

Our Ethics Policy

Ogawa & Co., Ltd. and its group companies will clarify the ethics and values that we need to abide by as enterprises and thereby establish high corporate ethics, permeate the spirit of compliance, and earn unshakable trust from society.

1. Scope

All officers and employees of Ogawa & Co., Ltd. and its group companies (hereinafter “We” or “we”) are aware of the corporate social responsibilities as business operators, and will sincerely comply with all laws and regulations and act with socially sensible manner.

2. Prohibition of corruptive behavior

We prohibit the following corruptive conduct regardless of whether it is performed domestically or internationally, or direct or indirect:

- Accounting fraud, quality data tampering, and other fraudulent acts
- Bribery of public servants
- Inappropriate entertaining of or gifting to business partners
- Unfair competitive acts such as bid rigging

3. Management of acts involving conflicts of interest

We appropriately manage acts that harm our group’s interest without due cause. We also pay close attention at all times to whether a certain act accompanies a conflict of interest.

4. Elimination of relationships with anti-social forces

We will not have any relationships with any anti-social force or organization that poses a threat to public order and safety of civil society. We will also not be involved in any illegal acts, including money laundering and terrorism financing.

5. Information security

We aim to be a trustworthy business partner, working on the protection of information assets. We recognize that information risks are business risks and endeavor to ensure the following:

- No accidental information leak or divulgence of confidential information to third parties
- Stable operation of information systems
- Raising information security awareness within the organization

6. Goals

We will annually monitor the progress toward attaining the following targets for 2026:

- Zero reports on corruptive conduct
- Zero outage of critical systems over one day
- Maintaining of 90% or higher compliance training participation rate

7. Responses to violations

In the event of finding any acts that violate this Policy, regardless of such acts being willful or committed due to negligence, we will subject the person performing such acts to disciplinary action.

8. Policy management and review

The promotion of this Policy is approved by the Board of Directors, including the President, and the officer in charge of compliance ensures that the Policy is communicated to all officers and employees. This Policy will be reviewed at least once in every three years.

Established on October 28, 2024