

Sojitz Group

Code of Conduct and Ethics



Message from the President of Sojitz Corporation

Our Corporate Philosophy: The Sojitz Group creates value and prosperity by connecting the world with a spirit of integrity.

We must all abide by both the letter and spirit of the laws and regulations applicable to our business activities, operating at all times with the highest ethical standards, and in doing so, we will continue to earn the trust of our stakeholders and build upon our reputation as a company that is committed to acting with integrity.

For the Sojitz Group, how we transact our business is as important as the results we achieve, so we will continually strive to leverage our diverse functions and global perspective to build businesses that contribute to local communities and are socially responsible.

As a global company, we must be responsive to opportunities arising from rapid technological innovation, an evolving environmental landscape, and growing diversity, equity and inclusion in our society, which we believe will be key drivers of our future growth and enhance our contribution to the communities we serve.

This Code of Conduct (Code) sets forth the fundamental principles and high ethical standards that govern the conduct of Sojitz Group employees around the world. The Code highlights the Company's commitment to an ethical business model that supports our mission to create value for its stakeholders and contribute to a more prosperous society.

We have updated our Code to address societal and environmental changes impacting our business activities and to foster and instill a "spirit of integrity" among all Sojitz Group employees. By working with integrity and remaining passionately focused on harmonizing business results and stakeholder satisfaction, we ensure that our reputation will be enhanced as a trusted business partner and we will be a successful and dynamic company for many years to come.

Kosuke Uemura
President & COO, Sojitz Corporation

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This Code of Conduct and Ethics (Code) applies to all group company employees. When this Code refers to “our Company,” “we” or “us,” it means all business units and subsidiaries of our group companies worldwide.

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Compliance Statement

As a general trading company (*sogo shosha*) that seeks international business opportunities throughout the world, we must ensure that we identify and follow the different laws, rules, and regulations of the markets in which we have business activities. We are committed to being a responsible and trustworthy partner to all our stakeholders. We recognize the importance of complying with our social responsibilities, maintaining high ethical standards, and conducting our business activities in a fair and transparent manner that adheres to the social norms, customs, and cultures of the markets in which we operate. To accomplish this goal, we provide training for all levels of our employee population to ensure that every member of our corporate family is aware of the high standards that we must follow. Our Code of Conduct sets forth the values, conduct, and legal compliance that we commit to.

KEY LINKS

Sojitz Group Statement

<https://www.sojitz.com/en/corporate/philosophy/>

Prohibition of Discrimination and Harassment and Promotion of a Positive Workplace Culture

We will promote an inclusive work culture that respects all diversity, including race, nationality, ethnicity, creed, gender, social status, religion, age, mental and physical disabilities, and sexual orientation. We insist that the diverse values, personality, and privacy of each employee be respected, and we will not accept or permit discrimination of any sort.

Harassment of any kind will not be tolerated, including the use of sexually explicit or offensive language or conduct, physical force, physical or verbal threats, actions that others would consider to be offensive, discriminatory behavior, or inappropriate statements or actions that bring pressure on others and constitute the abuse of status or authority.

We will comply with workplace labor laws and regulations, strive to ensure a safe and pleasant work atmosphere, and emphasize the balance between work and personal life. We will build mutual trust and promote good communication with our employees.

KEY LINKS

Sojitz Group Human Rights Policy

<https://www.sojitz.com/en/csr/humanrights/>

Sojitz Group Health Charter

<https://www.sojitz.com/en/csr/employee/healthmanagement/>

Quality and Safety of our Products and Services

In order to earn the trust of our customers, we will consistently strive to meet or exceed the quality that we guarantee to our customers. Moreover, we consider that the quality and safety required of corporations must change in lockstep with changes in peoples' values and our social environment. Accordingly, we will adopt quality control procedures that evolve along with technological innovations and implement appropriate quality control measures to

continuously improve our performance and production. Additionally, we will provide important information regarding the quality and safety of our products and services to our customers in a fair and transparent manner. In doing so, we will not only comply with all applicable laws and regulations but also fulfill our broader responsibility to be accountable to our customers and society.

KEY LINKS

Sojitz Group Quality Management Policy

<https://www.sojitz.com/en/corporate/governance/risk/policy/>

Supply Chain and Environmental Conservation

We will select suppliers and supply chain vendors that share our commitment to supply highly quality products and reliable services throughout our supply chains, from manufacturing through sales.

We demand that our business partners recognize and cooperate with our CSR Action Guidelines for Supply Chain, which expresses our respect for human rights, compliance with laws and regulations, quality and safety, and global environmental conservation. We prohibit the use of forced labor and child labor in our supply chains, and demand appropriate working hours and livable wages for our employees and contractors.

As a global company, our management values and prioritizes the safety and well-being of our global environment in our business activities. To realize a sustainable society, we will strive to minimize any adverse impact on the environment, make effective use of energy and resources, and reduce and recycle waste. To this end, we will strive to protect the environment, reduce pollution in our business activities, and promote competitive businesses with demonstrated high environmental performance.

KEY LINKS

Sojitz Group CSR Action Guidelines for Supply Chains

<https://www.sojitz.com/en/csr/supply/>

Sojitz Group Environmental Policy

<https://www.sojitz.com/en/csr/environment/policy/>

Wood Procurement Policy

<https://www.sojitz.com/en/csr/supply/lumber/>

Palm Oil Procurement Policy

<https://www.sojitz.com/en/csr/supply/palmoil/>

Compliance with Export and Import-Related Laws and Regulations

World peace, security, the maintenance of international order, and the furthering of international cooperation are universal values that our company endeavors to pursue. As such, we resolutely oppose the development, manufacture, use, and stockpiling of weapons of mass destruction. Therefore, we will neither deal with, nor have any relationship with,

any terrorist state, terrorist organization, or other entity that engages in, threatens to engage in, or otherwise promotes activities that are contrary to the values of peace, security, order, and cooperation.

We will (i) comply with the laws, regulations, and internal rules relating to trade compliance, (ii) conduct diligence on the counterparties that we trade with, invest in, give loans to, and otherwise transact with to identify and interdict denied parties, and (iii) carry out internal procedures and authorizations to prevent the risk of unapproved conduct and ensure compliance with all import and export laws.

KEY LINKS

Sojitz Group Sanctions Response and Export Control Basic Policy

https://www.sojitz.com/en/corporate/governance/compliance/pdf/exportpolicy_e.pdf

Compliance with Competition Laws

We will not engage in activities that unlawfully exclude or unjustly harm other market participants, such as participating in cartels or engaging in price fixing. In addition, we will not engage in unlawful business arrangements with our competitors that have the effect of manipulating prices or quantities of products sold or that restrict open competition to customers and territories. We will comply with the applicable competition laws of each country where we engage in business activities and promote free, open, and competitive markets.

Prohibition of Conflicts of Interest

We will act and make business decisions based on the company's best interests and not their own personal interests. The avoidance of conflicts of interest is essential to conducting business ethically, objectively, and with integrity, and we will avoid situations that present or create the appearance of a potential conflict between their personal interests and the interests of the company. We will always act with integrity and make ethical decisions in all aspects of our business.



Prohibition of Corruption and Bribery

We will not engage in corruption or bribery, such as the illegal provision of benefits or money, in any country or region where we may conduct business.

We will ensure that our anticorruption initiatives are implemented within every element of our business model.

We will not offer or provide cash or anything else of value (including gifts and entertainment), either directly or indirectly, to government officials, business partners, or other third parties in order to influence that person's decision-making to obtain or retain business or otherwise obtain an improper benefit.

Any conduct that could implicate anticorruption laws or create the appearance of impropriety when viewed objectively may only be taken after consultation with our team of anticorruption professionals to ensure that our business is conducted in a manner that is free of corruption and bribery in compliance with applicable laws.


KEY LINKS

Sojitz Group Anti-Bribery Policy

https://www.sojitz.com/en/corporate/governance/compliance/pdf/antibribery_e.pdf

Sojitz Group Corrupt Practices Rules

https://www.sojitz.com/en/corporate/governance/compliance/pdf/anticorruption_e.pdf

The background of the slide features a stylized, light blue-toned image. It depicts a hand holding an olive branch, a symbol of peace, positioned over a map of the United States. The map is rendered in a lighter shade of blue, and the hand and branch are in a slightly darker shade. The overall composition is clean and professional, with a focus on the text.

Dealing with Forces that Pose a Threat to the Order and Safety of Civic Activities

We will not transact with criminal organizations that threaten the order and safety of the public through activities such as fraud, extortion, money laundering, bribery, narcotics, terrorism, and other criminal acts, as well as with those who are suspected of being involved with such organizations or activities. We will take great care in the course of our transactions to ensure that our dealings are not used for these crimes, and if we receive unreasonable demands from these forces, we will reject them and take resolute action.

Confidentiality, Data Privacy and Security, and Intellectual Property Rights

We will comply with the applicable laws and regulations regarding data privacy and security. Additionally, we will take preventive measures to protect against data breaches and the unauthorized use of the confidential information entrusted to us, including the confidential and personal information of the company, its employees, our partners, and our customers.

In addition, we will protect the Sojitz Group's patents, copyrights, trademarks, and other intellectual property rights and we will not infringe upon the intellectual property rights of others.

KEY LINKS

Sojitz Privacy Policy

<https://www.sojitz.com/en/privacy/policy.php>

Sojitz GDPR Privacy Policy

<https://www.sojitz.com/jp/privacy/pdf/gdpr.pdf>

Corporate Controls, Transparency, and Information Disclosure

We will proactively and comprehensively disclose the corporate information required by applicable law, such as that with respect to our business activities and financial condition, in a timely and accurate manner. We endeavor to gain our stakeholders' long-term support and trust by sharing our management policies, social contribution activities, and other non-financial information with the public. In this connection, we also

strive to increase transparency through proactive public relations activities and dialogue.

We maintain financial and accounting records in compliance with generally accepted accounting principles, international financial reporting standards, tax laws, and other laws that are applicable to our business activities. We will respond promptly and accurately to requests from tax authorities and other government agencies regarding our business activities.

KEY LINKS

Information Disclosure Policy

<https://www.sojitz.com/en/ir/management/policy/>

Sojitz Group Tax Policy

https://www.sojitz.com/en/corporate/governance/compliance/pdf/taxpolicy_e.pdf

Prevention of Insider Trading

We have a legal and moral responsibility to safeguard the confidentiality of non-public and sensitive information that we have obtained in the course of our work at the company and to prevent the misuse of such information. We will not unduly use the position or knowledge of the company or its activities to gain personal benefit or provide a benefit to a third party. We will not buy or sell any shares or other securities of the company or any other entity that transacts business with the company based on non-public information. We will implement measures to ensure the confidentiality of any mergers and acquisitions that have not been publicly disclosed and any material revisions to the company's earnings forecast.