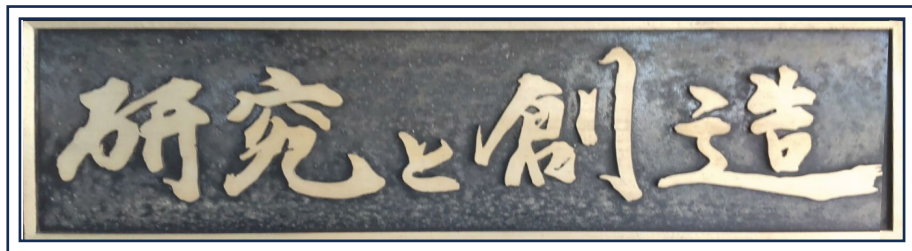


ALMEX TECHNOLOGIES

Code of Conduct



(Research & Creation)

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■ Code of Conduct Scope of Application

The ALMEX TECHNOLOGIES Code of Conduct shall apply to all executive officers and employees of our group companies.

■ Handling of violations

- An internal reporting desk has been set up for organizational/personal, legal & regulatory violations, etc. (wrongful actions, compliance violations, any form of harassment or suspicion of such acts, etc.).
- If the violating act, etc. is confirmed, the company will take appropriate remedial action along with taking disciplinary action according to the “Rules of Employment”, etc. on violating acts that are conducted with malicious intent or gross negligence.

Chapter 1 Human Rights

Respect for Human Rights

- Company policy
 - The company will respect the human rights of customers, employees and every person involved in the business activities of this company.
 - The company will comply with the laws of each country regarding human rights so that there is no involvement in human rights violations.
- Standards of behavior
 - We respect one another's human rights, treat people with integrity and fairness and endeavor to prevent harassment without hesitation or any form of discrimination.
 - We do not engage in child labor or forced labor that leads to human rights violations. In addition, we demand our business partners to cooperate to be in compliance with laws and mandates regarding child labor, forced labor, etc.

A Positive Workplace Environment

- Company policy
 - The company is committed to the utilization of diverse human resources and bringing out the best of every single individual's abilities for enterprise management that continues to create added value.
- Standards of behavior
 - We are committed to promoting diversity and smooth communication in the workplace to enable every single individual to perform at the best of their abilities
 - We help one another, and everyone bands together to demonstrate teamwork toward achieving goals.

Chapter 2 Environment & Safety

Protecting the Environment

- Company policy
 - The company will comply to international environmental regulations as well as each country's environmental laws & regulations and strive to realize a better global environment along with earning the trust of society through corporate activities.
 - The company, in executing corporate activities, will give careful consideration on the loads on the environment as well as the impact on the ecosystem.
- Standards of behavior
 - We are committed to the effective utilization of resources and energy by purchasing products and services that carefully consider the burden on the environment, energy saving, resource conservation and waste reduction.
 - We are committed to provide products, systems and services that contribute to the preservation and improvement of the earth's environment.

Safety & Health

- Company policy
 - The company has established a safety and health management organization and will actively promote the required measures and education/training in order to maintain a working environment in which people can work with peace of mind.
 - The company will comply to labor related laws and regulations regarding working hours, holidays, etc., and along with preventing unhealthiness of employees, the company is committed to correcting business operation workloads toward realizing a work-life balance for employees.
- Standards of behavior
 - We will comply to the laws, regulations and internal company rules regarding safety & health, endeavor to always be tidy, organized and clean inside the company, to maintain a safe and healthy workplace and endeavor to prevent disasters before they occur as well to prevent disasters from spreading should they occur.
 - Along with working to promote efficient business operations so that it will lead to appropriate business workloads, we strive to communicate proactively in the workplace and optimize business operations as a whole.

Chapter 3 Business Activities with Integrity

Quality of Technologies & Products

- Company policy
 - The company not only responds to the needs of customers and quality characteristics, but strives to constantly provide technologies and products that exceed those expectations and improve customer satisfaction.
 - The company will comply to the international standards and regulations of each country and will build trust with customers and society.
- Standards of behavior
 - We consider quality and safety to be the highest priority issue above all other issues and will comply to all relevant safety & quality standards.
 - If there is a problem or concern with the safety or quality of our technologies & products, we will promptly report to the relevant parties and take remedial action.

Fair Business Practices

- Company policy
 - The company will correctly understand and comply to laws, rules and regulations pertaining to competition laws, prohibition of unfair competition, tax laws, etc. applied in each country where its business activities are conducted.
 - The company will conduct fair transactions and build trust with society with integrity.
- Standards of behavior
 - We will correctly understand competition laws, not conduct actions such as unauthorized discussions or entering into agreements with competitors and be careful about our actions and words we speak that could raise suspicion of such action.
 - We will not engage in unfair competition practices such as the manufacturing and sale of counterfeit products, illegal acquisition and/or use of trade secrets, etc.
 - We will comply to applicable laws, regulations and procedures to conduct appropriate import/export control and security export control.

Insider Trading

- Company policy
 - The company implements strict controls to keep non-public material facts possessed by group companies from being wrongfully disclosed and used.
- Standards of behavior
 - When we gain knowledge of non-public material facts regarding our group companies, supplier, etc., we will strictly maintain confidentiality until it is made public and we will not buy/sell those stocks, etc.
 - We will not disclose company confidential information to anyone such as family, friends, specific stockholders, etc.

Chapter 3 Business Activities with Integrity

Bribery prevention and accepting or offering gifts/entertainment

- Company policy
 - The company will comply to each country's laws & regulations regarding bribery and prohibit any form of bribery. Bribery in foreign countries of public officials is considered to be a serious risk for the company to conduct business overseas. When dealing with public officials, fair and transparent dealings will be conducted.
- Standards of behavior
 - We will not improperly give, offer to give or make any promise of money, valuables or any other financial benefit to public officers or any party in a corresponding position. In addition, we will also not accept or offer gifts or entertainment that would infringe on relevant laws and regulations.
 - We will not conduct provision of money, offer or accept gifts or entertainment or any other financial benefit to business partners that would exceed a level that is considered socially acceptable. In addition, we will not demand any counterpart to accept or offer gifts or entertainment.

Actions Taken Against Company Interests

- Company policy
 - In order for the company to ensure fair decision-making, any action of an individual against company interests will not be tolerated.
- Standards of behavior
 - We will not sacrifice the interests of the company such as getting involved with a competing business, etc. or carry out actions for our own personal benefit or to benefit a business partner or a third party.
 - When we feel that an action goes against or has a possibility to go against the interests of the company, the circumstances of that action will be reported to the company promptly.

Anti-Social Forces

- Company policy
 - The company takes a resolute stand against and will sever any ties with anti-social activities and forces that would threaten the order and safety of civil society and obstruct financial activities.
 - The company will comply to relevant laws & regulations regarding money laundering and will not have any involvement in money laundering.
- Standards of behavior
 - We will have absolutely no dealings with counterparts that have or had relationships with anti-social forces regardless of being a past or current relationship.
 - In selecting new business partners, collection of information regarding anti-social forces through external specialized agencies and investigations and confirmation of the soundness of the candidate will be performed by third party institutions.
 - We will play close attention to situations of suspected money laundering such as payments received, paid or retained of questionable funds, etc.

Chapter 3 Business Activities with Integrity

Intellectual Property Rights of Third Parties

- Company policy
 - The company will comply to relevant laws and regulations to carry out research and development and will not misuse the intellectual property and confidential information of third parties.
- Standards of behavior
 - When carrying out the production and sales of products that utilize new technologies, we will investigate whether it infringes on the intellectual property rights owned by another party and will confirm that it does not constitute an infringement on those rights.
 - We will not use intellectual property rights owned by another party without permission, such as making copies of computer software without permission, etc.

Asset Management

- Company policy
 - The company appropriately owns and manages tangible assets, such as equipment and instruments, etc. that are management resources and intangible assets, such as intellectual property, confidential information, etc.
- Standards of behavior
 - We will manage company assets appropriately and will not conduct acts that would hurt the value of assets such as misuse (including use of information systems), etc. In addition, information equipment provided by the company will not be used for personal use.
 - We will protect the company's intellectual property & confidential information and it will not be used except for the purpose of work in accordance with internal company rules.

Chapter 4 Company Information

Information control

- Company policy
 - In order to properly handle the company's and other companies confidential information as well as personal information, the company will prevent the occurrence of accidental loss and fulfill its social responsibility by having a system to manage and establishing basic rules regarding this information.
- Standards of behavior
 - We will not disclose the company's confidential information without permission and will not use such information improperly for our own personal benefit. In addition, confidential information received that was disclosed by other parties will also not be used improperly.
 - We will comply to internal company rules pertaining to the creation, delivering/receiving, storage and disposal, etc. of confidential documents and we will implement measures to prevent the leak of confidential information.
 - In regard to the handling of personal information, we will comply to laws, regulations and other rules pertaining to the protection of personal information such as purpose of use, etc. and will manage the information strictly and properly.

Information disclosure

- Company policy
 - In order to raise corporate transparency, the company will observe timely disclosure and provide crucial company information in a timely and appropriate manner to stakeholders such as stockholders, investors, business partners, regional society, etc.
- Standards of behavior
 - If we are involved with information disclosure, it will be handled according to relevant laws, regulations and internal company rules, we will endeavor to disclose information being mindful of the accuracy and timeliness of the information.
 - When a material fact that has an impact on the company is recognized, we will notify the relevant division(s) (Corporate Planning, Finance Department, Human Resources Section, etc.) without delay.

Chapter 5 Relationship with Society

Politics and government administrations

- Company policy
 - The company will maintain a transparent and impartial relationship with politics (political groups, politicians) and government administrations (government offices, public officials) and comply to relevant laws and regulations, etc.
- Standards of behavior
 - We will not accept or offer gifts or entertainment that is prohibited by relevant laws & regulations, etc. to politicians or public officials for the purpose of gaining an unfair advantage.
 - When dealing with government agencies and government offices we will not obtain or accept relevant inside information.

Compliance in Practice

- Company policy
 - In order to garner more trust from society and fulfill the company's social responsibility, the company will continuously work on strengthening compliance. In addition, every single individual is encouraged to act according to compliance rules, not only at the workplace but, also in daily social settings.
- Standards of behavior
 - We will comply to laws & regulations pertaining to criminal code crimes & road traffic laws and internal company rules.
 - We will not conduct illegal acts that are unacceptable as a member of society such as actions that slander other people (including what is written on the internet including social media, etc.), or make illegal copies of copyrighted material, etc.

Contribution to Society

- Company policy
 - The company will contribute to the realization of a prosperous and sustainable society through its business activities starting with the provision of products and technologies, along with proactively working also on social contribution activities (volunteering, various support activities, etc.) to support regional society.
- Standards of behavior
 - We will understand the concepts regarding the company's social contribution activities and each individual will proactively participate also in social contribution activities such as volunteer activities, etc.

ALMEX TECHNOLOGIES Inc.