

Code of Conduct (Main Points)

Kinsho Corporation executives and employees shall:

1. Respect human rights and not engage in any discrimination or harassment.
2. Observe all treaties and laws concerning the environment, and act giving consideration to the global environment.
3. Aim at fairness and observe all laws and regulations in the execution of transactions.
4. Observe all international agreements concerning trade.
5. Appropriately manage and handle all company information, all information obtained from outside the company, and the intellectual property rights and other rights of third parties.
6. Not engage in any unfair trading (insider trading) of shares or other financial instruments.
7. Not engage in any behavior that is contrary to Kinsho Corporation's interests, and always behave with propriety, with a clear distinction between corporate and private affairs.
8. Engage in timely and appropriate recording and reporting concerning financial and accounting matters.
9. Not violate any laws concerning business entertainment and the exchange of gifts, and limit such conduct to within the range of social convention.
10. Resolutely deal with anti-social forces, and absolutely refrain from providing any benefits to such forces or receiving any benefits from such forces whatsoever.
11. Immediately report to their superiors, to the concerned department, or to the director or secretariat of the Ethics Committee whenever they judge that any individual or organizational action in violation of this Code of Conduct that is unfair, illegal or unethical (hereafter "illicit behavior") has occurred or is likely to occur, regardless of their own involvement, and thus strive to rectify and prevent said illicit behavior.

(Supplement)

This Code of Conduct applies to all employees and officers of Kinsho Corporation (including advisors, temporary employees, employees sent on loan to other companies, and local employees at overseas offices), and also applies mutatis mutandis to employees of each of its locally-incorporated companies based on agreements with each company. Also, this Code of Conduct applies mutatis mutandis to employees of subsidiaries of Kinsho Corporation, and companies to which the equity method is applied are requested to observe similar matters by using this Code of Conduct as a model.