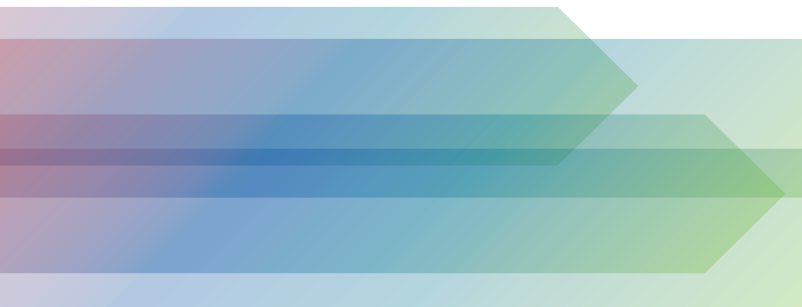




Toyo Seikan Group Sustainability Charter
Toyo Seikan Group Action Policy
Toyo Seikan Group Code of Conduct



Management Philosophy

Our management philosophy, consisting of our management policy, creed and vision, is a foundation of our business and integrated in our corporate philosophy structure as common values on which we pursue continuous growth.

— Management Policy —

We will constantly create new and innovative value, aspire to achieve a sustainable society and contribute to people's happiness.

— Creed —

We will honor dignity and always strive to be fair and unbiased in every way.

All of us will fully demonstrate our own strengths and expertise, and contribute to social prosperity while we grow and thrive as an individual, a corporation and a group.

— Vision —

We will aim to become a group that can provide unique and innovative technologies and products that will meet global expectations.



Toyo Seikan Group Sustainability Charter

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A framework of rules to be followed and practiced by companies in the Group for their management with a view to ensuring that the continued development of the Group is consistent with the continued development of society.



Toyo Seikan Group Action Policy

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Specific actions that we are to take for creating new value and for achieving a sustainable society and contributing to people's happiness



Toyo Seikan Group Code of Conduct

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Thirty-three commitments constituting guidelines on ethical standards that we should follow in day-to-day operations

Definition of terms

The Toyo Seikan Group is Toyo Seikan Group Holdings, Ltd. and its subsidiary companies (as defined in item (iii), Article 2 of the Companies Act).

In the Toyo Seikan Group Action Policy and the Toyo Seikan Group Code of Conduct, "Personnel" refers generically to (1) full-time and part-time staff members

employed by any company in the Toyo Seikan Group and temporary staff and loaned staff performing their duties under the direction and supervision of any Group company (hereinafter "Employees") and (2) directors, executive officers, audit and supervisory board members, honorary chairpersons and counselors (hereinafter referred to as "officers").

Toyo Seikan Group Sustainability Charter

- 1 We will practice the management philosophy in pursuit of the establishment of a sustainable society.

The Toyo Seikan Group's management philosophy is composed of the management policy, the creed and the vision. The management policy reads, "We will constantly create new and innovative value, aspire to achieve a sustainable society and contribute to people's happiness." Seeing this management philosophy as the Toyo Seikan Group's basic stance concerning sustainability, we will practice it with a view toward the establishment of a sustainable society.

- 2 We will work to improve value co-creation through dialog and collaboration with stakeholders.

The Toyo Seikan Group's businesses stand on the foundation of relationships of trust with different stakeholders. We will engage in dialog and collaboration with stakeholders to improve value co-creation through our businesses.

All stakeholders

We will respect basic human rights and diversity of people, and communicate and act sincerely.



- **3** We will identify material issues and strive to solve them in accordance with the Action Policy and the Code of Conduct.

The Toyo Seikan Group identifies the priority material issues that it should address to help establish a sustainable society. We will work to resolve these issues in accordance with the Toyo Seikan Group Action Policy, which specifies the behaviors that it is recommended that all personnel working for the Company engage in, and with the Toyo Seikan Group Code of Conduct, which stipulate the rules that they should follow.

- **4** We will carry out concerted business activities across the Group based on the spirit of this charter.

The management executives of each company in the Group will manage with an awareness of their duty to realize the spirit of this charter. They will construct effective governance systems, make them known to the Companies ensure they are implemented by the companies in the Group. Then, we will carry out concerted business activities across the Group to increase our corporate value.

Toyo Seikan Group Action Policy

- Pay attention to social issues
 - Discover small problems in daily life

We have been able to develop products and services because our predecessors solved the problems faced by customers and consumers and the customers and consumers recognized the value of these solutions. Always pay attention to social issues and think about what you can do to address them.

- Always learn and generate ideas
 - Accumulate ideas and techniques

In addition to the technologies and expertise that have been cultivated within the Group, we can also leverage new technologies to solve customers' issues. Do not set limits on your knowledge. Proactively learn new things.

- Involve different people in projects
 - Combine your strengths with those of your colleagues

To leverage your creativity, you must respect humanity and diversity. Work intrepidly to create new value not only with people inside your company but also with other personnel working for the Group companies, business partners and customers who share the same goals.

Toyo Seikan Group Code of Conduct

Chapter 1 Quality manufacturing P.12

- Quality manufacturing

Chapter 2 Fair and transparent business activities P.14

- Strict implementation for proper protection, management and use of information
- Fair competition
- Proper partnerships and transactions
- Prohibition of corruption and bribery
- Prohibition of conflicts of interest and confusion of official duties and private interests
- Communication and disclosure of corporate information and constructive dialog

Chapter 3 P.21 The growth of individuals and the prosperity of society

- Respect for human rights
- Respect for employees
- Comfortable workplace environment
- Initiatives for the environment and society

Chapter 4 Comprehensive risk management P.26

- Comprehensive risk management

Layout for the Code of Conduct

Intermediate category

Major category

Chapter 3 The growth of individuals and the prosperity of society

Initiatives for the environment and society

- 29** We promise to work towards fulfilling the Group's environmental targets in accordance with the Toyo Seikan Group Environmental Policy.
- 30** We promise to actively participate in society, the international community and local communities as a good corporate citizen and to help achieve the continuous development of these communities.

Our commitments

Reference information

QR Code for a related policy

Related policies and regulations

• Toyo Seikan Group Environmental Policy



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※Check the latest information at the reference destination.

※Also refer to the regulations of individual companies in the Toyo Seikan Group.

※Any personnel committing a violation of the Code of Conduct shall be subject to strict disciplinary action depending on the details of the violation in accordance with the rules of employment of individual companies in the Toyo Seikan Group.

Chapter 1

Quality manufacturing



Quality manufacturing

- 1** We promise to observe the applicable laws, regulations, safety standards and the like of the countries in which we operate to ensure the safety and high quality of the products and services we provide.
- 2** We promise to clearly define standards and procedures for all processes from development to the sale of products and services in accordance with our internal rules, ensure their implementation, review their effectiveness and correct them as necessary.
- 3** We promise to take swift and proper response action in accordance with our internal rules in the event of trouble with any of our products and services, and to manage and store information on cases of trouble for making use of it for prevention of recurrence.

Related policies and regulations

- Toyo Seikan Group Regulations on Quality Operations

Chapter 2

Fair and transparent business activities



Strict implementation for proper protection, management and use of information

- 4 We will properly manage and make effective use of the Group's confidential information, the confidential information of our business partners and other companies and the personal information of customers, employees and other individuals and never obtain or use this information in any unauthorized manner.
- 5 We will strictly manage the security of information systems and never use social media or technologies in any inappropriate manner.

Related policies and regulations

- Basic regulations on information management
- Regulations on information system security
- Toyo Seikan Group Rules to Comply with the Insider Trading Regulations

Fair competition

- 6 Never forgetting our past errors, we will comply with the Act on Prohibition of Private Monopolization and Maintenance of Fair Trade and with competition laws in countries and regions where we do business and we will never obstruct fair competitive relationships with our competitors.
- 7 We promise to take necessary procedures for contacting any competitor in accordance with our internal rules in the case where there is any lawful and justifiable business reason.
- 8 We will never exchange information or make arrangements with any competitor on any matter related to competition, including pricing, estimated prices, price revisions, sales regions, sales quantity, production volume, costs, market shares, allocation of customers, supply and demand forecasts and willingness to receive orders.
- 9 We promise to take action such as objecting or leaving a place when we come across any act that could cause people to suspect that a cartel is being formed during a meeting, party, golf event or the like in which any competitor participates, then to report the details of the matter to the relevant department in the company and keep records of the event in accordance with our internal rules.

Related policies and regulations

- Regulations on Compliance with Antitrust Laws

Proper partnerships and transactions

- 10 We promise to rigidly conduct proper transactions in compliance with the Act against Delay in Payment of Subcontract Proceeds, etc. to Subcontractors.
- 11 We promise to conduct sincere, fair, equitable and responsible procurement activities in accordance with the Toyo Seikan Group Procurement Policy and to always pay attention to whether or not our suppliers understand and observe the Toyo Seikan Group CSR Guidelines for Suppliers.
- 12 We will observe laws and regulations relating to security trade control and will not be involved in any transaction that may hamper international peace and security and maintenance of the world order.

Related policies and regulations

- Toyo Seikan Group Procurement Policy
- Toyo Seikan Group CSR Guidelines for Suppliers



Prohibition of corruption and bribery

- 13** We will not engage in any form of corruption, including the monetary or non-monetary bribery of a public employee of any country or any business partner, embezzlement and money laundering.
- 14** We will not give any entertainment, money or other gifts to any business partner or receive them from them to gain or maintain an unreasonable benefit or preferential treatment.
- 15** We will not offer any entertainment, money or other gifts that are prohibited by the laws or regulations of countries and regions to the public officials, etc. of any country.

Prohibition of conflicts of interest and confusion of official duties and private interests

- 16** We will not seek to achieve our own interests or the interests of any third party, such as relatives, friends or acquaintances, over the interests of the company.
- 17** We will properly control the company' s tangible and intangible assets and not use them for private purposes or other non-business purposes.
- 18** We will not engage in any political, ideological, religious or other personal activities in the workplace.

Related policies and regulations

- Group Regulations to Prevent Bribery Involving Public Officials, etc.



Communication and disclosure of corporate information and constructive dialog

- 19** We promise to disclose information to shareholders, investors and other stakeholders in a timely and appropriate manner in accordance with applicable laws and regulations and with our internal rules if we are appointed to communicate corporate information.
- 20** We promise to endeavor to engage in two-way communication with shareholders, investors and other stakeholders.
- 21** We promise to properly implement accounting and tax accounting activities in accordance with applicable accounting standards, taxation laws and other similar rules.

Related policies and regulations

• IR Policy



Chapter 3

The growth of individuals and the prosperity of society



Respect for human rights

- 22** We will understand and respect the laws and regulations of the countries where we do business and international standards for human rights and will never violate human rights in every aspect of our business.
- 23** We promise to understand the Toyo Seikan Group Human Rights Policy and to always pay attention to whether or not we negatively impact human rights in all the business activities we are engaged in.

Related policies and regulations

- Toyo Seikan Group Human Rights Policy



Respect for employees

- 24** We promise to never discriminate against anyone because of their nationality, race, ethnicity, religion, belief, gender, age, disability or sexual orientation and to develop and promote diverse human resources.
- 25** We will not engage in any sexual harassment, abuse our authority over subordinates, unfairly treat workers in relation to pregnancy, childbirth or childcare, coerce people to consume alcohol or engage in other forms of harassment.

Related policies and regulations

- Toyo Seikan Group Human Rights Policy
- Toyo Seikan Group Personnel Policy



Comfortable workplace environment

- 26** We promise to provide and improve work environments that enable individual employees to balance work and childcare, nursing care, medical treatment, learning, recreational activities and other activities and to work flexibly.
- 27** We promise to take steps to prevent overwork and reduce overtime hours and to address the reform of workstyles in consideration of the improvement of productivity.
- 28** We will always conduct everyday health and safety activities, including risk prediction (kiken yochi or KY) activities and 5S activities (seiri, seiton, seiso, seiketsu and shitsuke which are sort, set in order, shine (clean), standardize and sustain (maintain through training)).

Related policies and regulations

• Toyo Seikan Group Personnel Policy



Initiatives for the environment and society

- 29** We promise to work towards fulfilling the Group's environmental targets in accordance with the Toyo Seikan Group Environmental Policy.
- 30** We promise to actively participate in society, the international community and local communities as a good corporate citizen and to help achieve the continuous development of these communities.

Related policies and regulations

• Toyo Seikan Group Environmental Policy



Chapter 4

Comprehensive risk management



Comprehensive risk management

- 31** We promise to completely manage risk in preparation for acts of terrorism, cyberattacks, natural disasters and other risks.
- 32** We will firmly reject any unreasonable request from anti-social forces or groups that jeopardize the order and security of civic society and will have no relationship with them at all.
- 33** We promise to act fairly, sincerely and transparently in accordance with instructions from superiors and relevant departments in the event of a disaster, accident or other crisis.

Related policies and regulations

- Regulations on Risk and Crisis Management
- Rules for Emergency Management in the Group's Overseas Operations

Memo

The Future, Wrapped for All.

For over a century, we have promoted happiness through our packaging technologies. However, as the world and our daily lives change so fast, we need to adapt our operations and ourselves to be one step ahead.

We move closer to each person.

We continue standing by people in a world of diverse attitudes toward happiness and prosperity by creating new values based on various perspectives.

Always with the Earth.

We will create a new system of circulation that doesn't sacrifice the environment or prosperity.

We have always been close to the moments of delivery and use, which is why we can create joy for future generations.

It's a new way to connect people who make things with people who use them and the way we bring happiness to people all over the world.

We are Toyo Seikan Group.