

## **UBE Group Procurement Staff Code of Conduct**

To ensure the actions of staff charged with undertaking procurement are in line with corporate ethics or social norms, we promote fair and equitable procurement under the following Code of Conduct.

- ① Staff involved in procurement activities will respect all laws and regulations related to procurement. If any employee learns of a case in violation of such laws and regulations, they will swiftly report it to their superiors and it will be handled appropriately.
  - ② Staff involved in procurement activities will not accept such gifts from business partners as mid-year or year-end gifts. They will also refuse such courtesies as congratulatory or condolence payments.
  - ③ Staff involved in procurement activities will not acquire unlisted shares from business partners and will not acquire stocks after obtaining insider information.
  - ④ Staff involved in procurement activities will not accept special discounts or services on partner products for the purpose of personal use.
  - ⑤ Staff involved in procurement activities will not make requests for benefits or favors for themselves from business partners and will not maintain any position that constitutes a conflict of interest.
  - ⑥ Staff involved in procurement activities will not accept improper entertainment from business partners. They will also not provide business partners with such entertainment.
- \* Staff involved in procurement activities include all staff related to procurement, materials, purchasing, quality management, production technology, other development, or transactions with business partners.