



# **Trocellen Group CSR Code of Conduct**

*Based on and aligned with Furukawa Electric Group CSR Code of Conduct*

Last update: 13/07/2022



## Management message and operating standards of the Trocellen Group

Within the Trocellen Group, ethical and socially responsible behavior is a fundamental part of everyday life. Our mission statement reflects our company's commitment:

- Creating trustworthy solutions for today's important issues.
- Trocellen delivers advanced consumer and industrial solutions that improve lives in tangible ways and ensure a brighter future for all.
- As industry leader, we build trust, respect business relationships, and contribute to global sustainability efforts at every turn.
- We commit to being a fair employer that acknowledges the value of our people – together we build long-lasting value.

The Code of Conduct provides a framework for the values, principles, and actions we follow, which, in addition to legal compliance, take into account the environmental and social impacts of our activities in all circumstances.

With an eye to the future, the Trocellen Group management team pledges to:

- operate our businesses in harmony with society and the environment and endeavor to create social value through technological innovation, complying with laws, social norms, and ethics as a member of the international community.
- to maintain and build sound and friendly relationships with all our stakeholders and contribute to the sustainable development of society.
- live up to the expectations and trust invested in us by society, with fairness and integrity.
- nurture human resources at every level, so that we can become a more diverse and creative organization.

The Code of Conduct sets out the basic rules of conduct for Trocellen's managers and employees. Trocellen expects employees of the Group to contribute positively to its management policies, which are implemented in their daily work. It therefore requires Group employees to comply with the core values and principles set out in the Code of Conduct.

The Trocellen Group supports the UN Global Compact and has participated in it since February 2020 as part of Furukawa Electric Group. Trocellen Group believes that respecting and realizing the ten principles of the UN Global Compact will lead to the strengthening of our management foundations and help us to continue growing sustainably.

## Trocellen Group commitments

### 1. Human rights

#### 1-1. Respect the human rights/ Prohibit discrimination

Respect the human rights of all people and do not engage in discrimination or harassment on the grounds of race, nationality, creed, religion, gender, sexual identity, sexual orientation, social origin, age, disability, academic background or family circumstances.

#### 1-2. Prohibit harassment

Respect the human dignity of all people and do not use language that may disrespect them or engage in harassment. Do not use sexual language that may make others feel uncomfortable or engage in sexual harassment.

#### 1-3. Prohibit child labor and forced labor

Do not engage in child labor or forced labor and do not accept any such practices from suppliers and other associates.

#### 1-4. Respect the basic rights of employees

Respect the basic rights of employees, such as the right to organize and to bargain collectively, complying with local applicable laws and regulations.

#### 1-5. Promotion of diversity and inclusion (securing and acceptance of diversity)

Aim to be a Group that is creative and overflowing with vitality by respecting the diversity of individuals' ways of thinking and senses of value, which differ due to their various backgrounds, improving the capabilities and job satisfaction of all, and utilizing mutual strengths to change them into organizational power.

### 2. Working conditions and environment

#### 2-1. Ensure appropriate working conditions and working hours

Comply with labor laws and regulations and ensure that employment-related matters are managed appropriately in line with labor agreements and employment regulations.

#### 2-2. Ensure safe, hygienic, and motivated working environments

Strive to maintain a safe, hygienic and healthy work environment based on the recognition that ensuring safety is the premise of business execution.

#### 2-3. Creation of rewarding workplaces

Promote the independent work-life management of employees by providing systems that support diverse ways of working, balance the sustainable growth of the

Company and the enhancement of individual lifestyles (lives), and create a workplace atmosphere that allows employees to feel pride and job satisfaction.

### **Trocellen Group commits itself to Furukawa Electric Group - Basic Policy on Health and Safety Management**

- Endeavor to eradicate accidents by inspections and management in accordance with the Industrial Safety and Health Act.
- Nurture safety conscious persons that can avoid danger by pointing & calling and by complying with rules.
- Realize “fundamental safety” in which people and facilities are separated to eliminate unsafe conditions.
- Raise the quality of safety management by implementing SIDIS cycle-based dialogue, empathy, and standardization.
- Promote mental and physical health improvement by Furukawa Electric group’s health management activities.

## **3. Environment**

### 3-1. Comply with environmental laws and regulations

Comply with domestic and overseas environmental laws and regulations, and act in accordance with internal regulations at every stage of our business from research and development, purchasing, production, sales and disposal.

### 3-2. Ensure environmental preservation

Make every effort to protect the environment and prevent pollution by reducing emissions of greenhouse gases, reducing and reusing industrial waste, conserving water resources, and controlling chemical substances properly, and contribute to the realization of a resource recycling society while saving energy, saving resources and using renewable energy.

### **Trocellen Group commits itself to Furukawa Electric Group – Basic Environmental Policy**

We, the employees of the Furukawa Electric Group, recognize that conservation of the global environment is a serious issue confronting the international community, and we pledge to contribute to a sustainable future for the world through technological innovation that utilizes our strength in advanced materials.

#### Action Guidelines

1. We shall comply with environmental laws and regulations as well as the demands of our customers and others, setting ever higher environmental targets as we continuously improve our global environmental conservation efforts.

2. We shall strive to develop products that are friendly to the Earth and create new environmental businesses.
3. We shall strive to reduce environmental risk by incorporating anti-climate change and resource conservation/recycling considerations, as well as a reduction in the use of environmental impact causing substances, across the entire product lifecycle.
4. We shall evaluate the ecological impact of all of our businesses and strive for the conservation of biodiversity and sustainable use of resources.
5. We will seek harmony with the natural environment and local communities through dialogue with our stakeholders.

### 3-3. Contribution to society coexisting with nature

Make every effort to assess the impact of all business activities on the ecosystem and to ensure the sustainable use of resources and preserve biodiversity to contribute to the realization of a society that coexists with nature.

#### **Trocellen Group commits itself to Furukawa Electric Group - Biodiversity Conservation Guidelines**

1. Evaluate the effects that our business activities have on the ecosystem, and minimize the harmful effects while maximizing the beneficial ones
2. To sustainably use resources and conserve biodiversity, consider more than ever the need to carry out measures against climate change, conserve resources, recycle and reduce environmentally hazardous substances
3. Carry out activities in collaboration with local communities to conserve biodiversity

## **4. Products and services**

### 4-1. Ensure products safety and reliability

Always provide highly reliable, safe products and services and take all necessary measures to prevent users and other concerned parties from sustaining physical injuries or property damage. Satisfy safety standards defined by applicable laws and regulations in each country when designing products.

### 4-2. Provide high-quality products and services

Strive to provide products and services of outstanding quality the viewpoints of customers and users.

### 4-3. Understanding and observance of rules concerning quality

Understand and observe laws and internal and external regulations, concerning the quality of the Company's products and services, and perform contracts with customers properly and thoroughly.

## **Trocellen Group commits itself to Furukawa Electric Group – Basic Policy on Quality Management**

At every stage of our operations, from research and development to manufacturing, sales, customer service and management, in all sections and all hierarchies, we always strive to adhere to a PDCA management cycle based on actual facts, maintain and improve our products, customer services and the quality of our operations and put our management policies into practice.

## **5. International businesses and transactions**

### **5-1. Comply with laws and respect international norms of behavior**

Thoroughly research and comply with applicable laws and regulations in the relevant countries or regions when engaging in international businesses. Make every effort to respect the religion, customs, culture, and traditions in each country or region. In countries or regions where domestic laws and their enforcement do not meet social requirements, such as international norms of behavior, strive to respect such norms to the greatest extent possible.

### **5-2. Observe laws and regulations governing imports and exports**

Perform appropriate procedure when dealing with the import or export of products or technology regulated in laws and regulations. Ensure that no imported or exported products or technologies will be used for military purposes, such as the development of weapons (especially weapons of mass destruction).

## **6. Fair competition**

### **6-1. Prohibit impediment to free competition**

Always engage in free and fair competition with other companies, taking care to avoid any actions (cartels, bid rigging, division of markets, etc.) that violate competition laws in each country or region.

### **6-2. Prohibit abuse of superior positions**

Do not engage in acts that cause disadvantage to business partners including contractors by abuse of a superior position, observe Subcontract Act and other related laws, and engage in proper transactions and responsible procurement.

## **7. Relations with customers, partners, and society**

### **7-1. Prohibit bribes**

Do not provide, promise, or offer benefits, monetary or otherwise, to any public officials or quasi public officials (including public officials working for overseas government bodies or international organizations) in return for access to facilities or

other services. Similarly, in accordance with the relevant laws and regulations in each country or region, do not provide, promise, or offer benefits, monetary or otherwise, to customers and partners other than public divisions, in order to gain an unfair profit.

### 7-2. Prohibit excessive gifts and entertainment

Do not provide customers, partners or other concerned parties with excessive entertainment, gifts or other favors. Similarly, do not accept any such favors from partners or other parties.

### 7-3. Have fair relations with politics

Strive to build transparent and fair relations with political circles and comply with the internal regulations and applicable laws and regulations in each country or region concerning political donations or contributions.

### 7-4. Cut off all relations with antisocial forces

Adopt a resolute approach to and cut off all relations with antisocial individuals or groups to avoid giving in to any unreasonable demands.

### 7-5. Request legal compliance to partners

Position suppliers and manufacturing contractors as business partners, request thorough legal compliance, provide guidance on improvements, using CSR guidelines, and work jointly on the promotion of CSR.

### 7-6. Contribute to society

Positively undertake social contribution activities in cooperation with local community activities and contribute to the community through our business.

## **Trocellen Group commits itself to Furukawa Electric Group - Basic Policy on Social Contribution Activities**

The Furukawa Electric Group will continuously undertake social contribution activities focusing on nurturing future generations, promoting sport and culture, and living in harmony with the environment and local communities, in addition to its business-related activities, in order to maintain and strengthen community ties built over centuries and create a better tomorrow for future generations.

## **8. Management and preservation of Company assets**

### 8-1. Prohibit the improper use of Company assets

Properly manage company assets regardless of whether they are tangible or intangible (money, products, proprietary information, and office equipment, etc.), and do not fraudulently use or steal them.

## 8-2. Protect intellectual property

Make effective use of intellectual property rights, respect the rights of others and do not engage in any conduct that may infringe upon their rights.

## 8-3. Manage confidential information

Ensure that all confidential company information is managed appropriately and is not disclosed or leaked without authorization. Obtain confidential information concerning other companies only from authorized personnel by legitimate means, and manage and use the information properly.

## 8-4. Protect personal data

When handling personal data, ensure that all data is managed and handled appropriately in accordance with applicable laws, regulations, and internal regulations to avoid any unauthorized usage or leaks.

## 8-5. Use information system appropriately

Take protection against threats on the computer network, and manage to prevent damages to our company and concerned parties.

# **9. Disclosure of information**

## 9-1. Disclose information in a timely manner

Ensure that financial data and other important information relating to the Trocellen Group is disclosed appropriately and at the right time in accordance with applicable laws and regulations.

## 9-2. Achieve reliable financial reporting

Ensure that the facts disclosed within financial and other corporate data are accurate. Compile all financial statements in accordance with the applicable laws and regulations, corporate accounting principles and accounting standards and ensure that the details of the company's financial standing and management results are presented correctly.

## 9-3. Securing of the appropriateness of tax declarations

Maintain and improve tax compliance by acquiring correct knowledge of tax, preparing transaction documents in all transactions in accordance with the business purpose and business circumstances, preparing tax declarations, and making proper tax payments, thoroughly.

### **Trocellen Group commits itself to Furukawa Electric Group - Tax Compliance Policy**

Furukawa Electric Group recognizes that "tax compliance" is an important matter for the Group and its stakeholders. We also understand that the taxes we pay play an important role in the economic and social development of the countries in which they are paid. Therefore, Furukawa Electric Group recognizes that it is a matter of course that we appropriately pay taxes in accordance with

the relevant laws and regulations of each country, and that this is a means of social contribution.

“Tax compliance” is also in accordance with our concept of compliance in the “Furukawa Compliance Code of Conduct,” namely: “as not only observing laws and regulations, but also as acting in accordance with the values and ethics required of the company and its employees as responsible members of society.”

Accordingly, in addition to committing to international tax frameworks focused on tax law compliance, building trust with tax authorities, and transfer pricing, we must also give due consideration to the following.

#### 9-4. Prohibit insider trading

In the event that you obtain important, undisclosed information relating to a listed company or any of its subsidiaries, do not trade in the securities issued by the listed company until the information is made public. In the event that you obtain such information, do not disclose it to any other party until it is made public.

## **10. Duties and obligations of senior management and employees**

#### 10-1. Act in accordance with legal and ethical compliance

Fully understand that the Trocellen Group regards compliance as “not only observing laws and regulations, but also as acting in accordance with the values and ethics required of the company and its employees as responsible members of society.” Refrain from giving any instructions or orders that conflict with compliance.

#### 10-2. Fulfill the responsibilities of senior management

In order to fulfill social responsibility for the Trocellen Group, senior management shall take the initiative in complying with related laws, regulations, and this code, and shall continuously strive to ensure the proper operation and improvement of the internal control systems.

#### 10-3. Prohibit conflicting actions with the interests of the company

Do not use information obtained as a result of the position or during the course of the work duties to make a profit for one’s own or any third parties or engage in any form of conducts that could adversely affect the company’s profits. Do not engage in any form of conduct or accept any position that could potentially conflict with the interests of the company without obtaining authorization via the prescribed procedure.

#### 10-4. Report illegal and improper conducts

Upon learning that any action in violation of laws, internal regulations, or this code is about to take place or has already taken place, report the matter to the Company (using the internal reporting system if there is one in place at the Company). The Company will respond to any such reports in good faith. Unless the report has been

submitted for improper purposes, the reporting party shall not be disadvantaged in any way in terms of their position or treatment.

### 10-5. Cooperate with company investigations and prevent recurrence

When the company conducts an investigation of any violation or potential violation of applicable laws or regulations, cooperate with the investigation faithfully, and keep the relevant documents and data as they are and refrain from hiding, tampering with, or destroying them. In the event of a violation, take remedial action promptly and prevent a recurrence.

### 10-6. Crisis management and business continuity plans

Prepare emergency response measures for possible disasters and accidents in order to protect the safety of all people concerned, and fully inform people at the workplace of the measures. Develop business continuity plans for the prompt recovery of core businesses in unforeseeable circumstances.

#### **Trocellen Group commits itself to Furukawa Electric Group - Basic Policy for Business Continuity Management (BCM)**

##### 1. Respect for human life

Priority must be given to securing the safety of lives and bodies of all employees, their families, those in neighboring communities, customers and all other concerned parties.

##### 2. Prevention of spread of damage

We strive to prevent occurrence of secondary disasters (e.g., fire at a company facility, environmental pollution).

##### 3. Continuity and early restoration of important duties

As a socially effective company, we aim to continue important duties to the greatest possible extent and, if they must be halted, to restore them quickly.

##### 4. Contribution to local communities

As a company trusted by society, we will continue to cooperate with local people and governments of surrounding areas.

##### 5. Implementation of BCM

Our business Continuity plan will be consistently reviewed as we strive to make improvements with an aim of obtaining greater trust from stakeholders and being more resilient to risk.