

JTEKT Global Conduct Guidelines (Code of Conduct)

The following clarifies the attitudes expected of the JTEKT Group and us as its members during our business activities, based on JTEKT's MVV (Mission, Vision, Values) and the Behavioral Guidelines.

In our daily business operations, let us endeavor to act in accordance with these guidelines.

[Common Principles]

- ◆ Our work is not only for ourselves or the company but aims to contribute to society through JTEKT's business activities.
- ◆ We understand that laws, regulations, and rules exist to improve society, and we perform our work sincerely without violating them.
- ◆ When mistakes or failures occur in our work, we promptly report and strive for correction. We never make false reports or conceal facts, and if we see others attempting to do so, we report to our supervisors or the Whistle-blowing desks/the Helplines.

1. Relationship with the Earth and Natural Environment

- ◆ We consider a rich and stable global environment as the foundation of people's lives and corporate management, and we engage in environmental conservation through our business activities.
- We reduce greenhouse gas emissions in our business operations and aim to achieve Carbon Neutrality.
- By reducing waste and promoting recycling and reuse, we manage limited natural resources and contribute to building a circular economy.
- We support the maintenance and restoration of natural environments where diverse organisms can live.
- We maximize the efficiency of energy used in production and prevent adverse effects on the natural environment by utilizing renewable energy and other measures.
- We take responsibility for the use of substances that may adversely affect natural environments such as water, air, and soil, and strive to protect rich oceans and forests as well as animal welfare.

2. Relationship with Customers and End Users

- ◆ We aim to contribute to people's happiness and grow as a company together with society through providing better products and services and sound market competition.
- We develop products and services that can be used safely, securely, and comfortably, and strive to always provide attractive, high-quality products that earn customers' trust and satisfaction.
- We absolutely do not engage in acts suspected of bid-rigging or cartels, and develop and sell products and services openly and fairly under free and fair market competition.
- We conduct fair transactions to ensure that we never use bribes as a means of doing business and do not participate in corruption.
- We appropriately manage confidential information and personal information entrusted to us, prevent unauthorized use, and strive to establish a system to prevent leaks to outside parties.

3. Relationship with Business Partners (Suppliers, Contractors, Agents, etc.)

- ◆ We recognize that JTEKT's business is based on a symbiotic relationship of Coexistence and co-prosperity through collaboration with many business partners, and we cooperate for mutual development.
- In transactions with business partners, we strictly refrain from unjust demands that exploit economic superiority and always strive for fair conditions and proper operations based on dialogue.
- To address social issues such as realizing the society with Carbon Neutrality and Circular Economy through the supply chain and eradicating forced labor and child labor, we promote responsible procurement.
- We collaborate with business partners to build a sustainable supply chain that can continue business activities even in the event of natural disasters, cyberattacks, geopolitical risks, and other challenges.
- We absolutely do not request or accept bribes or other illicit benefits from business partners and conduct fair and transparent transactions.
- We respect the rights related to business information, personal information, and intellectual property held by business partners and take sufficient care not to infringe upon them.

4. Relationship with Colleagues

- ◆ We believe that our colleagues who work together are the foundation supporting the company's growth, and under common goals, we strive to help one another grow and improve together while engaging in our daily work.
- We endeavor to understand JTEKT's MVV (Management Philosophy) and Hoshin (Management Plan), and perform our duties based on workplace plans with integrity.
- We prioritize the safety and health of employees, never neglect safety and health measures such as wearing protective equipment and ensuring machine safety, and in emergencies such as disasters, prioritize human life above all.
- We create a workplace environment where everyone can work with peace of mind, fully demonstrate their abilities, and enjoy challenges.
- We are conscious of balancing the company's growth and our own growth, strive to accumulate knowledge and experience, and aim to contribute to society through daily goal achievement and continuous improvement (KAIZEN).
- We confirm through communication with colleagues whether our work is correct and understand society's expectations and eliminate misconduct in the workplace.
- We do not tolerate harassment or discrimination based on race, nationality, belief, gender, age, physical or mental disabilities, and embrace Respect for Diversity as a team strength in our work.
- Everyone understands their role and responsibilities, works to maintain working hours compatible with daily life, and strives to maintain wage levels that allow a secure living.

5. Relationship with Shareholders and Investors

- ◆ We recognize that the company's business activities are supported by capital entrusted by shareholders, and we strive to enhance corporate value over the long term.
- We conduct our daily duties with integrity and take care not to cause unjust harm to the company or our shareholders for personal gain.
- We thoroughly implement appropriate financial management and proper accounting treatment and accurately record budgets and expenditures.
- We strive to accurately grasp the company's financial and non-financial information in accordance with relevant laws and regulations and internal rules, and disclose it specifically and regularly.

- Information regarding company decisions and events that may significantly affect investment decisions is disclosed in a timely manner and appropriately.
- We handle business-related information properly, work to prevent confidential information leaks, pay attention to improper use such as insider trading, and contribute to maintaining trust in the securities market.

6. Relationship with International and Local Communities

- ◆ We respond to society's trust as a good corporate citizen within the international and local communities and contribute to people's happiness and the creation of a prosperous society.
- We conduct business activities that respect the culture and laws of the regions where we operate.
- We carry out responsible imports and exports and support regional security.
- We do not tolerate acts that hinder the sound development of society, such as terrorism, cyberattacks, economic activities of antisocial forces, money laundering, and distribution of counterfeit goods.
- We contribute to the development of local communities through job creation and proper tax payment.
- We build trust through sincere dialogue with local residents and give maximum consideration to human rights when using private and public security services.
- In conducting business activities, we consider the surrounding residents and natural environment, strive to suppress the outflow of pollutants and noise, and protect forest and marine environments.
- We strive to fulfill our social responsibilities as a corporate citizen through social contribution activities beyond business operations.

[Supplementary Provisions]

- The guidelines are implemented as an integral part of the JTEKT Group Behavioral Guidelines and will be revised as necessary.
- The behaviors required by the guidelines are planned to be concretized further details as internal regulations of JTEKT and the JTEKT Group as needed.
- Acts that violate these guidelines and internal regulations may be subject to disciplinary action in accordance with procedures separately stipulated in internal regulations.
- If you witness or hear acts violating this guideline and internal regulations in the workplace, please work to correct the issue within your workplace.

- If you consider that the issue cannot be resolved within the workplace, please use the various Whistle-blowing desks/the Helplines. Your consultations are kept strictly confidential, and those Whistleblowers will never be treated disadvantageously by the company.

[Related Policies, etc.]

- JTEKT's MVV <https://www.jtekt.co.jp/e/mvv/>
- JTEKT Group Behavioral Guidelines <https://www.jtekt.co.jp/e/company/koudokihan.html>
- JTEKT Group Tax Policy
<https://www.jtekt.co.jp/e/sustainability/governance/taxpolicy/>
- JTEKT Environmental Action Guidelines
https://www.jtekt.co.jp/e/sustainability/environmental_philosophy/
- JTEKT Group Human Rights Policy
https://www.jtekt.co.jp/e/sustainability/human_rights_policy.html
- Safety and Health Policy
<https://www.jtekt.co.jp/e/sustainability/society/employee/safetyhealth.html>
- Health Declaration
<https://www.jtekt.co.jp/e/sustainability/society/employee/healthmanagement.html>
- DE&I Policy <https://www.jtekt.co.jp/sustainability/society/employee/dandi.html>
- Human Resource Development Policy
<https://www.jtekt.co.jp/sustainability/society/employee/hrdevelopment.html>
- Quality Policy <https://www.jtekt.co.jp/sustainability/society/customers/>
- Basic Purchasing Policy <https://www.jtekt.co.jp/sustainability/society/partner/>
- JTEKT Supplier Sustainability Guidelines
https://www.jtekt.co.jp/e/assets/uploads/2024/10/files/supplier_sustainability_guideline_2022.pdf
- JTEKT Group Social Contribution Activity Policy
<https://www.jtekt.co.jp/e/sustainability/society/community/>

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