

Code of Conduct (Compliance Guidelines)

Chapter 1. General Provisions

Article 1. Purpose

The purpose of this Code of Conduct is to define the fundamental principles that should be adhered to in terms of behavior by all officers and employees (including full-time employees, part-time employees, and temporary workers) of the GALILEI Group (hereinafter referred to as the “Group”) in Japan and abroad and any other persons engaged in the Group’s business operations (hereinafter collectively referred to as the “Officers and Employees”) when conducting business, thereby fulfilling its social responsibility.

Article 2. Corporate Philosophy and Fundamental Approach

The Group’s corporate philosophy is “the Four Rules of Happiness.” To embrace the corporate philosophy, we have established the Charter of Corporate Behavior and the Employee Code of Conduct. The Charter of Corporate Behavior describes how we should conduct ourselves in the course of business at all times, while the Employee Code of Conduct provides a behavioral guide for the Officers and Employees for carrying out business. This Code of Conduct outlines the standard rules of conduct, as required in the Charter of Corporate Behavior, such as how we should or should not conduct ourselves.

Article 3. Scope of Application

This Code of Conduct applies to the Group’s business carried out both in Japan and abroad.

Chapter 2. Food Safety and Security

Article 4. Ensuring Product Safety and Quality

The Group will ensure the safety of its products, systems, and services, as well as the quality acceptable to consumers and customers. We will seek to develop superior products, systems, and services at all times.

Article 5. Provision of Product Information

The Group will make proper labeling and provide clear and easy-to-understand explanations of its products, systems, and services to inform consumers and customers of the safe and correct method of use.

Article 6. Response to Safety Concerns

In the event that a safety concern is raised about any of the Group’s products, systems, or services, the Group will immediately investigate the cause of the situation, take appropriate actions, and provide information required to ensure the safety of consumers and customers. Under no circumstances will we conceal any information about safety.

Chapter 3. Pursuit of Customer Satisfaction

Article 7. Provision of Useful Products

The Group understands diverse consumer and customer needs and will develop and provide products, systems, and services that are beneficial to society.

Article 8. Response to Consumer and Customer Feedback

The Group will establish a customer service desk to respond to inquiries and complaints from consumers and customers and to improve its after-sales service and customer support. The Group will respond to consumer and customer feedback in a sincere manner.

Chapter 4. Environmental Protection

Article 9. Provision of Environmentally-Friendly Products

The Group supports the SDGs and will develop and provide environmentally-friendly products, systems, and services to help achieve a sustainable global environment.

Article 10. Reduction of Environmental Impacts

The Group will assess the environmental impacts of its business and relentlessly work to reduce environmental risks.

Article 11. Transfer of Energy-Efficient and Environmental Protection Technologies

The Group will transfer technologies that are energy efficient and protect the environment to the countries in which it operates. As a global group of companies, we will continuously and proactively promote environmental-conscious initiatives.

Article 12. Provision of Information on Environmental Initiatives

The Group will widely disseminate its environmental initiatives, including the publication of its integrated reports.

Chapter 5. Social Contributions

Article 13. Participation in Industry-led Social Contribution Activities

The Group will participate in social contribution activities by providing cooperation in fundraising events or emergency aid programs organized by the industry and business community. Additionally, the Group will organize its own social contribution activities, such as charity fundraising events within the Group.

Article 14. Contribution to Local Communities

The Group will build friendly relationships with local communities in which it operates and make positive contributions as a good corporate citizen, by, for example, organizing regular cleanups in the local communities around each of our business locations nationwide.

Chapter 6. Global

Article 15. Compliance with Local Laws and Regulations

The Group will, in accordance with international rules, comply with the laws and regulations of countries and regions in which it operates and conduct business in a sincere and fair manner as a member of the global community.

Article 16. Compliance with Import and Export Regulations

The Group will comply with customs laws and import and export laws and regulations. For business transactions with countries, regions, companies, organizations, or individuals which are subject to economic sanctions, the Group will comply with the applicable laws and regulations as well as its internal policy, which has been separately established, to ensure that we conduct ourselves in a responsible manner.

Article 17. Business Conducted in Other Countries and Regions

The Group respects the cultures and customs of the countries and regions in which it operates and will carry out business based on mutual trust.

Article 18. Prohibition of Providing Gifts and Entertainment for Foreign Public Officials, etc.

The Group will not provide gifts, entertainment, or any other benefits to officials of foreign governments or regional public agencies or equivalent persons for the purpose of obtaining improper advantages.

Chapter 7. Legal Compliance

Article 19. Compliance with Laws and Regulations, Social Norms, etc.

The Group will comply with the applicable laws and regulations as well as its internal rules in the course of business. The Group is fully aware of social norms and corporate ethics and will act in a sensible and responsible manner.

Article 20. Proper Accounting Practices

The Group will perform financial reporting and bookkeeping and retain books and records properly and accurately in accordance with the applicable laws and regulations and its internal rules. In addition, the Group will make a proper disclosure of information on its financial condition and business results in accordance with the applicable laws and regulations and generally accepted industry standards.

Article 21. Proper Management of Company Assets

The Group will strictly manage its assets in accordance with the applicable laws and regulations and its internal rules and efficiently use them only for business purposes. The Officers and Employees will not use them for personal purposes or permit any third party to use them.

Article 22. Protection of Intellectual Property

The Group recognizes the importance of intellectual property rights and respects other people's intellectual property in accordance with the applicable laws and regulations. We will implement necessary measures to ensure that our intellectual property rights are protected by law.

Article 23. Prevention of Insider Trading

The Group will ensure that in the event that the Officers and Employees acquire any insider information about the Group or any of its business partners in the course of the performance of their job duties, they will not buy or sell any shares of the relevant company until the information is officially announced. Furthermore, the Group will provide comprehensive training to the Officers and Employees to prevent them from engaging in illegal share trading based on insider information.

Chapter 8. Fair and Equitable Business Transactions

Article 24. Compliance with the Anti-monopoly Act

The Group will raise awareness of the Anti-monopoly Act among the Officers and Employees to ensure legal compliance and engage in fair and free business competition.

Article 25. Proper Purchasing Transactions

The Group will establish a purchasing policy and promote fair purchasing transactions in accordance with the purchasing policy. Under no circumstances will the Group accept, from its business partners, cash or cash equivalents, such as gift vouchers, or gifts or entertainment that exceeds the social norm.

Article 26. Refraining from Providing or Accepting Gifts or Entertainment as a Formality

The Group will refrain from providing or accepting gifts or entertainment to or from its business partners as a formality in order to ensure fairness and transparency in its business, and will not provide or accept gifts or entertainment for the purpose of gaining improper advantages. In addition, the Group will not, in principle, accept any requests from its business partners to purchase or donate products or services that are not required to conduct business.

Article 27. Development of Highly Transparent Relationships with Political or Administrative Organizations

The Group will build highly transparent relationships with political or administrative organizations, and will not employ former government officials for the purpose of obtaining an advantage when applying for governmental permits or authorizations or aiming to win public work contracts.

Chapter 9. Respect for Employees

Article 28. Fair Human Resources System

The Group respects the rights of each and every one of its employees and offers equal opportunities for them. The Group will develop and maintain a fair and transparent human resources system to ensure employee evaluations are conducted in a fair manner and to make the employees feel motivated and rewarded in the workplace.

Article 29. Promotion of Diversity

The Group will strive to create and maintain a work environment that enables people with diverse values to work by promoting a work-life balance and improving workplace accessibility.

Article 30. Creation and Maintenance of a Safe and Comfortable Work Environment

The Group will implement measures to ensure health and safety in the workplace and prevent workplace accidents. In accordance with its Health and Productivity Management Policy, the Group will provide support for its employees in maintaining and improving their mental and physical health, and strive to create and maintain a comfortable work environment that enables them to work safely and healthily.

Article 31. Prohibition of Discrimination

The Group will not unreasonably discriminate against anyone in employment or employee treatment on the basis of beliefs, gender, or disability, and will strive to create a gender-equal society for people with diverse values.

Article 32. Elimination of Harassment

The Group will not tolerate any forms of harassment that harm the dignity of other employees or cause fear or discomfort to them, such as sexual harassment, power harassment, and maternity harassment.

Article 33. Abolition of Exchanging Gifts as a Formality in the Workplace

The Group will abolish the exchange of gifts as a formality in the workplace.

Article 34. Support for Employees' Capacity Building

The Group will provide support for its employees in their career development and capacity building with a focus on their individuality and characteristics through the provision of a wide range of training programs and capacity building opportunities and improving the career counseling system.

Article 35. Employee-Management Consultations

The Group will promote information sharing and mutual trust creation through sincere dialogues and consultations with its employees.

Article 36. Prohibition of Child Labor and Forced Labor

The Group will not allow child labor or forced labor and will also urge its business partners and subcontractors to ensure that child labor or forced labor is not tolerated.

Chapter 10. Information Disclosure

Article 37. Promotion of Communication with Shareholders, etc.

The Group will share correct information with its shareholders, investors, and other stakeholders in a timely manner and promote constructive communication with them in shareholders' meetings or through investor relations activities.

Article 38. Timely and Appropriate Information Disclosure

The Group will disclose information to its stakeholders in a timely and appropriate manner in accordance with the applicable laws and regulations and generally accepted industry standards.

Chapter 11. Information Management

Article 39. Management of Trade Secrets

The Group recognizes the importance of trade secrets. The Group will manage its trade secrets as well as those of other companies in strict confidence and will not externally disclose them or use them for any purposes other than for business purposes. The Group will ensure that the Officers and Employees will not disclose any trade secrets that they may have become aware of in the course of their employment or use them for any purpose during their employment with the Group or thereafter.

Article 40. Protection of Personal Information

The Group will develop and maintain internal rules and frameworks to protect the personal information of its customers and employees, and prevent unauthorized disclosure or use of the personal information for any purposes other than for business purposes.

Chapter 12. Resoluteness in Dealing with Anti-Social Forces

Article 41. Elimination of Relationships with Anti-Social Forces

The Group will remain resolute when dealing with anti-social forces and will not have any relationships with them. If we receive any unreasonable demand from them, we will hold firm and refuse to engage in any illicit transactions or conceal facts.

Article 42. Collaboration with Relevant Organizations

The Group will maintain relationships of trust with the police and other external organizations at all times as part of its measures against anti-social forces. In the event of an emergency, the Group will work with the external organizations to ensure the safety of the company as well as relevant parties.

Supplementary Provisions:

This Code of Conduct was implemented on February 16, 2008.

This Code of Conduct was amended and implemented on June 29, 2020.

This Code of Conduct was amended and implemented on July 26, 2021.

This Code of Conduct was amended and implemented on September 22, 2025.