

Yusen Logistics Group Code of Conduct

Foreword

The objectives of the Yusen Logistics Group are the provision of advanced and high-quality logistics services to maximize our corporate value through winning the trust of our clients and, ultimately, contributing to the advancement of the international economy as a world-class global corporation.

To achieve these objectives, our business activities must not only comply faithfully with the laws and regulations of each country, as well as international rules, and to be fair in practice in conformity with social norms.

At the same time, our business activities are founded on our human resources, the greatest asset of the Yusen Logistics Group. We believe that the betterment and enrichment of the capabilities of our manpower will lead to our growth as a truly global company.

In order to realize this, Yusen Logistics has set forth the Code of Conduct herein for all directors and employees belonging to the Group to observe and refer to for proper and ethical behavior.

We believe that each and every individual in the Group must upgrade one's sensitivities toward world developments and changes in social values and at the same time put into practice what is written in the Code of Conduct without fail in order to ultimately reach our goals to fulfill the social responsibility as an enterprise.

Yusen Logistics Co., Ltd.

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Chapter 1 Fair and Sincere Business Activities

1.1 Providing Logistics Services of Outstanding Quality and Safety

As a global logistics company, we provide services of outstanding quality and safety, with careful attention to fairness and integrity in our business activities, in order to win the trust and satisfaction of our customers.

1.2 Compliance with Laws and International Rules

(1) As a global company engaged in international business activities, we observe the laws and regulations of the countries where we operate and the international conventions and rules pertaining to trade practices, in addition to the laws and regulations of our home country. At the same time, we honor and respect the cultures and customs of the various regions of the world.

(2) In business operations in Japan and other countries, we obtain permits and approvals required by the laws of each country and engage in legitimate activities.

(3) Upon arrangements of import and export procedures requested by the customer, we comply with the related import and export laws of each country, understand and endeavor to comply with trade regulations invoked by national governments and international organizations such as the United Nations.

1.3 Full Compliance with the Antitrust Law.

(1) We will comply with the “Act on prohibition of private monopolization and maintenance of fair trade” of Japan, and any other laws and regulations to maintain fair trade and competition in all countries where our group companies operate.

(2) We will not engage in cartel behavior, acts that impede free and fair competition or any other act that may invite suspicion of such behavior.

(3) We assure that we do not promote nor participate in any meetings to discuss matters that could lead to the restriction of fair competition in the market.

(4) Upon dealing with business partners, we assure that we will not use our dominant bargaining position to delay or refuse payments, or unjustly return or refuse acceptance of products/services of subcontractors.

* Please refer to: "Yusen logistics group antitrust/competition law compliance basic policies"

1.4 Prohibition of Bribery

(1) As a global corporation, the Yusen Logistics Group observes the US Foreign Corrupt Practices Act (FCPA) and any other law that prohibits corrupt practices and bribery.

(2) Domestically or internationally, against any public or private individuals, directly or indirectly, we will not provide, offer or promise to pay, nor will we accept, request or agree to receive any sort of bribe or similar transaction in order to gain unlawful benefit.

* Please refer to: "Yusen logistics group Non-bribery basic policies"

1.5 Gift-giving and Entertainment

We will not engage in gift-giving and business entertainment exceeding the norms of social etiquette in our relations with our customers and business partners.

Also, we shall not accept gifts, entertainment, etc., that may lead to personal gain.

1.6 Prohibiting Conflict of Interest

(1) Individuals belonging to the Yusen Logistics Group will not serve as director, advisor, employee, agent, etc., for other business enterprises or organizations, except with the approval of the Company.

(2) We will not make use of the Company's assets or facilities without permission obtained in advance.

(3) We will engage in trade with vendors with fairness and impartiality and will not compromise the interests of the Company by promoting the interests of oneself, relatives, friends or acquaintances or designated organizations.

1.7 Cooperation with Research by Administrative Authorities

(1) We will cooperate with requests from relevant government organizations or other government-related organizations for research, notification or report and act accordingly in good faith.

(2) We will cooperate actively with internal audits and inspections related to the state of compliance with Company regulations and with laws and regulations. Should need for improvement, be pointed out, we will act promptly to address the issue, unless logical reason exists to do otherwise.

Chapter 2 Respect for Human Rights

2.1 Respect for International Norms on Human Rights

We respect international norms on human rights and will not engage in acts that violate human rights and the dignity of the private individual in any of our business activities.

2.2 Eradicating All Forms of Discrimination

We respect the rights of all persons and will not engage in discriminatory action or make discriminatory remarks based on gender, age, nationality, ethnicity, creed, religion, occupation, social status, appearance, illness or disability.

2.3 Prohibiting Harassment

We will not engage in libelous or slanderous acts that violate human dignity, abusive acts that may be regarded as harassment or any other act that may be misinterpreted as harassment, without any exception.

2.4 Prohibiting Forced Labor or Child Labor

We will pay due attention to the social responsibility of business corporations and will neither allow forced labor or child labor nor conduct trade with business enterprises engaged in such acts.

2.5 Equal Opportunity in Employment

We will promote equal opportunity in employment, personnel administration, wages, training, promotion, etc., and will observe labor contracts and other agreements with attention to the protection of the rights of workers established in international treaties and in laws and regulations of each country or region.

Chapter 3 Building a Friendly Work Environment

3.1 Importance of Diversity

We embrace the diversity of employees in personality, individual traits, ways of thinking, value perception, etc., and will realize sustainable growth of the Group by tapping into a wide range of human resources and generating vitality as an organization.

3.2 Assuring Balance between Work and Private Living

(1) We support work styles that realize balance between work and private living (work-life balance) and pay attention to the creation of a work environment in which each employee is able to work with a sense of satisfaction and fulfillment.

(2) For employees who need allowance for maternity, childbirth, child care, nursing care for family members, etc., we will develop a work environment that enables such employees to do so while working, through the creation of various work schemes and leave programs.

3.3 Assuring a Safe and Healthy Work Environment

(1) Maintenance of a safe and healthy work environment is the top priority for Yusen Logistics.

We engage in the prevention of accidents and occupational injury on a daily basis.

(2) We engage in keeping the work environment comfortable for the workers by actively conducting measures that maintain and promote the sound physical and mental health of workers.

Chapter 4 Relationship with Society

4.1 Assuring Information Disclosure and Corporate Transparency

(1) We will properly disclose Information demanded by society as needed with laws and regulations. At the same time, we proactively provide information beyond that which is required by law.

(2) We promote communication with our customers, shareholders and investors, employees and other stakeholders to achieve corporate transparency.

4.2 Sound Corporate Accounting

We assure the soundness of our financial statements by engaging in accounting and financial reporting in compliance with relevant laws and regulations, fair and rational accounting standards.

4.3 Rejecting Transactions with Antisocial Forces

(1) We will not establish any relation whatsoever with antisocial forces—or parties that are suspected to be related to such forces—that may threaten order and security of civic society.

Furthermore, we will categorically reject any demand for monetary payment or offer for transaction that transgresses legal authority from such an organization and shall act to eliminate such organizations with the resolution.

(2) Without exception, we will not be involved in terrorism, money laundering or any other form of organized crime and will furthermore conduct careful study into the processes for transactions to ensure they are not used in such crimes.

4.4 Political and Religious Activities

The Yusen Logistics Group does not support any specific political or religious movement.

Furthermore, as a general rule, the Group will not allow such activities to take place on Company premises, during business activities and its extent.

4.5 Social Contribution Activities

We promote harmony with regional communities and international society as a good corporate citizen and actively engage in social contribution activities through our business operations and sustainable advancement of our corporate value.

4.6 Attention to the Environment

We observe and comply with treaties, laws and regulations and rules related to environmental protection and engage actively in protection and preservation of the environment.

Chapter 5 Information Assets

5.1 Information Management and Administration

- (1) We will not acquire confidential information of other companies for unauthorized use. Furthermore, confidential information that had been disclosed to the Company will be used strictly for business purposes. If a confidentiality agreement is concluded, we will comply with the terms of the agreement.
- (2) Confidential information obtained in the course of business shall be managed properly in all information-related processes, including storage, use and disposal, and shall not be leaked or used without authorization, both during and after service with the Company.
- (3) We recognize the importance of protecting personal data and will handle such data obtained in the course of business activity appropriately, refraining from unauthorized use or removing the data from Company premises.
- (4) We uphold the protection of intellectual property rights of the Group and at the same time honor and respect the intellectual property rights of other business corporations, paying due caution to prevent violation.

5.2 Prohibiting Insider Trading

- (1) Should a director or an employee of the Group obtain unannounced information on the Company, our business partners, suppliers or customers that affects investment decision-making (insider information), we will not allow such a person to engage in trading stocks of the Company or of the business partner or supplier until official disclosure of the said information.
- (2) We will not allow such a person to leak insider information, recommend selling or buying to an external party with the aim of gaining profits or avoiding loss.

5.3 Appropriate Use of Information Systems

We comply with internal regulations on information security and, in use of the Company's information system devices, implement measures to prevent damage or loss of hardware, software, network or recording media making up the system, to prevent data leakage and to protect ourselves from external cyberattacks.

Chapter 6 Responsibility of Top Management

The top management should exercise initiative in complying with the Code of Conduct herein and strive for business management founded on fair corporate ethics and compliance with laws and regulations. In case a director or an employee violate the Code of Conduct, top management should clarify both internally and externally that it will take charge to resolve the problem, determine the cause of infringement and make efforts to prevent similar violations in the future, At the same time, top management should promptly make full public disclosure, explain what has occurred, and, upon determining the source of competence and responsibility, impose strict disciplinary action against those held responsible, including top management itself.

Chapter 7 Application of the Code of Conduct

The Code of Conduct herein applies to all directors and employees of Yusen Logistics Company, Ltd., as well as our Group companies, and applies accordingly to workers at such a company based on temporary service contracts.

Miscellaneous Rules

1. Inquiry regarding the Code of Conduct

For further information or questions regarding the Code of Conduct, please contact the Legal Affairs Department.

2. Application of the Code of Conduct to Group Companies

The companies of the Yusen Logistics Group are able to establish their own respective corporate codes of conduct, adapted to the laws and regulations, customs, culture, etc., of their respective country or region, in compliance with the rules of the Code of Conduct herein. However, deviation from the purpose of each provision of the Code of Conduct or relaxation of the provision is not allowed.

3. Modification of the Code of Conduct

Revision and cancellation of the Code of Conduct will require the approval of the Board of Directors.

4. Punitive Action

A director violating the Code of Conduct herein shall be imposed with strict punitive action according to the provisions of Chapter 6.

Also, employees may be imposed with punitive action based on laws or regulations, work regulations or the terms and conditions of the contract with the company with which they are directly affiliated.

Established on May 1, 2005

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