

Nippon Sanso Holdings Group Code of Conduct

We contribute to the creation of value of our customers in all industries through innovative gas solutions and to the realization of affluent and sustainable society through creation of harmonious relationship between human and the earth based on our corporate philosophy "Proactive. Innovative. Collaborative. Making life better through gas technology."

We act honestly and fairly with high ethical values toward the goal as described below so that we can gain trust from the society and make continuous progress.

1. Responsibility and Awareness

This Code of Conduct sets forth the standards of judgment and concepts of conduct to be observed by all officers and employees in our group (including temporary employees and contract employees) in various aspects of business activities in accordance with the corporate philosophy and vision.

We are aware of corporate social responsibilities and comply with this Code of Conduct based on the understanding that the foundation of business activities of our group companies should be built on trust of our customers and the society.

In addition, employees can present or report concerns through the internal reporting system of their company. Retaliation is prohibited against employees who honestly report actual or likely violation of this Code of Conduct, laws, regulations, or corporate policies.

2. Accountability and Respect for Stakeholders

We are aware of the importance of accountability in corporate activities, where we reserve transparency. We always maintain an open stance to internal and external stakeholders and endeavor to disclose information in an appropriate manner. We are truly open to views and criticism concerning information disclosure and have good faith communication, which we optimize in corporate activities.

3. Legal Compliance

We always comply with laws, regulations, and international standards, and treat all stakeholders in a fair, equitable, and sincere manner.

- (1) We comply with the laws and regulations relevant to our products and services and ensure that we follow the procedures including obtaining approval and licenses and notifying the authorities.

- (2) For maintenance of security systems both domestically and internationally, we comply with regulations under relevant laws and designated procedures under internal codes, confirm thoroughly the profile and description of our business partners in every export transaction, and ensure that no export goods/technologies will be used for any development, manufacture, or other activities relating to weapons of mass destruction of any kind.
- (3) If we come to know inside information of any of our group companies or of our business partners in the course of business activities, we do not buy or sell stocks of the company in question until such information is made public. We do not communicate such information or recommend buying and selling to cause another person to make a profit or avoid making a loss. We comply with relevant laws, regulations, and internal codes in trading stocks of our company.
- (4) We accurately perform accounting processing in accordance with relevant laws, regulations and internal rules. We do not make any false or fictitious entry, or hold unrecorded assets for the purpose of manipulating profit and loss or the like.

4. Respect for Human Rights

We support protection of internationally proclaimed human rights, are aware of corporate responsibilities to respect human rights, and respect dignity and rights of all people. We never make discrimination or give unfair treatment for any reason whatsoever such as race, nationality, ethnic group, sex, religion, creed, disability, health condition, economic background, political opinion, personal preference, sexual diversity, social status, family origin, or other positions.

5. Prohibition of Child Labor and Forced Labor

We support and implement effective elimination of child labor and abolition of forced labor in any form.

6. Better Working Environment

We respect employees' rights under labor relations acts and build a good relationship between the management and employees through dialogue. The management at all levels respects human diversity, personality, and individuality and create working environment where employees can exercise their abilities to the utmost in safe and physically and mentally healthy settings.

- (1) We do not allow any act to infringe fundamental human rights, impede abilities of individuals, or damage working environment such as engaging in discrimination,

annoyance, abuse, or acts that compromise dignity of the employee, and excessive labor forced upon or harassment of a subordinate by a manager using his/her position.

- (2) We endeavor to create a workplace where each one of employees can work with a sense of job satisfaction, motivation, and ambition and realize continuous growth of organizations and individuals through realization of flexible working style and respect for diverse values.

7. Environment and Safety

We endeavor to reduce environmental impact and to harmonize with environment in all fields of corporate activities through activities such as mitigation of and adaptation to climate change, reduction of volume of resource usage and waste, appropriate management of chemical substances and prevention of pollution, preservation of water resources, and preservation of biodiversity and also endeavor to ensure process safety and security based on our motto of “Selling gas is selling safety” in order to realize preservation of global environment and sustainable development.

- (1) We are always mindful of safety in manufacture, development, import, storage, sales, transportation, export, maintenance, and repair of products, fully understand and comply with laws and safety standards concerning product safety, and aim to achieve a higher level of safety.
- (2) If we obtain information on product safety, we immediately investigate the factual relevance of such information. If any issue is identified, we notify relevant departments and sections and take appropriate actions.
- (3) We understand and comply with laws, regulations, etc. concerning occupational safety and health. In case of any occupational accident, we give priority to ensuring workplace safety and minimize the effect of accident, and ensure that we take prescribed procedures such as an immediate reporting to prevent a recurrence of such accident.
- (4) We grasp the materialized and potential risks concerning business activities, and ensure safety of employees and the society by proposing and implementing countermeasures to prevent accidents and occupation injuries.

8. Sincere and Fair Business Practices

We conduct corporate activities in a sincere and fair manner, adhere to ethical principles, refrain from being involved in any form of corruption including bribery and anticompetitive acts, and contribute to sound development of social economy through fair and free competition in the market. We adopt a firm attitude toward antisocial forces and groups and refuse to have any relationship with them.

- (1) We not only give no bribe but also provide no unjust benefit, entertainment, or gifts to public officials, officers and staff of public organizations, and other similar personnel.
- (2) We do not commit an act that is considered as bribery or provision of benefit to make an unjust business profit to foreign public officials, etc. including foreign public officers or staff of foreign governments.
- (3) We do not commit any act that violates or may be deemed to violate the antimonopoly law such as involvement in pricing cartels, bid collusion, and allocation of customers or regions, and conduct fair and free inter-enterprise competition.
- (4) We adopt a firm attitude toward antisocial forces and refuse to have any relationship with them. If we receive an unreasonable request from antisocial forces or other similar groups, we hold a firm attitude toward them and do not resolve the issue by payment of money and the like.
- (5) We act in accordance with sound business practices and social norms in connection with any entertainment with or gift-giving to/from our business partners.
- (6) We have transactions with our suppliers with common decency and good faith and have such transactions fairly and equitably in accordance with laws and regulations and contracts.

When conducting purchasing, we do not request unfair price discounts, services, money, or other articles through abuse of the purchaser's position. We observe commonly accepted social norms in connection with entertainment with suppliers and gift-giving from them. In addition, we select suppliers based on rational criteria in terms of price, quality, delivery schedule, etc.

- (7) We recognize that we must engage in best practice that will lead to the benefit of the company when performing our duties and will not engage in acts that will or may create conflicts of interest using business position or authorization, or using information acquired through business.
- (8) We do not use any assets or expenses of the company for any personal purpose.

9. Customer Satisfaction and Quality Control

We comply with contracts, which are covenants with our customers, and endeavor to ensure safety and quality of products and services we provide. We are truly open to our customers' feedback and address the development and improvement for better products and services.

- (1) We give full attention to quality of products we provide to our customers and meet the requirements and quality standards under laws, regulations, etc.

- (2) We endeavor to fully provide information on usage conditions and usage environment and other information necessary for our customers to use and handle the products safely.
- (3) In the case of any quality issue of product, we immediately investigate a cause and take appropriate recurrence prevention measures, remedial measures, and other similar actions.

10. Information Management and Personal Information Protection

We appropriately handle the collection and management of all information concerning corporate activities in accordance with laws, regulations, etc.

- (1) We recognize the importance of protection of personal information and obtain, use, and provide personal information appropriately in accordance with laws, regulations, etc. We endeavor to prevent and remedy leakage, loss, or damage of personal information we handle by taking necessary and appropriate security measures.
- (2) We strictly manage personal information that can identify a specific individual and information on individual privacy that is obtained in the course of business to prevent external leakage.
- (3) We appropriately manage corporate confidential information in accordance with laws, regulations, etc., and do not disclose or leak such information to any external party without complying with prescribed rules nor use such information for any purpose other than those specified. We obtain confidential information of others only from persons authorized to disclose such information and manage and use such information appropriately in accordance with laws, regulations, etc. We handle such information in the same manner even after retirement/resignation of a relevant employee.
- (4) We use the company information system solely for business purposes and not for any personal purpose. We place strict controls on IDs and passwords concerning the company information system and prevent external leakage. We do not attempt any unauthorized access to any computer systems under the control of other companies.

11. Protection of Intellectual Property Rights

We recognize that the intellectual property rights of the company (such as patent rights, utility model rights, design rights, trademark rights, and copyrights) are important corporate assets, use them appropriately, endeavor to preserve such rights, and respect intellectual property rights of others.

12. Contribution to Local and International Communities

In conducting corporate activities, we respect the history, cultures, religions, social norms, customs, etc. of each country or region and endeavor to establish a relationship of mutual trust with each local community. We endeavor to contribute to the development of local and international communities with an awareness of being a good corporate citizen.

[Application/Revision and Abolition]

1. This Code applies to all officers and employees of our group companies including temporary employees and contract employees.
2. In this Code, our group companies mean our company and all domestic and overseas subsidiaries of our company.
3. This Code may be revised or abolished by the Board of Directors of the Company. Each of our group companies may make necessary amendments to the provisions of this Code in accordance with laws and regulations, practices, business forms, etc. of its country and region upon prior approval of our company; provided, however, that no provision may be set forth against the intent of this Code.

Established on February 2nd, 2021