



USUI INTERNATIONAL CORPORATION (THAILAND) LTD.

Code of Conduct for Our Company and Business Partners



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MESSAGE FROM MANAGING DIRECTOR

Amid the intense competition in the industry, the core values that drive the company moving forward to sustainability are business integrity and the code of conduct.

The company realizes the importance of building the integrity and foster it to become organizational culture, therefore, publishing this business integrity and code of conduct in a written form, so that the board of directors, managements, and staffs understand the integrity standard which the company uses in conducting business. Company aims that all employees in the organization strictly respect this value and express the common determination and commitment to be responsible to roles, duties, stakeholders, and society; and avoid any action that may violate ethics and laws.

We believe that upholding integrity, including justice and morality, as core value in conducting business will benefit company's credibility and trust with the stakeholders. Finally, the company will truly become "*The world's leading automotive tube manufacturer.*"



MASAHIRO SHIRAI

MANAGING DIRECTOR

USUI INTERNATIONAL CORPORATION (THAILAND) LTD.

BUSINESS RESPONSIBILITY AT UICT

Introduction

Business Ethic means the criteria, guidelines, and practice in carrying out business, which the company has set up to be a virtue and moral standard in conducting business.

Purposes of Business Integrity Guidebook

This Code of Conduct, which is published in written form to both inside, outside and on the website of the company, has the purposes to:

- Express the commitment to carry out business with business integrity, honesty, justice, transparency, rule of law and social responsibilities.
- Be the principles and practice for every personnel at every level, improve understanding and awareness of business ethics.
- Create organizational culture that promotes ethics values, rule of law, and responsibility to stakeholders and leads to security and sustainability.

Scope

This Code of Conduct is applied to all executives, staffs including contractors who work in the similar field and partners of USUI International Corporation (Thailand) Ltd.

General Information

USUI International Corporation (Thailand) Ltd. was established on 6 December 2000, supplying hoses and pipes such as brake hose, fuel pipe, high-pressure injection pipe for diesel and gasoline engines to one of the most famous automotive industries in the world. It is located at Amata City Chonburi Industrial Estate. Our headquarters is in Japan with subsidiaries located in every corner of the world, for instance, the US, Mexico, Germany, China, Indonesia, Korea, India, the Philippines, etc.

USUI are always improving to gain trust from our global customers. We prioritize the quality of our products and constantly organize activities to raise our personnel awareness of the quality priority policy. We also follow the IATF 16949 standard.

Moreover, the company also pays attention to the importance of safety, hygiene, environment, work happiness of every personnel, along with fair wages. Having set the policies and activities supporting workers' participation to be the principle of building happiness in the organization leads to safe and happy working environment also, balances the work and family life.

VISION

Leading of Tube Manufacturing in Automotive Market

MISSION

- Provide Excellent Products to customer based on the “Factory is SHOWROOM” Principle
- Promote Innovative Working Environment with ***“Happy Life Happy Working”*** Concept
- Create Valuable Organization (Company, Products, Person) with pursue to Sustainability by focusing on economic development, social responsibility, and environmental preservation to create more value added to all stakeholders.

BUSINESS ETHICS

Management Ethics

Company has brought good governance as a core value in conducting business. We value the rule of law and company's regulations in accordance with legislation, to create transparency, verifiable, honest, and accountability of stakeholder's interests. Also, applied to overseeing business and its operation, as the vital drive-in development, improving organization to become a sustainability organization.

1. Accountability to Stakeholder

1.1) Policy and Practice toward Customers

The company looks forward to impressing and earning trust from customers, emphasize the quality of our products by utilizing numbers of technologies into production as well as dedicate to improving Quality of service to meet the customers' satisfaction swiftly. In according with the quality policy, "***Quality, Cost, Delivery and Service***, for the world class satisfaction"

1.2) Policy and Practice toward Partners

The company is always paying high attention to the process of internal purchasing, the specification of expenses, to obtain quality and reasonable price with the clear procedure and proper staff in charge, that can be verified and optimized. Also, the company shall treat our partners as business partners.

1.3) Policy and Practice toward Staffs

The company realizes that every employee is a valuable human resource in supporting the stable growth of business. The company follows laws that are applicable to the work. Also, the company set the rules and regulations for fair work, provide welfare and privileges as well as activities in all fields, to encourage workers' happiness and efficiency.

2. Responsibilities to Labor and Human Rights

2.1) Respect Individual and Non-discrimination

The company emphasizes individual freedom and basic principles of human rights. We treat every personnel equally, comply with laws and regulations in regard with the staffs, and conduct legally, anti and discourage discrimination or violation in employment, remuneration, wage, welfare, promotion or position, terminate of employment, or threat to freedom, due to differences in region, race, language, age, gender, disability, physical condition, health, status, economic or social class, religious beliefs, education or political views which are not unconstitutional, associating and individualism that are not related to work, including other conditions which contribute to discrimination.

2.2) Child Labor

The company does not hire or support child labor—a person who is under 15 years of age—also do not support child in a health jeopardizing work; or in an environment that poses risk to health, hygiene, and safety, as stated in the law.

2.3) Pregnant Labor

The company assigns female labor who is pregnant to work in a safe environment that is not harmful or maybe harmful to both mother and child, without termination of employment, demotion, or deduction in privileges as stated in the law or United Nations convention.

2.4) Forced Labor and Sexual Harassment

The company does not support or contribute to forced labor, does not call, or acquire work deposit or damage deposit, and does not suspend remuneration, other privileges, assets or documents as a bargain or coercion against the staffs during the employment or as selection condition. Forced labor includes debt bondage, trafficking, and other forms of modern slavery.

The company anti sexual violation and harassment in all cases; or any action that violates the rights and freedom in life, body and mind, coercion, threaten the staff to or not to act in with the laws and related conventions.

2.5) Freedom of Association and Attending Negotiation

The company allows staff to enjoy their rights in expressing opinion, speaking, writing, or displaying their intention in other means, including grouping, contacting, and associating. We respect the rights in selecting the representatives of staffs to attend in negotiation with the company regarding the staffs' benefits. The company accepts the resolution, request, or bargain, done in the meeting in a reasonable and fair manner and treat such representatives equally with all staffs.

2.6) Employment condition and Employment Information Access

The company arranges the agreement to be lawful and in easy comprehensive phrases and addresses details and displays information related to employment, lawful and fair privileges.

2.7) Working Hours

The company limits work hours to not be longer than 8 hours per day or 48 hours per week. However, including overtime, total working hours shall not exceed 60 hours per week. Arrange for break during work hours not less than 1 hour and arrange holiday at least 1 day per week or in respect with the laws.

2.8) Wage and Remuneration

The company sets the fair wage and remuneration for every staff, in respect with the laws, and/or as agreed between employer and employee.

2.9) Responsibilities to Hygiene and Safety

The company prioritizes the hygiene and safety in life and body of the staffs, by act in comply with the law and regulation in regard of safety and environment. Arrange a good, safe, clean, comfortable environment for staffs, with control to check and prevent danger and accident that may occur in workplace. Moreover, the company still provides adequate personal safety equipment and suitable for the workplace. Also, the company does not use materials or procedures which could affect hygiene and the environment. In doing so, the company set up the executive committee or responsible representative to oversee, verify, control, and follow up the result continuously.

3. Anti-Corruption Policy

The company operates business with transparency and realizes the importance of combatting corruption in all forms and sets the anti-corruption policy, to be a clear guideline in preventing and fighting corruption.

Staff at all levels must not act, abstain, abuse of power, or violate the laws and integrity in pursuing any form of interests.

4. Conflict of Interests Policy

Employees in every position are expected to avoid any actual or apparent conflict between their own personal interests and the interests of the company in dealings with suppliers, customers, competitors, and other third parties. A conflict of interest can arise when an employee takes actions or has personal interests that may interfere with his or her objective and effective performance of work for the company.

The company must disclose the information to the customers in case that the conflict of interest occurs, which might affect or involve customers or customers' partners, for the sake of mutual trust and confidence in conducting business together enduringly.

5. Whistleblowing Policy

The company is committed to develop a culture of openness and honesty where a person who is aware of any potential malpractice or misconduct is encouraged to report such matters in good faith without fear of retaliation.

The Whistleblowing Policy provided a framework for responsible and secure reporting of concerns about irregularities within the company operations, such as Fraud, Bribery, Abuse of Powers, Conflict of Interests, and others that consider to be possible risks of loss or reputation damage to the company.

6. Competitive Policy

The company runs its operation on an equality and good business basis, along with the mutual interest with the customers. The company complies with the relevant laws in trade competition strictly; and does not make secret agreement with competitors, intervene the management of competitors, exchange information or confidentiality and reveal customers' or competitors' information in regards of price, profit, sales estimation, which cause unfair competition.

7. Copyright and Intellectual Property Infringements Policy

The company pays high attention to Industrial Intellectual Property which is human creativity on industrial products including new innovations and new products design. The company respects the rights to customers, business partners and employees' rights on information and Intellectual Property and shall not promote or support on any violation of Intellectual Property. Company shall not allow employees to do any actions such as import, duplicate, copy, edit, revise, and publish of confidential information as well as Intellectual Property without prior authorization, included the utilization of pirate computer software and applications. Company has authorization to monitor and control the utilization of computer software and hardware system that applied in workplace including tools and all equipment. Furthermore, the company shall monitor any information obtained from external parties that will be used in the company to avoid any violation of Intellectual Property and Computer Crime Act.

8. Confidentiality and Disclosure of Information Policy

Trade Secret, Business operation related information as well as personal information are considered valuable and critical information in managing company business effectively. To build up trusts to our customers, business partners and employees, Company has established guideline for Information handling and disclosure. All information stated above is considered confidential information which will be used for business purposes only. None of confidential information shall be disclosed to others/non-concern persons both inside and outside the company unless written authorization has been granted for disclosure.

All employees shall strictly control and protect company confidential information and intellectual property which is related to their own responsibilities from unauthorized disclosure and violation. Employee shall report any Intellectual Property violation cases and/or unauthorized disclosure of confidential information to Supervisor immediately. Disciplinary action and/or prosecution shall be taken immediately if the company finds out the case.

9. Privacy Policy

At present, there is a great deal of progress in infringing privacy of personal information. Advances in technology have made data protection possible. Individuals are vulnerable to harassment. Therefore, it is necessary for companies to control their personal information of employees. Standards for monitoring are based on the Personal Data Protection Act.

Personal information means information about an individual which makes it possible to identify the person whether directly or indirectly. The company has a policy to protect the privacy of the related parties, as data controller of the personal data. The appropriate electronic protection measures are in place for the collection, usage, or disclosure of the personal information in order to protect the basic rights and interests of the personal information owner.

10. Import - Export Control Policy

The company is committed to complying with the import-export of goods and services control laws.

11. Environment Policy

Waste and Emissions

The company shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any of these activities that have the potential to adversely impact human or environmental health will be appropriately managed, measured, controlled, and handled prior to release of any substance into the environment. The company shall have systems in place to prevent or mitigate accidental spills and releases into the environment.

Resource Conservation and Climate Protection

The company shall use natural resources (e.g. water, sources of energy, raw materials) in an economical way. Negative impacts on the environment causing pollution of soil, water, noise and climate will be minimized or eliminated at their source or by practices such as the modification of production, maintenance of facility, material substitution, conservation, recycling, reutilization and promoting the use of renewable energy. Company will engage in the development and use of climate-friendly products and activities to reduce power consumption and greenhouse gas emissions for achieving Carbon Neutrality within AD 2050.

Responsible Chemical Management

The company shall identify potentially hazardous substances in chemical products and articles used in its production and ensure that they are handled, transported, stored, recycled, and disposed of safely. Safety information shall be available to educate, train, and protect employees from hazardous materials and employees shall have access to adequate personal protective equipment.