

# Inabata Declaration of Compliance

The management and employees of Inabata & Co., Ltd. (the "Company") shall ensure that we operate to our own high standards. This declaration of compliance describes and summarizes our commitment to fully observe the laws and regulations applicable to our activities.

## **1. Respect for human rights**

We respect human rights and never discriminate against individuals based on race, gender, religion or nationality. In addition, we do not tolerate any form of harassment either inside or outside the office.

## **2. Laws and Regulations**

We comply with all applicable laws and regulations that are relevant to our business and conduct business in an ethical and responsible manner.

## **3. Import/export formalities**

We comply with relevant export and import procedures and do not import goods prohibited by laws or international treaties.

In exporting goods or technologies subject to export controls, we always comply with applicable laws and regulations.

## **4. Insider trading**

If information which may influence the judgment of investors becomes known to us, we refrain from trading stocks or securities of the subject company until such information becomes public.

In trading stocks or securities, we comply with laws regarding insider trading as well as the internal regulations of the Company.

## **5. Bribes and entertainment**

We never offer bribes or provide favors to domestic or foreign government officials or persons holding similar positions.

Offering gifts to or entertaining those in the private sector shall always be carried out within the terms of relevant laws, regulations and socially accepted standards.

## **6. Antisocial groups**

We never give in to antisocial groups, we refuse unreasonable demands and avoid easy monetary compromises.

## **7. Environmental conservation**

We comply with relevant laws and regulations regarding environmental protection and maximize our efforts to reduce the burden imposed on the environment.

## **8. Information management**

We shall use the Company's information or information disclosed by third parties, only for those purposes permitted by the relevant laws, and in an appropriate manner, and shall not use it for our personal benefit under any circumstances.

Personally identifiable information shall not be used for any purpose other than that designated by the discloser, nor shall it be disclosed to third parties without justifiable grounds.

## **9. Accounting procedures, tax returns, and disclosure of the Company's information**

We keep accurate accounting records, file proper tax returns and disclose material Company information in accordance with relevant laws and regulations.

## **10. Conflicts with the Company's interests**

We shall not participate in any activity which conflicts with the Company's interests.

We shall not use the Company's property, assets or information systems for any purpose other than that of pursuing the Company's business.