

TAMRON

**Tamron Group
Standards of Business Conduct**

Tamron Group Standards of Business Conduct

Overview

■ Purpose

- Tamron Group Standards of Business Conduct (hereinafter the “Standards of Conduct”) describe the conduct that every member of the Tamron Group must understand and practice every day in order to implement the Tamron Group Corporate Mission and Corporate Vision.

■ Scope of Application of the Standard of Conduct

- The Standards of Conduct apply to the officers and employees (including such fixed-term employees as contract, part-time and temporary employees) of all companies of the Tamron Group.
- The Standards of Conduct are adopted by a resolution of the Board of Directors of Tamron. Tamron Group companies resolve to develop the measures necessary to ensure that the Standards of Conduct are upheld in good faith.

■ Points to Remember and Responsibilities in Implementation

- Tamron Group companies do not order officers or employees to disregard the Standards of Conduct. In addition, Tamron Group companies ensure that no officer or employee is adversely affected due to complying with the Standards of Conduct.
- We will closely monitor for fraud and/or violations of laws and regulations and/or the Standards of Conduct in the workplace and in business. We will consult with appropriate superiors or report to or consult with the liaison appointed for each Tamron Group company concerning facts that are problems or are believed to be problems in light of laws and regulations and/or the Standards of Conduct. Tamron Group companies will secure the personal information of and protect the privacy of any person making a report or consultation and ensure that such reporting is not used to the detriment of such person.
- The top management of Tamron Group companies should recognize their own roles in complying with the Standards of Conduct and set an example of compliance. In addition to setting an example, top management should ensure compliance within their companies and regularly incorporate opinions from both inside and outside their companies in order to establish effective internal systems.
- When there is a major infringement of the Standards of Conduct, such as a violation of a law or regulation, the top management of Tamron Group companies is expected to make clear to stakeholders their stance on resolving the issue and to take the needed steps to determine the cause and prevent any recurrence.

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■ Basic Policy

- To realize our mission, we remain aware that we are a part of society and give priority to observing laws and regulations, respecting fair social rules, and conducting business activities with high ethical standards.
- We support the United Nations Global Compact.

The United Nations Global Compact

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Ensure that business practices are not complicit in human rights abuses.

Labor

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labor;

Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect to employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and dispersion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including but not limited to extortion and bribery.

1. Resolving Social Issues (Achieving SDGs) Through Corporate Activities

Tamron will contribute to the realization of a fulfilling society by focusing on resolving social issues and creating new value through corporate activities to achieve economic growth and solutions to social issues.

1.1 Resolving Social Issues Through Corporate Activities

- 1.1.1 We are aware that our business has an impact on society in various ways and endeavor to do everything within our control to help solve the issues facing society through our business activities.

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2. Quality and Product Safety

Tamron impresses and reassures customers by combining creativity, technological prowess and consideration for safety and the environment to provide high quality products that ensure customer confidence.

2.1 Marketing activities

- 2.1.1 We investigate customer needs, and develop and provide products and services which will be chosen by customers.
- 2.1.2 Before providing products and services, we fully research the market and listen to customer opinions with the aim of increasing customer satisfaction.

2.2 Provision of very unique, high quality products and services

- 2.2.1 We continue to develop key technologies and refine proprietary technologies to provide very unique, high quality services.

2.3 Product quality system

- 2.3.1 We strive to maintain and improve our quality assurance system in order to deliver safe and secure products to our customers.
- 2.3.2 We comply with laws, regulations, and appropriate quality standards related to the safety of our products and services. Whenever there is a concern that our product or service may not meet quality standards, we take immediate steps to identify the cause of the problem and prevent reoccurrence.
- 2.3.3 If a problem occurs with the quality of a product or service we provide to customers, we provide accurate information related to the product or service and respond promptly in order to limit any negative impact. Furthermore, we make every effort to determine the cause of the problem and prevent its recurrence.

2.4 Information regarding our products and services

- 2.4.1 We disclose information regarding our products and services as necessary and in a timely manner. We listen sincerely to the suggestions and opinions of our customers and respond in good faith.
- 2.4.2 We take care to properly describe and label our products and services and to ensure that such descriptions and labels are easy for consumers to understand.
- 2.4.3 With regard to advertising and communication with customers, we use appropriate and truthful expressions and avoid expressions that could cause misunderstandings related to the features and qualities of our products.

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2.4.4 We ensure that we do not give customers or business partners false information about the products or services of other companies. We do not act in a manner that may discredit other companies. In particular, when making comparisons between our own products and services and those of other companies, we are careful not to intentionally damage the reputation of the other companies.

3. Environment

With the understanding that environmental problems are important matters common to all mankind, Tamron works to reduce environmental impacts and protect the environment, contributing to the creation of a sustainable society in harmony with the environment.

3.1 Ensuring that our business activities contribute to the environment

- 3.1.1 We maintain awareness of global and local environmental issues at all times as we engage in our day-to-day work, and we constantly work to improve our environmental performance.
- 3.1.2 We not only meet customer needs, but also meet social expectations by contributing to the environment, including caring for biodiversity and ecosystems and using resources and energy more efficiently. To accomplish this goal, we consider environmental factors in every stage of our operations—from research and development, through procurement, production, and sales, to the consumption, disposal and recycling of our products and services.
- 3.1.3 We are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing.
- 3.1.4 We must manage to ensure their safe handling, movement, storage, use, recycling or reuse and disposal for Chemicals and other materials posing a hazard to humans or the environment.
- 3.1.5 We look for opportunities to save water and manage water resources. We comply with wastewater regulations through indication of characteristics, monitoring, management and treatment as required prior to discharge and disposal.

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3.2 Communicating about the environment

- 3.2.1 We stay abreast of the latest developments in environmental regulations in each country and region of the world, as well as relevant international standards, and we ascertain the environmental impact of our business operations. We do these things in order to minimize the impact that our business has on the environment.

- 3.2.2 We cooperate and collaborate with a diverse array of stakeholders including government and specialized agencies, customers, business partners, NGOs, NPOs, and local residents to ensure that we have a positive impact on the global environment and the communities where we do business.

4. Compliance

Tamron is aware that it exists together with society. We place a priority on observing laws and regulations while respecting social rules, and carry out our corporate activities with a high sense of ethics.

4.1 Complying with laws

- 4.1.1 We conduct business in a reasonable manner, striving to be fair and transparent in all our dealings and recognizing those we deal with as business partners.
- 4.1.2 As part of the Tamron Group, which has a global presence, we endeavor to fully understand and comply with laws and regulations concerning competition in all countries in which we operate.
- 4.1.3 We make sure to obtain business licenses and permits and carry our registration and other procedures in compliance with business laws governing the products and services we handle.

4.2 Complying with antitrust and related laws

- 4.2.1 We take steps to ensure compliance with antitrust laws, competition laws and other laws and ordinances intended to ensure fair competition in each country where we do business, as well as with related internal guidelines, while pursuing free and fair transactions.
- 4.2.2 We implement policies to avoid collusion with competitors to arrange prices or sales/production volume, etc., and do not engage in behavior to limit competition (including participating in cartels) or in bid-rigging.

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4.3 Practicing appropriate socialization

4.3.1 We do not engage in conduct such as offering inappropriate gifts, entertainment or money to customers or business partners for the purpose of building or maintaining business relationships. We do not engage in conduct such as asking business partners for gifts, entertainment or money for our personal benefit.

4.4 Prohibiting bribery and corruption

4.4.1 We do not provide gifts, entertainment, money or other benefits that could be considered bribes to domestic and foreign public or quasi-public officials, regardless of the means.

4.5 Avoiding any involvement with organized criminal elements

4.5.1 We prohibit involvement with organized criminal elements.

4.5.2 We take a resolute attitude against organized criminal elements, and refuse to entertain any inappropriate and/or illegal request.

4.5.3 We cooperate with relevant organizations working to eliminate organized criminal elements.

4.6 Prohibiting insider trading

4.6.1 We do not use internal corporate information or confidential information from business partners for personal gain. We do not engage in illegal activity such as insider trading, which includes trading in stocks or other investment vehicles using non-public information regarding publicly listed Tamron Group companies and/or publicly listed business partners.

4.6.2 We follow the prescribed company procedures when buying or selling shares or other securities of Tamron or other listed Tamron Group companies.

4.7 Managing corporate assets

4.7.1 We appropriately manage and protect tangible and intangible corporate assets in accordance with the internal regulations and rules of the Tamron Group.

4.8 Protecting intellectual property rights

4.8.1 We recognize that our brands and intellectual property (including patents, utility model rights, copyrights on registered designs, trademarks, copyrights, and trade secrets) are important corporate assets and use these in an appropriate and correct manner according to laws and regulations and the rules of the Tamron Group.

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- 4.8.2 We respect the intellectual property rights, such as trademark and patent rights, of third parties and we do not use them without permission. We do not damage or infringe on these assets.
- 4.8.3 We recognize that intellectual property laws and regulations differ by country and pay special attention in each country to the registration, disclosure, transfer, and use of intellectual property.
- 4.8.4 We endeavor to protect company intellectual property including promptly filing patent applications for inventions resulting from our manufacturing and development activities.

4.9 Prohibition of conflicts of interest

- 4.9.1 We take steps to ensure that the interests of employees, including their families, and the interests of Tamron Group companies do not conflict. In the workplace, we are conscious at all times of the fact that we are members of the Tamron Group, follow corporate rules, and conduct ourselves responsibly.

4.10 Compliance with import and export laws and regulations

- 4.10.1 In conducting global business activities, we understand and comply with the import- and export-related laws of each country where we do business.
- 4.10.2 We do not export products to countries that do not sanction the use or prohibit the import of such products, nor do we export products from countries that prohibit the export of such products.

4.11 Security trade control

- 4.11.1 We do not engage in exports of arms, military equipment or technology which would pose a threat to the maintenance of international peace and stability.
- 4.11.2 In all our export transactions, we carry out thorough checks on those we deal with and their business activities and confirm that exported goods and technologies cannot be used in the development or manufacture of weapons.
- 4.11.3 Taking the international situation into account, we carefully consider whether or not to engage in transactions involving the export of goods or technologies services or the rendering of services which are regulated by relevant laws and regulations, and we carry out any necessary procedures in accordance with relevant laws and regulations.

5. Information disclosure

Tamron strives to enhance its corporate value through active, effective and fair information disclosure and constructive dialogue with its various stakeholders.

5.1 Properly disclosing information

- 5.1.1 We implement policies to ensure that no information that should be disclosed to shareholders and investors is concealed or otherwise improperly withheld.
- 5.1.2 We take seriously our obligation to proactively disclose information concerning the environment, and we carry out appropriate environmental communications to respond to the expectations and trust of our stakeholders.
- 5.1.3 When disclosing information, we strive not only to disclose the information stipulated in disclosure-related laws, but also to meet the expectations of our diverse stakeholders by disclosing information that is useful to them.

6. Occupational safety and health

Tamron does everything possible to ensure the safety of each employee and maintain and improve the workplace environment so that everyone can work in a safe and healthy environment.

6.1 Creating safe and comfortable work environments

- 6.1.1 We seek to understand and comply with all laws and regulations related to safety and sanitation.
- 6.1.2 We do everything possible to ensure the safety of each employee and maintain and improve the workplace environment so that everyone can work in a safe and healthy environment. We also make every reasonable effort to prevent disasters, accidents and incidents, and establish internal systems, including employee training programs and safe equipment, to respond appropriately and create an efficient and comfortable work environment.
- 6.1.3 We never impose unnecessary work on others, including forcing them to do excessive work or overtime work.

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7. Social contributions

Tamron aims to create a spiritually enriching society by taking part in activities that contribute to the development of photography and film culture as well as in local community activities as a good corporate citizen contributing to local community development.

7.1 Social contributions

- 7.1.1 We engage in meaningful and appropriate donations and support activities, as a form of social contribution, seeking to respond to social issues and community.
- 7.1.2 In conducting donations and support activities, we thoroughly consider their necessity and appropriateness and comply with all related laws and regulations.
- 7.1.3 We continuously strive to understand and respect the cultures, customs and traditions of local communities, aiming for harmonious co-existence with society everywhere we do business.

8. Human resources/human rights

Tamron makes every effort to provide employees with opportunities to develop and demonstrate their abilities in ways that respect their diversity, character and individuality. We embrace a global perspective, value teamwork and endeavor to cultivate human resources who harness creativity.

8.1 Human resource development

- 8.1.1 We as a company work together to analyze all location, subject, and circumstances to improve our products, services, and operations.

8.2 Human resource development

- 8.2.1 We support international human rights standards, including the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, the United Nations Guiding Principles on Business and Human Rights, and the United Nations Global Compact.
- 8.2.2 We work to avoid any complicity in the violation of human rights.

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8.3 Prohibiting discrimination

- 8.3.1 We respect the laws and culture of each country and region and prohibit discrimination against anyone on the basis of race, ethnic group, nationality, religion, belief, birthplace, gender, age, sexual orientation, disability, or any other characteristic.
- 8.3.2 We do not discriminate in hiring or employment.
- 8.3.3 We continuously strive to understand and respect the cultures, customs and traditions of local communities, aiming for harmonious co-existence with society everywhere we do business.

8.4 Prohibition of political and religious activities

- 8.4.1 All employees engage in political activity only as individuals taking a personal stance and not on behalf of or in the name of the company, doing so only during non-working hours and outside company facility grounds.
- 8.4.2 We do not solicit religious groups, impose creeds, request donations, or distribute solicitation brochures during business hours.

8.5 Upholding basic principles and rights related to labor

- 8.5.1 We respect the basic rights of our employees regarding freedom of association and collective bargaining.
- 8.5.2 We prohibit the use of forced or coerced labor in any form.
- 8.5.3 We understand the harmful effects of child labor and do not use, in any form, labor by persons who have not reached the minimum age for employment.

8.6 Prohibiting harassment

- 8.6.1 We prohibit sexual harassment in the workplace, including any kind of sexually suggestive language or behavior.
- 8.6.2 We prohibit the exploitation of a job position to abuse the human rights of others in the workplace.
- 8.6.3 We prohibit all forms of harassment.

9. Information management

Tamron establishes protection from threats such as information asset incidents and crimes, and lives up to the trust placed in it by customers and society.

9.1 Appropriate use of information systems

- 9.1.1 We use the company information system for business purposes only and not for personal purposes.
- 9.1.2 We strictly manage IDs and passwords related to information systems and prevent them from being leaked outside the company.

9.2 Management of trade secrets

- 9.2.1 We never engage in conduct by which confidential information about our company or competitors is acquired in an illegal manner.
- 9.2.2 We understand the importance of confidential information, including that related to business, technology, research, product development, sales, finance and personnel related information, and rigorously and confidentially manage this information. In addition, we do not use internal information for any non-business purpose, whether or not the information is confidential.
- 9.2.3 After retirement, we will not leak confidential information about the company or confidential information obtained from outside the company or use it for any purpose.

9.3 Protecting personal information

- 9.3.1 We recognize the importance of protecting personal information and obtain, use and provide personal information in an appropriate manner. We rigorously control the handling of personal information in order to prevent it from being used for anything other than its original purpose and to prevent information leaks. We do not disclose personal information obtained in the workplace or business operations to others without the consent of the individual, unless required by law.
- 9.3.2 We respect one another's privacy.

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10. CSR procurement

Tamron engages in sound trade practices, and works with its business partners to promote procurement activities that consider social responsibility including human rights, labor standards and the environment.

10.1 Ensuring fair purchasing transactions

10.1.1 We do not engage in conduct that results in any disadvantage to our business partners by abusing our dominant position in purchasing transactions.

10.1.2 We respect free and fair competition at all times in purchasing transactions. We provide fair business opportunities and select our business partners based on general and just evaluations of price, quality, service, and other factors.

10.2 Sustainable procurement

10.2.1 We take steps to raise environmental awareness within our company as well as in the broader society while pursuing environmental initiatives in all of our business activities—from procurement of raw materials to provision of products and services to customers.

10.2.2 In purchasing transactions, we procure sustainable materials whenever possible.

10.3 Responsible procurement

10.3.1 We make clear to our business partners what we expect with regard to human rights, labor, the environment, anti-corruption, and other matters. We collaborate with them to ensure that these policies are put into practice.

11. Risk (crisis management)

Tamron prepares against risks that could threaten civic life or corporate activities, and does the utmost to prevent such risks from occurring. Should any such crisis occur, we will make every effort to minimize damage and loss, effect a swift recovery, prevent recurrences and fulfill our social responsibility.

11.1 Preventive activities

11.1.1 We identify and assess potential emergency situations and events. We endeavor to minimize their impact by implementing emergency plans and response procedures including but not limited to: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities and recovery plans.

12. Corporate governance

Top management works to build up sustainable corporate value by establishing governance to engage in fair, transparent and swift decision making in response to a changing business environment. In addition, top management will make the Tamron Group aware of the corporate mission system.

12.1 Sound management

- 12.1.1 We aim to realize our corporate mission by building a well-organized organizational structure so that we can take responsibility for all stakeholders.
- 12.1.2 We make every effort to employ sound management practices, to provide appropriate returns to shareholders, and to increase corporate value.
- 12.1.3 We maintain, operate and evaluate effective and appropriate internal control systems for financial reporting in accordance with Financial Instruments and Exchange Act and other laws to ensure the credibility and accuracy of financial reports.