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Code of Conduct

Integrity & Trust

“Integrity & Trust” is the most basic value to be shared by us for conducting our business. Both “Integrity” and “Trust” have a meaning of fairness, honesty and respect. Based on this value we maintain a good relationship with every stakeholders and take social responsibility as a good citizen.

3 Principles of Conduct

“Conduct of Integrity and Trust” is formed by day-to-day activities of each of us. In day-to-day activities, we bear in mind the following three (3) principles:

- (1) Make judgement with evidently fairness and behave
- (2) Speak and act honestly following your conscience
- (3) Have a relationship with others based on mutual respect

Important things to achieve compliance

When we face legal or ethical questions during doing business, we make judgements and behave taking into consideration the following four (4) points:

- (1) We do not make judgement unfaithfully like “Oh, well”, “No much problem”. Instead, we make judgements based on the spirit of “Integrity & Trust” that is the basic value. In the event that we cannot make judgement after reference of this Code of Conduct, we consult with our superior or Compliance Division.
- (2) Quick decision making is required in the business. However, we do not make an irresponsible judgement like “Maybe OK” even in the imminent situation. We behave based on responsible judgements which are made through consideration from all aspects.
- (3) Due to rapid technological innovation in the ICT market, sometimes laws go behind the reality. We do not think “it is OK, because it is not illegal”. We behave appropriately taking into consideration whether it is ethical or not.
- (4) Due to the current remarkable change, “Empirical Rules” rapidly becomes obsolete not meeting the current situation in some cases. We do not depend solely on “Empirical Rules” and always behave in accordance with the most recent internal rules.

20 Standards of Conduct

Re : [Employees](#)

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- 2 Respect for Personality and Individuality and Appropriate Communication
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- 15 Fair and Transparent Business Relationships with Partners
- 16 Selecting and Managing Partners Adequately
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- 20 Contribution to Society, Preservation and Protection of Global Environment

1 Healthy, Safe and Supportive Work Environment

Our Commitment

A. Provide and Maintain a Healthy and Safe Work Environment

Safety, hygiene and health are fundamental things for all working conditions. We have a medical check annually for health care by ourselves. In addition, if necessary we receive a professional counselling service provided by the Company to resolve the problems that we have for ourselves.

Managers and the Company take good care of safety and hygiene including employee's mental health. In addition, we improve and maintain the working environment to make each employee fulfill one's capability.

B. Prevent Disaster and Accident in close corporation

We observe the laws and company's internal rules with respect to securing safety and hygiene in the working place and endeavor to prevent the occurrence of disaster and accident. The Company holds various safety & hygiene prevention activities to secure employees' safety in collaboration with employees.

In the event that state of emergency including disaster, accident, epidemic disease arises, we act pursuant to directions issued by emergency headquarters or related divisions. We promptly report to HR division an accident which arises while working or commuting.

2 Respect for Others' Personality and Individuality and Appropriate Communication

Our Commitment

A. Respect for Others' Personality and Individuality and Appropriate Communication

In the Company which has vibrant atmosphere a polite greeting is the basis of all manners. And RCT (Respect, Communication & Teamwork) is indispensable to create and maintain a corporate culture which is liberal and open-minded, and values compliance.

We endeavor to communicate with each other smoothly and, respect and trust the other's personality and individuality.

B. Cultivate Professionalism and Creativity to Fulfill Ability and Potential

We always endeavor to develop ourselves to improve our professionalism and creativity in order to create a new marketplace meeting social needs.

The Company also endeavor to create a vibrant corporate culture and develop professional and creative human resources. The Company pays attention to the creation of a fair and transparent performance evaluation system in order for each employee to feel a sense of accomplishment by self-fulfillment.

3 Respect for Fundamental Human Rights

Our Commitment

A. Respect Fundamental Human Rights and Not Discriminate against Other Persons

The Company respect each employee's fundamental human rights and does not distinguish employees with irrational reasons irrelevant to conducting the business which includes but not limited to type of hiring, race, religion, color, sex, nationality, language, physical characteristics, age, marriage/single.

We never abuse, slander or harass other employees or outsiders inside or outside the office.

B. Never Tolerate Harassments

Harassments cause a serious adverse effect on (1) atmosphere and order of the office where a cause person and a victim work together and (2) motivation of the employees in the office.

We make good human relationships and good office environment preventing harassment and teasing pursuant to "Rules for Harassment Prevention".

Each Manager always watches an office environment in charge and is careful about how he/ she speaks and behaves, and endeavors to prevent harassment through coaching and warning statements.

The Company takes strict measures against harassments. If harassment has occurred, the company takes strict measures including disciplinary punishment against a cause person and give a relief for a victim, and endeavors to prevent recurrence of such harassment as well.

4 Maintenance of Discipline

Our Commitment

A. Comply the Company's Internal Rules

We comply our Company's internal rules and regulations and behave orderly. This is imperative for soundly managing the organizations of our Company and our Net One group. We do not make selfish judgement like "we can do anything which breaches internal rules so long as not found by others".

The Company take strict measures against breach of internal rules.

B. Conduct Business in accordance with Company's Rules and Make Records based on the Fact

Net One Group companies have various internal rules in which decision making process and authorized person for each task are described.

We conduct business pursuant to the process described in the internal rules and obey the decision made by authorized person described in the internal rules.

And we precisely record and preserve all of decision making processes. In addition, we make all of the documents or reports accurately and evidently showing the contents and substances based on the facts.

C. Do Not Behave Against the Ethics

We do not behave against socially accepted ethics even if not clearly described as forbidden matters in the internal rules or laws or regulations.

5 Protection and Management of Assets and Information

Our Commitment

A. Protect and Manage the Company's Tangible or Intangible Assets Properly

Neglect of management of the Company's assets gives material effect on business operation and the company's financial results. We properly protect and manage not only tangible assets, but also intangible assets including intellectual properties. We do not use the Company's assets for a private matter.

B. Do Not Cause the Company's Confidential Information to Leak Out

Once we leak the Company's confidential information and personal information, there is risk that social trust of the Company is lost and we bear criminal and civil liabilities.

We strictly manage the Company's confidential information and personal information and do not cause them to be leaked to any third party. Even after we left the Company or were fired, we do not disclose such information to any third party or the other company we newly enter.

6 Distinction between Public Matters and Private Matters

Our Commitment

A. Clarify Distinction between Public Matters and Private Matters

We do not bring a private life or interest into the Company.

Also, we do not bring a public role into a private life or outside the Company.

We respect freedom of ideology and religion of individual persons, but during working hours we concentrate on our duty work and do not engage in missionary work or persuasion and keep order of the office.

B. Do Not Use the Company's Property for Personal Matter

We carefully treat building, equipment, facility, system and software and use them only for conducting the business following the Company's internal rules. We never use them for personal matter.

We do not charge the Company the fee for personal matter as expenses.

We charge only the actual expenses for business activities including business trip and reception of the guests. We never take unjust monetary profit. We attach necessary proof document required by an adequate decision-making process for payment of house expenses. The manager who noticed that his subordinate is using the Company's property for his personal matter must instruct him to use the Company's property only for conducting the business.

7 Moderate Relationships with Customers and No Relationships with Anti-Social Forces

Our Commitment

A. Have Relationships with Customers with Modesty

We do not give or receive an entertainment or gift in excess of socially approved pattern of behavior in order to fairly conduct our duties. Especially we never give a government official or a deemed government official any entertainment, gift or benefit.

B. Do Not Have Relationships with Individual Politician or Anti-Social Forces

We respect individual political belief, but the Company does not support specific politician and political organization. Accordingly, we never give any cash gift, entertainment or benefit to any individual politician or political organization in the course of business.

We never have any relationships with anti-social forces which threaten order and safety of civic society. We stand against any menace and threats, and are not involved in anti-social activities and activities against public order and morality.

8 No Insider Trading

Our Commitment

A. Strictly Manage Non-Public Important Facts Regarding Group Companies

The Company strictly manages non-public facts regarding the group companies (the Company and its affiliates) and prevent leakage. We preclude insider trading in order for investors to invest without worry.

In case we come to know important facts, we never disclose them to any person except for the persons concerned.

B. Obtain a Permission in advance to buy and sell the Company's stocks

We never do any insider trading. When we trade the Company's stocks, we notify to the division of that in charge in advance and follow its direction.

C. Pay Attention to Non-Public Important Facts regarding Customers and Partners

We also pay close attention to treatment of non-public important facts regarding customers and partners (subcontractors, suppliers).

9 Protection of Privacy

Our Commitment

Pay Close Attention to Personal Information and Privacy

We fully understand our Company's "Policy of Protection of Personal Information".

We do not disclose employee's personal information and privacy recklessly without his or her consent. Especially the one who handles personal information pays close attention in handling personal information and manages it properly and strictly.

And we also manage customers' confidential information and personal information not to be leaked to any third party.

10 Customer Needs are first

Our Commitment

A. Grasp Individual Customers' true Needs

We always think from viewpoint of customers and endeavor to grasp customers' diverse needs promptly and appropriately.

B. Provide Excellent Products and Services

We provide products and services which conform to customers' true needs. We find new markets within the ICT territory, endeavor to develop excellent products and services, and create a market which meets social needs.

11 Fair and Transparent Business Relationships with Customers

Our Commitment

A. Endeavor to Provide Precise Information and Respect Judgement of Customers by themselves

We never neglect necessary explanation at any time. We fully provide precise information in order for customers to use our products and services without worry and safely.

It is our customers who decide to purchase the products and services provided by our Net One group.

We do not give our customers any entertainment or gift in excess of socially approved pattern of behavior for the purpose of influencing their judgements.

B. Execute Written Contracts with Customers

We execute written contracts which describe the items agreed regarding contents and terms & conditions of deals with customers, including without limitation sales agreements, consignment agreements and construction agreements. It is very important to execute proper written contracts for decreasing risks.

12 Developing Business in accordance with Laws and Ethics

Our Commitment

A. Do Not Perform Illegal or Unfair Sales Operations Which Harms Customers' Interests

If we perform sales operation with illegal or unfair methods, we lose customers' trust for Net One group. In some case we may be expelled from the market.

We always perform legitimate and transparent sales operations based upon fair and free competition.

If we perform joint sale operations with other companies, we pay attention to them not performing illegal and unfair sales operations.

B. Surely Acquire Necessary Permission, License and Requirement

Prior to dealings, we confirm whether we have necessary permission, license and requirement in advance. If we trade with certain customers such as national or local governments, permission acquisition is provided in some national or local laws and certain license or requirement may be required.

13 Handling Customers' Complaints Promptly and Appropriately, and Preventing Troubles beforehand

Our Commitment

A. Act Faithfully, Promptly and Properly

In the event that some trouble has occurred or we have received a complaint from a customer, how to act first is a crucial point. If we take erroneous action against the customer's complaint, we have risks such as facing trouble with the customer or lowering our trust. Therefore, reasonable action is required in light of risk control.

Firstly, we communicate with the customer faithfully and politely.

Secondly, we investigate the fact promptly in cooperation with related divisions. Lastly, we take appropriate measures as an organization after consulting managers. In this way, we change occurrence of a complaint or a trouble into an opportunity of acquisition of the customer's trust.

B. Improve Our Products and Services through Complaints

Customer's complaints and requests are free advice for the Company's products and services.

We analyze their contents and take action for prevention of recurrence, and utilize them for future development of products and services. Therefore, we share information such as complaints and requests in Net One Group.

C. Always Endeavor to Improve Our Skills and Prevent Occurrence of Complaints

We endeavor to improve ourselves utilizing opportunities for improving our skills inside and outside the Company, and cope with change of business environment in ICT market. We maintain quality of products and services, and prevent occurrence of complaints and troubles.

14 Managing Customers' Confidential Information and Personal Information Strictly

Our Commitment

A. Strictly Manage Customers' Confidential Information and Personal Information

Leakage of customers' confidential information and personal information gives material effect on business operation and the Company's financial results. The value of precious confidential information and personal information is maintained only by keeping them secret.

We strictly manage and use customers' confidential information and personal information in accordance with the terms of "Non-Disclosure Agreement". We never use them for unjust purpose or leak them to any third party. After we leave the Company or are fired, we do not disclose such information to a third party or the other company we newly enter.

B. Do Not Get Confidential Information and Personal Information Unjustly and Leak Them

We fully understand the Company's Policies including "Policy of Protection for Personal Information" and "Fundamental Policy of Information Security", and never leak customers' confidential or personal information.

- (1) We do not receive customers' confidential and personal information until we enter into "Non-Disclosure Agreement" with such customers.
- (2) We do not get confidential or personal information of a customer who is a competitor for us in order to avoid unjust acquisition of such information.
- (3) When we get customers' information, we confirm the route of acquisition and get it with proper way. Also, we record the acquisition precisely and in detail.

Example of High Security Information	Configuration Chart of Customer's Network
	Configuration Information
	IP Address
	Pass Code
	Personal Information

15 Fair and Transparent Business Relationships with Partners

Our Commitment

A. Maintain Sound and Normal relationships

We maintain sound and normal relationship with partners (sub-contractors and suppliers) following the principle of fair, transparent and free competition. If we are at a superior position, we maintain equal and fair business relationships based on the foregoing stance.

If we received a request irrelevant to Net One Group from partners, we consult and report with managers.

B. Do Not Receive an Entertainment or Gift in excess of Socially Approved Pattern of Behavior

We do not receive personal benefit from partners. To receive an entertainment or gift is exceptionally permissible so long as within courtesy and in accordance with certain procedures described in the internal rule of ethics. We do not receive any entertainment or gift which may influence Company's business decisions even if it is given to each employee on a personal basis.

16 Selecting and Managing Partners Adequately

Our Commitment

A. Make Proper Relationships with Partners

When we select partners (sub-contractors, suppliers), we comply with selection guidelines or rules set out in the Company's related internal rules. In addition, we fairly evaluate partners and procure and order properly. Also we observe the relevant laws and sound business customs as well, and build up and maintain a cooperative relationships with customers.

B. Manage and Instruct Sub-Contractors and Endeavor to maintain quality of their business

We manage and instruct sub-contractors and endeavor to maintain quality of their business. We check eligibility of partners continuously.

17 Maintaining and Controlling Product Quality

Our Commitment

A. Thoroughly Control Quality of Delivered Products and Services

We always think what quality is required to the Company from customers and markets. We conduct responsible quality control by properly checking delivered products and services from partners (sub-contractors and suppliers). Occurrence of defective products and services may give an adverse impact on the Company's financial results.

In the event that we find defective products and services, we act promptly and properly pursuant to the terms of contracts with partners by pointing out where the defects exist and what the defects are in cooperation with related divisions.

In addition, we utilize information regarding defects to improve quality and customers' satisfaction by feeding back them to partners.

B. Do Not Make a Complaint or Require to Send Back or replace with Unjust Reason

We do not make a complaint regarding products and services or require to send back or replace them for unjust reasons. If recognition or opinion is split between us and partners, we resolve the matters with gentlemanly discussion.

18 Proper Accounting Processing

Our Commitment

A. Do Proper and Prompt Accounting Processing pursuant to various Laws and Accounting Standards

We conduct business in accordance with Company's internal regulations or rules regarding internal control. In addition, we prepare financial documents (consolidated, non-consolidated) correctly and promptly based on the facts pursuant to laws and accounting standards in order to secure soundness of financial conditions. We never counterfeit accounting documents or sales amount leading to window-dressing accounting.

The Company prepares financial documents pursuant to laws and regulations and have them audited by auditors and auditing officers.

B. Operate our business making much of shareholders

We can gain correct results of operations by piling up of each one's proper accounting processing. We keep shareholders' interests in mind and operate our business making much of shareholders. Our executives who are entrusted by shareholders operate our business with integrity and trust.

19 Disclosure of Management Information in a Timely and Proper Manner

Our Commitment

A. Disclose Correct and Fair Information In a Timely an Proper Manner

We disclose correct and fair information which stakeholders require in a timely and proper manner. By this way, we aim to acquire trust of shareholders, customers and all of society.

B. Conduct IR Activity Positively

We disclose various management information through IR activity for shareholders and investors and endeavor to secure transparency of our Company's management.

20 Contribution to Society, Preservation and Protection of Global Environment

Our Commitment

A. Carry Out Social Mission and Contribute to Society

We carry out our social mission and contribute to society with highly value-added technologies and services in ICT market which requires us more technological innovation.

We, as a member of civic society, promote activities which contribute to society and aim for prosperous coexistence with society. In addition, through actions which contribute to society we strengthen corporation between employees, promote business operations including vitalization of Net One Group and training of human resources.

B. Promote Environmental Preservation with Technologies and Quality inside and outside Company

We contribute to decrease of customers' environmental burden by improving quality of technologies, products and services provided by Net One Group. In addition, we endeavor to improve our business operations and change our work style by utilizing ICT technologies efficiently. In this way, we aim for reduction and recycle of wasted materials and promote green procurement.

Also, the Company endeavors to train personnel who can act taking into consideration environment in any business operations.