

JALUX Group Policy on Customer Harassment

JALUX Group has established JALUX Group Policy on unacceptable customer behavior (the "Customer Harassment"), believing that it is important for every employee and their family members to remain healthy in mind and body, in order for us to pursue our corporate philosophy of "Contributing to Tomorrow—Your partner in creating happiness and bringing a bright future to people, society and the environment" and to achieve our long-term vision "to become a leading company creating JALUX-VALUE with partners all over the world."

Introduction

JALUX Group aims to contribute to society by providing safety and security to our customers as we strive to create high quality and unique businesses, products, and services.

However, we will not tolerate any unacceptable customer behavior such as violence, threats, verbal abuse, or unreasonable demands, as we consider such behavior to be harmful to the dignity of our employees, and may lead to unhealthy work environment, which should be safe, secure, and comfortable.

JALUX Group believes that it is essential to protect each of our JALUX Group employee by taking firm actions against Customer Harassment, while continuously responding to reasonable opinions and requests from our customers promptly and sincerely to improve our services. An environment where each employee can work in good mental and physical conditions not only increases corporate value, but also is an important cornerstone for providing customers with safety and security, creating high quality and unique businesses, products, and services, to contribute to society.

JALUX Group will work against Customer Harassment to ensure a workplace environment where all employees can work actively and in good mental and physical conditions.

■ Definition of Customer Harassment

Whether or not a demand, complaint, speech, or behavior of a customer is considered unacceptable will be made with comprehensive consideration of: (A) the reasonability of such demand of the customer; and (B) the reasonability under normal social conventions of the means or manner used to realize such demand.

(A) Demand, complaint, speech, or behavior of a customer shall be determined to be unreasonable in cases:

- (i) Where no defect or fault is found in the products or services provided by JALUX Group;
- (ii) Where the demand of the customer is not related to the products or services provided by JALUX Group; or
- (iii) Other cases similar to item (i) or (ii) above.

(B) The means or manner used to realize such demand will be determined to be unreasonable under normal social conventions in the following cases, including cases where a customer is determined to be likely to perform any of the following acts. In cases where a customer performs any of the acts listed in (B), it shall be deemed to be unacceptable, even if their demand referred to in (A) is reasonable:

- (i) Physical attack (violence, bodily harm);
- (ii) Mental attack (threat, slander, defamation, insult, or verbal abuse);
- (iii) Coercive speech or behavior;
- (iv) Demand to kneel down on the ground;
- (v) Continuous (repeated), persistent (insistent) speech or behavior;
- (vi) Binding acts (refusal to vacate, staying put, confinement, or long conversation (for 30 minutes or more));
- (vii) Discriminatory speech or behavior;
- (viii) Sexual speech or behavior;
- (ix) Attack or demand on individual employees working for the JALUX Group;
- (x) Posting of personal information of our employees or slander against the company or our employees on social media, the Internet, or other media (including publication of photos, voices, or videos); or
- (xi) Other acts similar to (i) to (x) above and acts prohibited by laws and regulations or the like.

■ External Measures toward Harassment by Customers

In cases of extremely malicious harassment by customers, JALUX Group may take appropriate measures such as reporting the incident to the police or consult with specialists such as our lawyers in order to protect each and every of our employees. In addition, we may refuse to provide further services to such customers.

■ Internal Measures at the JALUX Group

- (i) Necessary training for employees of the basic policy of JALUX Group to raise awareness
- (ii) Development of a system to respond to consultation by employees
- (iii) Establishment of response methods and procedures

- (iv) Accurate fact-checking and response to cases
- (v) Education and training for employees on internal response rules
- (vi) Aftercare support for our employees
- (vii) Efforts to prevent recurrence
- (viii) Measures to be taken together with (i) to (vii) above (Prohibition of disadvantageous treatment)

JALUX Inc.