

SG Holdings Group's Code of Ethics and Conduct

We will act in accordance with this Code of Ethics and Conduct, which is an embodiment of the Charter of Corporate Conduct of the SG Holdings Group.

Section 1 With Customers' Expectations ~We Continue Mutual Development~

1. Earning Satisfaction and Trust

We will continue to uphold the cornerstone of the Company's foundation "Hikyaku no Kokoro" (spirit of Edo-era express messengers) – making good faith efforts to meet our customers' satisfaction – and always act with the consciousness of being a representative of the SG Holdings Group.

2. Developing and Providing Quality Products and Services

We will develop and quality products and services, always from the viewpoint of the customer, to ensure complete satisfaction of the customer.

3. Explaining in a Polite and Clear Manner

We will provide accurate information and explain in a polite and clear manner when providing products and services to, and dealing with inquiries from, the customer.

4. Working Sincerely Responding to Confidence

We will respond to confidence of the customer by conducting operations with sincerity, following all pre-determined rules, as well as abiding by contracts and agreements with the customer, when providing products and services.

5. Responding Actively to the Voice of the Customer

We will listen attentively and respond actively to customers' requests and complaints, and make use of such opportunities to develop and improve products and services.

6. Management of Customers' Personal and Confidential Information

We will carefully manage all customers' personal and confidential information which is obtained in the course of our operations, to prevent fraudulent use, leak and falsification of the information. Additionally, we will comply with all applicable laws and the Company's internal regulations and will not use the said information for purposes other than the original intent nor will we provide it to a third party.

Section 2 With Employees' Expectations ~We Jointly Create a Positive Workplace~

1. Efforts toward Duties

We, as a member of the SG Holdings Group, will engage in our duties, always keeping in mind to improve ourselves and our colleagues.

■ Working Conscientiously and Thoroughness of Reporting, Communicating and Consulting

We will comply with all internal rules, including working regulations, ensure to report to, communicate and consult with supervisors, maximize our performance and sincerely engage in our business operations.

■ Personal Development and New Value Creation

We will make positive efforts to achieve personal development and create new values, making use of each personality and characteristics at the workplace.

2. Safe Driving

We will adhere to safe driving principals based on the common understanding that our group centers on transportation business.

■ Considering Vulnerable Road Users

We will drive carefully whenever we drive vehicles, whether for work or privately, paying particular attention to vulnerable road users, such as children and elderly people.

■ Promoting Eco-Friendly Safe Driving

We will practice "Eco Safe Driving" of being friendly to both people and the environment, recognizing that eco-friendly driving leads to safe driving.

3. Fostering a Healthy Work Environment

We will care for each other and respect each person's way of thinking and position at the workplace in order for all employees to work with vigor and enthusiasm.

■ Respect for Human Rights, Individuality and Personality

We will respect each person's human right, individuality and personality and create a workplace environment that maximizes the abilities of individual employees.

■ Respect for Beliefs of Others

We will respect the freedom of religious beliefs of all employees, and prohibit religious solicitation, slander or libel. We will also respect the political beliefs of all employees and will not carry out political activities in the workplace without the Company's prior approval.

■ Safe and Healthy Workplace

We will adhere to the rules and regulations pertaining to the workplace, including 6S activities (Seiri, Seiton, Seiketsu, Seisou, Shitsuke, Sahou) (Sorting, Setting-in-Order, Standardizing, Shining, Sustaining the Discipline, Showing the Good Manner).

■ Greetings and Communications

We will encourage greetings and communications and promote mutual understanding in order to create a vibrant workplace environment that increases job satisfaction.

■ Protection of Employees' Personal Information

We will respect the privacy of each employee. Additionally, we will protect and manage the personal information of all employees pursuant to all applicable laws and internal regulations, and will not utilizing the personal information for purposes other than the original intent, nor will we provide it to a third party.

■ Prevention of Discrimination and Harassment

We will not engage in unjust discrimination, sexual harassment, power harassment, maternity harassment or other actions in the workplace, which may violate human rights. Should an employee feel he/she is experiencing such discrimination, he/she should immediately report the matter to his/her supervisor or the Company. If the situation cannot be resolved, he/she should report the matter to the "Nandemo Soudanshitsu" (general consultation office) pursuant to the Company's internal whistleblowing rules.

The Company will make appropriate efforts by conducting impartial investigations. Additionally, we will comply with all internal reporting rules, and assure the anonymity of the informer and people who cooperate with the investigation, in order for them not to be treated unfairly.



4. Management of the Company's Assets and Information

We understand the significance of the Company's assets, information and intellectual properties, and we will protect the rights of our Company while respecting the rights of other companies.

■ Prohibition of Inappropriate Use of Company Assets

We will not use the Company's assets, whether tangible or intangible, such as the Company's money, securities, products, equipment, fixtures, information and intellectual properties, for personal gain and / or inappropriate purposes.

■ Information Management

We will, pursuant to the Information Security Basic Policy, be always aware that protecting the Company's information assets including confidential information is our societal responsibility, and strictly manage the information. We will also not use the information improperly or unfairly nor disclose or leak the information, even after the retirement.

■ Intellectual Property Management

We will ensure proper management of the Company's intellectual property and will not infringe the copyrights patents and other intellectual property rights of other companies.

5. Compliance with Laws and Behavior in a Sensible Manner Respecting Social Norms

We will abide by all domestic and international laws. We will also respect social norms, act in a sensible manner by high ethical standard, and upkeep the good name, reputation and brand of the Company, even in our private lives.

■ Prevention of Improper Activities and Establishment of Ethics

We will make efforts to establish the Company culture and ethics to prevent misconduct, not to overlook misconduct and not to hide scandalous events, by acting in a sensible and responsible manner in accordance with this Code of Ethics and Conduct as well as by abiding by all laws.

■ Respect for Human Rights and Prohibition of Discrimination

We have established the SG Holdings Group's Human Rights Policy, prohibit human rights violations and acts leading to discrimination and abuse, and make efforts to respect human rights.

■ Distinction between Private and Public Matters

We will keep private and public matters separated in the workplace, and will not take advantage of our position or title to achieve personal gain or offer facility for a third party. We will also not obtain personal rewards, borrow money from, or lend money to, our customers or business partners.

■ Propriety of Business Entertainment Expenses

We will ensure that all gifts, dinners and other business entertainments are within socially acceptable bounds and such entertainments are not used for improper purposes.

■ Dealings with Government Officials and Politicians

We will ensure to use care in our dealing with public officials, abide by applicable laws, and not offer gifts or entertainment in a way which may be misconstrued as collusion or bribery. In addition, we will not make unlawful contributions to politicians, political parties or electoral candidates.

■ Handling of Insider Information

We will abide by laws and internal regulations pertaining to insider trading. If we come to know insider information (important undisclosed information) about SG Holdings or another company in the course of business, we will not trade the Company's shares nor will we provide the information to a third party including our family, before the information is publicized.

■ Practicing Tax Compliance

We will properly understand and comply with tax-related laws and regulations stipulated in the countries and regions in which we conduct business activities as well as international tax rules.

■ Reporting to the Company and Notifying Appropriately

Should we find or realize a misconduct or mistake, we will report it to the Company or our supervisors immediately. If the situation cannot be resolved, then we will report it to the "Compliance Hotline" or "Nandemo Soudanshitsu" (general consultation office) pursuant to the Company's internal whistleblowing rules.

The Company will make efforts to resolve the issue appropriately through impartial investigations. Additionally, we will comply with all internal reporting rules, and assure the anonymity of the informer and people who cooperate with the investigation, in order for them not to be treated unfairly.

Section 3 With Expectations of Local Communities ~We Continue to Move forward~

1. Living in Coexistence with Local Communities

We will pursue to live in coexistence widely with society through our contribution to local community development both domestically and internationally.

■ Open Enterprise

According to societal expectations, we will ensure transparency in all our business dealings by actively disclosing corporate information and promoting communications with society.

■ Interacting with Local Communities

Toward the realization of a prosperous healthy and secure society, we will make efforts to interact widely with local communities through various events, disaster relief activities and volunteer activities.

■ Respect for Local Culture and Customs

We will give consideration to stakeholders in each country and respect the culture and custom of each country and region.

2. Safety Activities

Following the principal of "Safety above all else" we will practice approaches to safety in all our business activities.

3. Environmental Protection

We will, pursuant to our environmental policies, promote earth-conscious business activities.

■ Curbing Climate Change

We will strive to reduce greenhouse gas emissions by making efforts including utilization of renewable energy and improvement of the efficiency of our business.

■ Resource Recycling Initiatives

We will work to reduce and recycle waste, recycle limited resources, and aim to help create a sustainable society.

■ Biodiversity Conservation

We appreciate that human society benefits from other organisms and natural environments and that it affects them, and we will try to avoid impacting ecosystems as much as possible.



■ **Pollution Prevention**

We will make efforts to prevent air, water and land pollution as environmental preservation activities.

■ **Environmental Communication Initiatives**

Aiming for mutual understanding with the local community, we will develop awareness of environmental issues through environment education program toward environmental load reduction and conservation / restoration of the environment among not only the officers and employees of the SG Holdings Group, but mainly the children responsible for the next generation.

4. Supporting the Arts, Academic and Sports

We will support the arts, academic and sports, through the actions of our foundations and sport club activities.

Section 4 With Expectations of Shareholders and Business Partners

~We Establish Mutual Trust~

1. Dialogue with Shareholders

We will be fair to all shareholders, and convey accurate management information, so as to build understandings and trust. We disclose corporate information in a timely, appropriate and fair manner. We will also value dialogue with shareholders, take their opinions and suggestions seriously, and make efforts for sound and transparent corporate management.

2. Ensuring Reliability of Financial Reports

We will ensure the reliability of financial reports through proper accounting procedures in accordance with applicable laws and the Company's internal regulations.

3. Coexistence and Prosperity with Business Partners

We will mutually develop with our business partners by adapting sincere attitude to the business partners and building proper trust relationships.

■ **Prohibition of Abuse of Dominant Bargaining Position**

We will maintain a fair and equal relationship with others and will not engage in behavior that gives them disadvantage such as forcing product purchase or financial burdens by using our dominant bargaining position. We will also not make unilateral demands for lowering prices and shortening delivery time, without valid reasons.

■ **Management of Confidential and Personal Information of Business Partners**

We will rigidly manage our business partners' confidential and personal information obtained in the course of operations, to prevent fraudulent use, leak and falsification of the information. We will also abide by applicable laws and contractual provisions and will not utilizing the information for the purposes other than the original intent nor provide it to a third party.

4. Fair and Free Competition

We will not participate in collusive behavior which restricts fair and free competition. We will also, based on the competition principle, abide by applicable laws such as antitrust laws, compete openly and squarely, and will not defame or calumniate competing companies.

5. Dealing with Anti-Societal Groups

We will maintain an attitude of resolution against anti-social organizations / persons such as gang groups and have absolutely no connection with anti-social forces. In addition to rejecting all inappropriate requests from them, without making any individual judgments or responses, it will be immediately reported to supervisors or those in charge of preventing unjust demands, and we will respond as a company in systematic and legal manner. If the situation cannot be resolved, we will report to the "Unjust Demand Hotline."

The Company will make it a priority to ensure the safety of all employees, and resolve the matter organizationally and lawfully in cooperation with the police, lawyers and other professionals.

[Supplementary Provisions]

Scope of Application

This Code of Ethics and Conduct applies to all executive officers and employees of the SG Holdings Group.

Revisions and Abolition

Any revisions to, or the abolition of, this Code of Ethics and Conduct will require the approval of the Board of Directors of SG Holdings Co., Ltd.

Contact for inquiring and reporting

1. As for doubts arising on the content or interpretation of the Code of Ethics and Conduct, please contact at the Compliance Control Department of SG Holdings Co., Ltd.
2. Should you find a violation or potential violation of the Code of Ethics and Conduct, you should report it to your supervisors or the Company. If the situation cannot be properly resolved, you should report it to the "Compliance Hotline" or "Nandemo Soudanshitsu" (general consultation office) pursuant to the Company's internal whistleblowing rules.
3. The informer will not be subjected to any adverse treatment. However, defamation or calumny to frame other employees is not acceptable. (Internal Whistleblowing Regulations).

Penalties

Those who violate this Code of Ethics and Conduct, and also those who allow such violations, will be subject to penalties under the working regulations and other internal rules.

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