

# Code of Corporate Conduct

This Code of Corporate Conduct (the “Code”) is designed to provide a framework for the main principles and rules, reflecting applicable legal requirements and ethical standards, governing SCASE’s corporate actions and Personnel’s conduct in business activities.

The Company requires all of its employees (including officers and Board members), as well as contractors, consultants, representatives, agents and others who may temporarily be assigned to work for SCASE, to comply with this Code in connection with any work or services performed on our behalf.

The Company aims to ensure compliance with the Code through training programs, as well as monitoring programs involving internal investigations and audits. Failure to comply with the Code may have serious consequences on Company Personnel and result in disciplinary action up to (and including) termination of employment and, in certain instances, in civil sanctions or criminal prosecution according to applicable laws. In the event that contractors, consultants or others providing services to SCASE fail to comply with the Code, the Company will terminate those services.

If you are ever concerned that any activity or conduct of yourself or others may be not in compliance with the Code and in breach of any applicable laws, you are required to promptly contact your manager and report the relevant circumstances to him. By voluntary reporting any actual or suspected violation of this Code, you may avoid sanctioning actions by the Company.

The Code is organized in five sections that address how we at SCASE conduct ourselves:

- I. Relationship with society
- II. Relationship with customers, suppliers, and competitors
- III. Relationship with shareholders
- IV. Relationship with employees
- V. Relationship with the Company and its property

## **I. Relationship with society**

### *1. Compliance with laws*

We must fully understand all laws applicable to our business activities and take the necessary steps to comply with such laws (e.g. to obtain all necessary permits and licenses).

### *2. Freedom from association with antisocial forces*

We must stand firm against and eschew any relationship with antisocial groups or organizations.

### *3. Restrictions on social and political donations*

We must comply with applicable laws and regulations concerning the making of social or political donations, or buying tickets to fund-raising events.

### *4. Compliance with anti-corruption laws*

We must comply with all applicable anti-corruption laws and not conduct any act that may be considered to amount to bribery, fraud, corruption or any other form of corrupt business behavior. Violating anti-bribery laws is a serious matter that can result in significant financial penalties as well as in criminal prosecution.

### *5. Environmental protection*

As good global citizens, we must act autonomously and proactively to protect and live in harmony with the global environment and to fulfill our corporate social responsibilities through various activities; including, for example, dialogue with, and disclosure of information to, local residents to ensure their understanding.

### *6. Safety and disaster prevention*

We must handle chemical substances appropriately and seek to prevent the occurrence of accidents and disasters. Should any accident occur, we must take prompt action to limit the

resulting damage and to secure safety.

#### *7. Security trade controls*

If we export or are asked to analyze goods or technologies related to the manufacture or use of conventional weapons or nuclear, biochemical, or other weapons of mass destruction, we must fulfill our responsibilities to maintain international peace and security in compliance with applicable laws and regulations.

#### *8. Compliance with import and export laws and regulations*

We must ensure proper import and export controls in full compliance with applicable laws, regulations and international treaties concerning international trade.

## **II. Relationship with customers, suppliers, and competitors**

#### *9. Contractual obligations to customers and confidentiality*

Once we sign a contract with a customer, we are bound by confidentiality and other contractual obligations towards the customer. Customer confidential information that is disclosed to us may include, for instance, trade secrets, know-how, customer lists, production and sales data, manufacturing processes, R&D and technological development, intellectual property or marketing plans. We are prohibited from communicating any customer confidential information to third parties excluding such ones as permitted by any contracts with the customers corresponding to the owner of the confidential information in question.. In addition, we must take adequate measures to maintain the integrity of such information, protect its confidentiality and avoid the inadvertent spread and misuse of this data, in order to retain customer confidence and trust, fulfill our contractual obligations, and add to the driving force for future growth.

#### *10. Maintenance of the suitability of governing laws*

We must ensure that both we and the customer understand all laws and regulations governing specific business activities, including the provision of services and the sale of products to the customer. We must also ensure that all materials needed for business

activities and methods for handling such materials meet statutory safety requirements at all times. We must implement measures to prevent any increase in environmental loads resulting from the use thereof.

*11. Maintenance of product quality*

We must warrant the high-quality of tests done for, and products sold to, customers in compliance with applicable laws and regulations.

*12. Compliance with antitrust laws*

We must comply with domestic and foreign antitrust laws designed to protect and promote free market competition and must not engage in agreements or other collusive practices that have the objective or effect of preventing, restricting or distorting market competition, nor in abuse of market power or any other illegal trade practices. All of us, as well as any agents or third parties acting for the Company, must adhere strictly to the letter and the spirit of these laws. A breach of antitrust laws may result in very severe consequences in many jurisdictions worldwide, including exposure to heavy fines for the Company and criminal prosecution for those engaging in anticompetitive behavior.

*13. Prohibition of unfair competition practices*

We must not make unauthorized use of corporate secrets of another company or engage in any business activities that might harm the reputation of any other company. Additionally, we must not engage in any business activities involving the unauthorized use of another party's products or trademarks or the manufacture and sale of imitations that may mislead consumers, causing them to confuse our products or sales activities with those of another company, or sales activities that may mislead customers regarding product quality or origin.

*14. Respect for third parties' intellectual property rights*

We must respect the intellectual property rights of others.

*15. Entertainment and gifts*

We must avoid offering, soliciting or receiving from customers, suppliers, or other third

parties entertainment, gifts or other benefits which are inappropriate and noncustomary with local business practice.

*16. Avoidance of conflicts of interest*

We must avoid at all times acting or giving the appearance of acting for clients in the presence of a conflict of interest arising either between a client and the interest of the Company or between two or more clients.

*17. Data privacy and protection*

We respect the privacy of personal data of business partners, including customers and suppliers, in compliance with applicable privacy and data protection laws.

### **III. Relationship with shareholders**

*18. Prohibition of insider trading*

We must not engage in any action that constitutes a breach of insider trading regulations or that may lead others to suspect that we are engaged in such action. Insider trading is a serious violation of the law and can result in severe civil and criminal penalties, including imprisonment.

### **IV. Relationship with employees**

*19. Respect for human rights*

We must respect the fundamental human rights of all individuals and must avoid actions that would slight or damage another individual's dignity, including discrimination or harassment based on either the employee's position within the Company, form of employment, age, sex, origin, lineage, nationality, race, disability, religion, creed, marital status, or any characteristic protected by law.

*20. Protection of privacy*

We must not gather or use personal information concerning any Company employee,

customer, or employee of any other company, except to the extent necessary for our business activities. We must take care to ensure that such personal information is properly controlled and not divulged to any party other than those who require it for business purposes.

#### *21. Workplace health and safety*

Based on the principle expressed in the words “safety comes before anything else,” we must keep our workplaces safe, ensure safe work practices, and take steps to protect the safety and health of all those concerned, including employees of corporate partners, to at least the same degree as we do in our own workplaces. We must also be mindful of the maintenance of our own health, both mental and physical.

#### *22. Compliance with labor laws*

We must comply with applicable employment-related laws and regulations.

### **V. Relationship with the Company and its property**

#### *23. Prohibition of solicitations to join political, religious, or other organizations*

We must not force or solicit others to join or endorse political or religious organizations, groups of individuals sharing certain creeds or preferences, or other such groups.

#### *24. Proper accounting*

Our accounting practices must be abided with generally accepted accounting principles.

#### *25. Proper maintenance of transaction records*

We must establish and properly maintain accurate records of all transactions related to corporate activities in compliance with the applicable legal requirements.

#### *26. Management of corporate secrets*

In our daily activity, we have access to highly confidential information of the Company, such as trade secrets, know-how, intellectual property rights, customer lists, pricing and cost

information, financial information, personnel and compensation information, which constitutes important property and one of the Company's most valuable assets. We must take adequate measures to maintain the integrity of such information and protect its confidentiality. Failure to provide adequate protection can lead to the loss of highly confidential data, which may place the Company at a disadvantage in the marketplace.

*27. Proper handling of corporate assets (including intellectual property rights)*

We must make necessary records of and appropriately use, manage and safeguard all corporate assets, whether tangible or intangible, including the Company's intellectual property and know-how.

*28. Avoidance of conflicts of interest*

We must not capitalize on our positions within the Company or use any information that comes to our knowledge during the course of performance of our duties to engage in any action that is detrimental to the Company. We must avoid any action and any position that may be inconsistent with the Company's interests, unless specific permission has been obtained to do so. If an actual or potential conflict of interest arises, we must make prompt and full disclosure of its existence to our direct supervisor.

*29. Prohibition of personal use of corporate assets*

We must avoid using any corporate assets (whether tangible or intangible) to achieve personal goals.

*30. Proper use of communication and information systems*

We must not use the Company's communication and information technology systems, including computers and mobile devices, in an unauthorized manner.