

Fine Sinter Corporate Code of Conduct

1. Message from the President

The automotive industry is undergoing a major revolution for the first time in a century. There is a growing demand to address global social issues such as the climate crisis, food shortages, and water scarcity. In this context, social responsibility and compliance with laws and regulations have become increasingly important, especially in light of the rapid evolution of AI and digital technologies and intensifying global competition that requires diversified choices.

Traditional corporate management, which has focused solely on economic outcomes, is now being re-evaluated. We must implement transparent management with appropriate information disclosure and sound ethics, without neglecting stakeholders (customers, employees, shareholders, business partners, government, local communities, international society, etc.). We should aim to achieve favorable economic outcomes while maintaining this balance, and it is vital to build our own values centered on compliance with laws and regulations.

In today's society, corporations must coexist with communities and share happiness. It is no longer acceptable to develop a company while ignoring society, nor is it feasible to leave social development entirely in the hands of corporations. Businesses and society must progress together in mutual support and good relationships.

As business activities become more complex, fast-paced, and diverse, our company must consistently build its values. To achieve this, we must clearly define guidelines for "values and ethics" that align with the development direction of our organization and its people. We must also make clear the sources of reasoning and standards that individuals should rely on in their conduct.

The spirit of sustainability—our commitment to contributing to a sustainable society—is expressed in our fundamental philosophy: *"Contributing to a better society and the happiness of people through production systems."* The "Code of Conduct" translates this fundamental philosophy into a tangible and easily understood form. Since our business plays an important role in society, we must voluntarily establish and adhere to high ethical standards.

To embed the "Code of Conduct" as part of our corporate culture, it is crucial to accumulate small daily actions. Therefore, we kindly ask for everyone's cooperation in creating a better corporate culture to support the continued development of our company.

December 2024

Fine Sinter Co., Ltd.

President Executive Officer Toshiya Yamaguchi

2. Business Conduct Guidelines

Our company is committed to conducting business responsibly toward society, earning the trust of stakeholders, and contributing to sustainable social development in accordance with our fundamental philosophy. Therefore, we have established the following business conduct guidelines as part of our Code of Conduct to be observed for sound corporate governance:

1) Conduct Toward Customers

- (1) We will develop and deliver valuable products that satisfy customers and respond to their expectations and trust.
- (2) We will deliver products that are safe, reliable, and of high quality.
- (3) We will appropriately manage and protect customer information.

2) Conduct Toward Employees

- (1) We will respect human rights, age, nationality, race, ethnicity, personality, individuality, and gender. We will not engage in class discrimination, child labor, or forced labor.
- (2) We will not tolerate harassment or any actions that violate personal dignity. All complaints regarding harassment or violations will be promptly reported and investigated.
- (3) We encourage pride in work and the company, promote collaboration, and grow together with the company.
- (4) We will respect employees' individuality and support the development of their professional skills and capabilities.
- (5) We will strictly comply with relevant laws and regulations in each country or locality, including those related to compensation and working hours.
- (6) We will maintain a working environment suitable for the nature of the job and ensure employee safety.

3) Conduct Toward Shareholders and Investors

- (1) We are committed to transparent management and proper disclosure of information as appropriate for each situation.
- (2) We strive to operate in ways that create value and increase corporate worth through business activities.
- (3) We maintain systems to prevent misinformation in financial reports and adhere properly to accounting standards.

4) Conduct Toward Business Partners

- (1) We respect our business partners as essential allies.
- (2) We will maintain fair and equal relationships with business partners according to contract terms.
- (3) We will conduct business with fairness and appropriateness.
- (4) We will protect our intellectual property rights and will not infringe upon third-party intellectual property.
- (5) We will properly follow export procedures and control the export of legally restricted technologies and products.

5) Conduct Toward Society and the Environment

- (1) We will comply with all relevant laws and regulations and conduct business activities with honesty and social responsibility in accordance with ethical standards.
- (2) We will seriously address environmental issues and work to preserve the global environment.
- (3) We will respect the social norms and cultures of the countries and regions where we do business and strive to contribute to those nations, local communities, and their economies.
- (4) We will not use substances prohibited by the laws of each country.
- (5) We will strictly comply with anti-bribery laws in each country and maintain fair relationships between the public and private sectors.
- (6) We will have no affiliation with antisocial groups.
- (7) We are committed to participating in social contribution activities to help create a better society as responsible corporate citizens and community members.

3. Additional Provisions

1) Communication of the "Code of Conduct"

- (1) The company will ensure that the “Code of Conduct” is accessible to all executives and employees at all times.
- (2) The company will conduct appropriate training to promote understanding of the “Code of Conduct.”
- (3) The company will prepare clear, concrete manuals for urgent and important issues.

2) Operational Framework

- (1) The implementation and promotion of the “Code of Conduct” will be carried out by the Internal Control Committee and the Corporate Governance Department, composed of the company president and internal directors.
- (2) The Internal Control Committee is responsible for formulating and executing the “Code of Conduct.” The Corporate Governance Department is responsible for implementing and promoting related policies.
- (3) Department managers are responsible for promoting implementation within their departments as “persons in charge of promotion.”
- (4) For issues related to the “Code of Conduct” that cannot be resolved within the department or are not suitable for discussion with supervisors—or for inquiries regarding the “Code of Conduct”—please contact the Internal Control Committee.
- (5) Personal information of the inquirer and any consultations will be kept strictly confidential.

3) Action in Case of Violation of the “Code of Conduct”

- (1) Disciplinary actions will be taken in accordance with the company’s employment regulations in the event of a violation.
- (2) The company may seek compensation for financial damages if it determines that the violation was intentional or due to gross negligence.

4) Revisions to the “Code of Conduct”

- Revisions to the “Code of Conduct” shall be discussed and decided by the Internal Control Committee.

5) Effective Date

- This version of the “Code of Conduct” is effective as of September 1, 2014.

6) Revision History

- August 1, 2007: Newly established
- September 1, 2014: Revised
- April 1, 2022: Revised
- June 1, 2023: Revised
- December 1, 2024: Revised

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