

# Guidance on Yaskawa ASEAN Group Code of Conduct

Integrity carries us forward to sustainable success

www.yaskawa.com.sg

# Message from the Top Management

#### Dear Colleagues,

We are proud that YASKAWA Electric Corporation has faithfully managed its business in line with our corporate mission of contributing to the advancement of society and the well-being of humankind for over 100 years since its foundation in 1915.

In 1997 we implemented the YASKAWA Electric Corporation Code of Conduct and committed ourselves to conducting our business with integrity as a member of society.

Today, Yaskawa Group's business is expanding across a world where dynamic social environments are becoming more and more complex.

In response to the changing world around us, we have revised the Code of Conduct and are releasing this Guidance on Yaskawa Group Code of Conduct (hereinafter 'Guidance') to have a greater focus on our business operations.

In this Guidance, Yaskawa Group has compiled its basic ideas and specific guidelines to help each officer and employee to conduct operations fairly and faithfully with integrity. If you have any questions relating to compliance matters, please check the Guidance and consult your line manager or colleagues or contact your local/regional compliance officer or the compliance officer of YASKAWA Electric Corporation.

Yaskawa Group insists that each officer and employee must have high ethical standards and behave in a fair and faithful manner. A single compliance violation by a single individual can destroy the reputation and credibility of Yaskawa Group as a whole. The pursuit of profits at the cost of compliance and integrity can never be justified. Please be keenly aware that the actions taken by each of us tell the world who we are, and never hesitate to choose to do the right thing if you are facing a dilemma between compliance and profit.

Yaskawa Group can only continue to grow if all of us act with integrity and focus on compliance. Our actions represent the Group Principle of Management and the core values of the Yaskawa Group.

March 2016



Junji Tsuda Representative Director, Chairman of the Board YASKAWA Electric Corporation





Hiroshi Ogasawara Representative Director, President YASKAWA Electric Corporation

XI. Ogasawara



Shuji Murakami Representative Director, Corporate Executive Vice President, Chief Compliance Officer YASKAWA Electric Corporation



## Message from the ASEAN Regional Head

#### Dear Colleagues,

Yaskawa has been conducting business operations for more than 100 years since Yaskawa Electric was founded in 1915, and business has expanded in ASEAN in the more than 40 years since the establishment of the office in Singapore in 1976. Currently, we are developing business in ASEAN together with the local subsidiaries in Singapore, Thailand, Indonesia, and Vietnam.

Throughout the more than 100-year history of Yaskawa Electric, we have always provided society with cutting-edge technology. We also want to contribute to local communities in ASEAN as we take pride in working for the YASKAWA Group.

The importance of the global position of ASEAN will keep on increasing as business continues to develop. There are various differences between other advanced nations and ASEAN, where things change rapidly. Furthermore, ASEAN, which is made up of various countries, has a mix of various ethnic groups, religions, cultures, and languages, and there are differences in the history and status of economic development.

In view of such diversity, we have released the "Guidance for YASKAWA Group Code of Conduct," which contains behavioral guidelines that YASKAWA Group employees should observe when carrying out work. It has been produced in English, Thai, Indonesian, and Vietnamese.

Of course, we must comply with each country's laws and corporate regulations, but we must also work with honesty and fairness. Please refer repeatedly to this Guidance whenever there is any uncertainty about compliance in the course of carrying out business activities. If there is still any uncertainty, please consult your boss or coworkers.

There are approximately 200 employees of Yaskawa ASEAN, and there are 14,000 colleagues around the world. We must not forget that the actions of each and every one of us affect the evaluation of YASKAWA Group and all of our colleagues.

Together, we will expand business while taking pride in working for the YASKAWA Group.

February 2018



Junichi Nakano Corporate Vice President, ASEAN Regional Head Yaskawa Electric Corporation

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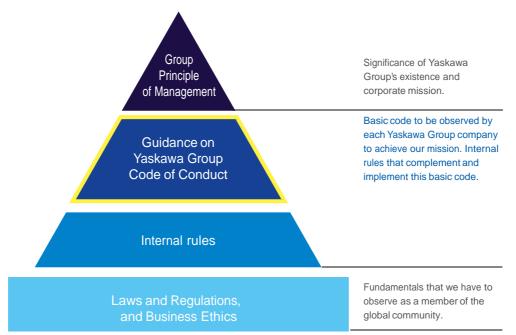
# **Basic** Policies

#### 1. Yaskawa Group Principle of Management

At Yaskawa our mission is to leverage the pursuit of our business to contribute to the advancement of society and the well-being of humankind. We will realize our mission by executing these core tenets:

- Develop and enhance world-class technologies, with an emphasis on our foundation of quality.
- Boost management and operation efficiency and achieve the returns necessary for the successful growth
  - of the company.
- Satisfy the needs of the market and dedicate ourselves to serving our customers as a customer centric organization.

#### 2. Policy Framework



We, the many members of Yaskawa Group<sup>\*1</sup>, are united across the world by our common mission: The "Yaskawa Group Principle of Management". In order to ensure the successful and sustainable growth of Yaskawa Group and realize this mission, it is essential that each company commits to observing the fundamentals of the "Yaskawa Group Code of Conduct", laws and regulations and business ethics. Each and every officer and employee of the Group should observe "Our Commitments" and behave in accordance with "Yaskawa Group Code of Conduct".

<sup>\*1</sup> Collectively efers to YASKAWA Electric Corporation and its domestic and overseas subsidiaries, hereinafter referred to as "Yaskawa Group" or simply the "Group."

# Speak Up

## 3. What is "Compliance"

"Compliance" as referred to in this Guidance means the Yaskawa Group conducts its business in accordance with applicable laws, regulations, business ethics, the "Yaskawa Group Code of Conduct", "Our Commitments", and our internal rules. The YASKAWA Group acts with integrity consistent with the Yaskawa Group Principle of Management.

#### 4. Responsibilities of Officers and Managers

- All officers and managers must be aware of and incorporate changes in the business environment and social requirements and maintain a compliance management system. At the same time officers and managers must assume leadership in practicing compliance.
- All officers and managers must regularly verify that employees act in line with all applicable compliance requirements. All officers and managers must strive to prevent compliance violations.
- All officers and managers must promptly report any violation to a local/regional compliance officer and, if necessary, the Chief Compliance Officer of YASKAWA Electric Corporation, and implement appropriate action(s) to rectify the compliance violation.
- All officers and managers must practice compliance and make reasonable efforts to educate subordinates on the principles of compliance. They must also ensure that the subordinates reporting to them receive the help and advice they need to act in line with all compliance requirements.

### 5. Responsibilities of Employees

• All employees are expected to familiarize themselves with the "Yaskawa Group Code of Conduct" and "Our Commitments" in order to be able to act in line with the applicable compliance requirements in their day-to day work. Increasing the good reputation of Yaskawa Group and the public's trust in us can be achieved if each employee consciously practices compliance in line with "Our Commitments".

## 6. Zero-Tolerance Policy

- Behavior which violates the principles of compliance will not be tolerated, and no member of Yaskawa Group may instruct another to act in such a manner.
- All officers, managers and employees are expected to seek a resolution to actual or suspected compliance concerns through consultation with line managers or speak up channels.
- Neither ignorance of laws and regulations, business ethics, internal rules and/or the Yaskawa Group Code
  of Conduct nor the intention to protect company interests may constitute justification of any non-compliant behavior.
- Any officer, manager or employee who behaves in a non-compliant manner will be subject to disciplinary action(s) according to the respective company's internal rules. The severity of those disciplinary action(s) will be determined by the nature and impact of the compliance violation, as well as the circumstances of each case.

# || Yaskawa Group Code of Conduct

The Yaskawa Group Principle of Management states that our Group mission is to leverage the pursuit of the business to contribute to the advancement of society and the well-being of humankind. Yaskawa Group believes that it is essential to conduct business in a fair and faithful manner and to create trusting relationships with the global community. Yaskawa Group is committed to respecting human rights, complying with applicable laws and regulations, and the spirit thereof, and proactively acting towards the creation of a sustainable society based on good social conscience. As such, we hereby lay out the following 16 principles:

- Yaskawa Group contributes to the advancement of society and the well-being of humankind through its operations. As such, Yaskawa Group respects communities worldwide, their cultures and customs, and ensures that internal rules comply with all applicable laws and regulations. In the absence of legislation or policy Yaskawa Group chooses a course of action based on integrity.
- Yaskawa Group recognizes that the conservation of the global environment is one of the most important issues for all humankind. At every stage of our business operations Yaskawa Group contributes to the realization of a sustainable society through environmentally conscious actions.
- Yaskawa Group complies with the competition laws of each country and does not contact its competitors in any way that could be perceived as a cartel. Yaskawa Group does neither make any agreements nor participate in concerted practices with competitors intended to achieve or affect the prevention or restriction of fair competition.
- Yaskawa Group respects intellectual property rights such as patent rights, copyrights and trademark rights by protecting its own rights and not infringing upon the rights of others.
- Yaskawa Group protects not only its own information but also important information of other companies and personal information. Yaskawa Group does not tolerate insider trading.
- Yaskawa Group complies with company information disclosure rules and strives to disclose correct information in a timely manner.
- Yaskawa Group maintains appropriate data storage practices and keeps records of the reasons behind key business judgments and decisions.
- Yaskawa Group carries out proper accounting and taxation processes in accordance with generally accepted accounting principles, and also carries out thorough control of company assets to protect their value.
- Yaskawa Group complies with all applicable laws and regulations concerning security trade control. Yaskawa Group strictly manages the security trade control process from the initial inquiry through to cargo/ technology shipment.
- Yaskawa Group maintains appropriate order fulfillment and sales records as well as appropriate credit management.
- Yaskawa Group strives to make continuous improvements to further increase customer confidence by implementing thorough safety and quality control from a customer-oriented perspective and responding to customer feedback in a timely and appropriate manner.

- Yaskawa Group pursues optimal procurement via supplier assessment and the implementation of appropriate payment procedures. Yaskawa Group expects all its suppliers to adhere to Yaskawa Group compliance policies.
- Yaskawa Group strives to build and maintain wholesome relationships with our distributors, agents, and representatives. YASKAWA Group ensures the compliance of those business partners through contractual terms.
- Yaskawa Group actively promotes giving back to the communities. Yaskawa Group does not engage in bribery or any activity that could be misconstrued as bribery and strictly prohibits all staff from offering or receiving inappropriate business entertainment, gifts, donations or other favors.
- ( Yaskawa Group complies with all applicable labor laws and rules to ensure the health and safety of our staff.
- Yaskawa Group respects individual human rights and the diversity of values. "Yaskawa HR Values" are practiced in our offices worldwide.





Compliance practice standards for all Officers and employees established under the 16 principles of the Yaskawa Group Code of Conduct are referred to as "Our Commitments"



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## 1. Compliance and Sincere, Responsible Behavior



#### Group Corporate Code of Conduct

Yaskawa Group contributes to the advancement of society and the well-being of humankind through its operations. As such, Yaskawa Group respects communities worldwide, their cultures and customs, and ensures that internal rules comply with all applicable laws and regulations. In the absence of legislation or policy Yaskawa Group chooses a course of action based on integrity.

- We strive to fully understand all laws and regulations related to our operations.
- **2** We strive to ensure that our business activities are not in violation of applicable laws and regulations.
- We ensure that we obtain all necessary official approvals and comply with legally mandated reporting. We ensure that we have legally qualified personnel on staff or on retainer for our operations as required.
- We check the details, responsibilities and authority of our own operations and follow all necessary authorization and reporting procedures as mandated by our internal rules.
- We update our internal rules in a timely manner in response to changes in the legal and operating environments.

#### 2. Sustainable Society through Eco-friendly Business Activities



#### Group Corporate Code of Conduct

Yaskawa Group recognizes that the conservation of the global environment is one of the most important issues for all humankind. At every stage of our business operations Yaskawa Group contributes to the realization of a sustainable society through environmentally conscious actions.

#### **Our Commitments**

- Participation by everyone. We believe that all of us have the responsibility to actively promote the protection of our environment. We strive to achieve biodiversity conservation, and a low-carbon and recycle-based society.
- Environmental contribution by innovative technologies. We aim to contribute to the improvement of the global environment to ensure a prosperous future for society. As such, we value technological innovation to create products and services for a wide range of applications in communities worldwide.
- Environmental consideration of products and services. We strive to reduce the environmental impact of our products and services over their entire life-cycle, from research and development, product design, procurement, manufacturing, distribution and usage through to end-of-life handling.
- Aiming for future-oriented goals and objectives. We not only comply with applicable environmental laws and regulations, but also strive to anticipate society's expectations and improve environmental excellence. We will continue to improve our environmental management and minimize environmental risks.
- Improvement of environmental awareness. We strive to improve environmental awareness among all of our members via education. We take a broad approach to discussing our relationship with the environment so that each of us can independently implement environmental activities.
- Information disclosure and communication. We are committed to disclosing information about our environmental activities and communicate proactively and openly with stakeholders to develop a deep mutual understanding.

Speak Up

## 3. Fair Competition



#### Group Corporate Code of Conduct

Yaskawa Group complies with the competition laws of each country and does not contact its competitors in any way that could be perceived as a cartel. Yaskawa Group does neither make any agreements nor participate in concerted practices with competitors intended to achieve or affect the prevention or restriction of fair competition.

- We avoid unnecessary contact with competitors. We refuse to discuss or disclose competition-related information with competitors and avoid behaving in any way that could be perceived as a cartel. We also strictly refrain from such actions via our distributors, agents, representatives and any other contracted business partners.
- We act in accordance with laws and our internal rules and do nothing to inhibit fair and equitable bidding when entering a bid for construction or business, whether in the public or private sector.
- We clearly specify information sources when recording industry statistics, benchmarking exercise results etc. in internal documents.
- We carefully control competitive intelligence and, when submitting statistical information to industry associations, take extra care to avoid any cartel-like activity.

# **Basic Policies**

# Speak Up

Integrity Test

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## 4. Intellectual Property Rights



#### Group Corporate Code of Conduct

Yaskawa Group respects intellectual property rights such as patent rights, copyrights and trademark rights by protecting its own rights and not infringing upon the rights of others.

- We are careful not to infringe the intellectual property rights of any third party and strictly refrain from replicating third-party products without due consideration, and take great care not to utilize intellectual assets without appropriate licenses and approvals.
- We do not duplicate or use computer programs without authorization. Furthermore, we do not install any unverified software on company computers, tablets or cell phones.
- We prevent the infringement of intellectual property rights by any third party by acquiring those rights. Before we have acquired those intellectual property rights, we keep the contents and know-how of our inventions strictly confidential.
- We carefully examine all technical reports and papers to check for confidential information before they are submitted to scientific workshops or journals. The function responsible for Intellectual Property must review all confidential content before the document can be made public.

### 5. Information Security



#### Group Corporate Code of Conduct

Yaskawa Group protects not only its own information but also important information of other companies and personal information. Yaskawa Group does not tolerate insider trading.

- We recognize that all information created or received in the course of operations is the property and responsibility of our company and ensure its proper management and effective security.
- We take extra care not to carelessly divulge confidential information over email. We understand that confidential information must be protected and its transmission must be authorized.
- We immediately contact and follow the instructions of our workplace's function responsible for IT if we misplace a company computer or mobile phone, notice an attack on our server or become aware of an information leak.
- We do not post any confidential information and any information that could cause misunderstandings when using social media.

## 6. Timely and Appropriate Disclosure



#### Group Corporate Code of Conduct

Yaskawa Group complies with company information disclosure rules and strives to disclose correct information in a timely manner.

- We immediately contact our line manager or the relevant department should we become aware of important facts that may impact our company or any of our publicly-listed business partners.
- We do not purchase or sell shares of any company for which we have access to information not yet publicly available. We do not divulge inside information to other parties, not even family members.
- We understand that certain information must be disclosed to remain compliant with laws and regulations or stock exchange regulations and disclose such information in a timely and appropriate manner.
- We confirm the details are correct and obtain approval from the appropriate manager before disclosing any company information.
- We only publicly disclose company information via representatives who are authorized to communicate on behalf of our company. We do not speak to the media without our company's approval.

### 7. Document Management and Fair and Transparent Decision-Making



#### Group Corporate Code of Conduct

Yaskawa Group maintains appropriate data storage practices and keeps records of the reasons behind key business judgments and decisions.

- We do not create, obtain or store any information (including emails) that could be misunderstood by a third party.
- We organize our company information according to our internal rules. We regularly revise and clarify the storage criteria and retention periods. We store documents and transaction records appropriately in order to corroborate the suitability of key business judgments and decisions.
- We do not act in any way that could be misconstrued as destroying evidence (e.g. destroying documents or deleting data at our own discretion) when faced with legal or ethical issues.

# **Basic Policies**

# Speak Up

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#### 8. Compliance with Accounting and Taxation Rules



#### Group Corporate Code of Conduct

Yaskawa Group carries out proper accounting and taxation processes in accordance with generally accepted accounting principles, and also carries out thorough control of company assets to protect their value.

- We fully understand the accounting standards that apply to our company (laws and regulations and our internal rules). We comply with applicable corporate accounting practices and tax laws.
- We keep a ledger of cash and bank account funds, inventory assets, fixed assets, leased assets, and important assets such as computers and software, regularly reconciling them with actual items.
- We carry out acquisition, use and disposal of our company assets in line with rules and regulations and authorizations. We do not use any assets for other than business purposes.
- When trading occurs within the Group, we ensure accurate consolidation of accounts and comply with applicable rules and regulations on transfer pricing and tax laws. If necessary, we timely consult with the function responsible for accounting.

## 9. Thorough Management of Security Trade Control

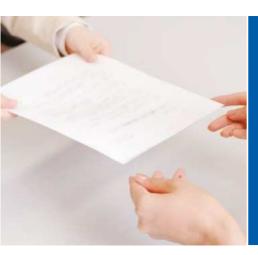


#### Group Corporate Code of Conduct

Yaskawa Group complies with all applicable laws and regulations concerning security trade control. Yaskawa Group strictly manages the security trade control process from the initial inquiry through to cargo/ technology shipment.

- We comply with all applicable export control laws and regulations in order to maintain international peace and security by preventing the proliferations of weapons of mass-destruction and accumulation of conventional weapons. We have developed internal rules and comply with them.
- We export products in compliance with all applicable laws and regulations governing export control. These include our own internal rules and the laws and regulations of each country where we conduct business.
- When importing or exporting, we follow customs clearance procedures in compliance with all applicable laws and regulations. We do not trade goods for which import and/or export is prohibited by international agreements.

### 10. Sales and Credit Management



#### Group Corporate Code of Conduct

Yaskawa Group maintains appropriate order fulfillment and sales records as well as appropriate credit management.

- We fulfill orders based on actual orders and planned order information from customers.
- We document the agreed terms and conditions by exchanging contracts, quotations, order confirmations, etc.
- We record sales based upon shipment/delivery or completion of service. We strictly refrain from improper accounting procedures such as recording of fictitious sales, anticipatory or delayed sales recording, and over- or understating of sales.
- We carry out credit assessments on customers in conjunction with thorough credit management including checking payment behavior and balance confirmations.

## 11. Safety and Quality Control



#### Group Corporate Code of Conduct

Yaskawa Group strives to make continuous improvements to further increase customer confidence by implementing thorough safety and quality control from a customer-oriented perspective and responding to customer feedback in a timely and appropriate manner.

- We keep the customer in mind when striving to improve our quality control system, technology development and technical platform. We comply with internal rules to ensure the quality and safety of our products.
- **3** We respond appropriately to customer requests and inquiries in a timely and factual manner.
- We place customer safety first by creating catalogs, product descriptions, adverts and so on which are easy for customers to understand. We also strive to continuously improve product description documents.
- We keep the customer in mind throughout all operations and reviews in order to ensure safety, quality and reliability in our product development process.

## 12. Procurement and Proper Payments



#### Group Corporate Code of Conduct

Yaskawa Group pursues optimal procurement via supplier assessment and the implementation of appropriate payment procedures. Yaskawa Group expects all its suppliers to adhere to Yaskawa Group compliance policies.

- We carry out a comprehensive assessment and make a rational decision when selecting suppliers based not only on quality, price and delivery times but also on the state of their operational systems (e.g. technical and operational capability, business soundness, legal compliance, environmental conservation, health and safety) and other criteria.
- In procurement transactions, in addition to contracts, we document evidence that shows the information agreed with the business partner (e.g. unit price of the order) and evidence that the products have been delivered and/or services have been rendered. We also follow appropriate procedure by thoroughly recording of expenses, cost and times in line with the facts.
- We carefully monitor procurement transactions for illegal activities, conflict of interests, and risks of involvement with organized crime groups (through money laundering etc.). We have no relationship whatsoever with organized crime groups and refuse any improper demands.
- We examine the facts about suppliers and their eligibility as a trading partner before beginning a transaction and reexamine them regularly. We also strive to understand as much as possible about the subcontractors of our suppliers.

# 13. Relationships with Distributors, Agents and Representatives



#### Group Corporate Code of Conduct

Yaskawa Group strives to build and maintain wholesome relationships with our distributors, agents, and representatives. YASKAWA Group ensures the compliance of those business partners through contractual terms.

- We do not violate applicable competition laws during sales transactions via our distributors (e.g. by restricting resale prices or exchanging sensitive information with competitors via third parties).
- We try to understand distribution channels to end-users and implement export management, confidential information management, and measures to prevent technical information leaks caused by the disposal of products at the delivery destination.
- We expect our business partners (e.g. distributors and business agents) not to engage in the bribery of public officials or any similar person.
- We provide guidance to ensure distributor sales materials (especially their descriptions of quality assurance and aftersales service) are lawfully and properly maintained.

# **Basic Policies**

## 14. Relationships with Stakeholders and Interested Parties



#### Group Corporate Code of Conduct

Yaskawa Group actively promotes giving back to the communities. Yaskawa Group does not engage in bribery or any activity that could be misconstrued as bribery and strictly prohibits all staff from offering or receiving inappropriate business entertainment, gifts, donations or other favors.

- We maintain fully transparent and equitable relationships with public officials and never offer business entertainment, gifts or other favors or bear expenses that could be misconstrued as bribery or having another unlawful motive.
- We do not offer customers, whether in the public or private sector, business entertainment, gifts, money or other favors beyond legally permissible conditions and conventional norms.
- We do not solicit or accept business entertainment, money or goods from suppliers beyond legally permissible conditions and conventional norms.
- We contribute to society, including communities, via our business activities. We grant donations and sponsorships only via a transparent approval process ensuring that the donations do not benefit organized crime groups.

## 15. Compliance with Labor Laws



#### Group Corporate Code of Conduct

Yaskawa Group complies with all applicable labor laws and rules to ensure the health and safety of our staff.

- We understand and abide by our contracts with our employees, all applicable labor laws and regulations, and applicable international standards including human rights. We do not use forced labor or child labor. We also expect our business partners not to violate the human rights of any individual.
- We ensure a safe workplace and healthy working environment. We comply with applicable laws and regulations, and our internal rules related to safety in the workplace.

### 16. Satisfying Workplace Environment



#### Group Corporate Code of Conduct

Yaskawa Group respects individual human rights and the diversity of values. "Yaskawa HR Values" are practiced in our offices worldwide.

#### **Our Commitments**

- We do not act in a way that causes character assassination or makes others feel uncomfortable, e.g. sexual harassment, power harassment or moral harassment.
- We respect each individual's human rights, diversity and individuality. We facilitate work-life balance. Furthermore, we do not discriminate or tolerate discrimination in recruitment, personnel evaluation, promotion, assignment, etc. on grounds of national or ethnic origin, race, religion, gender, views, age, disability, sexual orientation or any other characteristics.
- We protect the privacy of (our) employees. We strictly manage personal information obtained and do not disclose this information without a legitimate reason.

#### Yaskawa HR Values

- Being part of Yaskawa We expect you to take initiative and cooperate with others to achieve common goals while also constantly seeking new challenges.
- Grow with Yaskawa

We pledge to grow and develop those passionate about contributing to our global business in a communicative teach-and-learn environment and match them with challenging career opportunities.

- Work at Yaskawa We respect your individuality and diversity, and we pledge to provide a safe and healthy working environment that will provide motivation.
- Recognition by Yaskawa We guarantee fair evaluation and performance rewards via active communication.

## 1. Getting Help and Advice

Promptly communicate any compliance concerns to your line manager.

If you are uncomfortable discussing a compliance concern with your line manager, please contact your local/ regional compliance officer or raise concerns through the appropriate speak up channels.

### 2.Speak Up Channels Japan

If you are uncomfortable using the available local speak up channels, you always have the option to contact the Compliance Helpline at YASKAWA Electric Corporation (Japan headquarters) via e-mail (anonymously if you wish).

YASKAWA Electric Corporation (Japan) Compliance Helpline: hotline@yaskawa.co.jp (Japanese/English)

#### 3.Compliance Investigations

If there is a reasonable suspicion of a compliance violation, the company will conduct a fact-finding investigation. All employees should cooperate fully with any investigation.

We keep the facts and details of reports confidential and do not disclose them to any person not involved in the respective investigation. Retaliation against any employees raising concerns in good faith is strictly prohibited.



Integrity Test

Purpose of the system	To ensure effective self-improvement processes within YASKAWA Group through early detection and prevention of any actual or suspected compliance breach (hereinafter "Compliance Incident") and scandals caused thereby.
Contact for whistle-blowing	YASKAWA website dedicated for whistle-blowing: <u>yaskawa.ethicspoint.com</u> Open hours: 24/365
Available to	YASKAWA Group's officers and employees
Whistle-blowing process	<ul> <li>Whistle-blowing reports can be received via the dedicated web form or by phone.</li> <li>Anonymous whistle-blowing is allowed except when restricted by local laws.</li> <li>Reported matters and personal identification of whistle-blowers will be kept confidential.</li> <li>There will be no ill-treatment of whistle-blowers on the grounds of his/her whistle-blowing.</li> <li>However, no whistle-blowing intended for false reporting or for a dishonest purpose, e.g. slander against others, shall be made. Disciplinary action may be taken against any whistle-blower found to have abused the system for such improper purposes, as per the working regulations of his/her direct employer.</li> </ul>
Basic procedures of the system operations	<ol> <li>In principle, if you are informed/aware of any Compliance Incident, you should report the incident to your immediate manager or your company's management. You may use the Global Hotline for whistle-blowing only in cases where it may not be appropriate to report it to your immediate manager or to your company's management.</li> <li>The Global Hotline Office will deliberate on reported matters, and make a decision on whether to conduct an investigation and appoint a responsible investigator within 5-6 days from receiving the report (within 10-14 days if the report is made in any language other than Japanese or English). If the reported Compliance Incident is associated with the company's management, the Japan Headquarters or regional headquarters (RHQ) will be the responsible investigator.</li> <li>The responsible investigation acope and methods in order to protect whistle blowers' privacy and personal data, and prevent them from being identified.</li> <li>Progress and results of the investigation will be reported to the Chief Compliance Officer and/or members of the Audit and Supervisory Committee at the Japan Headquarters or to a compliance officer of a relevant YASKAWA Group company, etc. depending on the significance and impact of reported matters.</li> <li>If as a result of investigation any alleged misconduct is found to be true, YASKAWA Group will promptly take corrective actions and recurrence prevention actions.</li> <li>Within the extent permitted by laws, the company may impose a disciplinary action as set forth in relevant working regulations of a relevant company, file a criminal complaint against, and/or claim damages against person(s) committing or involved in any misconduct.</li> <li>The Global Hotline Office will report investigation and improvement results to whistle-blowers. This notification will not be provided to whistle-blowers who are anonymous or do not desire to receive feedback.</li> </ol>

For more information, please refer to yaskawa.ethicspoint.com.

## V Integrity Test

Our Commitments and internal rules do not explicitly cover all possible compliance matters. Should any of us become unsure about a situation not detailed in Our Commitments or the internal rules, we should ask ourselves the following questions to ensure we act with integrity.

☑ Is my behavior legal and am I sincere in my actions?

I Am I abiding by the spirit of the Yaskawa Group Code of Conduct?

☑ Could this action effect Yaskawa Group or me negatively if it became public?

Z Can I explain my actions to the general public, governmental authorities, customers and business partners?

☑ Can I explain my actions to my family and friends with confidence?





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