Japan Food Research Laboratories Code of Ethics and Conduct

The fundamental principle of Japan Food Research Laboratories (JFRL) is to support people’s health and safety, and contribute towards the progress and development of our society through analytical testing. Our mission is to sustain a high level of technical expertise and maintain independence and impartiality in our activities as an analytical institute, and by doing so, to be a good partner that resolves future challenges together with our clients.

We recognize that society’s trust is essential to realizing our fundamental principle. To earn this trust, we commit ourselves to performing analytical testing from an independent and impartial standpoint, accurately and in time, and ensuring that our data is backed by advanced technology and of high quality.

We base our daily conduct and business on a keen awareness of our mission and social responsibility as a general incorporated foundation that provides services of public interest, and on sufficient understanding of the spirit of this Code of Ethics and Conduct.

1. COMPLIANCE ........................................................................................................................................2
   (1) Legal and ethical standards ..................................................................................................................2
   (2) Antimonopoly Act ...............................................................................................................................2
   (3) Fair and transparent transactions .......................................................................................................2

2. HUMAN RIGHTS ..................................................................................................................................2
   (1) Respect for human rights .....................................................................................................................2
   (2) Anti-harassment ..................................................................................................................................2
   (3) Personal information ...........................................................................................................................2

3. CLIENT SATISFACTION ........................................................................................................................3
   (1) Client satisfaction ...............................................................................................................................3
   (2) Excellence in quality ............................................................................................................................3
   (3) Client demand and feedback ...............................................................................................................3

4. INTERACTION WITH SOCIETY .........................................................................................................3
   (1) Coexistence with the environment ......................................................................................................3
   (2) Harmony with global diversity ..........................................................................................................3
   (3) Anti-organized crime ..........................................................................................................................3

5. CREATING REWARDING WORKPLACES ........................................................................................3
   (1) Safety and health management .........................................................................................................3
   (2) Motivation and morale .........................................................................................................................4
   (3) Political and religious solicitation ......................................................................................................4

6. BUSINESS OPERATIONS AND INFORMATION DISCLOSURE ....................................................4
   (1) Risk management ...............................................................................................................................4
   (2) Accounting practices ..........................................................................................................................4
   (3) Asset management .............................................................................................................................4
   (4) Intellectual property ............................................................................................................................4
   (5) Confidential information ....................................................................................................................5
   (6) Electronic information ........................................................................................................................5
   (7) Information disclosure ........................................................................................................................5

7. PRACTICING THIS CODE OF ETHICS AND CONDUCT ..............................................................5
1. COMPLIANCE

We comply with laws and regulations, and with internal rules and policies, and base our conduct on high ethical standards and social norms. By conducting our business with awareness of compliance and swiftly improving our conduct as indicated by audits and inspections, we continue to be an organization engaged in compliance.

(1) Legal and ethical standards
   - We conduct our business in compliance with laws and regulations, and observing high ethical standards and social norms, recognizing that this is fundamental to all aspects of our activities.
   - We approach our business with integrity, understanding the spirit of our fundamental principle and observing this Code of Ethics and Conduct, the Employee Manual, and other internal rules.

(2) Antimonopoly Act
   - We respect fair and free competition. We do not engage in unfair transactions, in compliance with the Antimonopoly Act and related laws.
   - We do not engage in bid rigging, cartels, or other activities that hinder fair and free competition or that arouse suspicion of such.
   - We do not trade stocks or other securities, either ourselves or through others, using non-public information obtained through our business activities.

(3) Fair and transparent transactions
   - We do not give profit or advantage to specific clients.
   - We build fair, transparent, and equal relationships with business partners based on open transactions.
   - We do not use our position as an outsourcer to seek personal profit or advantage from business partners.
   - We do not sacrifice the rightful profit of the JFRL for personal profit.

2. HUMAN RIGHTS

We respect the basic human rights of all people, and do not display discriminatory speech or action that harms an individual’s dignity, in support of the United Nations’ Universal Declaration of Human Rights.

(1) Respect for human rights
   - We strive to be a sensible corporate citizen that respects human rights.
   - We do not discriminate or violate human rights on the basis of race, ethnicity, nationality, religion, belief, age, gender, social status, occupation, physical condition, or other reasons. We do not tolerate child labor or forced labor.
   - We respect the human rights and privacy of all people both within and outside the JFRL.

(2) Anti-harassment
   - We treat one another as valuable partners and strive to build fruitful interpersonal relationships.
   - We do not tolerate sexual harassment, abuse of power, bullying, or other violations of human rights.
   - We base our workplace conduct on respect for one another’s character and awareness of others’ perception of our speech and action so as to prevent sexual coercion, misuse of power, and other behavior that violates legal or moral norms.
   - We deal firmly with incidents of harassment that affect our right to work or disrupt our work environment.

(3) Personal information
   - We recognize the importance of protecting the personal information of our clients and of JFRL directors and staff members. We strive to prevent loss and leakage of personal information, and handle it in compliance with laws and regulations, and with the Personal Information Protection Policy and other internal rules.
   - We respect the rights and interests of our clients when collecting, managing, and using their personal information through our business activities.
3. CLIENT SATISFACTION

We constantly seek to offer services that meet our clients’ needs. By providing the best services possible, we strive to earn our clients’ satisfaction and trust, and by extension, to support people’s health and safety.

(1) Client satisfaction
- We identify our clients’ needs and provide services that earn their satisfaction and trust.
- We strive to understand our clients’ challenges and deliver services that resolve those challenges.
- We employ creativity and innovation in developing technologies that meet our clients’ expectations and demands. We make continuous efforts to enhance our services so as to earn our clients’ satisfaction.

(2) Excellence in quality
- We believe that quality is our top priority in earning our clients’ satisfaction and trust. We ensure quality not only by identifying society’s needs and complying with laws and standards but also by promoting accuracy in each process of our services at the responsibility of individual divisions.
- Should the possibility of a quality-related issue arise, we notify the relevant division promptly and accurately, strive to resolve the issue, and prevent it from escalating.

(3) Client demand and feedback
- We respond to complaints with sincerity and fairness.
- We respond to demand and feedback promptly and accurately, from the perspective of the client.
- We use demand and feedback to improve quality and prevent complaints, and disclose information as needed.

4. INTERACTION WITH SOCIETY

We respect the cultures and customs of the countries and regions in which we conduct our business. We build sound relationships with local communities through communication, and as a good corporate citizen, strive to coexist and develop with our society.

(1) Coexistence with the environment
- We strive to conduct business activities gentle on the environment and prevent pollution in support of the concept of sustainable development presented at the United Nations Conference on the Human Environment (Stockholm 1972).
- We conduct our business activities taking care not to inconvenience local communities or residents.
- We strive to save resources and energy, and to reduce and recycle waste, to minimize the burden of our business activities on the environment.

(2) Harmony with global diversity
- We understand and respect the cultures and customs of different countries and regions, and strive towards harmony between that and our business activities.
- To the extent possible in our daily lives, we make efforts to participate in social, educational, and cultural support activities; to interact with local communities; to clean and maintain our environment; and to volunteer.

(3) Anti-organized crime
- We refuse involvement with organized crime groups that threaten social order and safety, and to this end, cooperate with police and other authorities.
- We do not yield to the unreasonable demands of organized crime groups.
- We make efforts to eliminate the entrenchment of organized crime in our industry and society.

5. CREATING REWARDING WORKPLACES

We aim to create safe, clean, and comfortable work environments for all JFRL directors and staff members. Our ideal workplace respects diversity and creativity, and is a source of pride and vitality for everyone.

(1) Safety and health management
- We strive to improve our material resources and work processes, and to eliminate potential hazards, towards protecting the safety and health of JFRL personnel.
We perform our respective duties with a focus on safety, in compliance with laws and internal rules.

JFRL directors and managers are responsible for safety and health management, and to this end, strive to improve material resources and create comfortable workplaces.

(2) Motivation and morale

- We strive for self-improvement and work to hone our expertise, creativity, and passion for taking on challenges.
- We promote teamwork while respecting one another’s character.
- We aim for workplaces that promote understanding and respect for diversity, where individuals can fully exhibit their talent and expertise regardless of position.
- We strive to create cheerful and vibrant workplaces that encourage open discussion, creativity, and bold endeavors to achieve goals.

(3) Political and religious solicitation

- In the workplace, we do not engage in political, ideological, or religious activities, or in solicitation for personal profit or that of a specific organization.
- We do not use the name of or our title at the JFRL in personal activities outside the JFRL.
- We do not make illegal political contributions or offer bribes, in compliance with related laws.

6. BUSINESS OPERATIONS AND INFORMATION DISCLOSURE

We strive to uphold trustworthy and transparent business operations as an independent and impartial third-party institute. To this end, we maintain sound relationships with our clients, local communities, and other stakeholders, and conduct our business activities efficiently from a long-term perspective, thereby ensuring sustainable growth and a sound financial structure. Further, we make every effort to create the systems and foster the human resources necessary to implement the JFRL management policy, thereby enhancing our brand value and earning our clients’ trust. We work to disclose to all our stakeholders information about our business operations as well as about our efforts towards environmental protection and social responsibility.

(1) Risk management

- We identify the various risks in our business operations, and take measures to avoid and prevent crises.
- Should a crisis occur, we respond promptly and sincerely, and work to earn our clients’ satisfaction and trust.
- JFRL directors and staff members receive education and training in risk management and crisis response.

(2) Accounting practices

- We ensure accuracy and integrity in our financial books and records, and in all other accounting practices.
- We ensure that our records are not misleading and do not misrepresent facts. To this end, directors and staff members responsible for accounting and financial matters, as well as all other staff members, comply with related laws and internal rules relevant to their respective positions.

(3) Asset management

- We recognize and respect the value of our assets and rights, as well as those of others. We use assets and rights fairly, and manage and protect them stringently, and do not infringe on them under any circumstances.
- We do not use JFRL assets such as land, buildings, machinery, and office supplies for personal or other non-business purposes.
- We do not use JFRL information systems, including software, for non-business purposes.

(4) Intellectual property

- We strive to manage and protect our intellectual property, including proprietary knowledge obtained through technological development, so as to prevent inappropriate use by others. We actively use our intellectual property and contribute to the sustainable growth of the JFRL.
- We respect the patents, utility models, trademarks, designs, copyrights, proprietary knowledge, and other intellectual property rights of others, and strive not to intentionally infringe on them.
(5) Confidential information

- We handle marketing, technological, operational, and other confidential information in compliance with laws and internal rules. We do not leak confidential information obtained through our employment, or disclose it without permission from the JFRL, either during or after the end of our employment.
- We treat information obtained from others through our business activities as we would confidential information of the JFRL. We manage it stringently, and do not use it for purposes other than intended.
- We do not attempt to obtain or access non-public information using inappropriate means or methods.

(6) Electronic information

- We recognize the importance of information security. We take sufficient care to prevent the leakage of electronic information, as well as theft and falsification by others.

(7) Information disclosure

- We promote smooth and appropriate communication with our clients, society, staff members, and other stakeholders. We strive to ensure the reliability of our accounting and financial reports, and to improve the transparency of our business operations.
- We strive for accuracy and for the timely and fair disclosure of information related to our business activities.

7. PRACTICING THIS CODE OF ETHICS AND CONDUCT

The responsibility to realize this Code of Ethics and Conduct lies with JFRL management. Directors and managers will work to take the initiative and set an example, and ensure that all staff members are familiar with the code. Further, they will build an effective internal control system to earn our clients’ trust.

In the event a breach of the code occurs, management will swiftly assess the situation, promptly and accurately disclose information and take other necessary measures, and strive to identify the cause and prevent recurrence. Any individuals responsible, including members of management, is subject to strict disciplinary action.

- Should anyone’s conduct present a problem in light of this Code of Ethics and Conduct, or arouse suspicion of such, as a rule, consult the relevant workplace, discuss the situation, and seek a solution. Directors and managers are under obligation to respond with sincerity at all times.
- Should anyone’s activities present the possibility of a violation of laws or social norms, notify a superior or the relevant division, or use the internal hotline.
- The JFRL has in place an internal hotline for reporting incidents that cannot be resolved through consultation with a superior, as well as situations in which a superior cannot be consulted. Reports will be handled with sincerity.
- The anonymity and privacy of the reporting individual will be protected. The JFRL will not disadvantage the reporting individual in any way, and will work to prevent harassment and retaliation.
- Anyone who attempts harassment or retaliation is subject to strict disciplinary action.
- Should a director or staff member breach this Code of Ethics and Conduct, the individual is subject to disciplinary action in proportion to the degree of the breach, including demotion and pay reduction, in addition to legal action.