

Fuji Group Ethics and Compliance Policy

1. Policy and basic approach

Based on our belief that the Fuji Group is a group that not only complies with laws and regulations but also maintains a high level of moral integrity, we recognize that instilling a sense of normative awareness is a fundamental challenge in corporate management for ensuring that our corporate actions fulfill our social responsibilities. All Fuji Group employees (including contract employees, associate employees, part-time employees, and temporary workers) shall uphold high ethical standards, adhere to the management philosophy and “FUJI Group Behavior Charter,” prioritize compliance, and strictly comply with all laws, regulations, and internal rules related to business operations.

2. Ethics and compliance promotion system

The Fuji Group has established a Risk Compliance Committee, chaired by the representative director, to strengthen the compliance system across the entire group and monitor compliance for compliance-related matters throughout the Fuji Group. The results of the committee's deliberations are reported to the Board of Directors as necessary.

3. Initiatives

(1) Compliance with laws and regulations

The Fuji Group complies with the laws and regulations applicable in all countries and regions where it operates, and conducts its business activities in a fair and transparent manner. We will position compliance with laws and regulations as a fundamental principle of our corporate management, and all employees will thoroughly adhere to this principle.

(2) Prohibition of corrupt practices

We prohibit all acts of corruption, including bribery, extortion, and fraud. We promote fair business activities based on high ethical standards to contribute to the maintenance and development of an orderly and free competitive market, and will not engage in corrupt practices.

(3) Prohibition of fraud and misappropriation

The responsibility for the detection and prevention of fraud and misappropriation* lies with the representative director, and all employees are required to maintain the utmost integrity and ethical standards in the conduct of their business.

* This term refers to any dishonest act such as misappropriation of Fuji Group's assets, any misrepresentation regarding financial reporting, and any leakage of material information by an employee for their own or a third party's benefit.

(4) Prohibition of conflicts of interest

In situations where the interests of employees conflict with the interests of the company, we will act in accordance with relevant laws, regulations, and internal rules, giving priority to the interests of the company.

(5) Exclusion of anti-social forces

We will strive to maintain public trust and ensure the safety of society and sound corporate management by refraining from any involvement with anti-social forces.

(6) Anti-competitive practices

We will conduct our business in accordance with laws and regulations related to the prohibition of monopolies and fair competition, as well as internal rules, and will operate under fair and free competition.

We will not engage in unfair trade practices such as cartels, bid riggings, or other actions that restrict competition or take advantage of our trading position.

(7) Prohibition of insider trading

We strictly prohibit insider trading by employees to ensure investor confidence in the securities markets.

(8) Prevention of money laundering and terrorism financing

We strive to ensure that our products and services are not used to transfer proceeds of crime, finance terrorists, or finance the proliferation of weapons of mass destruction.

(9) Appropriate tax compliance

The Fuji Group will comply with international rules and tax-related laws and regulations in each country and region and also respect the spirit of such rules and regulations, pay appropriate tax payments that ensure tax fairness, and fulfill our corporate social responsibility to maximize our corporate value.

(10) Protection of personal information and privacy, and management of confidential information

The Fuji Group will handle personal information and confidential information obtained in the course of business appropriately in accordance with laws and regulations, internal rules, and international standards, and will respect the privacy rights of all individuals.

(11) Protection of intellectual property

The Fuji Group will protect the intellectual property owned by the Fuji Group and will not infringe on the intellectual property owned by third parties.

(12) Information security measures

The Fuji Group will implement the latest information security measures to ensure the security of customer information and business data.

(13) Appropriate information disclosure

The Fuji Group will provide accurate, timely, and transparent information to shareholders, employees, customers, business partners, and other stakeholders. In addition to complying with laws and regulations, the Fuji Group will disclose important information related to its financial condition and operations in a manner that is easy for relevant parties to understand, fulfilling its responsibility as a reliable source of information.

(14) Proper labeling, explanations, and advertising

The Fuji Group will always provide accurate information to ensure that customers understand the contents and characteristics of its products and services.

(15) Responsible mineral procurement

The Fuji Group will ensure that minerals procured through its supply chain are mined in a manner that respects human rights and minimizes environmental impact. This includes avoiding the use of conflict minerals, selecting sustainable and ethical suppliers, and regularly evaluating the implementation of these measures through a transparent audit process.

(16) Political involvement

We do not make inappropriate political contributions to politicians or political organizations.

(17) Whistleblowing system

The Fuji Group has established and operates a whistleblowing system as a mechanism to monitor the penetration of corporate ethics and compliance.

We have established internal and external reporting channels to receive reports of conduct that violates or may violate the Fuji Group Behavior Charter, employment regulations, or laws and regulations.

We have established internal regulations to ensure that reports are kept confidential and that whistleblowers do not suffer any disadvantage as a result of their reports.

(18) Compliance education, training, and awareness

The Fuji Group will provide education and training to all employees to ensure strict adherence to corporate ethics and compliance with laws and regulations. We will also strive to actively engage with our business partners to work together to maintain high ethical standards.

4. References

The following were referenced in the establishing of this Policy.

Global Compact Network Japan (GCNJ) ・ United Nations Global Compact (UNGC)

Responsible Business Alliance (RBA) version 8.0

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FUJI CORPORATION

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