

## Introduction

The Vision of our MVV is to become a company that is “indispensable for customers“, “selected by customers“, and “grows together with customers”. The trust is the most important among others, and it is essential for us to ensure compliance in order to maintain their trust. Not only does ensuring compliance protect such trust, but it also leads to protection of individual employees. As a member of society and a member of Mitsui & Co. group, we are pleased to comply with all applicable laws and regulations having in our mind “With Integrity”, Mitsui & Co. Group Business Conduct Guidelines which fosters a sense of integrity while promoting activities in accordance with high ethical standards.

The Guidelines describe our basic policy on compliance and other related matters in a concise manner. Let us fully understand and properly follow these guidelines in our business activities as well as a private life.

Kazuhiro Okuma  
President

**BUSINESS CONDUCT GUIDELINES  
FOR EMPLOYEES AND OFFICERS  
OF ORIENT MARINE CO., LTD.**

Enacted: January, 2003

Revised: December, 2004

Revised: February, 2021

Revised: April, 2024

These guidelines apply to all employees and officers of Orient Marine Co., Ltd. (the “Company”). Whenever used in these guidelines, the expression “Employees” includes officers and corporate auditors in addition to staff members (including secondees to and from the Company, contract employees, and temporary employees), unless the context otherwise requires.

**1. Compliance with the Law and Integrity**

- Employees should comply with all applicable laws and regulations, whether domestic or foreign.
- Employees should maintain the highest levels of corporate and employee ethical standards, and, as members of society, conduct themselves with sincerity, in a responsible manner and with common sense and dignity.

**2. Respect for Human Rights and Diverse Cultures**

- Employees should respect human rights and must not discriminate in any way whatsoever between persons based on grounds of race, creed, sex, social status, religion, nationality, age or physical or mental disability.
- Employees will not be the cause of any child labor, forced labor, etc. that may lead to violations of human rights. In addition, employees will work together with our business partners to ensure that they will not play any part in violations of human rights.

**3. Office Environment and Harassment**

- In order that Employees, with individuality and diversity, perform their duties for the Company to the best of their ability, the Employees should respect the character and

individuality of one another and make every effort to cultivate an open-minded corporate culture, and to ensure that the office is an open and comfortable environment in which to work.

- The Employees should not harm, mentally or physically, a person or surrounding people beyond reasonable range of work, based on advantages at workplace such as an official position or human relations.
- The Employees should not engage in any sexual behavior against the will of a person or surrounding people.
- The Employees should not treat others in a disadvantageous or detrimental way for the reason of pregnancy, giving a birth, and taking child-care leave or family-care leave, nor engage in any behavior regarding these matters that is harmful to the workplace. In addition to the foregoing, Employees should not exhibit any language or behavior that can be harmful to the working environment of other workers through any discriminatory act or harassment in the workplace, such as language or behavior that pertains to sexual orientation or gender identity.
- Employees should not disturb the sound discipline, environment and good order of the office by conduct which is contrary to public order and good moral standards.

#### **4. Health and Safety**

- Employees should place the highest priority on the health and safety of themselves and all those connected with business activities of the Company, prevent occupational accidents, and protect their health and safety by creating a safe working environment.
- Employees should comply with all applicable laws and regulations regarding occupational health and safety of each relevant country and region and constantly pursue and comply with optimal safety standards for each business activity.

#### **5. Compliance with Antitrust Law, etc.**

- Employees should not conduct themselves in their dealings with the Company's competitors in a manner which results in an illegal restraint of trade, such as collusion with a view to the fixing of price levels or levels of production or supply or the division of markets.
- Employees should not collude with the Company's competitors in any tender such as determining a successful bidder or contract price.
- Employees should not engage in unfair trade practices, such as boycotts, resale price maintenance or tie-in agreements.

- Employees should not unreasonably damage the interests of sub-contractors of the Company through the unjustified demand to reduce purchase prices, rejection to receive goods, return of goods or delay of payment of purchase prices.
- Employees should promote fair, transparent and free competition, and carry out appropriate business transactions that are compliant with the laws and ordinances observed in each country or region.

## **6. Conflicts of Interest between Employees and the Company**

- Employees should not participate in any activity which creates or appears to create a conflict between his or her personal interest and the Company's business interest, such as working for the competitors or the customers of the Company or dealing with the Company for their own behalf.
- Employees should not use the Company's property, assets or information system for any purpose other than that of the Company's business.
- Employees should not, without the prior consent of the Company, be engaged in any other occupation.
- Employees should not, without the prior consent of the Company, acquire any stock of the customers of the Company or the companies to which the Company makes, or is expected to make, investment where such stock is not listed in any securities exchange.
- On the basis of personal relationships, whether inside or outside the Company and including familial relationships, Employees should not act in a manner that conflicts with the Company's interests, such as by failing to perform their duties properly, nor should they harm the working environment or motivation of other Employees, such as by causing doubt in the workplace regarding the proper treatment of personnel.

## **7. Gift and Favor**

- Employees should not render public officials or persons in a similar position any economic favor such as money, gift or other favor, for the purpose of securing any improper advantage or excess the range of normal social courtesies.
- Employees should not pay any agent, advisor or consultant any commission which they have reason to know will be used for influencing public officials or persons in a similar position in an unlawful manner.
- Employees should not render employees or officers of customers of the Company any economic favor such as money, gift or other favor, the value of which is greater than a

generally accepted commercial level at the relevant locale, nor should they receive such economic favor from officers or customers of the Company.

#### **8. Treatment of the Company's Information**

- Employees should hold any secret information of the Company, customer information and personal information as strictly confidential and should not divulge such information to any third party, both during and after their employment with the Company, nor should they use the same for any purpose other than that of the business of the Company.
- Employees should treat any secret information divulged by a third party as in the same manner as they treat the secret information of the Company.
- Employees should not infringe the intellectual property rights of any third party, including the copying of computer software, without express permission of such third party.
- Employees should actively and appropriately disclose in a timely manner any information of the Company in accordance with any laws and regulations protecting the interests of investors including the rules of any relevant stock exchanges.
- If Employees become acquainted with any information of the Company or its customers which may materially influence the judgment of investors in the Company or in such customers, they should not sell or purchase any stock of the Company or stock of such customers unless and until such information becomes public and in any event Employees should comply with all relevant insider dealing laws.
- Employees should not illegally acquire or use any secret business information of a third party.

#### **9. Compliance with Procedures for Export and Import, Applicable Laws and Attention to International Situations, etc.**

- Employees should comply with the export and import procedures and not engage in the export or import of prohibited goods.
- For the purpose of securing international peace and security, Employees should comply with not only all applicable laws and regulations, but also with the internal rules, etc. of the Company relating to security trade control when they export goods to any foreign country or engage in other such transactions.
- Employees should understand the laws and regulations applicable to the business, goods and services, etc. in which they are engaged, and comply with the procedures related to any necessary permits and approvals.
- Employees should comply with applicable trade, investment and sanctions-related laws and

regulations when forming and executing transactions and business. Employees should also cooperate with governments and related government agencies appropriately, and pay sufficient attention to each country's policies and measures considering international situations and economic security.

#### **10. Company Funds, Financial Reporting and Meeting Tax Payment Obligations**

- Employees should properly manage the assets and funds of the Company and use them only for appropriate business related purposes. Employees shall not establish or maintain undisclosed or unrecorded assets or funds.
- Employees should make timely and appropriate accounting reports, ensuring the accuracy of the reports, and should not make any false or misleading entries in the Company's books and records.
- Employees should comply with the tax laws of each country and, in accordance with the spirit of the law, perform all obligations to pay taxes in an appropriate and fair manner.

#### **11. Political Donation and Other Contributions**

- When making a political donation or other such contribution to various entities, Employees should clarify its purpose and social significance, and make such donation or contribution via the use of a method that is appropriate, as well as ensure transparency while complying with applicable laws and regulations.

#### **12. Social Contribution**

- As good corporate citizens, Employees should make every effort to establish relationships of trust with all stakeholders of the Company with whom they have dealings for the continued improvement of corporate value, while carrying out their duties for the Company and further should try, where possible, to make a positive contribution to the communities in which they perform such duties to contribute to the development of a sustainable society.
- Employee responsibilities should extend beyond economic contributions, and Employees need to be globally active on a consolidated base in different fields, with emphasis on international exchange (regional contribution), education (cultivation of human resources), and the environment.

### **13. Protection of Environment**

- Employees should comply with all laws and regulations relating to the protection of the environment and strive to reduce the burden on the environment by paying maximum attention to the efficient use of resources and energy.
- Employees should strive to consider the environment and to achieve the optimum balance between economic benefit / return and environmental protection.
- Employees should contribute to the development and spread of environmentally friendly technology and always take into consideration issues of safety.

### **14. Action against Antisocial Group**

- In the situation where an antisocial group makes unreasonable demands on the Company, Employees should firmly refuse such demands and should not resort to an easy monetary settlement.
- Employees should never deal with any antisocial group or any entity that is connected with such antisocial group.
- Employees should not become involved in any way whatsoever in any act of terrorism, money laundering, the use of illegal substances, or any other such crimes.

### **15. Report and Sanction**

- If an Employee finds evidence of violation of these guidelines, he or she should inform the Chief Compliance Officer, the secretariat of the Compliance Committee, or his or her superiors.
- If an Employee desires to inform anonymously, he or she may do so to the designated outside lawyers or a third-party hotline described in the "Report / Consultation Route" as otherwise stipulated.
- Employees should cooperate in any investigation of such alleged violation. If, as a result of the investigation, it becomes clear that there was a violation of these guidelines, sanctions will be imposed on the violator or his or her superiors in accordance with the regulations of the Company.
- The Company ensures that no retaliatory action will be taken against an Employee for informing of such violation or cooperating in such investigation and makes every effort to prevent such informant and any Employees cooperating in such investigation from suffering any disadvantage at his or her office. Any Employee(s) who treats the aforesaid

Employees unfairly or retaliates against them shall be subject to disciplinary actions.

**16. Revision or Abolition**

- Human Resources & General Affairs Dept. shall be responsible for these Guidelines. Any revision or abolition of the present rules shall require approval by the President of the Company.