

JTEKT Global Conduct Guidelines

As members of the JTEKT Group, we will honor the following Code of Conduct in the fulfillment of our duties.

1. Laws, Regulations and Rules

- We will endeavor to correctly interpret laws and regulations of each country or region and internal rules, and act in accordance with the spirit thereof.
- We will not engage in illegal acts for any reason, even if our motivation is the company's interests.
- We will never falsely report or conceal our mistakes. If we learn of illegal acts, false reporting or concealments committed by others, we will report to our superior or the dedicated department and take appropriate action.

2. Customers and Business Partners

- We will respect contracts with our customers and business partners and honor these in good faith. If conflict arises between contracts with customers or business partners and laws, regulations or internal rules, we will take appropriate action for resolution.
- We will engage in business activities based on fair and free trade and never utilize unfair means such as bid-rigging or cartels or engage in acts that could be misunderstood as such.
- We will not offer bribes or other illicit gain in order to fulfill business activities or obtain trade. Moreover, we will not respond to offers of illicit gain from external parties.
- We will not make improper demands of our business partners by taking advantage of our position or economic strength in a business transaction.

3. Company

- We will constantly endeavor to enhance the corporate value of JTEKT Group.
- We will continually seek to improve the performance, quality and safety of products.
- We will perform accounting and financial management duties in accordance with laws, regulations, internal rules, etc. in order to appropriately process accounts and pay taxes.
- We will not use company property for our personal gain. We will pay due consideration when storing and managing company property to avoid loss, theft, breakage or other damage.
- We acknowledge that intellectual property rights are important and valuable company assets. So, we will endeavor to appropriately develop, acquire and manage such rights without infringing another party's intellectual property rights.
- We will endeavor to appropriately manage confidential information and prevent leaks, misappropriation and manipulation.
- We will endeavor to appropriately collect, utilize and manage personal information.

4. Our Colleagues

- We will not unfairly discriminate on the grounds of ethnicity, nationality, creed, gender, sexual orientation, age, religion, color or mental/physical disability, etc.
- We will endeavor to secure the safety and health of the people we work with and maintain/improve our workplace environment.
- We will respect our mutual individualism, and work together to create workplaces in which all employees can work with vigor and energy.

5. Society at Large

- We will respect human rights, never use inhumane means such as forced labor or child labor, nor utilize the results thereof.
- We will disclose information on business activities and other operating performance in an appropriate manner.
- In order to maintain credibility with the stock market, we will not engage in illegal stock transactions, etc. utilizing non-public information regarding our company or another company.
- We will endeavor to eliminate anti-social forces and take a resolute stance towards unreasonable demands.
- We firmly acknowledge the necessity of protecting the environment on a global scale and will endeavor to contribute to this cause.
- We will endeavor to proactively engage in social contribution activities.