company's permission.

The company does not support or discriminate against religions. The company never interferes with personal religious activities except in special circumstances, for example, when the performance of operations is affected. Religious activities, however, also constitute a part of an individual's personal life. For this reason, religious activities including proselytizing may not be conducted on the company's premises unless otherwise agreed.

(1) Behavior Standards

(a) Participation in political activities

Participation in politics through voting and other means is one of the obligations of a citizen. We are therefore encouraged to participate actively in the political process.

If, however, participation in political activities affects operations, we shall obtain the prior approval of our immediate superiors.

When expressing views on political issues, we shall make it clear that our views are entirely personal.

(b) Religious activities

Religious activities represent a part of an individual's personal life and are therefore left to the discretion of each individual. We, however, shall exercise due caution to ensure that such activities do not interfere with the company's operations.

(c) Prudence as a consumer

We shall endeavor to acquire a correct knowledge that enables us to avoid encountering problems relating to consumer finance services or credit services. In seeking any such services, we shall ensure advance planning in consultation with our family members. In the event we have difficulty adhering to the repayment schedule or encounter other kinds of problems, we shall immediately consult family members, lawyers, or other relevant persons.

We shall acquire a correct knowledge about illegal business practices such as multilevel marketing to avoid the potential financial damage associated with such practices. If asked by any acquaintance to purchase a product relating to such business practices, we shall firmly decline the request as this is in our best interests. In the event of actual or expected damage, family members, lawyers, or consumer affairs bureaus shall be consulted.

(2) Divisions concerned/to be consulted

(a) (b) (c) Division in charge of General Affairs, (c) Division in charge of Legal Control

2. Traffic safety

The company is committed to ensuring traffic safety on a group-wide basis through the Ibiden Group Traffic Safety Committee. Each of us shall endeavor to eliminate traffic accidents so that no one will be the victim of or be responsible for any traffic accidents.

(1) Behavior Standards

(a) Compliance with traffic rules

Officers and employees shall comply with traffic rules to avoid causing accidents. Each employee shall make sure to fasten his or her seat belt and drive at a moderate speed.

Officers and employees shall never drive under the influence of alcohol, to any degree whatsoever.

(b) Improvement of traffic manners

When driving an automobile, officers and employees shall show consideration and kindness to others. For example, they shall endeavor to give way to other drivers and to prevent accidents involving vulnerable road users such as children and elderly people.

(c) Responses to traffic accidents

If we encounter a traffic accident, we shall immediately render assistance to the injured person(s), call an ambulance, and contact the police. At the same time, we shall report the accident without delay to the insurance companies, the company (Ibiden), and other parties.

If we cause a traffic accident, it is especially important for us to (i) offer the police our fullest cooperation at the post-accident police interview and to (ii) provide compensation to the victim(s) in good faith after full consultation with the parties including the insurance companies.

(2) Divisions concerned/to be consulted

(a)-(c) Division in charge of General Affairs