

Lithium Energy Japan CSR Code of Conduct

1. Developing fair, transparent, and sound business, and anti-corruption

1-1 Compliance

- (a) We respect international and regional norms, guidelines, and initiatives, and also strictly comply with the laws and regulations in each country and region in which we operate.
- (b) As a member of the international community, we will comply with the export control laws and regulations of each country in order to maintain international peace and security, and we will not export in a manner to spread materials which could lead to the proliferation of weapons of mass destruction.

1-2 Elimination of mixing up official business with personal affairs

We will never conduct to bring damage to the company, through misappropriation of corporate assets and corporate expenses only for one's personal ends or else with misfeasance allowing one's personal advantage.

1-3 Fair, Transparent and free competition and trade

- (a) We will not engage horizontal agreements (cartel) through meeting and participation to trade association's activities, i.e. price and quantity fixing as well as exclusivity in distribution of products and services. Upon receipt of such proposal, we decline clearly without leaving no doubt to be misunderstood. To this extent, we will never act in collusion with other contractors, nor to fix the winning bidder and/or contract price.
- (b) We never act in abuse of dominant position, to take advantage of subcontractors, i.e., withholding the amount of subcontract payments without reasons attributable to the subcontractor or failing to make payment after the lapse of the due date of payment, or obtaining undue or improper advantage. Also, upon issuing our order to subcontractors, we will retain the written offer on paper or electronic record.
- (c) We will not obtain or use industrial information or data of other companies or firms in an unauthorized way.
- (d) We will not leave product labelling or service information inexact or unclear in a manner to cause customers misunderstanding.

1-4 Management of confidential information

- (a) We observe the protection of confidential information and its appropriate use; then, at the event of disclosure to the third parties, we will disclose only after concluding confidentiality agreement.
- (b) We will observe the protection and appropriate use of confidential information received from our business partners and co-researchers or co-developers; We will not disclose to the third parties without the prior consent of the disclosing party.
- (c) Before assembling personal information, we will at first notify the purpose of use, and then collect in an appropriate way. The purpose of using personal information is to be limited and specified.
- (d) We will conserve personal information data in safety and control its use, then monitor in a suitable way the employees and subcontractors using/handling these data.
- (e) We always respect the individual privacy, so need to pay the most attention in handling their confidential information, learned from one's business relations or in the course of business, and at last, not to inform or leak to anyone without authority.
- (f) We will not commit so-called ""insider trading"", act of making max profit in stock and security exchanges transaction thanks to privileged acknowledgement of internal information, within our group and received from business partners.

1-5 Respect for intellectual property

- (a) We will assess sufficiently third parties' patents, industrial designs, trademarks and other commercial rights, prior to development, production, commercialization and delivery of, or providing our products and services.
- (b) We will not use intellectual property of a third party without authorization of patent holder, or unless we have a justifiable reason.
- (c) We will not unlawfully duplicate any software and other copyrighted works, i.e., Literature and images, Journalistic articles, Paintings, Music.

1-6 Separation from organized crime

- (a) We will not provide any form of benefit in excess of the normal shareholder's right to any person or company associated with organized crime.
- (b) We will cut off business or any other relationships with individuals and organizations having an indication of support for organised crime.

1-7 Transparency of information disclosure

We will disclose, within a specific time limit and with appropriate method, any information required by laws and regulations of each country and region in which we operate, as well as specific information to maintain good communication with other stakeholders and local communities.

1-8 Legal compliance for political funds control

We will not contribute for political funds, requesting some business advantage in return, such as acquisition or maintenance of trading, or access to nondisclosure information. Also, we will comply with the conditions stipulated by the laws and regulations of each country and region in which we operate before making political contributions.

1-9 Prohibition to offer entertainment or gifts to public employee

We will not offer money, entertainment, gifts, or other economic benefits, nor provide advantages to public employees or equivalent persons perceived as a conflict of interest.

1-10 Sound relationship with business partners

We will endeavor to maintain sound business relationships with our business partners; therefore we will not receive money, gift or entertainment offered from business partners exceeding commonly accepted limits.

2. Respect for human rights

2-1 Prohibition of discrimination and respect for diversity

We will respect and honor diversity and will not discriminate anyone for any reason, including race, gender, sexual identity, nationality, national origin, disability, and religious or political opinions.

2-2 Respect for individual personality

We will not condone the removal of human rights of any individual person, including sexual harassment and power harassment, nor the reduction of personal dignity of others.

2-3 Respect for labor rights

We will respect labor rights including freedom of association and collective bargaining rights, in accordance with the laws of each country and region in which we operate.

2-4 Prohibition of forced labor and child labor

We will neither force labor, nor employ children under the legal working age. Furthermore, we will not tolerate forced labor or child labor in any way.

2-5 Avoidance of complicity in human rights abuse

Directly or indirectly, we will not be complicit in human rights abuse.

3 . Conservation and improvement of adequate working environment

3-1 Conservation and improvement of safety and health in working environments

We will maintain and improve working environments from the perspective of health and safety in accordance with laws and regulations of each country or region in which we operate."

3-2 Ensuring appropriate working hours, securing minimum wages and prohibiting unreasonable wage reduction

- (a) We will provide management in order to maintain appropriate working hours and will make every effort to take measures to prevent mental and physical health disorders caused by overwork.
- (b) We will respect minimum wages in accordance with laws and regulations of each country or region in which we operate and will not conduct unreasonable wage reduction.

3-3 Mid to long-term human resources development and appropriate ability assessment

We will make every effort to proactively support career development in accordance with each employee's abilities and aptitudes. Performance of each employee will be assessed adequately.

3-4 Respect for individual work-life balance

We will make every effort to respect diverse working styles, so as to ensure work-life balance and to maintain physical and mental health of employees.

3-5 Offer of equal employment and working opportunities

We will offer equal opportunities in recruitment and promotion, as well as forbid any arbitrary or discriminatory treatments.

4. Fulfillment of responsibilities to provide safe and secure products and services.

4-1 Focus on safety and quality

We will address to prioritize safety and quality throughout our business. For this purpose, we will strive to provide safe products and services to maintain and improve satisfied quality for customers, through all our business activities which are research & development, design, procurement, production, sales and after-sales service.

4-2 Making Safety Information accessible

We clarify Safety Information on our products and services. Safety Information includes Instruction manuals supplied with products, Labelling of products, Web portal communication, etc. We will make Safety Information accessible for customers as well as for any other stakeholders involved in commercialization of our products and services.

4-3 Solutions in case of Product accidents

We address to prevent spin-off effects on the extent of damages of accidents as well as swiftly react in case a serious accident occurs on our product or service. And also, we investigate and collate the relative facts, research of causalities, make a necessary report on these inside and outside our company group, and then we disclose information so as to take preventive steps.

5. Global environmental conservation

5-1 Promoting environmental protection

- (a) We will evaluate environmental impact resulting from our business activities, products and services; strive for environmental protection (including prevention of pollution) through energy saving, greenhouse gas reduction, efficient use of raw materials and

water as well as waste reduction and recycling; and aim to increase our environmental performance through continuous improvement of these aspects.

- (b) We will address to reduce the environmental burden resulting from the activities conducted at each stage of the life cycle of products and services, from acquisition of raw materials, development and design/conception, production, transportation, use, until end-of-life treatment and final disposal.
- (c) We will satisfy environmental needs corresponding to comply with environmental laws and regulations. In addition, if necessary, we address to develop our environmental risk management with operational control by voluntary management standards and for preventing accidents likely to lead to environmental pollution.

5-2 Providing environmental considerations products

We will contribute to the environmentally conscious society through the provision of products and services corresponding to the environmental requirements.

6 . Building better relationships with local communities

6-1 Contribution to sustainable development of communities

We recognize that we are member of the community and we aim to work together in cooperation with the local community which is our foundation. We will respect local culture and customs.

6-2 Adoption of local human resources

We will actively adopt local human resources in the business activities of our overseas affiliates and contribute to the development of local communities through our business activities.

7 . Ensuring social responsibilities within our supply chain

7-1 CSR procurement promotion

We will share CSR procurement guideline among our suppliers, then address to promote CSR procurement upon interactive cooperation, aiming to ensure our social responsibilities across overall supply chain.



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President

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