

# Acting with Integrity

Code of Conduct



PT Asahimas Chemical

**AGC**  
Your Dreams, Our Challenge



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## What Integrity & Trust Means to Us

The legacy of the AGC Group is about more than the high-quality products we make for customers around the world. It's about more than the trust we have gained over our century-long history. It's about more than our continued pursuit of ingenuity, diversification, and global growth. Our legacy is about doing all those things and more, with an ethical foundation. We know a stable moral outlook allows us to fulfill our responsibilities, building open and fair relationships with all our stakeholders, and consequently, achieve customer satisfaction and strong relationship of trust.

The AGC Group Code of Conduct reflects the Shared Values found in the AGC Group Philosophy ***“Look Beyond.”*** Integrity & Trust is one of those Shared Values. The Code defines requirements for all AGC Group companies and their employees to ensure we do business with integrity according to applicable laws, rules, regulations, company policies, and business ethics. The four Shared Values—Innovation & Operational Excellence, Sustainability for a Blue Planet, One Team with Diversity, and Integrity & Trust—help us achieve the AGC Group Vision, while **the AGC Group Code of Conduct sets forth the Company's expectations for each of us to demonstrate integrity & Trust in our daily actions.**



## Who Must Follow the Code?

The AGC Group Code of Conduct applies to all of us, from our board of directors to each of our colleagues worldwide. It sets expectations for the exercise of good judgment and ethical behavior to ensure we live our AGC values in our day-to-day roles. We know the AGC Group's reputation is in the hands of everyone who represents us—so we work together to build on the trust that defines our success.

We hope the Code will help everyone understand expectations so we can continue to build on the confidence of our communities and partners.

It's important to incorporate compliance with the Code into your day-to-day activities. Follow the Code, and whenever you are unsure or have questions, ask management or any other Compliance Resource identified on page 5. Speak up if you have any concerns, especially if you notice a possible violation or unethical conduct. Throughout the Code, you will find guidelines and scenarios to help you make the right choices. Remember always to use your good judgment.



## AGC as a Team

The AGC Group Code of Conduct establishes twelve principles to keep us on the right track as a global team. These principles are divided into three categories: “We are fair and honest in our business,” “We ensure a safe and helpful workplace,” and “We care for our communities.”

The people we work with on a day-to-day basis and the communities where we operate make us proud, so we make it our mission to treat everyone—and our environment—with dignity and respect.

Our open company culture reflects how we all work as a team to achieve our values and vision in business. Honest communication with our colleagues promotes a workplace where everyone feels comfortable and free to express their opinions. We respect our teammates and make the right decisions together. We will never mistreat employees if they speak up in good faith and report something they think is wrong or not in line with our standards at the AGC Group. The AGC Group has a strict non-retaliation policy.

## Supply chain management

We hold ourselves, our suppliers, and business partners to the highest standards of ethics and quality. So we focus on doing business with companies, people, and suppliers that respect similar ideals. That’s why we will share the principles of this Code of Conduct with everyone we work with, including our suppliers and business partners, to ensure we all come together to respect the values that make a positive influence in the world.

### Always ask yourself:

- Do my actions demonstrate integrity & Trust?
- Will customers, suppliers, and society feel trust in my choices?
- Am I turning a blind eye to misconduct?

Even minor violations of the Code of Conduct are prohibited and can damage trust, so ask yourself these questions before taking any action. Managers and supervisors have a particular responsibility to lead by example.



## The Compliance Organization

### Who is the Chief Compliance Officer?

The AGC Group Chief Compliance Officer (CCO) reports to the AGC Group CEO and is responsible for overseeing and managing compliance policies that follow applicable laws and regulations.

### What are the Compliance Committees?

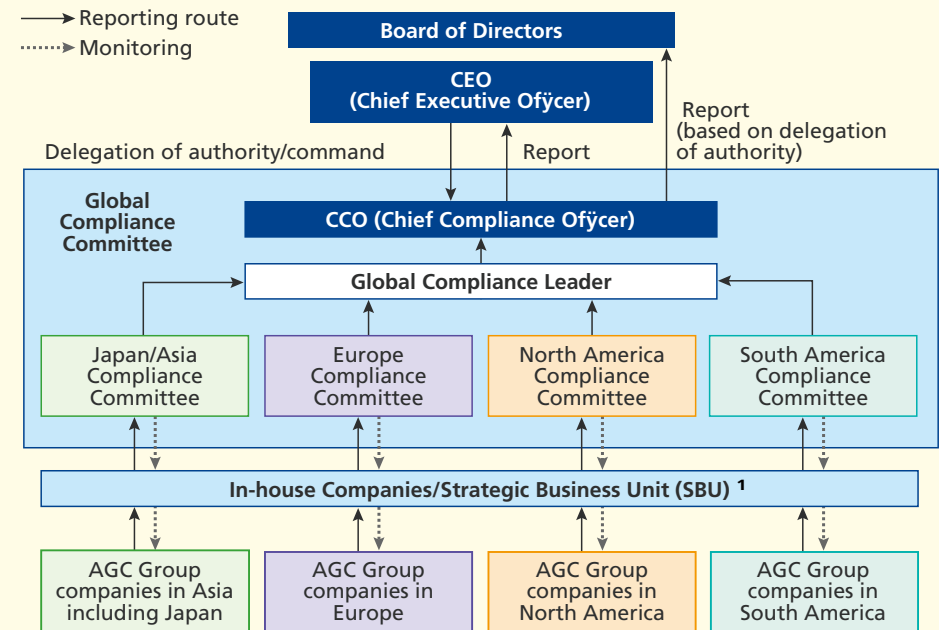
The Compliance Committees develop programs that make and enforce compliance policies at every level and region of the AGC Group. Regional compliance officers and committees operate in Japan/Asia, Europe, North America, and South America to ensure we achieve compliance in each location.

The Global Compliance Committee considers global compliance-related policies and measures to ensure the AGC Group follows compliance according to international laws and regulations. The committee includes the CCO, the Global Compliance Leader, and the Regional Compliance Officers from the Japan/Asia, Europe, North America, and South America Compliance Committees. They periodically report on group-wide policies and compliance measures to the AGC Board of Directors.

### Who are the Local Compliance Managers?

In some countries, AGC has also appointed Local Compliance Managers. They oversee complaints concerning the AGC Group Code of Conduct and report to the Regional Compliance Officers.

### Global Compliance Organization



1 SBU is a counter for Strategic Business Units.

## In Case of an Actual or Potential Violation

### Take action

If you have any questions or concerns about compliance or want to report an actual or suspected compliance violation, use your regional compliance helplines or contact management. You may also use any of the following Compliance Resources: your Compliance Officer, your Human Resources representative (particularly in the case of employee/employment-related matters), your company legal counsel (in the case of legal issues), your Local Compliance Manager, or the AGC Global External Helpline.

Remember, you are not alone. We have processes, guidance, and procedures to help you follow this Code, company policies, and applicable legal requirements. You can provide your identity when making a report or submit a report anonymously. By asking questions and reporting concerns, you are doing the right thing by helping our Company stop and prevent misconduct.

### Cooperate with investigations

The AGC Group investigates all reports fairly and thoroughly. Whether you wish to remain anonymous or identify yourself in your report, the AGC Group will respect your choices and conduct its investigation accordingly to the extent reasonably and legally practical. All employees are requested to cooperate fully with Company investigations into potential violations.

### Retaliation is prohibited

The AGC Group strictly forbids acts of retaliation against any person who reports a possible or actual violation in good faith, or who participates or assists with an investigation. This policy means that you will not be punished or subjected to an adverse employment

action by the Company for helping to enforce this Code. Acting in good faith means that you come forward with a report you believe to be true. However, intentionally making a false report or submitting false information may result in disciplinary action, up to and including termination.



**1 If you notice something suspicious, take the following actions**



**2 Refer to this Code of Conduct**



**3 Report immediately any suspected violation**

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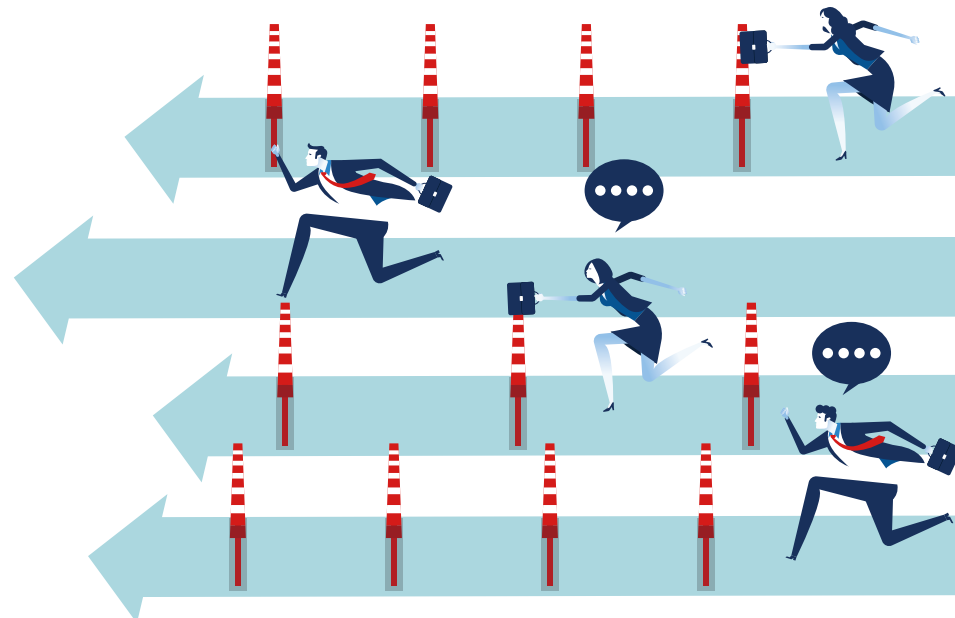


We are fair and honest in our business

## 1.1 Fair Competition and Antitrust

# Play by the rules

We believe in an ethical, lawful marketplace where strong values and business resourcefulness determine success. Antitrust laws are in place to protect and maintain a fair, open, and honest marketplace—consistent with our beliefs at AGC. It is our responsibility to understand how antitrust laws apply to our job and follow them at all times. Along with our own Global Antitrust Guidelines, employees must observe and follow all antitrust laws everywhere in the world.



## Learn more

Employees must maintain independence of judgment and action in designing, producing, pricing, and selling our products and services and must avoid even the appearance of conspiring or making an agreement with a competitor. It is illegal to enter into formal or informal agreements with competitors that may prevent, restrict, or distort trade. These agreements include, but are not limited to, arrangements to fix prices, rig bids, or divide or allocate markets, territories, or customers.

Stop the conversation if a competitor tries to discuss any of these topics. Then, immediately report the incident to your supervisor or Legal Department. Remember that a simple discussion or exchange of information with a competitor—even one with no clear agreement—could lead to a violation of Antitrust laws.

Any contact with competitors must be for a legitimate purpose and approved in advance by management or the Legal Department. After contact, you must take extra care to prepare and maintain accurate records of all activities and discussions.

## Consequences

Antitrust law enforcement and sanctions are becoming stricter around the world. Penalties and consequences for violating antitrust laws are severe and may include high fines for the Company, imprisonment for individuals, and private lawsuits to recover substantial damages. In addition to legal repercussions, an antitrust violation would result in a serious loss of reputation for the AGC Group.

## Keep in mind

Antitrust and relevant laws also prohibit:

- Improper market monopolization.
- Entering into formal or informal agreements or understandings with suppliers or customers that would restrict competition.
- Improperly tying products.
- Imposing fixed or minimum resale prices.
- Boycotting specific customers or suppliers.
- Making false or deceptive comments regarding competitors.



Employees who have to deal with antitrust issues in their work must understand the basic principles of antitrust law and the importance of compliance. Therefore, these employees must attend Antitrust training organized within the Company to ensure a good understanding of the applicable laws and rules. In case a situation raises questions or poses a potential risk, employees must seek help and advice.

The AGC Antitrust Guidelines provide further guidance and details regarding the expected appropriate behavior to be adopted by each employee to avoid Antitrust issues.



We are fair and honest in our business

## 1.2 International Trade Controls

# Trade globally— the right way

As a global company with worldwide operations, products, and services, it's our responsibility to respect and follow the laws that regulate international trade activity. These laws and regulations affect businesses involved in transferring materials, services, and information across international borders—regardless of location. Employees must follow all applicable trade laws, regulations, restrictions, and marketplace rules that govern each country and locality.



## Learn more

Export, import, and trade laws cover a wide range of business activities. For example, export compliance rules apply to products and technological information including software and technology. In some cases, disclosing technological information that originated in one country to a person—even another AGC employee—who is not a citizen or resident of that country may violate export laws.

Many laws and regulations also apply to import activity. When we import a product, service, or information from another country, we may be required to pay duties and taxes and file specific documents with government offices.

## Keep in mind

- All employees involved in exporting and importing products and technological information must know and comply with applicable laws, regulations, and restrictions.
- Always pay attention to the origin of foreign products because the country of origin's laws may apply outside of that territory.
- If you are unsure about which legal requirements apply, consult with your

**Q** I will be traveling overseas to present at a technology forum next month. I need to bring my laptop, which contains business files and data for the presentation, along with some samples. What should I keep in mind during my trip?

**A** When traveling abroad for a business trip, remember that export laws regarding information apply to any technological device that contains company data. Be sure to review applicable export laws before bringing samples, laptops, tablets, or phones that contain technological information. If you are unsure, ask your supervisor or the person in charge of trade control for help.

manager/supervisor and the person in charge of trade control.

- Any proposed dealing with a country or entity subject to sanctions, embargoes, or both, must be reviewed in advance by the person in charge of trade control to determine whether the proposed conduct is allowable.
- Be aware of and comply with all internal policies, including AGC Group Trade Control Compliance Program, Export Control Compliance Program in each Group company or procedures applicable to your specific location.





We are fair and honest in our business

## 1.3 Gifts and Entertainment

# Think before gifting

Giving or receiving an occasional gift is a common business practice that can play a positive role in building healthy relationships with our customers, suppliers, and other third parties. However, a gift or offer that seems harmless could unintentionally create a conflict that damages the Company's reputation or even breaks the law. We may give or accept gifts and entertainment only for legitimate business purposes that are customary, appropriate, and follow local etiquette and principles. All gifts and entertainment must comply with the applicable local gift, travel, and expense policies.





## Keep in mind

- Never accept a gift or entertainment which could influence your judgment.
- Turn down any cash or personally beneficial offers.
- Do not accept any entertainment or gifts without reporting it to your management (except those which are allowed by local rules or generally accepted in practice).
- You can allow a supplier or customer to pick up the check at a meal, so long as it is a reasonable amount and there is no intent to influence any decision.
- Respect customers' or suppliers' policies on gifts and entertainment.
- A customary and appropriate business gift depends on the country, and you should never accept an item that would reflect poorly on the AGC Group if the details were made public.
- Check with your manager or a Compliance Resource in advance if you have any questions about a gift or entertainment.

**Q** A potential supplier sent me a \$100 USD gift card as a thank you after our meeting. Am I violating the AGC Group Code of Conduct if I keep this gift?

**A** Yes. You should refuse this gift immediately. It is not appropriate to receive a cash equivalent or an expensive gift from a potential supplier as this could influence your decision. You may consult with your supervisor and regional compliance resource if you have questions.





We are fair and honest in our business

## 1.4 Conflicts of Interest

# Don't mix business and personal interests

A conflict of interest happens when we have interests or loyalties outside the workplace that influence something we do inside the workplace. We should always act in the best interests of the Company and avoid conflicts that may directly or indirectly benefit a family member, a friend, or us as individuals. Even the appearance of a conflict poses a risk. This is why it's important to always deal with current or potential customers, suppliers, public officials, contractors, competitors, other third parties, and fellow associates with the utmost care and integrity.



## Learn more

Always give priority to our Company's mission and goals when conducting business. Use good judgment and follow high ethical standards to avoid situations that create a conflict between the work we do together at AGC and our relationships with other companies or individuals. Being aware of the rules can help us recognize situations that could negatively affect the Company.

Any outside business activity must be strictly separate from your employment at the AGC Group, not compete with AGC's interests, and not harm your job. AGC's assets may not be used for any outside business activity without prior approval from management. Additionally, holding a position as a board member, advisor, or any other role at a competitor, supplier, or customer of the AGC Group is not allowed without prior management approval.

## Keep in mind

Recognize potential conflicts before they happen. Be sure to avoid using your position at the AGC Group for the following:

- Doing business or influencing a business

decision with a company or person where you, your relatives, or close friends hold a managerial position or a position of influence.

- Acquiring new information or business opportunities that directly or indirectly benefit you or any third party, including suppliers, competitors, or entities that should not receive such information or opportunity.
- Entering into a contract with a supplier, partner or any other third party, from which you, your relative, or close friends may benefit.
- Influencing other employees to enter into such activities.
- Directly or indirectly buying, or otherwise acquiring rights to any property or materials, to your benefit when you are aware that the AGC Group may be interested in pursuing such an opportunity.

Remember, avoid engaging in close personal relationships with others who are, or may become, involved in business activity related to the AGC Group, including acting as an AGC Group supplier, customer, or vendor. If a conflict occurs, you should immediately disclose the nature of your relationship to management and Human Resources and remove yourself from any future decision-making. If you supervise or are in a position to exercise influence over any aspect

**Q** My department decided to revise our products catalog. As my uncle runs a printing company, I thought it would be a good idea to get a quote from his company, as well as a few more companies. The quote from my uncle's company is a bit higher than the others, but I'm considering placing the order with his company because it is facing some financial hardships. Is this a problem?

**A** This is a conflict of interest because it creates a situation where you or your family member benefits from your role at AGC. You should disclose the relationship to your supervisor in advance while prioritizing AGC's interests and avoid being involved in the decision process. The Purchasing Department or a Compliance Resource will answer any questions you have about conflicts of interest, so please contact them if you have any concerns.

of the performance, compensation, or advancement of a family member, or someone with whom you have a close personal relationship, you must report this relationship immediately to Human Resources.

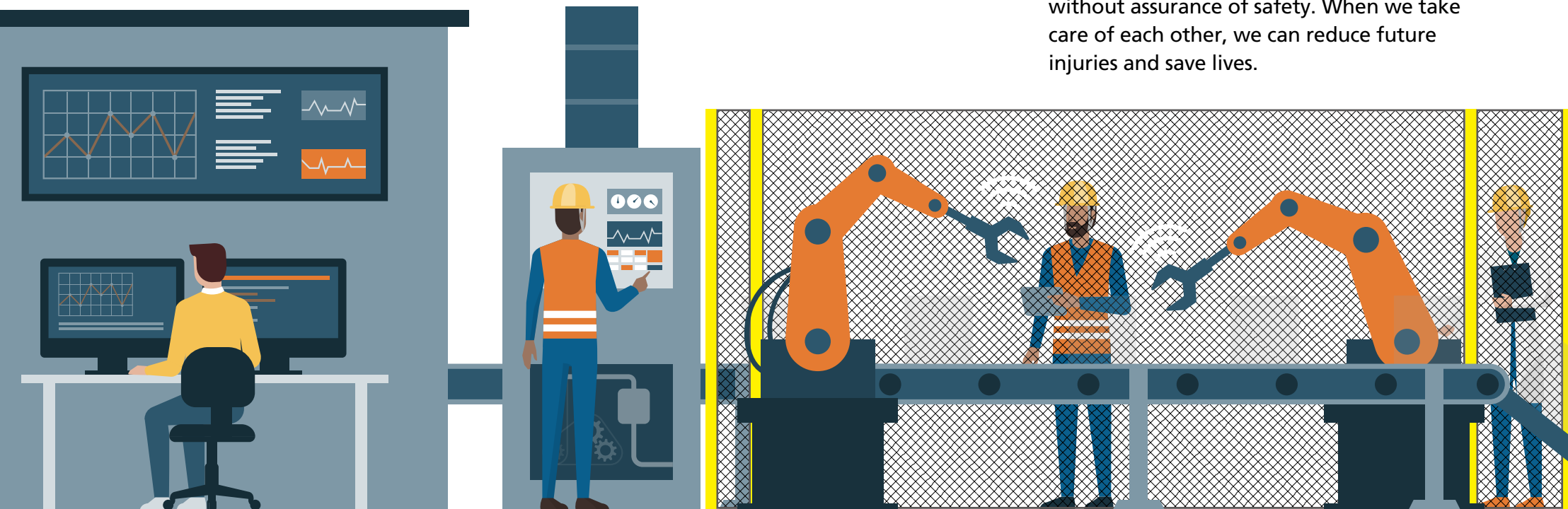


We ensure a safe and helpful workplace

## 2.1 Workplace Health and Safety

# Safety first

AGC prioritizes the health and security of our employees, business partners, visitors, neighbors, and communities everywhere we operate. The Company implements and enforces safety rules and procedures to help prevent accidents. Every employee must follow these safety rules and procedures and promptly notify management of any non-compliance with these requirements. We must lead by example, demonstrate a commitment to health and safety in our daily actions, and actively promote a workplace where everyone can work safely. No production should be operated without assurance of safety. When we take care of each other, we can reduce future injuries and save lives.



## Learn more

A safe, healthy workplace keeps a business running. It is the Company's responsibility to ensure our safety rules and procedures stay up-to-date. These rules and procedures must be followed at all times to ensure the continued success of the AGC Group.

Everyone should know what to do if an accident occurs or a problem arises, so we carry out annual drills and safety trainings which require mandatory employee participation. Do not hesitate to ask your nearest safety advisors if you have any questions about health and safety at work.

## Keep in mind

To ensure a safe and healthy workplace:

- We perform our duties with safety as the top priority. No production should be operated without assurance of safety.
- We do not hesitate to stop operations to prevent injury.

- We observe all safety-related signs and use designated safety equipment.
- We thoroughly manage hazardous materials and chemicals.
- We perform risk assessments in all of our facilities to reduce the risk of occupational accidents.
- Our manufacturing facilities are free of alcohol and illegal substances. The Company may conduct tests for illegal substance use or alcohol to detect or confirm a suspected violation of Company policy, where local law allows.
- Everyone must follow all Company policies and procedures related to health and safety, as well as all applicable laws, rules, and regulations to help prevent accidents and injuries.
- We employ Lockout-Tagout (LOTO) practices and procedures to safeguard employees from the unexpected energization or startup of machinery and equipment, or the release of hazardous energy during service or maintenance activities.

**Q** While working at an AGC plant, I witnessed a fellow employee repairing a piece of equipment without disconnecting the power first. I am worried that by not following posted procedures for equipment repairs, my coworker is putting himself and other employees at risk of injury from electric shock or even from a fire or explosion. What should I do?

**A** Promptly warn the employee, tell the manager, and then follow up with other company resources, as necessary. Safety is our top priority, so corrective measures must be taken immediately. We will not allow retaliation against anyone who raises a concern in good faith, reports suspected misconduct, or provides information related to an inquiry of suspected misconduct as stated on page 5 of this Code of Conduct.





We ensure a safe and helpful workplace

## 2.2 Diversity and Inclusion

# Diversity and respect for all

The people who work for the AGC Group come from a wide variety of experiences and backgrounds—each one with a unique set of strengths, skills, and ideas. We value diversity in our workplace and provide equal opportunities for success. That’s why “One Team with Diversity” is another one of AGC Group’s four shared values, further outlined in the AGC Group Philosophy **“Look Beyond.”** AGC will not tolerate discrimination or harassment of any employee or individual with whom we have a business, service, or professional relationship.



## Learn more

We never discriminate against anyone based on race, ethnicity, religion, nationality, gender, gender identity, sexual orientation, gender expression, disability, age, or any other legally protected group.

Physical or verbal harassment, sexual harassment, and physical violence of any kind (whether by supervisors, fellow employees, or third parties) harm a positive work environment and are strictly prohibited. These actions are also prohibited outside of work and on social media.

AGC believes in the rights of all workers. We follow all applicable laws concerning human and civil rights and require that all employees treat their colleagues with dignity and respect. AGC has zero tolerance for forced labor, child labor, or physical punishment in any AGC Group operation.

## If you need help

If you experience or observe workplace harassment, discrimination, or other unfair behaviors prohibited by this Code of Conduct, you should promptly report the incident to your manager, any other member of management, Human Resource, or a Compliance Resource. AGC takes these claims seriously and will investigate them thoroughly. Employees who engage in harassment, discrimination, or inappropriate behavior are subject to disciplinary action, up to and including termination.

**Q** I was recently hired. Since my arrival, every day I hear my colleagues whistling at me and making inappropriate comments. I am embarrassed, but I don't want to make any enemies at my new job. Is there anything I can do about this?

**A** Your colleagues' actions are a clear example of harassment. Our work environment should always be comfortable and free from harassment and discrimination. Report the issue to your manager, a member of Human Resources, or the Compliance Helpline. The AGC Group will promptly investigate and ensure non-retaliation when raising concerns about discrimination or harassment.





We ensure a safe and helpful workplace

## 2.3 Reports and Records

# Be accurate and honest

Providing accurate and helpful records regarding our Company's operations is an essential part of being an ethical company. We present the facts in a clear, truthful way in the data and information we record and communicate. Records (physical or digital) could include finance, accounting, taxation, production, quality, legal, technical, or sales information. We never manipulate data or records, conceal information, or misrepresent our business, product or financial health.





## Learn more

Accurate reports and records help inspire trust in AGC by our customers, business partners, investors, stakeholders, and the general public. They also help us manage our priorities and long-term goals as a company so that we can make the best business decisions. Our success depends on it.

To accurately reflect the status of purchasing, inventory control, product quality, sales, and other matters, we must follow all AGC Group record-keeping rules and internal controls. We must also follow applicable laws and regulations regarding accounting, financial, and taxation standards to ensure our financial records and tax returns are accurate. No AGC Group company employee may, under any circumstances, discard, destroy, or change company finance, accounting, or other records without the appropriate authorization, or in violation of any applicable rules. Finally, our communications must avoid exaggeration, guesswork, and insulting remarks or mischaracterizations of data or information.

## Keep in mind

- Honestly record and report information about our jobs and responsibilities.
- Honestly record all necessary information about product quality.
- Never report inventory, purchases, or sales that do not exist.
- Do not create false expense reports or entries.
- Do not intentionally record expenses or profits in the wrong period.
- Provide accurate information and reasonable support to internal and external auditors.
- Provide truthful, accurate data, and information during all certification and auditing events.
- Follow all internal policies and procedures relating to record-keeping and document retention, including all directions and instructions from the Legal or other responsible departments.





We ensure a safe and helpful workplace

## 2.4 Protection of Assets and Confidential Information

# Protect our information and property

Each AGC Group member is responsible for protecting our Company's assets—both tangible and intangible—whether we are at the workplace, traveling for business, or in our homes. You must not disclose outside the Company any confidential or sensitive information that belongs to the Company. The same rule applies to any information belonging to any AGC employee or third party that does business with AGC. We must be mindful that improper disclosure of this information could materially harm our business.



## Learn more

Our resources and assets include land, buildings, machinery, equipment, inventory, computers, and funds. They also include intangible assets such as confidential information, trade secrets, patents, trademarks, copyrights, computer software, and personal information. We must protect company assets at all times and not allow access to such assets to unauthorized persons or parties. We also must avoid discussing sensitive information in public places where someone might overhear.

### Company Property

The Company is free to inspect and restrict the use of company property to make sure everyone uses it with care and in compliance with applicable internal policies. Anything stored or written on company property belongs to the Company. Limit using Company property to work-related matters only.

### Personal and Third-Party Information

We equally respect personal information, including that of our employees. As a company, we sometimes collect information about our team, which may include compensation, benefits, home addresses, individual and family health matters, and identifying information. However,

it's our responsibility to protect such information, in accordance with the applicable laws, and use it only for appropriate reasons associated with a legitimate business purpose.

Third parties and our business partners trust us to keep their information and intellectual property safe as well. We protect their information as securely as we would our own.

### Using IT Resources

AGC provides access to various electronic communication systems to use in our daily work. We must always safeguard these systems and technologies and follow company policies and procedures regarding information security.

### Social Media

Be careful on social media, blogs, and forums. Remember that anything written online becomes a permanent, transferable record of your communications that can affect the interests of the Company and cause harm to others. The Communications or Marketing Department, Legal Department, or both, should first approve any communication on behalf of the Company in accordance with any applicable AGC social media policies and rules. Please remember that you are not authorized to speak on behalf of the

**Q** Someone who used to work for the AGC Group called me to ask for another former colleague's contact details. The person requesting the information explained that they lost their phone and all their contacts. Since it does not seem to be business-related, am I allowed to send it to them?

**A** No. We cannot give out personal information, such as contact details of former and present colleagues, to anyone inside or outside the Company. We never know how someone might use that information, even if it seems harmless.

Company without authorization obtained in advance.

## Consequences

When something private becomes public, our Company, employees, business partners, or other individuals could be negatively affected. Following proper security policies helps protect everyone, so you must consistently secure your computer and confidential documents.



We care for our communities

### 3.1 Quality and Safety of Products

## Ensure safe, high-quality products

The AGC Group cares deeply about the safety and quality of our products and services. It's one of the main reasons our customers and partners trust us to meet—and go beyond—their expectations in doing business together. Our success depends on maintaining that trust for years to come. We follow all applicable laws, report product quality data and analytical data with honesty and clarity, and demonstrate our commitment to safe and satisfactory products and services through our daily actions.



## Keep in mind

- Check safety and quality throughout every step of a product's life cycle.
- Always include the applicable safety warnings when you prepare product documentation.
- Explain the safe and proper usage of a product to all who need to know.
- Take immediate action on any risk you may discover with AGC products or services.
- Investigate the root cause of any product safety or quality issue and correct the mistake honestly and immediately.
- Follow all internal policies, rules, and procedures related to quality, recordkeeping, and safety.

**Q** We received fewer materials for manufactured products than expected due to a shipping problem. I am working to resolve the situation but think it would be good to exchange the material specified in a contract with another material of the same quality. Since the difference was small, I believe it would be less damaging to our relationship with the customer to exchange the material than to deliver the products late. Can I go ahead with my idea?

**A** No. The first thing to do in this situation is to immediately communicate the issue with your supervisor and then honestly discuss the situation with the customer. Make sure you get approval before exchanging the material or doing something different from the contract. If our customer gives us the appropriate approval, then we can proceed with the alternative plan. However, we should never make changes to our agreements without going through the appropriate steps.





We care for our communities

## 3.2 Environment

# Contribute to a better environment



The AGC Group prioritizes protecting and preserving the environment to achieve a sustainable society. Whether engaging in technological development, planning, design, products, sales, or logistics, we follow environmentally safe business practices. We invest in advanced technologies at our factories to reduce waste and save energy because taking care of our planet is much more than good business. While it means we can create even more opportunities and benefits for our enterprise and stakeholders, it also helps future generations live and grow in the cleanest, safest environment.

## Learn more

AGC Group is committed to creating a sustainable society as an outstanding player in the global materials industry by carefully considering our impact on the natural environment, including climate change and biodiversity.

We also make environmental protection an essential part of our business by assessing and improving our operations, using renewable energy through solar and other methods, recycling where possible, and reducing waste. Our energy-saving innovations in green product development and resource management systems help us reuse chemicals, conserve water, and prevent water pollution. AGC also encourages all our business partners to implement policies and take active steps to care for the environment. We must all work together to stop the consequences of climate change, air and water pollution, deforestation, and many other environmental threats. We strive for continual improvement by developing specific programs that address the environmental cost and impact of our activities, products, and services.

## Keep in mind

- AGC prioritizes environmental initiatives in all phases of its business activities, as further outlined in the AGC Group Environment Policy.
- We focus on developing products that benefit the environment rather than harm it.
- We set ambitious goals to shrink our environmental footprint and address sustainability challenges.
- We assess risk at every stage to evaluate and reevaluate new methods of environmental conservation.
- We always take special care to manage chemicals and hazardous materials properly.
- We follow all applicable laws, rules, and regulations related to environmental health and safety.





We care for our communities

### 3.3 Relations with Government Officials and Politicians

## Remain free from corruption



We do not tolerate bribery or corruption in any form—whether public or private, active or passive, or whether consisting of activities which could be considered embezzlement, fraud, theft, or the granting of improper advantages. Fairness, honesty, and transparency are essential elements of integrity that define how we conduct business.

A bribe, corruption, or improper advantages can mean giving or offering a reward (or anything of value) to influence anyone's behavior to gain a financial, business, or personal advantage. Whether dealing with politicians, public officials, business partners, individuals, or third parties, our actions should reflect high ethical principles at every level. We must not directly or indirectly offer or give anything of value to any person, including government officials, to influence official action or to secure an improper advantage as defined by applicable laws.

It is important to remember that perception matters, and your behavior could be considered a bribe or granting of an improper advantage, regardless of your intention.



## Learn more

The Company has created and implemented the AGC Anti-Bribery Rules to help us understand how to maintain professional relationships with public officers. Use them to identify problematic situations and avoid impropriety before it happens.

The Company has also established Anti-Bribery Guidelines for specific regions and countries as necessary, which outline procedures when dealing with public officers in countries with a higher risk of corruption.

You must follow the AGC Anti-Bribery Rules and Guidelines (if applicable) at all times.

## Keep in mind

Bribery, corruption, or improper advantages could mean any of the following things:

- Cash or gift offers to an individual or family members.
- Inflated commissions.
- Fake agreements.
- Unauthorized rebates.
- Political or charitable donations.
- Kickbacks.

- Special favors or privileges.
- Job offers or loans.
- Anything of value, including but not limited to payments, meals, gifts, entertainment, and travel expenses.

## Consequences

Many countries have strict laws and regulations regarding bribes, corruption, and improper advantages. Failure to comply with these laws and regulations may result in criminal and civil actions, such as high fines or imprisonment, against the Company and the individuals involved.

These laws cover a wide range of activities, so it's important that you understand how your job and responsibilities may be affected. Ask management or contact a Compliance Resource if you become aware of any actual or potential arrangement or agreement that could be problematic, or if you have any questions or concerns about applicable laws or policies.





We care for our communities

### 3.4 Insider Trading

# Never trade on inside information

As we work together as a team, we sometimes hear non-public information about our Company or other companies. If this non-public information were to become public, it might influence others to purchase, sell, or hold onto a company's stocks. Using this non-public information for your personal or financial benefit—or for the benefit of anyone else you know—is considered insider trading. It's unethical and against the law. So, we never reveal non-public information to family, friends, or anyone outside the Company.



## Keep in mind

What is inside information?

- Inside information refers to non-public information about a company's plans, products, operations, finances or any other matters that, if disclosed, could be used to gain a material personal advantage or would reasonably be expected to affect the price of stocks of AGC Inc. or other listed companies.

Examples of inside information include:

- Financial forecasts.
- Information about Research & Development including new products or technologies.
- Any information related to mergers, acquisitions, divestitures, or new business operations.

Who is an insider?

- Individuals who know inside information about AGC Inc. and other publicly-traded companies.

Who should you not tell inside information to?

- You may only share inside information on a need-to-know basis to individuals with proper authorization to know the information and with proper controls in place.

**Q** I recently became an account manager of a publicly-traded company. I'd like to have a financial interest in the company, so I plan on buying shares. However, before I went through with the purchase, an employee of that company mentioned that the company would make a profitable acquisition next month. Can I go ahead with my original plan to buy shares?

**A** No, you cannot. Once you receive inside information about a company—even if you originally planned to buy shares before—you cannot take action until that information becomes public. This rule applies whether you are an employee of that company or not. If you have any concern or uncertainty, please contact the department responsible for communication or a Compliance Resource.

## Consequences

Violating insider trading laws can result in criminal or civil penalties for individuals and the Company. If you are concerned that an activity violates insider trading laws or this Code of Conduct, immediately contact Corporate Communications & Investor Relations Division in HQ or a Compliance Resource.



# Indonesia Regional Information



## 1.1 Fair Competition and Antitrust

### 1. Monopoly and Unfair Competition

It is the policy of the Company to comply with the prevailing Anti Monopoly Law and to avoid unfair competition.

### 2. All Transactions should be Fair Competition

Each Commissioner, Director and Employee has responsibility respectively in conducting any of the Company's business activities which strive for fair competition.

### 3. Agreement with Competitor

Every Commissioner, Director and Employee is prohibited from entering into any discussions, formal/informal agreements with our competitors which are against antitrust law. These include such as agreement on price, cost, profit, terms of sales, market share, production volume, sales territory, customer allocation and method of distribution.

### 4. Information Disclosure to External Parties

Communications and/or Meeting and/or providing data or information to competing companies and participating in associations shall be allowed only on extremely limited basis as long as those conducts shall not rise antitrust concerns.

## 5. AGC Guidelines

You must understand the specifics of the "The AGC Antitrust Guidelines," and "Guidelines concerning relationships with competing companies and trade associations for Japan/Asia," and comply with both of them.

## 1.2 International Trade Controls

### 1. Risk Management in trade

The Company resolves to abide by the national and international trade regulations and also to take actions to minimize the risk in conducting such trading.

## 1.3 Gifts and Entertainment

### 1. Receiving the Entertainment and/or Present Materially from the External Party

Every Commissioner, Director and Employee is prohibited from receiving the entertainment and/or present materially, directly or indirectly from the business transaction between Company and External Party. In the event there is any doubt on this matter, the concerned person should consult with his/her direct Superior and/or Department Manager.

## 2. Entertainment and gifts from the Company

In offering gifts and entertainment to the third parties in the course of Company business, Commissioners/Directors/Employees should comply with the Company regulation in order to create a fair business relationship between the Company and the third parties.

## 1.4 Conflict of Interest

### 1. Disclosure of Company's Confidential Information

Every Commissioner, Director & Employee should not disclose any confidential information at own interest.

### 2. Business Transactions with the Company

To maintain the Company's independence and to prevent occurrence of a conflict of interest, every Commissioner, Director and Employee, on behalf of Company, should not transact business with any parties, such as supplier, contractor, agent or any kind of business with which he/she may have a special relationship through ownership or a family relationship by blood or marriage.

## 2.1 Workplace Health and Safety

The Company is committed to ensuring the occupational health and safety of every Commissioner, Director and Employee who works in the Company's premises, by providing a safe and healthy working condition.

The Management will exert their every reasonable effort to avoid accidents and illness in the working area.

## 2.2 Respect for People

### 1. Treatment To Employees

#### a. Right and Responsibilities of Employees

The Company is committed to respecting the rights and responsibilities of every employee in conducting their work according to the organization structure and their job responsibilities.

#### b. Equality of Treatment

In the recruitment process the Company is committed to treating fairly every candidate, without any discrimination against gender, physical condition, religion or belief, race and class.

### 2. Sexual Harassment

Every Commissioner, Director & Employee should avoid sexual harassment.

### 3. Respecting The Norms of Society

Every Commissioner, Director & Employee should not behave against the common norms prevailing in society.

### 4. Pressure on Subordinate

Every Commissioner, Directors & Employee should not misuse his/her position and authority personally to intimidate his/her subordinates in various manners which may damage their psychological condition.

### 5. Diversity and Inclusion

We never discriminate against anyone based on race, ethnicity, religion, nationality, gender, disability, age, or any other legally protected group.

Related to the same provisions regarding the matter on pages 16 and 17 this Code of Conduct, if it is contrary to the applicable laws or regulations in Indonesia, then the Indonesian laws or regulations will be applied.

## 2.3 Reports and Records

### 1. Validity of Financial/Accounting Transaction

Every Commissioner, Director & Employee shall not record unreal/fictitious and or untrue transactions into the financial/accounting documents of the Company.

### 2. Accuracy of Transaction

Every Commissioner, Director & Employee shall not manipulate the recording of work completion, goods received from suppliers, sales to customers or data of the production result.

When creating transaction records and ledgers, etc., you must make sure that you comply with the AGC Group Accounting Policies and the Guidelines for "Prohibition of Fraudulent Transactions," as well as related laws.

### 3. Disclosure Information

We will disclose the necessary information to the stakeholders, in line with the relevant prevailing Law and Regulations.

## 2.4 Company and Third-Party Assets and Confidential Information

### 1. Disclose of Company's Information

Every Commissioner, Director & Employee should not disclose any of the Company's confidential information to third parties, except being authorized by the Management. All the Company's tangible and intangible assets (for instance trade secrets and production formula) should only be used for the interest of the Company.

### 2. Maintaining the Company's Confidential Documents

Every Commissioner, Director & Employee should manage the Company's confidential documents by internal rules.

The Company is committed to keeping confidential information on all of its personnel according to prevailing laws and regulations.

### 3. To keep confidential information after resignation or retirement

Every Commissioner, Director & Employee who has retired or resigned from the Company, should keep in confidential the Company's information obtained during his/her employment with the Company.

### 4. Securing the Company Assets

Every Commissioner, Director & Employee who has an access to the Company assets, is fully responsible to protect the assets with high integrity and to strive for avoiding any misuse of them. This includes protection of equipment and materials from possible damage and loss.

### 5. Handling Enquiry Information from Media, Public, Institutions and Others

Information to media, public, institutions and others concerning on the Company's business should only be provided by certain appointed employee who receive authority from the Management.

### 3.1 Quality and Safety of Products and Services

#### 1. Guarantees on the Company's Products

The Company should ensure that only quality products are supplied/delivered. The Company is committed to being responsible for every Company's products according to the term of warranty, agreements and prevailing regulations.

#### 2. Safe Products

Company is committed to producing safe products, which are not dangerous to human safety and environment according to the prevailing regulations and standardization.

### 3.2 Environment

#### 1. Working Environment

The Company is committed to minimize pollution arising from its factory's operations.

#### 2. Social Responsibility

In carrying out its operation the Company should always observe its responsibility to society. The Company is committed to participating in developing small-scale business activities for the surrounding and other relevant social activities.

### 3.3 Relations with Government Officials and Politicians

#### 1. Company's Policy towards Political Activities

The Company adopts a policy not to enter political activities, act neutral and does not give special attention to any political party.

#### 2. Restriction on Having Political Activities in the Area of the Company

The Company's areas and assets must not be used for any political events and political attributes whatsoever.

#### 3. Involvement in Political Activities

The Company acknowledges the right of all Commissioner, Director and Employees to be involved in political activities, but they should not undertake such activities during working hours nor represent the Company whatsoever.

### 3.4 Insider Trading

#### 1. Insider Information

Every Commissioner, Director & Employee shall not use any non-public information, which may affect the share price of the Company for entering into transactions with respect to the Company's shares, either on their own account or by using other persons names.

#### 2. Shareholders' Rights

The Company is committed to protecting the rights of shareholders and to implement the principles of equality of right to every shareholder, based on the Company's Articles of Association, Limited Liability Company Law and other related regulations.



## Appendix

### Guidelines in Relation to Compliance with the Antitrust Law

#### Global Guidelines of Compliance with the Antitrust Law.

1. Prior to having meetings with competing companies (including meetings with trade associations), take every possible step to confirm if the objective of such meetings is appropriate from the perspective of applicable laws. Limit the frequency of attending such meetings to the lowest possible. If keeping a relationship with any trade association becomes unnecessary, leave the association.
2. At any meetings with competing companies, tell them your intention to comply with the Antitrust Law and avoid initiating unnecessary contact with them.
3. If you intend to have a meeting with competing companies, inform your supervisor of the purpose of such meeting and obtain his or her permission in advance.
4. Always maintain a written record of the details of discussions with competing companies.
5. Refer the written record mentioned above to your Legal Division (or, when directed by your management, with a law firm) regularly for review.
6. If any competing company contacts you in a way that gives rise to suspicion of possible antitrust issues, notify your supervisor and Legal

Division of the situation without fail and seek their advice.

7. If you have heard or seen any employees engaged in conduct that gives rise to suspicion of possible antitrust issues, report this to your supervisor or to Legal Division and/or to those persons in your business in charge of Corporate Compliance.

#### **Guidelines concerning relationships with competing companies and trade associations. Actions that may induce suspicion of such acts may not be taken.**

It is prohibited to form cartels or to rig bids with competing companies or trade associations. Actions that may induce suspicion of such acts may not be taken.

The following cartelistic activities among competing companies or trade associations are generally illegal (per se illegal) and could be subject to fines and/or criminal charges.

- Discussions concerning prices (product prices, construction fees, transportation fees, maintenance fees, visiting fees etc.).
- Making arrangements concerning volumes of sales, shipping and/or production, or fixing their ratio to be maintained among competitors.
- Discussing issues such as the limitation of the number of days (or percentage) that facilities should be in operation, limitation or expanding or building facilities, or limitation on the adoption of new technologies.

- Discussions concerning bidding.
- Customer allocation.
- Making arrangements concerning market share

The following acts are also prohibited, because they are highly risky behaviors that may cause suspicion of carter behavior.

- Offering information on prices, volumes of sales and production, etc. to competitor unilaterally.
- Taking no counteractive action, when information such as the above is unilaterally transmitted from a competitor (orally, or via e-mail, facsimile etc.).

- I. Communications and/or Meetings with competing companies and participation in trade associations are allowed only on an extremely limited basis, and only to extent that they do not raise antitrust concerns.

1. Communications and/ or Meetings with competing companies

- 1) Communications and/or Meetings with competitors may be made only when necessary to carry out a specific legitimate business relationships, such as a certain OEM manufacturing, licensing, sales consignment, joint venture or technological partnerships.

- 2) Discussion at such meetings must be limited to those relevant and necessary for the above businesses, and the exchange

of any other information must be avoided. Further, sales personnel shall not be allowed to attend meetings unless there is a legitimate necessity.

## 2. Participation to trade associations

1) Participation in trade associations is allowed only if the purpose and details of its activity are clearly defined in the convention of the association, and the association complies fully with the Antitrust Act. Involvement in informal organizations/ meetings with competing companies must be avoided.

2) Discussions at trade associations must be limited to those within the scope of the purposes of their activities, and exchanging any other information must be avoided. In addition, sales personnel shall not be allowed to attend the meetings unless there is a legitimate necessity.

3) Discussions at trade associations must be limited to the following items that do not lead to cartel behavior and serve a social and public purpose.

- Establishing common specifications and standards based on social and public needs such as environmental and/or safety concerns.
- Carrying out public relations and

dissemination activities for purposes such as improving the overall position of the industry, promoting demand and disseminating information about proper use.

- Collecting and releasing information on past business activities. Note, however, that collecting any information concerning current and future sales or production plans, or cooperating in such conduct must be avoided.
- Expressing opinions or requests to the national or local government

II. When meeting with competing companies or participating in trade associations, the person attending must obtain prior permission from the his/her supervisor.

III. A summary of the discussion/meeting must be recorded, along with important exchanges that were made.

IV. Participation in events (such as dining, get-togethers, get-acquainted trips and golfing) to socialize with competing companies shall be extremely limited. If someone participates in such activities, he/she must abide by II. and III. Above.

1. If you are going to hold/attend a meeting with competing companies, you must report the purpose, agenda and planned participants

to your supervisor in advance, and obtain his/her permission. The supervisor must cancel the meeting in case he/she judges that the meeting is not necessary or raises antitrust concerns in light of criteria I. above. Contacts with competing companies before or after the revision of pricing should be avoided in particular. Whenever you find it difficult to make a judgment by yourself, consult with Legal Department.

2. When hosting meetings, prepare an agenda well in advance, and do not discuss other issues. For meetings held by trade associations, ask the host to prepare an agenda.

3. Records of meetings will become necessary when we are suspected of being involved in a cartel. Be sure to record the date, participants and topics of meetings and keep it safe so that it will not be disposed of or discarded. If there is no record of the meetings, it will be extremely difficult to deny the accusations. Exchange of important information should be made in written form such as facsimile or e-mail, and they should be stored. Whenever there is any contact, discussion or exchange that might be suspected to be in violation of the Antitrust Act, contact Legal Department for advice.

4. Holding social gatherings among competing companies after meetings and events such as year-end parties, golf competitions and get-together trips, or participating in these

in itself is a highly risky behavior that may cause suspicion of cartel behavior. After thoroughly examining factors such as necessity, risk of getting drawn into a cartel and the timing of events, only those that are indispensable should be attended. In that case, relevant personnel shall be sure to obtain permission of the relevant supervisor in advance and keep a record, even for social events.

5. Legal Department shall check the status of storage of such records and their content periodically.

V. If you get drawn into conduct suspected of cartel behavior, you must make sure to announce your position clearly and with evidence that you and AGC will never participate in cartels.

1. If information on prices, quantity or rate of production or sales, etc. is provided at meetings, the participating person must make a clear statement that AGC will never participate in such cartelistic behavior and walk out after requesting to have statement recorded in the minutes. After that, the relevant person must inform his/her supervisor and consult with Legal Department on the subject.

2. If information on prices or bidding is offered unilaterally via media such as facsimile,

e-mail or telephone, it must be reported to Legal Department, in addition to protesting via document or depending on the situation, orally, that "AGC will never participate in activities contrary to the Antitrust Law and request that you stop sending such information." Further, what happened and what was done must be recorded in writing.

- Cartels can be established even if there is only a verbal understanding or tacit consent.
- Even if you are absent from a meeting, if you later receive information on the agreement and it is followed, it will be regarded as a violation of the law, in that an illegal "implied consent" exists.
- Even if you and AGC are not actively involved in a cartel, an ambiguous attitude can be regarded as having taken part in it.

## Guidelines for “Prohibition of Fraudulent Transactions (Asia) ”

\*Finance & Control Office, Legal Office, and Purchase & Logistic Center have changed to Finance & Control Division, Legal Division, and Purchase & Logistic Division respectively (as of April 2021).

### 1. Introduction

As a public institution that serves for the benefit of society, ensuring “proper financial reporting” is absolutely necessary for a company to sustain its business operations and continue to fulfill its social responsibility into the future.

Some may think that financial reporting is performed solely by the accounting department. In reality, however, the accounting department alone is not capable of creating a complete reporting. Proper financial reporting is possible only when proper reporting is made at every division.

In this sense, false reporting never benefits the Company even if you tried to do it for the Company's interest. Please keep in mind that even if it may appear to be beneficial for the Company for the short term, reporting that is contradictory to the fact will eventually cause damage to the Company. “Proper financial reporting” is therefore a crucial aspect of the Company which every one of us must follow.

### 2. Prohibition of Fraudulent Transactions

The following acts are strictly prohibited as “fraudulent transactions.”

- 1) Processing a fictitious transaction or creating record as if the transaction exists even though there is no substance such as purchase, sales, or inventory. Conversely, not correctly recording the actual transaction even if it exists.
- 2) Creating record that does not reflect the actual situation, failing to faithfully perform duties and/or conduct budget management in compliance with the Company's rules and regulations.

### 3. Compliance with the AGC Group Accounting Standard

The AGC Group prepares its financial statements based on the AGC Group Accounting Policy, and the recording of sales and purchases, booking of inventories and capitalization of equipment, costing and profit/loss calculation are all performed in compliance with the policy. Outlined below are some of the major rules set forth in the policy. If you have any questions or concerns about the handling of particular transactions or any other issues, please always consult with the accounting department.

### 4. Outline of Major Rules Concerning “Prohibition of fraudulent transactions”

- 1) Sales
  - 1.1) Transactions to be recorded in Sales  
Sales are revenue from transactions that are performed for business purposes established in the articles of incorporation and that generate a profit from short- or mid- and long-term perspectives.

Accounts	Target revenue
Sales of product and merchandise	<p>This includes revenue from sales activities of products and merchandise which are the company's principal operations (including the related service rendered).</p> <p>Sales of products purchased from an outside manufacturer are also included in sales of products and merchandise.</p>
Construction revenue	<p>This includes contract revenue from construction of plants, buildings, roads, etc. which are the company's principal operating activities. Revenues are classified by the type of sales as below:</p> <p>(a) Equipments and materials: Sales of product and merchandise</p> <p>(b) Construction: Construction revenue</p> <p>(c) Design and technical services: Revenue from technical services rendered</p>
Revenue from technical services rendered	<p>This includes revenue from providing a method, design, and other technology information rendered in the company's principal business.</p>

## 1.2) Sales recognition

Sales recognition is described in the "Revenue" section of the AGC Group Accounting Policy. Please check with the accounting department if you have any questions or concerns.

**Types of transaction**

1. Domestic sales of products, merchandise, and plant equipment and materials
2. Export sales of the same items as those listed above
3. Contract works and plant construction
4. Sales of purchased products not involving logistics operation
5. Sales of know-how, industrial property rights
6. Sales of royalties
7. Sales of engineering fees
8. Sales of service fees

## Notes:

- Recording of sales at the end of the closing month  
You are not allowed to deviate from the rules on sales recognition in order to control the internal budget and/ or profit targets.
- Handling of provisional unit prices  
If a product is sold at a provisional unit price, the final unit price must be determined before the end of the accounting period, in principle. Please check with the accounting department for the handling of specific transactions.

## 2) Purchase and related transactions

## 2.1) Purchase recognition

Purchase of merchandise	In principle, it is the date when the merchandise is inspected and accepted. Provisional unit price: If any raw material or equipment is purchased at a provisional unit price, the final unit price must be determined before the end of the accounting period, in principle.  Please check with the accounting department for the handling of specific transactions.
Acceptance of services	In principle, it is the date when the service is inspected and accepted.

## 2.2) Prohibited acts

Raising Off-the-book money	It is strictly prohibited and is considered socially- unacceptable behavior to manipulate purchase and/or other transactions together with suppliers and raise off-the-book money.
Fraudulent advance/delayed recording	You are not allowed to deviate from the rules on purchase recognition in order to control the internal budget and/or cost/profit targets. (Example) <ul style="list-style-type: none"> <li>• Fraudulent advance acceptance of research expenses: Accepting research expenses in advance and making/recording the payment at the end of the closing month even though the research commissioned is not yet completed.</li> <li>• Fraudulent advance acceptance of construction expenses: Accepting construction expenses in advance and making/recording the payment even though the construction ordered is not yet actually completed.</li> <li>• Recording construction expenses in excess of the actual amounts with intent to record a reduced amount for a different construction item in the subsequent term or later, because there will be a surplus of the budget for the current term.</li> </ul>

## 3) Issuance of slips

Accounting slips must properly express the actual transaction including the purchased product, construction, service, etc. and must be recorded in the correct accounting titles to reflect the facts.

Budgets must not be diverted into an irrelevant expense item or construction item.

that are needed for monthly costing, and profit/loss calculation must be recorded by the departments in charge in accordance with the applicable rules.

- Calculations must be made based on the correct data. You must not distort any amount by recording a false quantity. Materials consumption rates and yields must also reflect the actual data.

## Prohibited acts:

- Recording a false construction item, expense item and/ or budget code.
- Diverting the costs for construction of a plant, etc. to a different construction item.
- Distorting actual transactions (e.g. Asking a supplier to pay for entertainment costs and paying back the equivalent amount in the form of a fraudulent product purchase).

## 7) Value-added tax, customs duty, etc.

You must always comply with the laws and regulations concerning value-added tax, customs duty, etc. associated with sales and purchase transactions.

## 4) Sales of reusable products (e.g. iron and paper scraps)

The sale of reusable materials must be treated as an independent revenue and must not be offset with product or other purchases.

## 5) Inventories

Inventory difference must be clarified and corrected through physical stocktaking by the department in charge or by obtaining the inventory certificate and confirming the balance based on the inventory control table.

## 6) Monthly costing and profit/loss calculation

- The quantity of production, work-in-process, cost allocation base, sales, and other data

## In case of something suspicious or a concern:



### 1. Consult the Code of Conduct

If you have any questions or concerns about compliance, please refer to this Code. It will provide you with guidelines and scenarios to help you make the right choices.



### 2. Report it

If you suspect a compliance violation, report it to your regional compliance helplines or contact management. You may use other Compliance Resources as well.



### 3. Cooperate with investigations

The AGC Group investigates suspected compliance violations fairly and thoroughly. All employees are expected to cooperate fully with the Company's investigations into potential violations.



### 4. Retaliation is prohibited

Acts of retaliation against any person reporting a possible or actual violation in good faith are strictly prohibited in the AGC Group.



Your Dreams, Our Challenge