



Handbook **Corporate Ethics**

TSUBAKI KABELSCHLEPP Group

**Code of Conduct –
Principles for a lawful act**

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01 Ensuring compliance with laws and corporate regulations

No matter what the situation, we must adhere to all relevant laws and corporate regulations. We must also avoid any behavior that draws public criticism, even if it is not strictly against the law. As representatives of the company, we must conform our conduct on both this social model and our Code of Ethics. All executives and managers shall set an appropriate example by taking the initiative in following these corporate work ethics and all employees shall conduct themselves according to this code.



02 **Respect local cultures and customs worldwide**

When engaged in international operations, all employees shall adhere to local and international rules as well as local laws, become fully aware of local customs and respect them while fulfilling the essential aspects of corporate operations. Remain aware of our role in the community and contribute to the prosperity of the local community while establishing reliable relationships with local companies.



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03 **Practising appropriate and timely information disclosure**

Always ensure that the necessary disclosure of information is timely and appropriate. Avoid releasing any information that has not been approved for release or that could be used for questionable purposes, and ensure open disclosure to all parties, and not specific individuals.



04 **Safeguarding and enhancing the TSUBAKI KABELSCHLEPP brand**

Safeguard and enhance the TSUBAKI KABELSCHLEPP brand by pursuing the highest levels of quality and providing safe and reliable products & services to meet the demands of our customers and distributors.



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05 **Implementing eco-friendly and people-friendly initiatives**

In order to sustain a healthy environment for future generations, we must comply with the environmental laws and regulations of all countries where we conduct business. To this end, TSUBAKI KABELSCHLEPP always seeks to develop environmentally friendly products. Moreover, in our daily operations, we must continue to take steps to save energy and natural resources.



06 Actively participating in community initiatives

Always remain aware of our corporate role in the community. TSUBAKI KABELSCHLEPP employees are encouraged to contribute to and engage in volunteer activities that support social and charitable activities in our communities.



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Protecting our corporate assets

Products, devices, machinery, appliances, equipment – and especially our intellectual property – are all assets of the TSUBAKI KABELSCHLEPP Group. All TSUBAKI KABELSCHLEPP employees are expected to follow corporate regulations in order to prevent loss, misuse or inappropriate use of corporate assets.



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Greeting others with warmth and respect

Greeting others with a cheerful “Good morning!” or “Good afternoon!” is part of basic etiquette. You will start the day on a positive note if you always offer a respectful greeting to others.



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Creating a safe and positive working environment

Always keep your workplace neat and organized. With active participation in QC and other continuous improvement activities, we can ensure a safer and improved work environment.



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Adhere to fair and ethical business practices

Make all purchasing and other business decisions based on fair and ethical business judgment. This will ensure that the company will continue to be recognized as an employer with high standards of conduct and a company that others want to do business with.



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Eliminating harassment and discriminatory practices

The TSUBAKI KABELSCHLEPP Group supports all basic human rights and therefore forbids harassment and discrimination in all its forms. Discrimination based on race, nationality, religion, belief, gender, or age will not be tolerated.



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Eliminating sexual harassment

Sexual harassment is not only debasing and an infringement on an individual's human dignity, it also severely damages and discredits our corporate image. TSUBAKI KABELSCHLEPP has a "no tolerance" approach to sexual harassment. Violators will be subject to discipline up to and including discharge.



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Avoiding disclosure of confidential corporate and personal information

If confidential corporate or personal information are inappropriately disclosed, both our customers and employees will lose trust in the company. We must acknowledge the importance of respecting confidential information, and take the necessary steps to ensure that we safeguard all such information.



14 Prohibiting of illegal drugs and alcohol

The use of alcohol or other illegal drugs on company property is strictly prohibited. Employees found to be under the influence of alcohol or other illegal drugs while on company property will be subject to discipline up to and including discharge.



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15 Prohibiting of acts constituting conflicts of interest

All employees, as well directors and officers, owe a duty of loyalty to the company. We must avoid any situation in which our personal interests would conflict with the interest of the company, e.g. serving as director, manager or employee for any other company or operate a personal business without obtaining permission of the company.



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Prohibiting of bribe and exchange of excessive gifts and entertainment

It is illegal to pay or receive a bribe intended to influence a business decision. We should not give or accept, directly or indirectly, any entertainments, gifts or services to and from any supplier or customer unless the expenses are nominal.



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Using good judgment

As an employee, every action that you take should be consistent with corporate work ethics and business practices. Our actions should be transparent and stand up to any reasonable review. Even a small violation of TSUBAKI KABELSCHLEPP policy can raise doubt about our ethics and business practices. Consider the impact of your actions and strive to be a positive role model.

Owner:

Company:

Department:

Name: