

## Mitsubishi Logisnext Europe Group Code of Conduct

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### Foreword from the President

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Dear Colleagues,

I am very pleased to provide you with the newly updated Code of Conduct. As of today, we will have one uniform Code on which we can all rely and which is the same for everybody in the entire Mitsubishi Logisnext Europe group.

In an ever changing international world, clear guidance is key to make sure that we can strive for success of our group whereby we act responsibly and with integrity.

Multiple companies in our group have been doing business in our territory for decades. Thereby we do not only rely on the quality and strength of our products and service, but we rely on (y)our strong commitment to compliance in the fields of legal and ethics. The same high standards should be applied to our customers, dealers and all other parties with whom we do business or with whom we are in contact. It is exactly this robust combination and pledge to compliance which ensure our high standards.

This Code is intended to strengthen employees to recognize circumstances which may lead to or give the appearance of involving corruption or unethical business conduct, to avoid conduct which is clearly prohibited, and to promptly seek guidance where it is not.

This is especially relevant as only one compliance issue has the potential to damage our reputation. That is why any unethical conduct for any reason, will be terminated immediately and without exception. Or in other words, compliance can never be a compromise.

We are supported by our stakeholders Mitsubishi Heavy Industries and Mitsubishi Logisnext in achieving compliance. In this respect, we can rely on both the MHI Group Global Code of Conduct as well as ML's Group Compliance Guidelines. These policies form the backbone and basis of MLE's Code of Conduct and more information can be found on the following pages.

In case of doubt or questions, please always consult Legal or Internal Control & Compliance. More information can also be found in specific company policies.

Yours sincerely,



K. Saito

*President of Mitsubishi Logisnext Europe*

August 2021

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## 1. INTRODUCTION – SCOPE OF THE CODE OF CONDUCT

### *What is the Code of Conduct?*

The Code of Conduct is a set of standards that all our employees must adhere to in order to uphold our reputation as a company of high integrity and ethics. It summarizes the principles and policies of fair play and integrity that govern our company and sets out expectations regarding acceptable employee behavior.

### *Why do we need a Code of Conduct?*

As a global company, MLE employs many individuals from different backgrounds, nationalities and cultures. This diversity of talent and perspectives is one of our greatest assets. At the same time, however, MLE as a company must operate with a single corporate culture that enables it to compete successfully in the global market while maintaining our reputation as a company of high integrity and ethics. The Code of Conduct describes how MLE employees should conduct themselves. It provides guidelines for handling situations and dilemmas, which call for support and clarification, in order to assist the employee in furthering MLE's goal.

### *Different countries – different laws*

MLE employees are subject to various local laws and regulations. Although the Code of Conduct is applicable in any country where MLE operate, employees are also subject to the national laws and regulations of their home country and of the countries within which they operate. MLE is committed to comply with the laws of every jurisdiction in which it operates. Where a local law sets higher standards or requirements than those set out in this Code of Conduct, the local law's standards and requirements takes precedence.

### *To whom does the Code of Conduct apply?*

This Code of Conduct (also referred as the “**Code**”) applies to Mitsubishi Logisnext Europe B.V. (“**MLE**”), including its subsidiaries, branches or representative offices, divisions and any other affiliated companies from time to time). It also applies to all directors, officers, employees or agents (which include temporary or contract staff, consultants and sales agents) (“**Employees**”). In addition, MLE expects third parties retained to perform services for it to comply with the principles set out in this Code.



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## 2. BASIC BEHAVIORAL REQUIREMENTS

Employees should at all times:

- act with honesty and integrity,
- interact with one another based on mutual respect and honor each individual's right to privacy, equality and dignity,
- avoid any actual or apparent conflicts of interest between personal and professional relationships,
- ensure that all public statements or announcements made on behalf of the company are true, accurate, clear, complete, fair and timely,
- ensure that MLE complies with all applicable governmental laws, rules and regulations of the countries in which it operates and the terms and conditions of any contracts which impose further ethical conduct obligations on MLE,
- comply with applicable company rules and regulations,
- promote ethical and honest behavior within the workplace and within all work-related functions,
- keep a firm stand against, and refuse to accept, any inappropriate demand from any crime syndicates, gangs, mafia, terrorists, drug dealers or other criminal organizations, or other individuals that are engaged in unlawful activities or that would damage our company's reputation, and
- report promptly any suspected or actual violation of this Code to their manager, Legal, Internal Control & Compliance or the Whistleblowing helpline.

When unsure about the right thing to do in specific business situation, employees should consider these questions:

- Is it legal?
- Does it comply with this Code of Conduct and internal policies?
- Is my manager aware?
- Am I involving the right people (internal and/or external expertise)?
- Could I justify the action to my supervisor and to the Management?
- Could I justify the action to an independent third party investigator or regulator?
- Could I justify my action to my family or friends?
- How would the company's existing and potential customers react if they become aware of the situation?
- How would my family or friends react if they become aware?



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- How would I feel if I read about my actions in a newspaper?

If you find yourself using one of the following (or similar) expressions, that's a very good indication that you are in danger of stepping over the line and being in conflict with the Code of Conduct:

- Yes, but just this once...
- Nobody needs to know about it...
- Everybody does it...
- You/We shouldn't mention it...
- Sometimes you have to turn a blind eye...
- If we followed all the rules, we could no longer work efficiently/would not be in a position to achieve our internal goals ...
- This is how this industry/culture works...

## *Managers' and supervisors' responsibility*

All managers and supervisors, because of their position, should act as role models for staff by adhering to the principles set out in this Code of Conduct. Managers and supervisors have a duty to inform, encourage and monitor the people who report to them in relation to the Code of Conduct. All managers and supervisors should support employees who raise questions or concerns about the way professional activities are conducted.

## *Personal responsibility*

Each individual employee has a personal responsibility or requirement to use common sense to the specific facts of each case. This Code of Conduct sets standards and serves as a tool to help employees understand MLE's expectations. The Code of Conduct is not intended, however, to cover every possible ethical dilemma or situation that you may face in your interactions with third parties as part of your job. You should use the Code of Conduct in conjunction with our corporate policies to guide and inform your way of conducting business; however, being confronted by a situation not covered in this Code of Conduct does not exempt employees from responsibility for their actions. In the event of any questions or concerns, you should always consult with your manager, Legal or Internal Control & Compliance when appropriate.

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## 3. FAIR COMPETITION

### *Observing competition laws*

Fair competition is the major underlying principle for our company's continued growth in the global market, and no act in contravention of the applicable competition laws throughout the world will be tolerated. Nothing — not “closing the deal”, winning the bid, achieving a profit target or even a direct order from a superior — should compromise your commitment to fair competition. Competition laws work to try to ensure fair and healthy competition in the market place, which ultimately drives productivity, innovation and value for consumers and society. Competition laws generally restrict activities that might undermine or reduce competition such as price fixing, bid rigging, and market allocation.

Employees should not engage in any non-competitive activity or any activity that might lead to suspicion of non-competitive behavior such as:

- Talking with competitors (whether current or potential) about market sensitive information such as pricing, capacity, bids, margins, distribution channels or capabilities, production plans, discounts, marketing plans, conditions of sale, terms of contract, costs or other confidential information from which competitive advantages can be derived,
- engaging in collusive tendering (including agreeing to or proposing to enter a bid for any purpose other than winning the business), or
- agreeing with competitors not to compete or to split markets or customers. Other activities such as fixing or restricting the prices of our products in independent resale or distribution channels, offering special discounts to only select customers or entering into certain exclusive relationships with suppliers may be considered anti-competitive based on the facts of the situation. Competition laws are complex, so employees should always consult with Legal or Internal Control & Compliance whenever encountering a contractual condition or business arrangement that restricts or that could be used to restrict competition.

In addition, each country has its own anti-competition laws and enforces those laws through its own enforcement regime. It is important to note that in certain circumstances these anti-competition laws may apply to MLE and/or the individual for an alleged offense even though the relevant act(s) occurred outside of the relevant country.

### *Contact and interaction with competitors*

In general, contact and interaction with competitors is only permitted when there is a legitimate business reason that would be recognized as such by an independent third party. The information exchanged with competitors should be kept to a minimum to support the purpose of a legitimate and legal business activity. If during any meeting with competitors, the employee becomes aware that there might be an involvement in prohibited conduct, the employee should immediately contact Legal.

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## *Trade associations*

Trade associations consist of individuals and firms in the same industry with common interests that meet and carry out legitimate and lawful functions, such as setting common technical standards for products in the applicable industry. Employees must always bear in mind that members of trade associations are competitors, and great care must be taken to avoid anti-competitive behavior such as exchanging market sensitive information.

Further detailed information can be found in the MLE Anti-trust policy.



## 4. ANTI-CORRUPTION

### *Bribery*

MLE is committed to promote fair and honest business practices and will not tolerate bribery of any form.

Bribery is the offering, promising or giving, accepting or soliciting of an advantage in order to obtain in return an action which is illegal, unethical or in breach of trust. The “advantage” does not need to be in cash. It can be anything of value such as gifts, loans, kickbacks, fees, commissions, rewards and other monetary and non-monetary benefits (e.g., charitable donations, services, travel, entertainment, hospitality, employment opportunities, etc.), or a promise or an informal agreement to provide similar types of benefits in the future.

In case of receiving gifts, employees should consult the MLE Anti-Bribery policy.

International legislation against corruption and bribery is developing rapidly. A breach of any of these laws is a serious offense that can result in fines for the individual, as well as for the company and/or its Directors, and/or exclusion from tendering for public contract, and can additionally result in imprisonment for individuals. Employees must not engage in bribery of any kind, for any purpose, whether directly or indirectly through third parties, and whether to government officials or to private persons. In certain jurisdictions a company can be held responsible for bribery activity even if the activities were carried out by an agent, consultant, joint venture partners or any other intermediary working for or on behalf of the company. It is therefore very important that employees take steps to ensure that bribes are not offered or made for MLE or on its behalf by third party intermediaries. Such steps must include:

- conducting anti-corruption Due Diligence before entering into the respective relationship with third parties to verify their qualification, reputation and integrity,
- inserting in agreements or contracts with third parties appropriate contractual provisions requiring them to act properly,
- ensuring that all fees and expenses paid to third parties represent appropriate and justifiable remuneration for legitimate services rendered by them, and
- keeping accurate financial records of all payments to third parties.

When you are asked to provide or offered a bribe, or in the event of any other suspicious requests, you must immediately inform your manager or the Whistleblowing helpline, and subsequently the incident must be reported to Legal or Internal Control & Compliance. The same principle applies to facilitation payments<sup>1</sup> intended to secure or expedite performance; such payments might be considered “borderline” cases by some, but they are illegal in most (but not all) countries.

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<sup>1</sup> Facilitation payments are small cash payments or items intended to secure or expedite a routine action or performance that the payer is legally entitled to. Facilitation payments are forbidden in most countries and as such considered equivalent to bribes in these countries. Any employee who has been asked for facilitation payments must inform his or her manager or the Whistleblowing helpline. The incident must also be reported to Legal or Internal Control & Compliance.

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## *Gifts, entertainment and hospitality*

MLE is aware that gifts, entertainment and hospitality are tokens of gratitude in business and private relations and can be important in building long term business relationships. These expenses must however always stay within reasonable limits, be consistent with local custom and practice, and in all cases avoid being excessive or improper to ensure MLE retains its reputation of transparency and integrity. Money or cash equivalents are always inappropriate gifts.

When giving our business relations gifts, we should always maintain a great restraint. In case of doubt, contact Legal or Internal Control & Compliance.

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## 5. TRADE CONTROL

MLE delivers products and services all over the world. As part of these worldwide activities, we must comply with all applicable export controls, import and customs laws and regulations, and applicable economic sanctions of the countries where we do business.

Export occurs when a product, service, technology or piece of information is delivered to a counterpart in another country. Export also occurs when technology, technical information, drawings or software is provided in any way, including telephone, verbally or electronic mail, to someone outside the country or, in certain jurisdictions, to someone of a foreign residence or to a foreign national. Questions regarding whether a transfer of information is considered an “export” should be referred to Legal or Internal Control & Compliance.

In case of export or import, employees should always refer to the MLE Export Controls and Trade Sanction policy.

Employees involved in export activities should have an understanding of all the facts of the transaction to determine if specific licenses are required. Licensing requirements, or other trade restrictions or embargoes, are imposed for various reasons including the product(s) having ‘dual use’ applications with concerns about the development of weapons of mass destruction or military use, or other trade sanctions or arms embargoes. It is vital to understand the details of the proposed transaction because trade controls tend to be complex and their application depends heavily on the specific facts of each case. To determine whether specific licenses are required, employees should verify key facts of the transaction by checking the following five functional questions in light of applicable laws and regulations:

- What are you exporting?
- Who will receive your items?
- What are your items used for?
- Where are you exporting
- Does the transaction look suspicious and/or lack transparency?

Violating trade control laws and regulations can have severe consequences for the company and the individuals involved, including the potential loss of export privileges, imprisonment and civil and criminal penalties. It is our obligation to monitor and have access to the latest lists of sanctioned countries/parties and regulated goods and services. In case of doubt, employees should contact Internal Control & Compliance or Legal.



## 6. INFORMATION SECURITY AND INTELLECTUAL PROPERTY RIGHTS

### *Information security*

All companies possess certain proprietary information that could harm their commercial or legal position if disclosed to or used by unauthorized third parties. Laws exist in many countries to protect this type of proprietary information, and MLE takes active steps to ensure the protection of its proprietary information.

Employees must commit to:

- Take sufficient safety measures to maintain the confidentiality of all business and technical information, with such measures based on the importance of the information,
- Take preventive measures to prevent unauthorized access, loss, destruction, and leakage of proprietary information and take appropriate management measures to ensure business continuation (and recovery if possible) in the event of such a loss, and
- Respect the intellectual property and proprietary information of others.

From time to time, employees may need to share proprietary information with a third party not employed or contracted by MLE. Although there might be a valid requirement to disclose such information, employees must never disclose any proprietary information to a third party without the prior approval of their manager, Legal, Internal Control & Compliance or HR.

Employees should not use confidential information that belongs to other companies, unless it has been properly obtained. This typically requires explicit permission from the owner, and then the use is restricted by any use restrictions accompanying the permission. When proprietary information of a third party is offered to an employee through a manner that is not authorized, the employee is expected, in all instances, to refuse the offer.

At times, newly hired employees may possess proprietary information about their former employers. MLE does not wish to receive or have access to any such proprietary information and expects that all employees will respect the confidentiality of this information and never reveal or use (or ask a co-worker to reveal or use) such information in connection with the provision of services for MLE. More information on information security can be found in the MLE Information Security policy.

### *Intellectual property rights*

Intellectual property rights are one of MLE's greatest assets, and accordingly, MLE places great importance in the protection of our intellectual property rights. However, MLE also respects the intellectual property rights of third parties and seeks to avoid the unauthorized use of any third-party intellectual property in any of our products. Unauthorized use of third party intellectual property could significantly disrupt our business activities and could also subject MLE or the individual to fines or criminal prosecution. Therefore, employees must always contact Legal or Internal Control & Compliance if there is any uncertainty whether their use of third party intellectual property is permitted.

Information obtained from external sources like the Internet should be used with great caution. Just because it is found on the Internet does not mean that it is free to use for our products.

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Information from external sources should be used for our products only after consultation with Legal.

Specifically, employees should not:

- download any unlicensed software onto an MLE computer or copy for personal use any software owned by or licensed to MLE,
- distribute or publish information about any MLE products, technologies, or processes without obtaining prior authorization, or
- distribute or publish any data protected under data protection laws without prior authorization.

Employees are expected to abide by the obligation not to distribute, use or make public any information about our products, technologies and processes even after the end of their employment.

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## 7. FINANCIAL INTEGRITY

Any business decision regarding a group company's future development is taken based on data, documentation and reports. It is crucial that reporting and documentation be honest, accurate and complete. Besides being a legal requirement, adequate and truthful reporting is also of crucial importance for the company's management, shareholders and other stakeholders, and for company's reputation and credibility.

Integrity and transparency are important to MLE. As such, all data must accurately reflect transactions and events. This approach applies to all of MLE's data, but is of particular importance to its financial and accounting matters.

MLE and its employees should:

- ensure that every transaction is properly authorized and recorded promptly, truthfully and accurately,
- never distort the true nature of any transaction,
- ensure that all accounting follows the relevant accounting standards,
- avoid exaggeration, guesswork, and derogatory remarks in business records and other documentation,
- not falsify records or use creative accounting,
- demonstrate financial integrity in submitting or approving expense claims, and
- ensure that all documents are safely retained to satisfy both internal and legal requirements.

Employees must strive to be accurate when preparing any information for the company, but honest mistakes occasionally do happen. Only intentional efforts to misrepresent or improperly record transactions, or otherwise to falsify a company business record, are violations of the Code of Conduct.

If an employee has concerns or complaints regarding accounting practices, internal controls, audit matters or financial reporting, the employee should be encouraged to consult with their manager, Internal Control & Compliance, Legal or the Whistleblowing helpline.

Employees should only enter into transactions on behalf of MLE when they have the authority to do so, either because they have been given the authority through a specific power of attorney or because of the authority that comes with their position and which is documented in the company's internal authorization guidelines or delegation of authority.



## 8. ANTI-MONEY LAUNDERING

Money laundering is the process by which individuals or entities conceal illicit funds or make them look legitimate. Money laundering is a serious crime and is regulated by international conventions and national criminal codes. Monetary transactions, including bank transfers and currency exchanges, are now routinely monitored by national and international authorities.

MLE will not condone, facilitate or support money laundering.

Employees should look out for irregularities in the way payments are made and be cautious when working with business partners who appear to lack integrity.

Examples of transactions that may point to irregularities include:

- payments made in currencies other than those specified on the invoice,
- payments made to or received from countries unrelated to the transaction,
- attempts to make payments in cash or cash equivalents,
- payments made by a third party not involved in the contract or from an account other than the counterpart's normal business account,
- requests or attempts to make payments for each invoice or group of invoices through multiple forms of payment, and
- requests to make overpayments.

Employees should report all suspicious behaviour or suspicious requests from within MLE or other parties to Internal Control & Compliance or Legal.

It is MLE's expectation that employees always perform proper "Due Diligence" when initiating contacts with new business partners to prevent and detect illegal financial transactions.

## 9. HEALTH, SAFETY AND QUALITY OF SERVICES AND PRODUCTS

### *Ensuring health and safety*

Safety is of the highest priority within MLE. MLE believes that all employees, contractors, customers and members of the public entering working areas controlled by MLE are entitled to a safe and secure environment where people and property are not exposed to unnecessary risk. The first priority and immediate reaction upon the identification of a health and safety issue with our services and/or products must always be preventing the occurrence or spread of damage and/or personal injury. MLE shall take immediate action to resolve any identified health and safety issues together with the relevant parties. Employees at all levels are expected to conduct themselves in accordance with the law and applicable procedures. They should never expose themselves or others to unacceptable safety risks, whether at an MLE site or another party's site. Employees are required to report all incidents in which they are directly involved, or that they witness, to their managers, Legal, Internal Control & Compliance or the Whistleblowing helpline.

We expect all entities to have their own Health, Safety and Quality policies in place, in accordance with local laws and regulations.

### *Ensuring quality*

In order to provide high-quality products and services, MLE complies with relevant laws, the contracted specification of our customers and MLE's internal standards, as well as complying with our standard steps and procedures. Should an incident or problem in regard to product quality be identified, MLE shall promptly investigate the matter, and take appropriate actions and preventive measures. In the event an employee discovers an incident related to quality as a result of a failure to comply with relevant laws, the contracted specification of our customers or MLE internal standards, he or she is required to report such incidents to their manager or the relevant department. If the employee feels uncomfortable approaching his or her manager, the employee should approach another management representative or use the Whistle-Blowing helpline.

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## 10. ENVIRONMENT

MLE aims to provide customers with high quality products and services that meet all legal and contractual requirements. Our work will be executed in a manner that sets and maintains a standard of quality, health, safety, and in everything we do and make, we must always remember our responsibilities for environmental stewardship.

MLE recognizes that manufacturing processes can affect the environment through energy use, water consumption, and hazardous and non-hazardous waste streams. The company's goal is to continuously improve operations while reducing environmental impacts in a cost-effective, deliberate manner to create a safe and healthy environment for patients today and for future generations.

The importance of the preservation of the environment should be apparent in the products we make, in the suppliers we use, and in our everyday activities. We will continually look for ways to use environmentally friendly processes and materials and will continue our pursuit of developing environmentally friendly technologies. As part of our corporate responsibility and integration in the communities within which MLE has operations, we are committed to the sustainable and efficient use of natural resources and to the reduction, reuse, and recycling of the materials we use in order to further minimize our impact on the environment.

At MLE, we support the principles of good environmental practices and sustainability in all aspects of our operations and in the welfare of the communities and people that our business affects. We are committed to reducing our environmental impact while enhancing our business performance and investments in our personnel and the patients we serve. MLE considers how our company, supply chain, and the communities we rely on are vulnerable to the impacts of climate change.



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## 11. CONFLICT OF INTEREST

A conflict of interest occurs when an individual's obligations and interests in the work environment conflict with his or her own private interests. The mere appearance of what might be a conflict of interest can seriously damage a company's reputation and ultimately its business. All business activities should be conducted in the best interests of MLE and not in the interest of an individual employee. Employees are expected to declare immediately any direct or indirect personal interest they might have in any transaction or project MLE plans to execute. Personal interests should be declared to the manager and Legal or Internal Control & Compliance. In order to avoid even the appearance of a potential conflict of interest, employees must have clearance from their manager, Legal or Internal Control & Compliance, in order to proceed further with the transaction or project.

A conflict of interest can take many forms. It is each employee's responsibility to exercise sound judgment over situations where conflicts of interest could arise.

Examples of potential conflicts of interest include:

### Investments

- Significant investments by employees, or their close relatives, in MLE's business partners or competitors
- Sale of MLE business activities to, or purchase from, close relatives, friends or business relations
- Buying and selling MLE shares based on information the employee had privileged access to, due to the employee's position within the company.

### Procurement

- Procurement of goods and services from a close relative or friend

### Interaction with family and friends

- Hiring or supervising close relatives or friends
- Actively influencing management to hire a close relative or friend
- Conducting business negotiations with a business partner where your counterpart is a close relative or friend • Authorizing payments to a close relative or friend

### *Outside employment and directorships*

Professional engagement in businesses outside MLE can represent a conflict of interest. MLE does not allow any form of employment, consultancy, part-time work, board service or any other type of engagement with MLE's customers, suppliers, competitors, companies in the same line of business as MLE or any other interested party without written consent from the HR Department, Internal Control & Compliance and Legal. Employees are encouraged to take advice from their manager, HR, Internal Control & Compliance or Legal before taking on any outside engagements.

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## 12. INSIDER TRADING

Insider trading is the illegal practice of trading on the stock exchange to one's own advantage as a result of having access to confidential information. Some employees, as part of their position within the company, will be exposed to privileged or confidential information about our company, clients or partners. Using this "market sensitive" information, which is not in the public domain, puts the recipient at an unlawful advantage when dealing on the stock and equities markets. Employees should refrain from dealing in ML or MLE partners' equities listed on stock markets when they are aware of any market sensitive information or when such transactions might raise concerns or suspicion of insider trading. Employees should also refrain from advising others to buy or sell equities based on such privileged information. In case of doubt, employees should contact Legal or Internal Control & Compliance.

Insider trading activities can result in criminal prosecutions for the individual as well as each person who buys or sells equities on such privileged information. It is important for all employees to ensure "market sensitive" information is kept confidential and not discussed with or leaked to anyone inside or outside the company. Information that might be considered market sensitive includes:

- new technology developments or research projects not yet made public,
- planned Merger and Acquisition activities,
- planned divestments,
- financial results prior to their publication,
- financial plans prior to their publication,
- gain or loss of important contracts prior to their publication, and
- key developments in major projects (such as expected delays, potential liabilities, etc.)

## 13. PRIVACY

### *Personal data protection*

MLE respects the privacy of all individuals, including customers and employees, and takes very seriously its responsibilities for personal data protection, including the obligations to properly handle and maintain such data in compliance with applicable data protection laws such as the GDPR and with any relevant contractual obligations.

As further specified in the Privacy Notice, no personal information or data owned by MLE will be used or disclosed for personal purposes and will not be sold, rented, loaned, leased or otherwise disclosed to any third parties outside of MLE, except when MLE has the individual's express permission or under special circumstances, such as when MLE believes in good faith that disclosure is necessary to comply with the laws or regulations of a governmental or regulatory body.

MLE will therefore:

- respect the applicable data protection laws of the countries within which it operates,
- acquire or retain an employee's personal data only to the extent that is necessary to the employee's work at MLE, or that it is required by law in the specific country in which the employee works, and
- make sure that access to personal data is limited to people who have appropriate authorization and a clear business need to access the data.

### *Use of company owned computer and e-mail*

Employees should be aware that MLE owns all the data, not limited only to e-mail data, stored on computers. Under certain specific conditions and in accordance with applicable laws and regulations, MLE will be entitled to review an employee's use of the computer and e-mail in order to:

- ensure proper operation of its systems,
- check employees' compliance with MLE's IT security rules and other internal policies, and
- prevent or detect crime.



## 14. OCCUPATIONAL ENVIRONMENT AND HUMAN RIGHTS

### *Working in a safe environment*

MLE considers its employees to be its most important asset to achieve its goals and believes that all employees are entitled to a safe and secure workplace where no one is exposed to unnecessary risk.

MLE is committed to:

- continuously review and improve its occupational health and safety procedures and guidelines, and
- give employees the appropriate training and information they require to manage risks in their own work environment whether on MLE property or any other site.

In support of MLE's commitment every employee is obliged to:

- participate in all mandatory training,
- undertake only work for which they are trained, competent, and fit to perform,
- follow MLE's safety rules and procedures at their workplace, including the use of all relevant standards and instructions,
- demonstrate safe working practices and refrain from work that is potentially unsafe,
- help to ensure other people – Employees, subcontractors and other relevant parties – follow MLE's safety rules and procedures, and
- refrain from work when their performance is impaired by illness, injury, alcohol, or any other substance, prescribed or otherwise.

### *Respect and equality*

MLE is strongly committed to human rights and employees' rights as expressed in the relevant international conventions.

With this Code of Conduct, the company seeks to support and develop a single common corporate culture. This culture is one of inclusion and mutual trust, in which everyone who works for MLE is treated equally with dignity and respect, regardless of race, color, religion, political conviction, gender, age, national origin, sexual orientation, marital status or disability or any other characteristic protected by national or local laws. MLE will not tolerate discriminatory treatment of any kind.

MLE will ensure that it:

- does not use compulsory or forced labor in any of its operations,
- does not use child labor in any of its operations,
- maintains a framework of fair and just remuneration, fair working hours and benefits, and

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- maintains open communication with employees, according to the laws or practices of the countries in which it operates.

## *Work environment free of harassment*

Every MLE operation should be characterized by mutual trust and respect for the individual. Therefore MLE will not tolerate:

- sexual harassment,
- any other kind of harassment, whether direct or indirect, physical or psychological, verbal or non-verbal, and
- any other action or activity that creates a hostile working environment for its employees.

## 15. RELATIONSHIP WITH POLITICS

### *Corporate political activities*

MLE may, at its discretion, disclose its political views and participate in government initiatives if invited by political or public bodies. In many countries, however, there are stringent legal restrictions on contributions (financial and non-financial) that can be made to elected officials, members of their staff and political parties. Employees should not provide or offer company funds or other company contributions (directly or indirectly) for politically related causes or activities without pre-approval by Legal or Internal Control & Compliance. Political contributions are defined broadly and can even include buying tickets for or loaning corporate resources to a political fundraising event. In principle, all political contributions should be disclosed to avoid being construed as a bribe designed to improperly influence the recipients.

### *Lobbying*

In many countries, there are also strict rules governing corporate lobbying activities whereby lobbyists might require registration. Lobbying requires disclosure to the government and covers many kinds of activities. Employees may be deemed to engage in lobbying activities if their work involves:

- contacts with legislators, regulators, government officials or their staff,
- sales and marketing activities related to government procurement contracts, and
- efforts to influence legislative or administrative action.

No employee should engage in any activity that might be considered lobbying without prior approval from Legal or Internal Control & Compliance.



## 16. COMPANY PROPERTY

Company assets are the tools we all use to achieve the company's goals. They may be either tangible or intangible. Misuse or loss of company assets can damage the performance of the company or its financial stability.

All MLE assets must be used only for valid business purposes, in accordance with the company's guidelines and procedures and in its best interests. Assets must be protected and safeguarded to prevent their loss.

When an employee creates significant written material (such as a new manual), makes any advance in technology, makes any new discovery or invention, or otherwise develops an "improvement" to MLE's technology, manufacturing processes or business processes, the employee should immediately contact the appropriate manager and Legal to determine if the work needs protection through a patent or other legal means, and should not make any attempt to register the intellectual property by themselves before MLE has the opportunity to assert its rights to the work, invention or other creation.

## 17. MONITORING, REPORTING AND SANCTIONS

### *Monitoring*

MLE managers in every country in which MLE operates should distribute this Code of Conduct widely and ensure its implementation throughout the business. Furthermore, all MLE Group companies should, on a regular basis, monitor employees and activities for compliance with local and international laws, and for observance of the Code of Conduct, in accordance with applicable national procedures and legal provisions.

We expect all (new) employees within MLE to sign the Code of Conduct acceptance letter, as is provided by HR.

### *Reporting a breach of the Code of Conduct*

Employees are strongly encouraged to take action promptly when faced with an actual or potential breach of the Code of Conduct. Employees should report breaches to their manager or supervisor. When an employee feels uncomfortable approaching his or her manager, the employee should approach another management representative, Legal or Internal Control & Compliance or the company's Whistleblowing helpline.

Legal and Internal Control & Compliance of MLE take all reports of possible misconduct seriously. The company will investigate the matter confidentially, make a determination whether the Code of Conduct or any law has been violated, and take appropriate corrective action. If any employee becomes involved in any investigation, the employee should cooperate fully and answer all questions completely and honestly. It is in the best interest of MLE that employees report breaches of the Code of Conduct. As such MLE will not tolerate retaliation against anyone who reports non-compliance with the Code of Conduct, regardless of whether or not their claim can be substantiated. Any retaliation against an employee who raises an issue honestly is a violation of the Code of Conduct.

### *Sanctions*

Violation of the Code of Conduct may result in disciplinary action up to and including dismissal. In cases where a breach of the Code of Conduct implies a violation of the law, criminal prosecution may result.

## 18. MITSUBISHI LOGISNEXT GROUP COMPLIANCE GUIDELINES

1. Relationships with customers
  - (1) We should respect the opinions of our customers and treat each customer fairly and honestly.
  - (2) We should provide attractive and safe products and services to our customers.
  - (3) We should conduct our domestic and overseas business activities in fair competition with other companies in accordance with relevant laws and social norms.
2. Relationships with shareholders and investors

We should communicate with our shareholders and other investors to fairly disclose corporate information for our business activities.
3. Relationships with business partners
  - (1) We should maintain fair relationships with our business partners and conduct transactions in accordance with objective principles.
  - (2) We should exchange business courtesies, such as gifts, meals, and entertainment, within socially acceptable limits and in a socially acceptable manner.
4. Relationships with employees
  - (1) We should respect basic human rights and strive not to take any discriminatory actions.
  - (2) We should comply with relevant labor laws and strive to maintain a safe and friendly working environment.
  - (3) We should respect the individuality and creativity of every employee and promote employee education, training, and growth.
5. Relationships with law and society
  - (1) We should strive to ensure efficient use of resources and to protect the global environment.
  - (2) We should comply with relevant laws and standards, including related internal rules, and behave fairly and honestly.
  - (3) We should not use inside information, from either internal or external sources, to buy or sell stock or other securities, and we should not disclose inside information to any other persons, including family members and friends.
  - (4) We should firmly resist and not enter into engagements with anti-social activities or forces.
6. Acknowledgement regarding compliance

We should remain aware that compliance with the Compliance Guidelines will benefit the company significantly as well as contribute positively to society.

## 19. MITSUBISHI HEAVY INDUSTRIES GROUP GLOBAL CODE OF CONDUCT

The MHI Group Global Compliance has uploaded translated versions of the MHI Group Global Code of Conduct. MHI Group employees can access the MHI Group Global Code of Conduct in 12 different languages from the following link:

<https://www.mhi.com/company/aboutmhi/policy/conduct.html>

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# Logisnext

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