



Soshin Electric Group  
**Guidelines for  
Corporate Behavior**

## Objective

The objective of establishing the Guidelines is to ensure that we constantly review our own behavior in light of the Guidelines and act honestly and responsibly while implementing sound management of Soshin Electric and the group companies as members of the PSA Group.

### — Guidelines for Behavior —

## I PSA's Corporate Philosophy

- Integrity First
- Treat Customers as Partners
- Focus and Quality as Top Priority
- Globalization
- Stabilization and Talent Development
- Value Key Stakeholders
- Collaboration

## II Realization of SOSHIN WAY

### "Our Mission"

The Soshin Electric Group will respect the spirit of mutual trust, form a "ring" that links people, companies, and countries around the world by offering electronic parts that impress customers, and contribute to social development and people's lives.

### Guidelines for Behavior

- We will try to improve trusting relationships with customers by communicating with them with a customer-first mindset as the basis of corporate activities.
- We will respect individual characters and diversity of employees based on respect for humanity and create a corporate culture where they can find joy and pride in working.
- We will contribute to the development of the local community as a good corporate citizen.
- Each of the employees will work voluntarily and proactively to reduce greenhouse gas emissions and achieve zero emissions toward the realization of an environment-friendly society.
- We will maintain healthy relationships with our business partners through fair and proper procurement activities.
- We will keep trying to change and grow and maintain transparency in management to improve the corporate value.

## III Policy to Engage in Business Activities

### 1 Disclosure of corporate information

We will release, in an accurate and timely manner, information sought by the public, including information on our management, finance, products, or services to improve transparency in management and gain society's trust in the Soshin Electric Group.

### Guidelines for Behavior

- We will promptly disclose information needed by society according to laws and regulations as well as internal rules.
- We will establish and properly operate an internal control mechanism for financial reporting to disclose accurate financial information.
- We will sincerely answer customer questions about products and services with accurate and appropriate information and methods.

## 2 Total enforcement of compliance and risk management

We will abide by the laws and rules of each country and area in which we do business and will enforce our compliance thoroughly, respecting international arrangements that are applicable to us. We will develop human resources that are sincere and have high ethical standards. In addition, through our efforts to build an internal control system and implement risk management, we will protect our corporate assets and credit, as well as the rights of third parties.

### Guidelines for Behavior

- We will always act honestly by respecting laws and regulations, rules, global agreements and business practices, and internal rules.
  - We will observe the security export control legislation and ensure management based on the internal rules.
  - We will observe antitrust legislation and the competition law of the country and avoid any unfair act or transaction.
  - We will observe the internal rules and avoid insider trading when buying or selling the shares of the company or business partners.
- We will deal with illegitimate and undue pressure from antisocial organizations with a firm attitude and action.
- We will try to act reasonably when interacting with customers, and avoid any suspicious act when dealing with someone from a public agency, from home or abroad.
- We will allocate organizations and individuals with internal control in mind to avoid excessive concentration of authority on specific individuals or organizations.
- We will properly manage and use the company's properties and assets and will not use them improperly or for private purposes.
- We will properly manage and use information assets including documents and electronic data according to laws, regulations, and internal rules. We will not improperly acquire or use personal information of employees and temporary workers or information of customers and business partners.
- We will handle PCs and mobile phones carefully according to the internal rules in order to prevent any information leakage.
- We will actively acquire intellectual property rights such as patents, and properly manage and use intellectual property rights acquired. We will also respect third parties' rights including software, and deal with infringement appropriately.
- We will not overlook any fraudulent act, and report to or consult with our superior or the department in charge when we find anything that goes against these Guidelines or Guidelines for Corporate Behavior. If necessary, we will not hesitate to use the Help Line system.

## 3 Respect for humanity and assurance of a comfortable working environment

We will hire and treat people in a proper and fair manner and provide a safe and pleasant working environment in which our people can work comfortably without sacrificing their family life. We will make available opportunities that people with versatile talent can take and will support the development of human resources through the acquisition of knowledge and expertise. We will prevent bullying, discrimination, harassment, or any other acts that violate human rights. If there is a human rights violation, we will take appropriate action in an expeditious manner.

### Guidelines for Behavior

- We will not discriminate based on race, nationality, creed, personality, or disability, or commit any act that may harm the dignity of individuals such as bullying and harassment. When we find or are subjected to such an act, we will report to or consult with our superior or the Human Resources department, or use the Help Line system if necessary.
- We will actively participate in education and training, and continue to educate ourselves to improve our skills.
- We will understand and observe the work rules, laws, and regulations related to occupational health and safety, prevent occupational accidents, and create a safe and pleasant working environment.
- We will value daily communication and try to create a working environment where each individual can work happily and vibrantly. We will help our subordinates and peers balance work and family life/parenting.

## 4 Implementation of fair, free, and transparent transactions

As a good and equal partner, we will implement fair, free, and transparent transactions in search of mutual benefit with our business partners. In addition, we will promote our commitment to discharge our corporate responsibility for society throughout the supply chain used by the Soshin Electric Group.

## Guidelines for Behavior

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- We will observe the internal rules on ordering and avoid business transactions that violate the Act against Delay in Payment of Subcontract Proceeds, Etc. to Subcontractors.
  - We will try to act reasonably based on the understanding that business partners are equal partners. We will not commit any act that profits the company unfairly by taking advantage of the position of superiority over business partners. We will not commit any act for personal profit related to business operations.
  - We will use business partners that observe the "Soshin Electric Group Basic Purchasing Policy" as well as the laws and regulations with absolute certainty based on the understanding that society demands that the entire supply chain should manage its social responsibilities.
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## IV As a Member of Society

### 1 Preservation of global environment

We will contribute to the preservation of the global environment by committing ourselves to take the lead in reducing environmental impacts at every location and in every process that is involved in our business activities. We will cooperate in efforts with local communities to preserve the environment and will also actively support our employees' efforts.

## Guidelines for Behavior

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- We will understand the impact of business activities on the environment and society, observe environmental laws and regulations and the company's standard, periodically conduct equipment inspection and environmental measurement, and keep accurate records. In the case of an abnormality, we will report it to the superior and facility manager, correct the situation, and take preventive measures for the future.
  - We will make efficient use of energy in all the processes from research, development, and design to procurement, production, sales, distribution, and disposal, and work proactively to reduce environmental impacts by resource saving, recycling, and waste reduction.
  - We will actively participate in environmental preservation activities of the company and local community as well as energy-saving and resource-saving activities in everyday life. We will also work proactively on environmental certification tests.
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### 2 Cooperation with local communities and promotion of social action programs

We will actively commit ourselves to contributing to society, satisfying the needs of local communities with our interest in the social tasks required by each country and local community in accordance with our objective to become a corporate citizen that can be trusted by local communities.

## Guidelines for Behavior

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- We will actively participate in the social action programs of the company based on the understanding that the company is part of the local community and a symbiotic relationship with it comprises the basis of the sustainable development of the company.
  - We will work on the social action programs as a member of the local community to put individual power to use in the local community.
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### 3 Communication with stakeholders

Through communication with all of our stakeholders, including customers, business partners, shareholders, employees, and members of local communities, we will enhance their understanding of the Soshin Electric Group and review corporate activities based on comments forwarded to us. We will use these in our efforts to accomplish our social responsibilities.

## Guidelines for Behavior

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- We will respect the culture and traditions of each country and region and incorporate them into the company's activities as much as possible.
  - We will take suggestions from stakeholders seriously and strive to make improvements.
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## ● Environmental Policy

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The Soshin Electric Group will contribute to the resolution of global environmental problems based on our own policy as described below:

1. Compliance with legislation, pacts, agreements with customers, and voluntary standards
2. Identification of environmental objectives and organized continuous promotion of activities with local communities to reduce environmental impacts
3. Development, design, production, and marketing of environmentally-friendly products
4. Implementation of preventive measures and monitoring of environmental pollution
5. Continuous encouragement of education, training, and enlightenment activities to raise awareness of the roles and responsibilities of employees, as well as all other people involved in our business activities

## ● Quality Policy

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1. Quality First: Achieve higher levels of "customer satisfaction."
2. Thorough Implementation of the Basics: Return to the basics and do all the things we need to do.
3. Full Participation: Create a favorable environment for manufacturing.

## ● Human Resource Development Policy

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We will promote productive educational measures to achieve the human resource development goals below:

1. Develop independent human resources with a human resource system that encourages challenges.
2. Improve individual performance by providing educational opportunities according to ranks and functions.
3. Implement job rotation to help develop a wide perspective and broad knowledge.

## ● Health and Safety Policy

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Ensuring the health and safety of each employee comprises the basis of the management and existence of the company.

1. Comply with legislation, pacts, agreements with customers, and voluntary standards related to occupational health and safety.
2. Improve health and safety levels through continual improvements based on an occupational health and safety management system.
3. Enhance health and safety education and respect consultations with employees related to health and safety activities.
4. Realize a comfortable working environment by reducing the risk of danger or harm and preventing accidents.
5. Enhance efforts to prevent health problems and improve the health of employees.

## ● Information Security Policy

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1. Establish information security management systems to prevent unauthorized access, loss, tapping, leakage, falsification, destruction, and disruption of use of information assets to ensure the safety of information assets held, such as information held during business activities as well as devices, facilities, and services required to handle such information.
2. Provide education and training on information security on a continual basis to all individuals working at the business locations of Soshin Electric and the group companies who use information assets to raise their security awareness.
3. Make any behavior that goes against the basic policy subject to penalties based on work rules and regulations in addition to punishment by laws.
4. If a security incident should occur in any of the information assets, identify the cause immediately to try to minimize damage.
5. Observe the laws, regulations, and social norms related to information security as well as clients' contractual requirements and obligations related to information security.
6. Strive to review and improve the activities above on a continual basis.

## ● Personal Information Protection Policy

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We will pursue the following policy when handling personal information acquired by the company.

1. Handle personal information according to the applicable personal information protection laws and regulations.
2. Obtain personal information by lawful and fair means.
3. Use personal information to the extent necessary to the specified purpose of use.
4. Avoid providing personal information to third parties unless there is consent of the person or it is permitted by the applicable laws and regulations.
5. Create internal rules and organizational structure to prevent leakage or loss of personal information, and implement thorough personal information management through employee education.

## ● Basic Purchasing Policy

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1. Seek open, proper, and fair procurement, competition, and economic efficiency.
2. Achieve mutual prosperity with suppliers based on mutual trust.
3. Comply with the laws and protect the global environment.
4. Implement green purchasing activities for all purchased products and services including raw materials, parts, production equipment, secondary materials, and office equipment.
5. Use products and services with a low environmental impact and companies that place a high priority on environmental preservation, in addition to taking into account quality, price, and delivery.

## — Promotion Framework —

The Soshin Electric Group's Guidelines for Corporate Behavior apply to all individuals working at the business locations of Soshin Electric and companies in the Soshin Electric Group.

Any behavior that goes against the Guidelines is subject to penalties based on work rules and regulations in addition to punishment by laws. For an overseas group company, special rules shall be established and implemented according to the characteristics of the company, country, and/or region based on the main purport of the Guidelines.

### "Corporate CSR Committee" and "Compliance Committee"

We have the "Corporate CSR Committee" and the "Compliance Committee" under it to ensure the compliance with the Guidelines.

These Committees deal with matters related to compliance, including compliance with legislation and corporate ethics based on the Guidelines, and carry out planning, dissemination, the administration of the Help Line, handling of cases, and other related operations.

### Help Line System (Consultation and Reporting System)

We have the Help Line system for providing consultation and receiving reports from you, to which the Guidelines apply. The main purpose of this system is to suppress, prevent, and/or achieve an early solution to behaviors that go against the Guidelines. The outline is as follows.

#### 1) Targets of consultation and reporting

When you find any behavior that goes against the Guidelines or any sign thereof, first consult with or report to your superior, department manager, officer.

If you have any difficulty in consulting with or reporting to your superior, department manager, Human Resources department, General Affairs department, Business Auditing Office, or Legal Affairs Office for any reason, you can consult with or report to the Help Line Contact Desk.

#### 2) Help Line Contact

Legal department	Phone: +81-267-67-4511
	Fax: +81-267-67-4544
	E-mail: <a href="mailto:hsinoue@soshin.co.jp">hsinoue@soshin.co.jp</a>



Revision History	
June 1, 2003	: Created
June 1, 2006	: Revised
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