

# Omron Group Sustainable Conduct Policies





By living up to the Omron Principles, the Omron Group is committed to contributing to a better society through our businesses. To this end, we implement fair and transparent management of all our corporate activities, while autonomously and proactively addressing environmental and social issues faced by our stakeholders. To carry this out in practice, we will establish a PDCA system which is a repeating cycle of the following steps: First, clarifying environmental and social issues we aim to address and determining actions to take (PLAN); implementing the plan (DO); monitoring the status and results of execution (CHECK); and taking a corrective measure if a problem exists (ACT). The environmental and social issues that the Omron Group will address, as well as our policies for coping with these issues, are discussed below:

### **1. Human Rights, Labor Conditions, and Occupational Safety and Health**

#### 1-1. Respect for Human Rights

The Omron Group is conscious of the fact that all human beings should be free and equal, and that we must respect the basic human rights of individuals. The Omron Group will not discriminate on the basis of national origin, citizenship, color, race, belief, religion, ancestry, marital status, gender, disabilities, age, sexual orientation, place of birth, social status, or any other basis prohibited by local law. To meet this commitment, the Omron Group references the UN Guiding Principles on Business and Human Rights and fulfills its corporate responsibility to respect human rights by developing procedures to identify, prevent, mitigate and remedy adverse human rights impacts.

The Omron Group actively strives to educate all Omron Group directors and employees and enhance their awareness of human rights. We also expect business partners related to our operations, products and/or services to understand and comply with this policy.

#### 1-2. Labor Standards Compliance and Respect for Individuality and Diversity

The Omron Group believes that human resources are an essential source of energy that drives the company's growth, and that activating human resources is critical to create added value and improve productivity. Based on this belief, the Omron Group will motivate and support employees to reach their full potential by improving the working environment through appropriate human development, worker support initiatives, performance evaluation and remuneration, workplace facilities, corporate culture, etc. The Omron Group will also comply with applicable laws in respective countries or regions regarding remuneration and treatment for employees.

Also, the Omron Group has a high regard for the ILO Declaration on Fundamental Principles and Rights at Work. This means that we will, in accordance with applicable law, respect freedom of association and the right to collective bargaining, make the recruiting process discrimination-free, and otherwise eliminate unlawful or inappropriate discrimination in the workplace. We also will never be involved in forced, compulsory, or child labor.

#### 1-3. Occupational Safety and Health

The Omron Group will abide by applicable laws and regulations regarding occupational safety and health in each respective country or region. The Omron Group also respects the rights of employees to work in a safe and healthful work environment, as well as the right to refuse to work in unsafe work conditions.

The Omron Group is mindful that safety at the workplace and the mental and physical well-being of employees and the maintenance of health are essential to enable employees to exhibit their full capabilities. Accordingly, the Omron Group gives the utmost priority to the promotion of safety and health in all business processes, and strives to build a safe and healthful work environment.

The Omron Group will also establish an effective risk management system for protection against potential disasters, accidents, terrorism, and other unexpected events.

### **2. Fair and Honest Business Practices**

#### 2-1. Delivery of Secure and Safe Products and Services and Protection of Customers

Omron Group defines "Quality First" as its fundamental principle. It shall create quality products and services in any circumstance. For this purpose, the Group shall prioritize security and safety of its products and services and continue to deliver value that exceeds customer expectations to fulfill its social responsibility. The Group commits to fulfill the above responsibilities to its customers and execute them faithfully. Employees of the Group shall engage in quality assurance activities with



pride and confidence and contribute to achieving fair and transparent business operations.

### 2-2. Management of Information and Intellectual Property

The Omron Group is aware that trade secrets, intellectual property and personal information are property held by an organization or individual that is entitled to profit from the property. As such, the Group will appropriately manage and use information and intellectual property it holds while also implementing proper measures to maintain security of its information systems. The Group will not illegally access or use information or intellectual property held by other persons or organizations.

### 2-3. Competition and Fair Dealing

The Omron Group strives to act in conformance with principles of fair and free competition, recognizing this as a fundamental ground rule for proper and efficient business activities. The Omron Group also emphasizes protection of rights for customers and consumers, sound development of the economy, and the independence of individual organizations. Accordingly, the Omron Group promotes free competition and endeavors to maintain legal, fair and transparent relationships with its distributors, suppliers, customers and, as appropriate, competitors.

As for suppliers, we require their support and cooperation in the Omron Group's sustainable procurement activities.

### 2-4. Prevention of Corrupt Practices

To maintain a just and orderly society bound by laws, the Omron Group will not conduct or encourage corrupt practices such as extortion. We will also work to maintain a sound and normal relationship with political and administrative bodies as we conduct business activities. We strictly prohibit any association whatsoever with antisocial groups or others that threaten the public order and security, standing firm against them.

### 2-5. Proper Discharge of Tax Responsibilities, Accounting and Investment Activities

The Omron Group will pay tax obligations in strict compliance with the applicable laws, and will not make any false or fictitious descriptions or attempts at concealment. The Omron Group will make investments in accordance with applicable laws and internal company rules, and make no improper, speculative investments

## **3. Environmental Protection**

### 3-1. Environmentally Conscious Business Activities

The Omron Group considers environmental issues to be a corporate responsibility and important management objective for the Group. As such, while working to lessen the negative impact on the environment arising from our business activities, we are also committed to developing and promoting products and technologies that help conserve the natural resources and the environment. By so doing, the Omron Group aims to implement environmental management practices that enhance both ecology and efficiency. To build a solid base for environmental management, the Omron Group will provide all employees with environmental education and awareness-raising opportunities in order to encourage an ecological mindset.

### 3-2. Environmental Conservation Activities

The Omron Group recognizes that actions implemented by all concerned organizations and individuals are crucial for the promotion of conservation of natural resources and the environment. As such, the Omron Group, together with relevant organizations, will proactively engage itself in solving the environmental issues that society faces. We also recommend all Omron Group directors and employees to demonstrate concern for environmental protection, even in private activities away from work, and to act in an environmentally conscious manner.

## **4. Harmonious Coexistence with Society**

### 4-1. Respect for Local Communities

The Omron Group is aware of the importance of serving as a valued corporate citizen, and thus it strives for harmonious coexistence with society. As a part of our local communities, we not only



comply with all applicable laws and rules but also respect local culture and customs. We will always strive to give due consideration to the effect of our business activities on local communities.

### 4-2. Strict International Trade Management

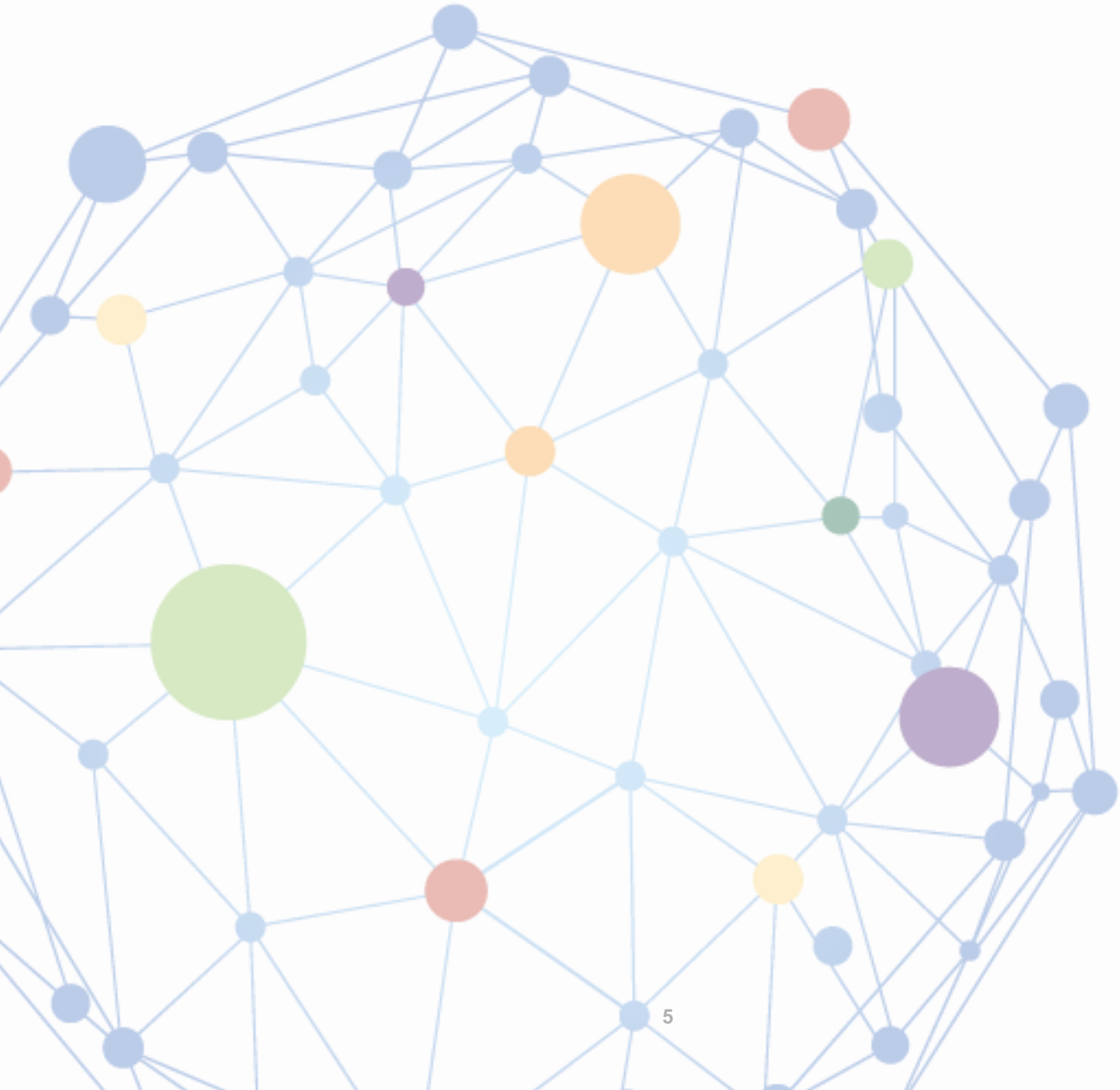
The Omron Group complies with applicable laws and regulations relating to international trade restrictions.

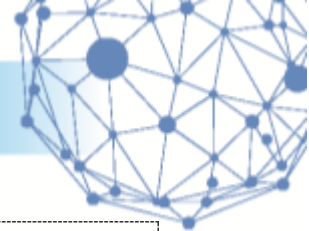
### 4-3. Community Involvement and Social Contributions (Corporate Citizenship)

As a responsible corporate citizen, the Omron Group will actively promote community involvement and other social contribution activities. When engaging in community activities, the Omron Group selects themes of activities that suit the culture, social climate or issues of respective countries or regions and are aligned with the Omron Group's values, resources (financial and human resources, products, facilities, etc.), and expertise (technology, know-how, etc.). Based on this, the Group aims to take the best action available, such as collaboration with communities and related organizations (NGO, NPO and other concerned organizations).

The Omron Group Sustainable Conduct Policies were developed by referring to ISO 26000 – Social Responsibility, the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact, the Universal Declaration of Human Rights, and other major international standards and guidelines.

# Omron Group Rules for Ethical Conduct





All individual members for the OMRON Group, including directors, officers, and employees (referred to as "**Members**", "**we**", or "**us**") will understand and comply with this OMRON Group Rule Relating to Ethical Conduct in order to contribute to enhancing the social reputation of the OMRON Group and its corporate value, and to facilitating smoother corporate management and business practices.

## **1. Respect for Human Rights**

### **(1) No Discrimination or Other Unreasonable Treatment**

We will value the human rights of each individual and must not discriminate, harass or treat others in an unreasonable manner.

### **(2) Fair and Sincere Attitudes towards Others**

We will interact with others with respect and gratitude, and respond to them in a fair and honest manner.

### **(3) Respect for Privacy and Protection of Personal Information**

Subsection 6. (2) "Respect for Privacy and Protection of Personal Information" shall apply to the respect for privacy and the protection of personal information.

### **(4) No Forced Labor and Child Labor**

We must not engage in forced or child labor or other similar practices.

## **2. Labor Standards Compliance**

### **(1) No Harassment**

We must not engage in sexual harassment, power harassment, status-based harassment (i.e., workplace discrimination or infliction of emotional distress based on a position of power) or any other form of harassment.

### **(2) Proper Work Communication**

Our workplace communication must not adversely affect the company's reputation or creditworthiness, or create a hostile work environment.

### **(3) No Coercion**

We must comply with the Rules and must not use coercion, force or threats to induce others to violate internal OMRON policies or applicable laws and regulations.

## **3. Occupational Health and Safety**

### **(1) Safety and Comfort in the Workplace**

We must comply with all applicable laws, regulations and internal company rules relating to safety and hygiene in the workplace. We will strive to create a workplace that is safe and comfortable to work in both physically and mentally.

### **(2) Prompt Response to Accidents and Prevention of Recurrence**

If any disaster, accident, outbreak of infectious disease, environmental spill, or other misfortune occurs in the workplace, we will promptly take all appropriate measures in accordance with directions from responsible managers and others in charge. We also will actively cooperate in company efforts to limit and prevent such events in the future.

## **4. Safe Products and Services**

### **(1) Delivery of Secure and Safe Products and Services**

We will execute the fundamental policy of "Quality First" in our products and services by prioritizing security and safety over other business functions such as planning, R&D, production, sales, maintenance, and disposal.

### **(2) Making Safety Information Available**

To ensure user safety, we will provide to our customers plain and clear instructions and warnings. We will also make available safety training and guidelines to encourage proper use of our products and services.

### **(3) Prompt and Proper Action in the Event of Accidents**

If there are accidents caused by our products or services, we will take prompt action to limit damage. We will investigate and identify facts, make appropriate disclosure, identify the causes of the accidents, and take action to the extent practicable to correct any problems and prevent the recurrence of the problem.

### **(4) Complying with Laws, regulations, and Standards**

We will comply with all applicable laws, regulations, and standards relating to the quality and



safety of products and services in the countries or regions in which they are sold and used.

### **5. Protection of Customers**

#### **(1) Provision of Appropriate Information**

To assist customers and consumers with decisions regarding the purchase, use and disposal of our products and services, we will examine all methods of providing information, such as specification sheets, instruction manuals, leaflets and website pages, and carefully consider and implement appropriate methods of notification.

#### **(2) Protection of Customer Information**

Subsection 6. (1) "Proper Management of Information" shall apply to the protection of customer information.

#### **(3) Good Faith Response to Inquiries and Service Requests**

We will respond in good faith to requests and inquiries from customers and consumers. We will also forward feedback and input from customers and consumers to relevant internal personnel, so as to incorporate useful customer input into subsequent business activities.

### **6. Information Protection and Management**

#### **(1) Proper Management of Information (Information Security)**

To fulfill our responsibilities to all stakeholders, we will appropriately manage personal information, company information and information supplied from business associates. Appropriate management of information requires identifying and marking information to be protected, management of third parties to which information is disclosed, and reasonable systems and procedures to prevent illegal or inappropriate leakage of confidential or private information, misuse of such information, use of mistaken information such as data input errors, and loss or corruption of such information as well as system failures.

#### **(2) Respect for Privacy and Protection of Personal Information**

We respect the privacy of all persons and will use all reasonable care to maintain the privacy and confidentiality of personal data, prohibiting unauthorized disclosure of or access to such data in accordance with applicable data protection laws and regulations.

### **7. Protection and Management of Intellectual Property**

#### **(1) Respect for Intellectual Property and Non-infringement of Rights**

We respect intellectual property held by others and must not infringe the intellectual property rights of others. Unless we have reasonable grounds for its use, we will obtain the consent of the owners of intellectual property. We must not make unauthorized use of the intellectual property of others.

##### **a. Due Investigation of Intellectual Property**

Before the development, manufacture, sale or distribution of products or services, we will conduct appropriate investigations of existing patents, designs, trademarks and other intellectual property rights of others.

##### **b. No Unauthorized Reproduction**

We must not make unauthorized copies of software or other copyrighted materials.

##### **c. Proper Use of Computer Networks**

We will not infringe on the rights of others with regards to copyrighted materials (such as books, articles, pictures, music or other items) when communicating information in e-mails or website pages or when using information available on computer networks.

#### **(2) No Misappropriation and No Unauthorized Use of Trade Secrets**

We must not acquire or use trade secrets of others in an unauthorized or unreasonable manner.

#### **(3) Proper Management of OMRON's Intellectual Property**

We must appropriately manage intellectual property held by the OMRON Group, complying with internal company rules regarding confidentiality and information security. We must also safeguard the company from unauthorized disclosures, leakage and infringement of intellectual property rights by others.

#### **(4) Prompt Reporting of Intellectual Property Created in Work**

In accordance with internal OMRON rules and employment-related agreements, we will promptly report to OMRON information regarding inventions, designs, trademarks, copyrighted materials, trade secrets and other intellectual property devised, created or made in relation to job related activities.

#### **(5) Proper use of the OMRON logo and OMRON domain**

We will use the OMRON logo and OMRON domain correctly in accordance with the internal



rules that stipulate the ways for representation and presentation and the conditions for usage, approval process and other matters, in order to maintain and improve the value of the brand.

### **8. Fair and Healthy Competition with Competitors**

#### **(1) No Restrictions on Free Business Practices**

We must not engage in illegal agreements or arrangements that may lead to restrictions on free business practices as set forth by the applicable laws and regulations.

##### **a. No Agreements with Competitors (No Cartels)**

We must not engage in price fixing or other illegal agreements or arrangements with competitors regarding sales volume, territories, customers or other competitive factors.

##### **b. No Unethical or Unfair Bidding Arrangements**

We must not take part in any unethical or unfair bidding activity, such as fixing the successful bidder or contract price.

##### **c. Prohibition on Certain Trade Association Activities**

When participating in trade associations or other meetings with companies in our industries, we must not participate in any way in actions or plans with competitors contemplated to form a cartel, rig bidding or interfere with companies newly entering a market or exclude other companies from a market. If presented with proposals by other companies to engage in these activities, to avoid any doubt, we must register our clear objections.

#### **(2) No Unfair Trade Practices**

We must not misappropriate the trade secrets of others and not engage in unfair trade practices such as untrue or misleading statements to customers about products of others.

### **9. Fair Dealings with Distributors**

#### **(1) We will deal with distributors, agents or other distribution entities (“Distributors”) in a fair and honest manner and must not make unreasonable demands or exhibit unfair behavior towards them.**

##### **a. No Restrictions on Resale Prices**

We must not engage in any illegal agreement with respect to fixing resale prices with Distributors, nor must we instruct or pressure Distributors to maintain inappropriately the level of wholesale or retail prices, unless permitted under applicable laws and regulations.

##### **b. No Unfair Rebates**

Rebate policies and terms must be fair and clear with respect to calculation standards, timing, method of payment and other items. We must not reward Distributors with rebates for maintaining resale prices or for not dealing with competing products, unless permitted under applicable laws and regulations.

##### **c. No Abuse of Bargaining Power**

We must not take unfair advantage of our market position to dictate or change business terms, force purchase of our products, request unreasonable financial contributions or interfere with internal management of our Distributors.

##### **d. No Restrictions on Distributors**

In addition to the above, we must not engage in unfair trade practices with our Distributors, such as imposing unreasonable restrictions.

#### **(2) We must not accept money, gifts or entertainment from any Distributors except for items distributed for advertising purposes, gifts for all section members and entertainment and gifts of de minimis value that are appropriate to promote mutual relationship. In addition, We must not offer excessive gifts and entertainment beyond appropriate as a courtesy or as permissible under current societal standards We must understand some countries and regions prohibit receiving and/or giving certain gifts and entertainment as commercial bribery.**

### **10. Fair Dealings with Suppliers**

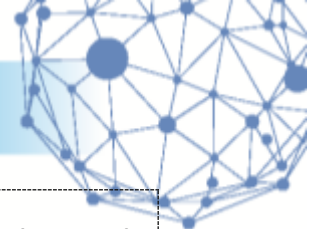
#### **(1) Fair Selection of Suppliers**

We must deal with selections of suppliers of products or services based on an “open door” policy. We must select suppliers fairly, based on objective standards such as quality, price, delivery, service and compliance.

#### **(2) Equal and Fair Relations**

Purchasing must be equal, fair and based on mutual agreement. We must work fairly and honestly with our suppliers and not make any unreasonable demands or exhibit unfair behavior toward them. We must comply with all applicable laws and regulations regarding purchasing.





### a. No Compulsory Purchases or Tie-in Transactions

We must not force suppliers to purchase certain products or services or make supply transactions conditional on their purchase of our products or services in violation of applicable laws and regulations.

### b. No Abuse of Bargaining Power

We must not abuse our position as purchaser or consignee to dictate unfairly the terms of transactions or related changes or to impose unreasonable demands or obligations.

### c. No Monetary Gifts and Entertainment

We must not accept money, gifts or entertainment from any supplier except for items distributed for advertising purposes, gifts for all section members and entertainment and gifts of de minimis value that are appropriate to promote mutual relationship. We must understand some countries and regions prohibit the receipt of certain gifts and entertainment as commercial bribery.

## 11. Fair Dealings with Customers

### (1) No Misleading Conduct

We must avoid conduct or misuse of facts that will mislead consumers and customers in their decisions regarding product purchases.

#### a. No Excessive Promotional Items

We must not provide to customers gifts, gift coupons or prizes that would exceed statutory limits under applicable law and regulations.

#### b. Fair Comparison Advertising

When we make advertisements, representations or explanations regarding our products or services in comparison with those of others (if permitted under applicable local laws and regulations), we must not make false, inaccurate or misleading statements.

#### c. Fair Representations, Advertising and Promotion

In our brochures and advertising for products or services, we must not make false or misleading representations with respect to such products or services. Furthermore, our advertising and promotions must comply with accepted ethical standards for advertising, and we must not defame or infringe the rights of other companies or individuals, or violate applicable laws and regulations.

### (2) No Excessive Entertainment

We must not offer excessive gifts and entertainment beyond appropriate as a courtesy or as permissible under current societal standards; provided that Subsection 12. (1) "Compliance with Restrictions on Entertainment and Gifts" shall apply to gifts and offerings to public officials or governmental employees (which are generally prohibited). We must understand some countries and regions prohibit giving certain gifts and entertainment as commercial bribery.

## 12. Appropriate Relations with Governmental Authorities

### (1) Compliance with Restrictions on Entertainment and Gifts

We must comply with restrictions on entertainment and gifts to public officials, employees in public bodies or governmental owned entities, and politicians ("**Governmental Employees**").

#### a. No Unlawful Exchange

We must not offer payments, entertainment or gifts, or provide other personal benefits to Governmental Employees in any way related to OMRON business, such as for purposes of obtaining or maintaining commercial contracts, receiving preferential tax or other treatment or acquiring non-public information.

#### b. No Entertainment or Gifts

With or without the intent to win favorable treatment, we must not offer entertainment or gifts to Governmental Employees unless clearly permitted by prudent social standards and applicable laws and regulations.

#### c. Third Party Payments

The provisions of a. and b. above also apply to payments, entertainment, gifts or other personal benefits given through third parties, such as agents or consultants.

### (2) Applicable to Foreign Governmental Employees

The above guidelines will apply to all politicians and Governmental Employees in countries in which we do business.

## 13. Standing Firm Against Antisocial Forces

### (1) No Offer of Economic Benefits



We must not provide economic benefits in any form in connection with shareholders' exercise of their rights.

(2) No Affiliation with Antisocial Groups

We must not have any interaction whatsoever with antisocial groups or groups that threaten the public order and security, regardless of the manner, such as through magazine subscriptions, donations, membership fees or commercial transactions.

(3) "Standing Firm" Attitudes

We must "stand firm" in our refusal of demands for money or gifts from any antisocial group. Members receiving any such demands must, upon consultation with their manager or supervisor, resolutely refuse any such demands with a policy of "No Money," "No Use" and "No Fear." We will report these incidents to the appropriate regulatory agency.

(4) No Money Laundering

We must comply with applicable laws and regulations regarding "money laundering" and similar financial transactions, such as relating to the holding, exchange, conversion and transfer of illegally generated financial assets.

### 14. Proper Discharge of Tax Responsibilities and Accounting

(1) Compliance with Tax Laws

We must endeavor to maintain our understanding of, and strictly compliance with, tax and foreign exchange laws. We must promptly pay our tax obligations.

(2) Proper Accounting Management

We must handle all expenses, accounting sales, profits and fund transfers properly and in accordance with applicable laws, accounting principles and internal company rules. We must not make any false descriptions in accounting documents and must not conceal accounting information.

(3) Maintenance of Records and Reporting

We must maintain records of the foregoing in accordance with applicable laws and regulations, accounting principles and internal company rules. Accurate information and records must be disclosed or reported to the administrative section of the company, if requested, for their review of the foregoing practices.

### 15. No Speculative Investment

(1) Appropriate Funds Management/Investment Activities

Funds Management/Investments in real estate, securities and other similar items must be made in accordance with internal company rules and applicable laws and regulations, and must be limited to the scope necessary for the management and business purposes of the company. These investments must be carried out only after receiving necessary approvals.

(2) No Speculative Investment

We must not make any investments, foreign currency exchange transactions or commodities purchases for purposes of speculation.

### 16. Environmentally Conscious Business Activities

(1) Environmental Activities

Throughout our operations with respect to research and development, production, sales, administration and after-sales service, we will undertake environmental activities such as energy and natural resource conservation, reducing waste, discontinuing or reducing use of hazardous materials, reclaiming unused products and recycling.

(2) Compliance with Environmental Regulations

We must properly understand and comply with all applicable environmental laws, national and local regulations, and other governmental requirements and agreements for preserving the environment and protecting it against industrial pollutants.

(3) Compliance with International Standards

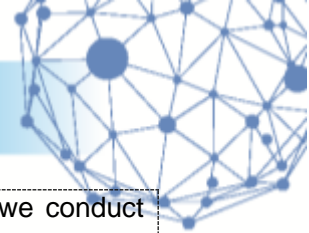
We will establish an environmental management system to achieve conformance with international standards. We will maintain relevant environmental standard certifications.

### 17. Respect for Local Communities

(1) Compliance with International Rules and Local Laws

We must comply with applicable laws and regulations of the respective countries or regions in which we conduct transactions.

(2) Respecting Culture and Customs in Each Country or Region



We will respect the local customs and cultures in countries or regions in which we conduct business.

### (3) Maintenance of Safety in Business Practices

We will endeavor to maintain safety in our business practices through proper management of equipment, facilities and practices so as to prevent our business practices from threatening the communities in which we operate. If any problem occurs, we will promptly respond under the guidance of responsible company management. We also will cooperate in the company's implementation of necessary measures to limit the damage and prevent the recurrence of such problems.

## 18. Strict International Trade Management

### (1) Compliance with Laws/Regulations and Internal Rules regarding Prohibition of Engaging in Restricted Trade and Export Control

We must not be involved in any trade activities that negatively affect, in any significant way, the maintenance of international peace and security. Moreover, we must comply with all applicable laws and regulations and internal rules regarding export control in countries or regions in which we conduct business.

#### a. Obtaining Export Licenses and Permits

Before initiating certain activities that are restricted by applicable laws and regulations or internal company rules such as exporting weapons, controlled commodities (such as products, parts and production facilities) or controlled technologies (such as software, drawings, materials and training) that may fall within the export control restrictions under applicable laws and regulations or internal company rules and could be used for weapons, we must obtain appropriate licenses or approvals.

#### b. No Dealings with "Forbidden Persons"

We must not sell products or technology to customers listed on any applicable forbidden or restricted persons list in violation of applicable laws and regulations or internal rules.

#### c. Compliance with Statutory Procedures for Hand Deliveries Out of Country

We must comply with export control requirements, including with respect to hand deliveries of controlled products or technologies on business trips abroad and electronic transmission of software or technical documents.

### (2) Compliance with Laws/Regulations and Internal Rules regarding Customs Clearance Administration

When engaging in international trade, we must classify goods, set prices, and determine and mark the country of origin in a precise manner in accordance to the laws and regulations and internal rules regarding customs clearance administration.

## 19. Proper Contract Management

Before we execute a contract with a third party, we must have it reviewed by the legal department in advance and obtain approval under internal rules. We will properly manage contracts and their retention, modification, renewal and termination and perform their terms and conditions in good faith.

## 20. Prohibition of Abuse of Corporate Position

### (1) No Insider Trading

Each of us must not, by using non-public information about OMRON Corporation or other listed companies obtained through performance of work duties, personally participate in the purchase or sale of stock of OMRON or such other companies.

In addition, each of us must not use non-public information obtained at work for obtaining personal economic benefit such as investing in real estate.

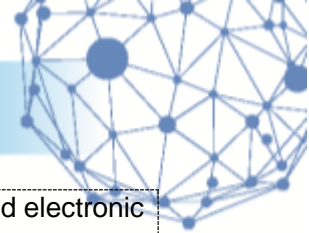
Finally, each of us must not communicate any such non-public information to any person inside or outside the company, except when the disclosure is necessary for performance of work duties.

### (2) No Disclosure of Confidential Information

Each of us must not disclose trade secrets or other confidential information about OMRON to any third party if the disclosure is not necessary for performance of work duties. Such information must not be used for purposes other than the performance of work duties.

### (3) No Use of Corporate Property and Assets for Non-Work Purpose

Each of us must not take company property off the company premises or use company property for personal benefit or the benefit of a third party, unless the same is necessary for performance



of work duties. (In this subsection, company property includes computer systems and electronic data.)

(4) **No Money and Monetary Gifts and Entertainment**

Each of us must not accept cash, gifts or offers of entertainment in connection with work activities except as permitted in Subsection 10(2)c.

(5) **Related Party Transactions**

Each of us must not be engaged in any conflict of interest situations or related party transactions without prior and proper disclosure to and approval by top business and compliance management in accordance with internal company rules. Such restricted transactions may include, for example, any purchase by an OMRON Group company of products or services from a company owned or controlled by a Member or relative of a Member.

(6) **Prohibition of Conduct that oversteps granted Authority**

When making a decision on behalf of our company, we may not overstep our granted authority, and must follow the approval procedures established by the internal rules.

(7) **No Pursuit of Personal Gain**

In addition to the above, each of us must not seek or accept inappropriate personal gain for ourselves, or family members in connection with performance of work duties.

### **21. Prohibition of Activities that Harm the Company's Reputation**

(1) **No Personal Activities at Workplace**

Except as otherwise permitted clearly by OMRON, each of us must not, at work facilities, engage in political or religious activities, sales or solicitations regarding products or services, or other similar activities unrelated to our work duties.

(2) **No Use of Company Reputation or Creditworthiness**

Each of us must not make use of OMRON's reputation or creditworthiness to secure personal gain.

(3) **No Adverse Effect on Company's Reputation**

The private activities of each of us must not adversely affect the company's reputation or creditworthiness. When using internal or external social media, we must ensure protection of personal privacy, must not disclose confidential information of OMRON or third parties learned through work activities, and must not share information that may negatively affect OMRON's reputation or the OMRON brand.

(4) **No Engagement in Other Work**

Each of us must not be employed with other companies or engage in work that may compete with OMRON's businesses or that may conflict with the company's interest without approval of the company.

(5) **No Use of Illegal Drug**

We must not, at work facilities or within working hours, sell, buy, possess, use, or be under the influence of illegal drugs.

(6) **Safety Precautions for Travelling**

When travelling on OMRON business, we must comply with company guidelines and rules and endeavor to secure our own personal safety. In particular, when travelling to a foreign country, we must plan carefully and act cautiously to ensure the safety of all aspects of our travel, including any personal time.

(7) **Compliance with OMRON Group Rules and Laws**

We must comply with the OMRON Group Rules. And as a member of society, each of us, in our private activities, must comply with applicable laws and regulations.

### **22. Consultation and Reporting**

If we discover any violation of the Rules and a risk that may damage social trust of the company or may cause serious damage, we should consult with and report to our supervisor or manager in charge of risk and compliance in the company or report the same through our whistleblower service or to the legal department.