

# Our Compliance Policy

(Corporate Compliance and Business Ethics Policy)

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# Musashi Philosophy

## ■ Our Origin

**Our Origin** 【創業の精神】

|  |  |
|--|--|
| Shisei-Ikkan   | Shitsujitsu-Goken  |
|  |  |
| Consistent Sincerity   | Simple and Sturdy  |

## ■ Our Purpose

### Our Purpose 【使命】

We contribute to enriched **Harmony** between our lives and Earth, using our **Passion** for technology and **Wisdom** for innovation.

わたしたちは、テクノロジーへの“情熱”とイノベーションを生み出す“知恵”をあわせて、人と環境が“調和”した豊かな地球社会の実現に貢献します。

## ■ Our Way

### Our Way 【行動指針】

- |                             |            |
|-----------------------------|------------|
| 1. Customer first           | お客様本位で     |
| 2. Integrity                | 誠実を尽くし     |
| 3. Be unique, be creative   | 工夫をこらして    |
| 4. Try first, learn fast    | 努力をおしまず    |
| 5. One Musashi              | みんなで力を合わせて |
| 6. Leadership and ownership | 権利義務を忘れずに  |
| 7. Smile and thanks         | 笑顔と感謝を届けよう |

## CEO Statement

The automobile industry is now in a “once in a hundred-year” state of major transition. Looking back at the Musashi Group history, we have confronted major changes in the business environment. However, we have always taken such challenges as opportunities to transform and later grow our business.

We have started the new philosophy and “Musashi 100<sup>th</sup> vision – Go Far Beyond!” for the 100-year anniversary of our founding in 2038. Beyond the bounds of a conventional automobile parts manufacturer, we continuously “contribute to the development of the global society” through our business activities and aim to be an “essential company” whose existence is needed by society.

This requires us to discharge social responsibilities as a company such as corporate ethics and compliance and to respond to expectations and trust from society. In order to ensure that the Musashi Group will continue to be needed and trusted by society, I am personally committed to leading and enlightening the compliance throughout our Group. It is equally important, however, that every employee has a full understanding of their own obligations to comply with the highest ethical standards. This is how we will realize the spirit of “Shitsujitsu-Goken Shisei-Ikkan” in the Musashi Philosophy.

“Our Compliance Policy” has been established based on the Musashi Philosophy to define common guidelines that each of us working in the Musashi Group should comply with, involvement with our customers and society. If you ever have any doubt as to whether what you are going to do is legally or ethically acceptable, then please re-read this policy in order to make a sound judgment.

My strong expectation is that your sincere judgment and action contribute to the continuous improvement of the sound culture of the Musashi Group.

March 2022  
CEO, Musashi Seimitsu Industry Co., Ltd.

**Hiroshi Otsuka**

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## **1. Musashi Group Compliance Policy and Guidelines**

Compliance is the word used to describe our corporate responsibility to society, or in other words “how to conduct business within the laws and ethical standards of our society.”

The global expansion of the Musashi Group has been rooted in the “Musashi Philosophy” and we have established the following “Musashi Compliance Guidelines” for both domestic and global use.

It is essential that each of us makes a conscious effort to improve the quality and safety of our activities and products in response to our customers’ expectations, and that each of us individually understands how to conduct our daily work activities in a manner that fulfils the corporate expectations of ethical and legal compliance.

As we continue to develop our global business, we must obtain the trust of our customers and of wider society by both respecting local culture and customs and by sharing and using the following “Musashi Compliance Guidelines”.

### **Musashi Compliance Guidelines**

- 1. We will act with decency and according to society’s expectations.**
- 2. We will build positive relationships with our local communities and with wider society.**
- 3. We will conduct fair and sound business transactions.**
- 4. We will respect the human rights and diversity of every individual.**
- 5. We will ensure high standards of health and safety, whilst keeping a well-ordered working environment.**
- 6. We will treat the information held by the Company appropriately.**

## **2. Purpose of “Our Compliance Policy” (Corporate Compliance and Business Ethics Policy)**

“Our Compliance Policy” is to be practiced by all employees, including, part-time, temporary and agency staff.

The six Guidelines summarize the most basic Musashi Group principles regarding Compliance and Company ethics.

However, compliance-related issues can be difficult to resolve, and it is not always easy to interpret the Compliance Guidelines correctly, or to apply them to our daily activities, so the “Basic Concepts” have been written to more fully explain the “Compliance Guidelines”.

In addition, the Action Guides provide practical examples of actions that should be taken by employees based on the principles in our Compliance Policy. This helps us to both understand the Policy and to implement it in actual situations.

If there are any doubts about a particular action which can be socially unacceptable or difficulty in judging what to do in a particular situation in the day-to-day business, the first step is to read the Policy.

If there are still uncertainties or concerns after reading the Policy, the issue should be addressed to the employee’s immediate supervisor in the organization. If the issue is still impossible to judge, the Whistle-Blower Hotline should be contacted in order to finally resolve the issue.

### **3. Compliance Guidelines Based on Our Compliance Policy**

#### **1 Compliance with laws and regulations**

##### **Guideline 1**

**We will act with decency and according to society's expectations**

#### **(1) Compliance with laws and regulations**

##### **Basic Concept**

The Musashi Group will comply with all relevant laws and regulations and conduct business activities in an appropriate manner.

##### **Action Guide**

- We will understand and comply with both the detail and the spirit of all relevant laws and regulations (rules, procedures, and other documented requirements).
- We will also identify anticipated changes in all relevant laws and regulations and respond to them in order to ensure that we have a full understanding of the latest situation.
- We will promptly report and file all information with the appropriate organization(s) and management as required by all relevant laws and regulations.
- In the event that we find a violation, or a risk of violation, of any relevant law or regulation, we will report it to the relevant department, the Human Resource Division or the "Whistle-Blower Hotline" (Company Consultation Service).
- We will control the assets of the Company responsibly, using the appropriate rules and internal policies.
- We will make a strict distinction between the assets of the Company and our personal assets. We will never use corporate assets for any personal or non-business use without going through the proper procedures as defined in the internal policies.

## (2) Product Safety and Quality Improvement

### Basic Concept

The Musashi Group will continuously improve the quality of our products in order to respond to the expectations of our customers.

### Action Guide

- In order to provide our customers with products that meet their expectations, we will prioritize the safety and quality of products and comply with the designated standards and procedures.
- In order to ensure the safe design and function of our products we will use clearly defined objective standards during the research and development phase of the project.
- In order to gain the trust of our customers, we will target zero defects with regards to the quality of Musashi Group products.
- We will record and collect all relevant data in order to avoid quality problems. In the event that a quality defect does occur, we will take all appropriate actions needed to avoid defective parts reaching the market, including making a prompt internal report, informing our customers and collecting all affected products. We will fully investigate the root-causes of any incurred problems in order to prevent a recurrence of the problem.
- As members of the Musashi Group we understand that we have a heavy responsibility to ensure that the products we supply do not threaten life, injury or damage to property; we will therefore make every effort to avoid sending defective products into the market.



### (3) Control of Imports/Exports

#### Basic Concept

The Musashi Group will comply with all applicable laws and international treaties for global business and the import/export of goods or services, applying appropriate controls as needed.

#### Action Guide

- We will authorize, approve, and file the information required for the import/export of goods according to all relevant laws. We will pay all legitimate taxes and duties as required.
- In order to import and export goods within the Musashi Group, we will comply with all applicable import and export laws (both Japanese and International).
- We will not export goods or technologies, nor conduct brokerage transactions, for products which have been prohibited.

#### (4) Action as a Considerate Member of Society

##### Basic Concept

The Musashi Group will seek to ensure that every person working within the Group takes personal responsibility for confirming that their daily activities meet the expectations of society.

##### Action Guide

- We will each recognize that we are responsible for generating the trust of both our customers and of society and that we therefore have a duty to act in a sensible and ethical manner.
- We will conduct ourselves with dignity in our private lives. We will not damage the honor or trust, or have any personal conflict of interest with the Musashi Group.
- We will not bring our personal activities into the Company. We will not conduct personal activities in the workplace without permission from the Company. This includes (but is not limited to) political, religious, social clubs and volunteering activities which have no connection with our regular duties.

## 2 Positive Dialogue with Society

### Guideline 2

**We will build positive relationships with our local communities and with wider society**

#### (1) Contribution to Society

##### Basic Concept

The Musashi Group will contribute to the positive and healthy development of society and culture.

The Musashi Group will encourage every person working within the Group to become involved in activities contributing to society.

##### **Conservation of local natural environment**

Based on an understanding of the diverse value of nature, the Musashi Group will actively engage in the conservation and enhancement of the local natural environment

##### **Support for nurturing and educating the next generation**

Recognizing that all our business activity is based on the cooperation of our stakeholders, the Musashi Group will actively support educational and training activities for the next generation.

##### **Promotion of traffic safety**

As a vehicle component manufacturer, the Musashi Group will promote awareness-raising activities for traffic safety.

##### **Other support activities for community values and sustainable development of local communities**

Recognizing that our development has been made possible by the support of our local communities, the Musashi Group recognizes their value and will support their sustainable development.

#### Action Guide

- We will apply the Musashi Group's approach to social contribution as well as accepting the normal obligations that are expected by society.
- We must understand that throughout our history, the Musashi Group has relied on the support and trust of our local communities in order to develop our business, indeed Musashi would not exist today without them. We will therefore conduct all of our activities with a sense of respect and gratitude to our local communities.
- In order to further strengthen bonds and mutual trust with our local communities, we will encourage every Musashi member to recognize their own importance in supporting such activities. We will actively participate in local events as well as voluntary support activities and so contribute to the creation of vibrant communities.

## (2) Traffic Rules and Manners

### Basic Concept

As a company engaged in the manufacture and sale of parts for vehicles, the Musashi Group will facilitate a better traffic environment by encouraging its employees to drive safely with good manners, whilst complying with all traffic rules.

### Action Guide

- Recognizing that we are manufacturing and supplying parts for vehicles, we will hold a firm stance against the violation of traffic rules.
- We will never drive a vehicle if we are either physically or mentally unfit to do so for any reason, including being under the influence of alcohol or drugs; neither will we allow ourselves to be driven by a person who is similarly unfit to do so.
- We will not only follow the traffic rules ourselves, but also pay close attention to others who may act in an unexpected or careless way, so that we will be ready and able to avoid an accident if for example, a pedestrian suddenly dashes into the road, or a car in front suddenly brakes.
- We will never allow ourselves to be distracted whilst driving.  
(This includes using smartphones or cell phones, sending or reading texts, watching internet, using applications, operating car navigation systems etc.)

### (3) **Avoiding Relationships with Criminal Organizations**

#### Basic Concept

In order to prevent our business from becoming involved in money laundering or funding criminal activities, the Musashi Group will firmly reject any contact with criminal organizations, including trading, compromise agreements such as protection rackets, or any other form of collusion, activity or cooperative relationships.

#### **Action Guide**

- We will refuse to make any direct or indirect transaction with criminal organizations. As part of our daily activity, we will ensure that our customers and suppliers do not have any relationships with criminal organizations.
- We will not use any criminal activity to gain profit for the Company or for ourselves including our private lives.
- In the event that a criminal organization makes an unfair demand of any sort, we will immediately work with the appropriate authorities, including the police, government agencies, company departments etc. to remove the demand.
- We will be careful to avoid having private relationships with members of criminal organizations.

#### (4) Appropriate Disclosure

##### Basic Concept

In order to remain a highly transparent company, the Musashi Group will communicate appropriately with our stakeholders including customers, suppliers, shareholders, investors, and local communities.

We will disclose the correct and fair information required by investors for their investment judgment as soon as it is available, in accordance with the laws and stock market rules applicable to a listed company.

##### Action Guide

- We will follow all laws and internal policies to disclose information appropriately to external parties. We will also respond sincerely to our various stakeholders.
- We will take requests and opinions from external parties seriously and reflect those in our corporate activities.
- We will disclose information on a voluntary basis if we believe that the usefulness or urgency of disclosing such information will be beneficial to our stakeholders.

### 3. Fair and Sound Business Transaction

#### Guideline 3

**We will conduct fair and sound business transactions.**

#### (1) Compliance with Legislation for Anti-Monopoly and Anti-Corruption

##### Basic Concept

The Musashi Group will provide honest and precise data to our customers and conduct truthful promotional activities based on facts and data.

The Musashi Group will conduct fair and sound business transactions based on internal policies complying with all applicable legislation for fair-trade including anti-monopoly, anti-corruption and anti-bribery in each country and region of operation.

##### Action Guide

- To avoid misunderstandings and misleading our customers, we will ensure that we use precise information and product data as a basis for conducting fair and honest promotional activities.
- We will preserve product related information and data in accordance with internal policies, we will provide the information and data which our customers require.
- We will comply with all fair trading and anti-monopoly legislation applicable in the country or region of operation and our internal policies. We will not seek to create private monopolies, use improper trading restraints or any other unfair methods of business, such as improper agreements, cartels or bid-rigging, nor will we seek to abuse any dominant bargaining positions which may arise.
- We will comply with all anti-corruption and anti-bribery legislation applicable in the country or region of operation. We will not receive or offer improper or excessive facilities including money, gifts, services or entertainments from or to interested parties such as suppliers.
- When sourcing products or services, we will compare the terms and conditions from at least two suppliers in order to fairly determine which one to use.

\*"Customer" refers to all people who use products provided by the Company, not only companies that directly purchase our products, but also final consumers who use finished products.

## (2) Prevention of Insider Trading

### Basic Concept

The Musashi Group will never violate the insider trading regulations nor take an action which might cause suspicion of violation.

### Action Guide

- In the event that we come to know undisclosed material facts about the Musashi Group or any other listed companies in the course of our work, we will follow all laws and internal policies and treat such information as secret. We will not disclose it to any person internally or externally other than for legitimate business purposes. We will never conduct insider trading, by selling or buying shares or bonds in such companies whilst in the possession of such information.
- We will not only avoid insider trading ourselves, but we will also avoid passing on undisclosed material facts about the Company to our family members, acquaintances, suppliers or others who would then be given an opportunity of insider trading.



### (3) Conflicting Interest Transactions

#### Basic Concept

The Musashi Group will not accept any act by an employee against the interests of the Company.

#### Action Guide

- As a member of Musashi, we will never conduct an act against the interests of Musashi in favor of the interests of ourselves, suppliers, or third parties.
- We will not use information learned in the course of work to the benefit of ourselves or to third parties.
- We will not use our position in the Company for making profits for ourselves or interested parties (such as companies or organizations operated by ourselves, friends or relatives) at the expense of the Company's profits.

In the event that we wish to place business with such an interested party, we will make a full written disclosure of our interests in that person or company to an appropriate supervisor, and then obtain their written permission to proceed.

## 4 Respects for Human Rights and Diversity

### Guideline 4

**We will respect the human rights and diversity of each individual.**

#### (1) Respects for Human Rights and Prohibiting Forced or Child Labor

##### Basic Concept

As a responsible company which conducts business activities around the world, the Musashi Group will respect the human rights of each individual and will not accept forced labor, child labor or any form of discrimination. Additionally, the Musashi Group will avoid any complicity in human rights violations.

##### Action Guide

- We will not accept forced labor and ensure that all labor is on a voluntary basis such that each employee is able to leave his or her job freely. We will never take any actions that restrict freedom of movement or leaving the company's employment, such as keeping a government-issued identification card (including passport, work permits etc.) at the company.
- We will not employ children who are under the legal working age in the country or region of operation.
- We will not conduct business with companies which accept human rights abuse.
- We will avoid and prevent adverse impacts against human rights which may indirectly occur as a result of our business activities, including avoiding the use of "conflict minerals" from unverified sources.

## (2) Respects for Diversity

### Basic Concept

To enable each person working for Musashi to maximize their worth and ability, we will embrace the diversity and differences of each individual.

### Action Guide

- We will not discriminate against those working for Musashi or its suppliers for any reason including family background, nationality, race, ethnicity, belief, religion, gender, sexual orientation, age, intellectual or physical disability, disease, academic background or social status.
- We will not use words or expressions which are, or could be deemed as discriminatory or could violate human dignity.
- We will evaluate and appoint people based on their ability and performance and create an environment which allows them to develop through their work.

### (3) Prevention of Harassment

#### Basic Concept

The Musashi Group will not tolerate any form of harassment in the workplace. We will respect people who work together with us.

#### Action Guide

- We will not tolerate any kind of harassment (including bullying, sexual harassment, power harassment etc.) in our workplace or any activity which could violate the human dignity of others, put them at an unfair disadvantage, or make them feel threatened or uncomfortable.
- We will never violate the human dignity of others either in or outside the workplace, including any “extended workplaces” such as parties.

## 5 Health, Safety, and Environmental Protection

### Guideline 5

**We will ensure high standards of health and safety, whilst keeping a well-ordered working environment**

#### (1) Safety and Hygiene

##### Basic Concept

The Musashi Group will create a safe and comfortable workplace which is well organized, tidy, and clean, based on the principle of “no production without safety”, ensuring that all associates can work safely and remain healthy.

##### Action Guide

- We will care for our own physical and mental health.
- We will systematically operate 5-S at all times (*5-S = Sorting, Setting in order, Systematic cleaning, Standardizing, Sustaining*).
- We will take all reasonable steps to prevent accidents when performing potentially hazardous jobs or using potentially hazardous equipment.
- If accidents or disasters should occur, we will give top priority to the safety of human life and make every effort to prevent the spread of damage.
- We will ensure good communications within our workplace, so that we work together effectively.

## (2) Environmental Protection

### Basic Concept

As a corporate member of global society, the Musashi Group considers that protecting the global environment is of the utmost importance. To maintain and improve the environment, the Musashi Group will recycle wherever possible, use resources as efficiently as possible and pro-actively undertake contamination prevention measures.

### **Action Guide**

- Working together with our local communities, we will be pro-actively involved in social events to support the environment.
- We will comply with all applicable environmental legislation and standards. We will also provide any measurements, records or reports required by applicable environmental laws. We will ensure that all chemicals are properly controlled.
- We recognize that the earth's resources are limited. We will therefore conduct our daily business in a manner that minimizes the environmental impact by saving and recycling energy and resources.
- We will work towards becoming an environmentally sustainable business in every aspect of our operations including product development, manufacturing, maintenance technologies and product transportation.

## 6 Control of Information

### Guideline 6

**We will treat the information held by the Company appropriately.**

#### (1) Producing, Handling, Preservation, and Discarding of Company Documents

##### Basic Concept

The Musashi Group will produce and manage company related documents and records including those stored in electronic media in accordance with internal policies.

##### **Action Guide**

- We will produce, handle and preserve all necessary documents and records according to our internal policies.
- We recognize that documents and records may include confidential business matters and we will pay close attention to their correct handling.
- We will ensure that all contracts are signed by a properly authorized Company officer, in line with the appropriate internal policies.
- We recognize that matters described in contracts are important promises between companies, including agreements and implementation items. We will properly fulfill such contracts.
- We recognize that all contracts are confidential documents and we will hold and/or destroy them in accordance with our internal policies.

## (2) Control of Confidential Information

### Basic Concept

The Musashi Group will treat the confidential information of both the Group and its customers and suppliers with great care.

### Action Guide

- We will not disclose any confidential information to external parties, including information regarding the sales and technology of either the Musashi Group, or its customers or its suppliers; nor will we disclose such information to internal parties unless it is needed for business purposes.
- We will ensure that all confidential information, both written and electronic, is properly controlled in an appropriate manner according to our internal policies. We will not make copies of confidential information for personal use, even if it is not intended to be disclosed to any external parties.
- We will avoid any action which may cause the leaking of personal or confidential information. This includes (but is not limited to): having indiscrete conversation about business issues outside the Company, leaving documents in public places and the disposal of un-shredded documents.
- To prevent information and data leakage, we will only use devices and services which have been authorized according to internal policies by the Company.
- We understand that personal information which has been obtained in the course of our business activities is extremely confidential.
- We will comply with all laws and regulations relating to individual privacy respecting the basic principles of such laws. We will treat and protect all personal information carefully, and only use it for its intended purpose.
- If we no longer need a document containing personal information, we will dispose of the document, using an appropriate disposal method as defined by the relevant internal policies.



### (3) Recognition of Intellectual Property

#### Basic Concept

The Musashi Group recognizes that the inventions, ideas, designs and know-how as well as trademarks and copyright resulting from research, development and other business activities are important intellectual property. The Musashi Group will conduct business by respecting intellectual property.

#### **Action Guide**

- We will not use intellectual property including inventions, ideas, designs, know-how, trademarks, and copyright, without the express authorization of the rightful owner.
- We will record and manage the outcomes achieved through research, development and other business activities in the appropriate manner. We will not disclose any information relating to the outcomes to any other person or third party without going through the proper procedure.
- If any outcome from our activities is within the legitimate scope of the Musashi Group, we will cooperate in ensuring that the Musashi Group is able to register the appropriate rights as quickly as possible.
- At no time will we use the Musashi Group's intellectual property for our own or for any third party's advantage, either during our employment or after leaving.
- If we become aware that the intellectual property of the Musashi Group has been misused, we will immediately inform the relevant division.

## **4. How to Assess Your Compliance**

### **(1) The Importance of Checking Your Activities**

#### **(1) Basic approach for compliance checking**

Every Musashi member has a responsibility to confirm their compliance with all of the items highlighted in this manual; however, this cannot be achieved by doing a single check: the most important thing is to keep checking your own activities on a daily basis. If you are unsure about any judgment that you are making as part of your daily activities, you should first consult this policy. If you are still in doubt, you should either consult your supervisor, or use the Musashi Group Compliance Consultation Service as described in the following section.

#### **(2) Compliance check against unconscious acts**

As well as checking the compliance of any activity that is giving you concern, it is also important to confirm that all of your regular activities are fully compliant.

In addition to checking their own activities, every Musashi member should also help to create a corporate culture of compliance by making themselves aware of what is going on around them, and by offering and accepting advice to and from other Musashi members. This Compliance Policy should be utilized to assist with this.

## (2) Use of “Open Door Whistle-Blower Hotline”









### - Compliance Consultation Service

#### (1) Basic rules for using the Compliance Consultation Service

- Any employee or temporary staff of Musashi Group or its suppliers' employees can use this service for consultation or suggestion.
- In order to confirm facts as far as possible, it is recommended to use the service under your own name, but you may also use the service anonymously.
- You can use the service by post, phone or e-mail.
- Neither the Company nor your supervisor will penalize you in any way if you choose to use the “Whistle-Blower Hotline” service.
- The “Whistle-Blower Hotline” service should not be used to insult specific individuals.

#### (2) Contact Details of “Whistle-Blower Hotline”

There are 3 windows you can choose.

|                                 |  |
|---------------------------------|--|
| Internal<br>Hotline             |  By mail :Whistle-Blower Hotline, Musashi Seimitsu Industry, Co., Ltd. 39-5 Daizen, Ueta-cho, Toyohashi, Aichi, 441-8560, Japan<br><br> By E-mail: MSI_PROPOSAL@musashi.co.jp<br>(See “Musashi consultation service” in Outlook address book)<br><br> Phone: +81 (0)80-9642-1731  |
| Internal<br>Auditors<br>Hotline |  By mail :Internal Auditors window for Whistle-Blower Hotline, Musashi Seimitsu Industry, Co., Ltd. 39-5 Daizen, Ueta-cho, Toyohashi, Aichi, 441-8560, Japan<br><br> By E-mail: msi_audit@musashi.co.jp<br>(See “Musashi consultation service” (Auditor) in Outlook address book)<br><br> Phone ☐ : +81 (0)80-4611-0384 |
| External<br>Lawyer<br>Hotline   |  By E-mail:<br>Eiji Ueda (Lawyer) : ueda@ginza-nire-law.jp<br>Yuta Masuzawa (Lawyer): masuzawa@ginza-nire-law.jp<br>Aya Komachiya (Lawyer) : komachiya@ginza-nire-law.jp<br><br> Phone: +81(0)80-9665-0896 (10:00-19:00 on weekdays in Japan time)   |

### **(3) Conducting Self-Assessment Test**

If you wonder whether an action that you are about to take meets our Compliance Policy, please ask yourself the following questions:

1. Do you think that “a trivial violation can be acceptable”?  
⇒ Even if it is a trivial matter and there is no problem at that moment, violation of the regulation may lead to serious problems in the future. If you think that trivial violation can be acceptable, such attitude is likely to be a problem.
  
2. Would you behave in the same way with your family or friends?  
⇒ If you would not behave in a particular way with your family or friends, it is quite likely to be against the compliance policy.
  
3. Can you confidently tell your actions to your children and family members?  
⇒ If you cannot tell your behavior to your children or your family members with confidence, it is very likely that you are undermining your own values by that behavior.
  
4. Can you give a satisfactory explanation of your actions even if it is publicized in a newspaper, in the company newsletter or on a website?  
⇒ Never do anything that you would be unable to satisfactorily explain to others.
  
5. Are you confident that your action does not go against your conscience?  
⇒ Even if no one else will find out, you yourself know whether or not you have behaved well. Follow your conscience - this is the final and most important test!

**I understand “Our Compliance Policy” and declare that I will practice actions based on the Musashi Compliance Guidelines.**

Employee  
Number

Name

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# MEMO

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## Our Compliance Policy

April 1, 2022, English 2<sup>nd</sup> edition issued

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Issued by HR Division, Musashi Seimitsu Industry Co., Ltd.  
Person in charge: Masaru Maeda, Compliance Officer  
Musashi Seimitsu Industry Co., Ltd.

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|------|------|----|---|
| 2007 | Jan  | 8  | 10 items of "Compliance Guidelines" established   |
| 2008 | Mar  | 26 | Name changed to "Our compliance"  |
| 2008 | Apr  | 24 | "Our Compliance" partly revised   |
| 2012 | Apr  | 1  | "Our Compliance" partly revised   |
| 2014 | Jan  | 1  | "Compliance Manual" issued  |
| 2015 | Oct  | 1  | "Compliance Manual" partly revised  |
| 2017 | Dec  | 4  | "Our Compliance" and "Compliance Manual" integrated.<br>"Our Compliance Policy" established as a global policy. |
| 2018 | Apr  | 1  | "Our Compliance Policy" 1 <sup>st</sup> edition issued  |
| 2021 | Dec. | 21 | "Our Compliance Policy" fully revised1  |
| 2022 | Apr. | 1  | "Our Compliance Policy" 2 <sup>nd</sup> edition issued  |

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**GO  
FAR  
BEYOND**