NIPPON SANSO

Live the Code

Code of Conduct



This document defines our commitment to ethics, integrity, and legal compliance, applying to all employees, managers, directors, and temporary workers.

Corporate ethics, integrity & social responsibility

This Code of Conduct ("Code") sets forth our values and principles to ensure that all employees, managers and directors are acting in accordance with relevant laws, regulations and internal policies and furthering our commitment to corporate ethics, integrity and social responsibility.

The Nippon Sanso Group in Europe ("Group") and each employee, manager and director as individuals strive to be ethical in all business endeavours.

This Code highlights how, by building relationships of mutual trust with our employees, customers and public and private business partners, we can achieve the Group's goals.

Understanding the Code

This Code applies to any and all employees, managers and directors of our Group. Temporary workers under any dispatch contract are also subject to the Code.

Complying with the Code

The Group and its employees, managers and directors will adhere to the Code and relevant laws and regulations in every aspect of our business activities. Any person who violates the Code or fails to report a violation of the Code may be subject to disciplinary action. The Group has established a Compliance Organisation, headed by the Chief Compliance Officer Europe, to investigate violations.

Our values

Integrity
Safety & Quality
Trust & Respect
Leadership
Innovation
Sustainability

Our principles

All compliance breaches can be prevented



Compliance is the responsibility of line management



Every employee is responsible for his / her own ethical behaviour



Every employee must stop a job if it cannot be done ethically



Efforts in compliance yield results in compliance



Ethical and compliant behaviour is a condition of employment



Integrity

Respecting our Customers and Business Partners

We value our relationships with third parties and seek to comply with all laws applicable to our products and services.

We treat our customers fairly and equitably and protect all confidential customer information. We treat our suppliers fairly and equitably and never abuse our position as the purchaser by requesting unfair prices, discounts or services.

We select business partners on the basis of rational criteria (e.g., price, quality, delivery schedules) and screen and monitor all third parties acting on the Group's behalf to ensure compliance with applicable laws and regulations.

Anti-Bribery & Anti-Corruption

We do not permit or tolerate improper payments of any kind. We strictly refrain from offering bribes or improper gifts/entertainment to our business partners or public officials in order to receive an improper business advantage.

We avoid engaging in activity that may be interpreted as colluding with politicians or governments and instead endeavour to build sound and transparent relationships with government officials.

We act in accordance with all applicable laws, regulations and internal policies, as well as sound business practices and local customs in connection with gifts/entertainment.

We maintain adequate policies and procedures to prevent our business partners from engaging in corrupt activity. We strictly follow the procedures for obtaining approvals and licenses required to conduct our business.



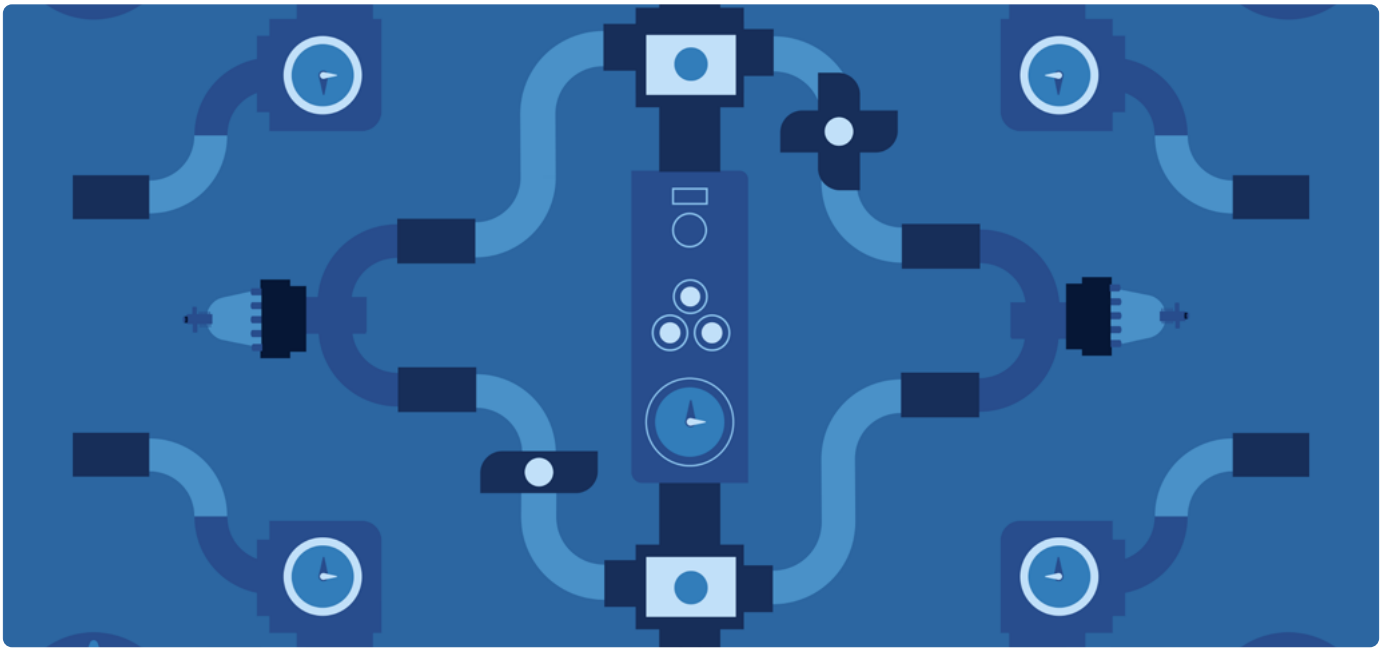
Interacting with other Businesses

Fair competition
We win business based solely on our products and services and comply with all relevant antitrust and fair competition laws. We never enter into agreements with competitors to limit competition by fixing prices, limiting production, dividing markets and bids, or restricting product quality, innovation or variety.

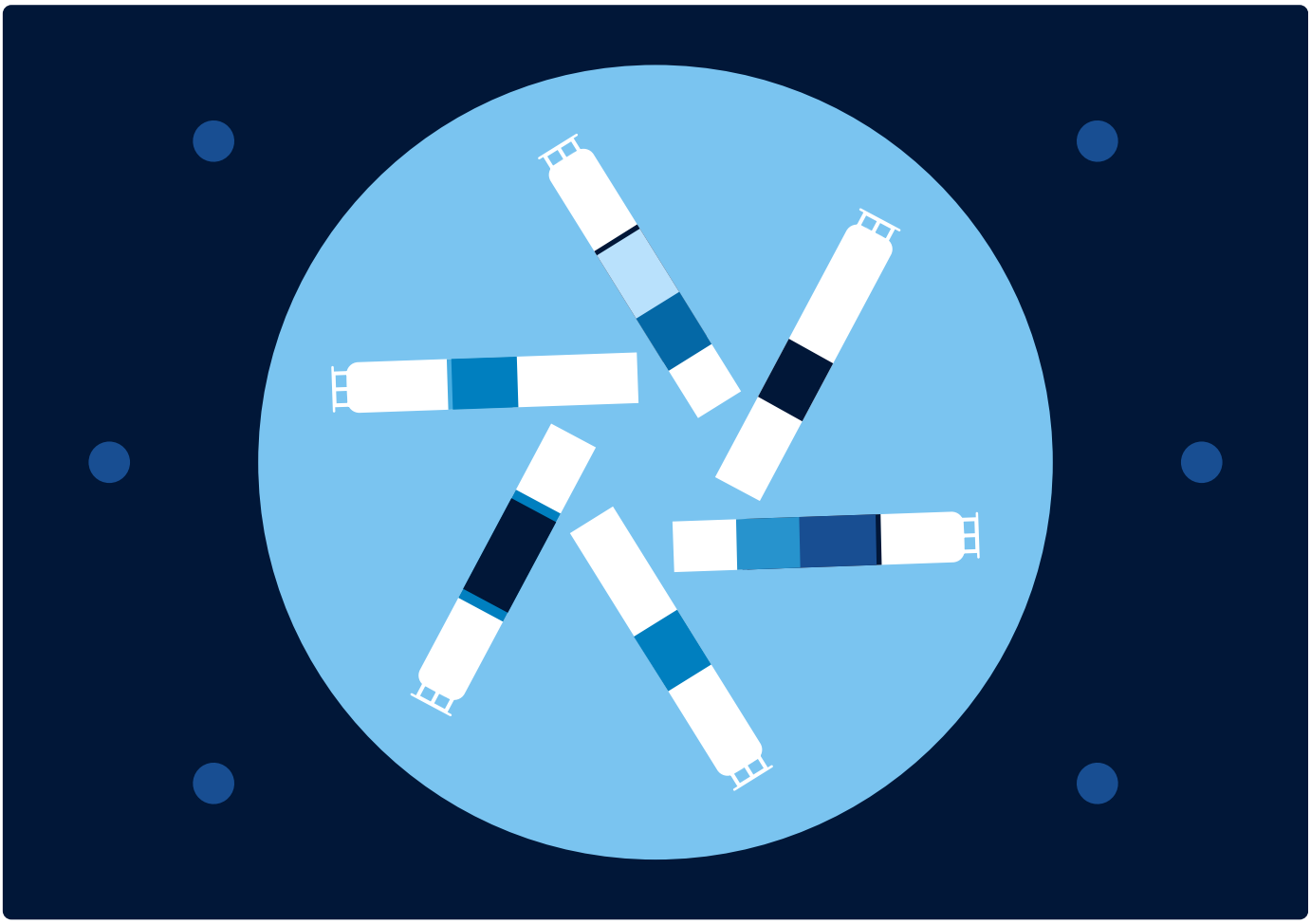
We do not exchange confidential business information with competitors. Our strategic choices are based solely on public information and reasonable estimates.
We ensure fair competition on all levels of the production and value chain, including resale by our customers.

Global Trade, Import & Export
To maintain export security control, we strictly comply with all regulations and internal procedures, confirm the profile and description of our business partners in every export transaction.

Regulatory Compliance
We perform our business and production in accordance with all applicable laws and regulations.



Safety & Quality
Commitment to our customers & employees



Safety

We are always mindful of safety in manufacturing, development, import/export, storage, sales, transportation, maintenance and repair of products.

We adhere to all laws, regulations, standards and internal policies concerning product safety and consistently aim to achieve a higher level of safety in our business.

We believe that all accidents can be prevented.
Every employee is responsible for his/her own safety.
Every employee must stop a job if it cannot be done safely.
When an accident does occur, we will immediately report and remediate.

Quality control

We provide our customers with only those products that have been thoroughly examined for quality and satisfy all requirements and standards.

We provide sufficient information, including terms of use and environmental conditions, that our customers need in order to use and handle our products safely.

We will thoroughly investigate the cause of any quality problems and take immediate action to prevent recurrence and remediate.

Trust & Respect
Essential to our workplace



Working Environment
We respect the labour rights of our employees, and thus, encourage personal development and work/life balance. We seek to build a positive working environment that motivates employees to work and lead a satisfying life.



Human Rights
We support and respect internationally proclaimed human rights and will not be complicit in human rights abuses.



Child / Forced Labour
We are against any form of child/forced labour.



Discrimination
We will not engage in any discriminatory treatment in employment or other working conditions based on nationality, race, sex, religion, creed, personal preference or social status.



Harassment
We do not allow any sexual harassment, abuse or any other conduct that impairs the dignity of an employee in the workplace.



Diversity & Inclusion
Diversity and Inclusion are essential to our work and workplace.

Transparency with stakeholders

Shareholders
We disclose only accurate management information, such as the composition of finances and status of business activities. We clearly convey our management principles and policies to our shareholders and are open to their views and criticism.

Financial data
We accurately perform accounting processing in accordance with relevant laws and regulations. We do not make any false or fictitious entries or hold unrecorded assets for the purposes of manipulating profit and loss.



Best interest of the company

Inside Information
When we obtain inside information on any of our group companies or on our business partners in the course of business activities, we will not buy or sell stock of the company in question until such information is made public.

Moreover, that information will not be communicated or purchase recommendations made to enable another person to profit or avoid making a loss.

We will ensure compliance with relevant laws and internal codes in relation to trading of stocks of our company.

Conflicts of Interest
All employees, managers and directors are expected to act in the best interest of the Company at all times. We do not use company assets and expenses for personal purposes.

Employees, managers, directors and business partners are expected to be transparent and promptly disclose any potential conflicts of interest.

Confidential Information
We do not disclose or divulge confidential information of the Group without prior approval.

We will obtain confidential business information only from persons authorised to disclose such information.

This provision applies to current and retired employees, managers and directors.

Innovation
Protecting Technology

Personal information
We will properly obtain, provide, or use personal data under our control in compliance with the General Data Protection Regulation and other relevant laws, regulations and internal policies.

We will ensure that any personal data used in the course of business activities is protected and seek to prevent and remedy any leak, loss or damage of such information we hold by taking necessary and appropriate security measures.

Intellectual property rights
Patents, utility models, designs, trademarks, and copyrights are business assets, and we will ensure proper use and protection of such assets, while also respecting the intellectual property rights of others.

Information systems
We will use the Group's information systems for business purposes only and place strict controls on IDs and passwords to prevent leaks.



Sustainability
Our commitment

Local & International Communities
We respect the history, culture, religion and social customs of the respective countries where we do business.

We seek to establish relationships of mutual trust with local communities and contribute to the development of those communities by acting as good corporate citizens.

Environmental Preservation & Protection
We seek to enhance our environmental awareness and coexist with the environment in all aspects of our business activities through such efforts as:
- energy saving;
- waste reduction;
- recycling promotion; and
- appropriate management of chemical substances.



Reporting of non-compliance

Any person who has discovered a violation of the Code must promptly report such violation either to her/his manager, Local Compliance Champion, Chief Compliance Officer Europe, the Human Resources Department or the Legal Department.

Reports and questions can also be addressed to the hotline **0800 007 4241 (PIN: 855-229-9304)**, staying anonymous is possible, or to **compliance@eu.nipponsanso.com**.

No person will receive unfavourable treatment as a result of reporting a Code violation through the Company's hotline and/or through other channels.

The Group will ensure that any and all parts of such report and related discussions or personal data will remain confidential.