

## JALUX GROUP CODE OF CONDUCT

This Code of Conduct has been established to set out the guidelines that JALUX and its affiliated companies worldwide (JALUX Group) will follow in order to create value through fair competition and to play a role in the development of a sustainable society.

Based on our corporate philosophy of "Contributing to Tomorrow", we aim to be a good corporate citizen and a corporate group, recognizing our social responsibility and exercising high ethical standards, and make a broad contribution to society by consistently providing products and services which can satisfy society and our customers.

Based on this philosophy, we will act under the following guidelines.

### **1. Compliance with Laws and Regulations**

- We will comply with all relevant laws, regulations and international rules, whether national or international, and act with integrity, the high standards of business ethics and common sense.

### **2. Provision of Safe Products and Services and Conduct of Appropriate Transactions**

- We will develop and provide socially useful products and services with high safety standards, and strive to earn the trust of our customers and business partners.

- We will conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which we conduct business. We will not agree or undertake with our competitors to fix prices, rig bids, divide markets or limit production, and conduct appropriate transactions based on the principles of fair, transparent and free competition.

- All business decisions must be made, and all business activities must be conducted, in the best interests of JALUX Group. We must avoid any action which may involve, or may appear to involve, a conflict of interest with JALUX Group. None of us may have any financial or other business relationship with suppliers, customers or competitors that might impair the independence of any judgments we may need to make in the best interest of JALUX Group.

### **3. Compliance with International Trade Laws**

- We will comply with all applicable trade-related treaties, local laws and regulations and carry out appropriate import and export procedures.

- In security export control, we will not only comply with laws and regulations, but also carefully conduct transactions, considering international interests in order to maintain global peace and security.

#### **4. Fair and Transparent Relationship with Business Partners**

- We will strive to develop sturdy and sustainable relationships with our business partners by always dealing with them in an honest and fair manner and by establishing and maintaining strong partnerships.
- We will not give any kickback, favor, cash, gratuity, entertainment or anything of value to gain unjust benefits. Any gift, meals or entertainment must comply with applicable law, must not violate the giver's and/or recipient's policies on the matter, and must be consistent with local custom and practice.
- We must not, directly or indirectly, offer or pay anything of value (including travel, gift, hospitality expenses and charitable donations) to any employee or official of any commercial organization (in accordance with UK Bribery Act) or government, government agency or public international organization. We will comply with relevant laws and regulations and maintain proper, normal, and transparent relationships in transactions with public officials and their equivalent parties, whether in or outside Japan, including the U.S. Foreign Corrupt Practices Act and/or UK Bribery Act.
- We will not make inappropriate donations or contributions to politicians, political groups, or other organizations in violation of laws, regulations, or company rules.

#### **5. Disclosure and Control of Information**

- We will communicate not only with shareholders but also with society at large, and disclose corporate information in an appropriate and fair manner.
- We will establish a system responsible for strictly protecting and controlling confidential information of JALUX Group, information related to intellectual property rights, personal information, and customer information.
- We will not engage in any acts that constitute unauthorized acquisition or use of confidential information of other companies (others) or infringement of intellectual property rights.
- We will not engage in unfair trading and insider trading of stocks or other securities. If we are aware of material non-public information relating to Japan Airlines Group or any other company, we shall not buy or sell Japan Airlines Group's or such other company's securities or pass that information on to others.

#### **6. Respect for Human Rights**

- In accordance with the JALUX Group Human Rights Policy, we will respect human rights, give consideration to individuality, diverse values (diversity), personality, and privacy, and will not engage in any form of discrimination or harassment based on race, religion, color, national origin, age, gender, disability, marital status or pregnancy.
- We are committed to promoting work-life balance, employment of a diverse workforce and

equal treatment in the work place.

#### **7. Exclusion of Antisocial Forces**

- We shall not give money to, enter into contracts with, or have any dealing or relationship with antisocial forces or organizations, such as corporate racketeers and organized crime groups.
- When any doubt exists as to the legality of any proposed action or agreement, the matter should promptly be discussed with the legal and compliance department.

#### **8. Contribution to Society**

- As a good corporate citizen, we will actively participate in social activities and contribute to the development of society.
- In response to the globalization of our business activities, we will conduct our business based on respect of the culture and customs of each country and region, as well as contribute to the development of local communities.

#### **9. Contribution to the Environment**

- Based on the JALUX Group Environmental Policy, we will contribute to the creation of a sustainable, recycling-oriented society by addressing global issues such as de-carbonization and preservation of biodiversity.

#### **10. Proper Accounting and Reporting**

- All records, recordation and reporting of information, including but not limited to accounting books and other financial records, must be accurate, complete, honest, timely and must be a fair representation of facts.
- We will comply with all relevant laws and accounting standards and should never cause records to be inaccurate or create records that are misleading or artificial.

#### **11. Awareness and Leadership**

- The management of JALUX Group shall respect the individuality and personality of its employees and create a corporate culture that is free, vigorous and encourages creativity. We will strive to realize the spirit of this Code of Conduct, ensure that all employees are fully aware of these guidelines, and take the initiative in establishing effective internal systems to achieve them. In the event that a violation of these guidelines should occur, management shall take the initiative in resolving such situation, and commit to identification of the causes and prevention of future occurrences.