

USUI CSR Report 2022

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January 28, 2022
USUI CO., LTD.
CSR Promotion Dept.

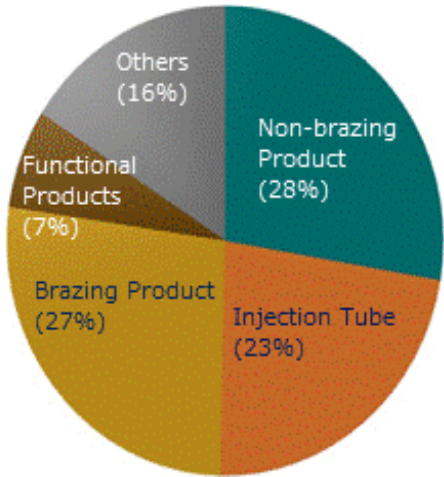
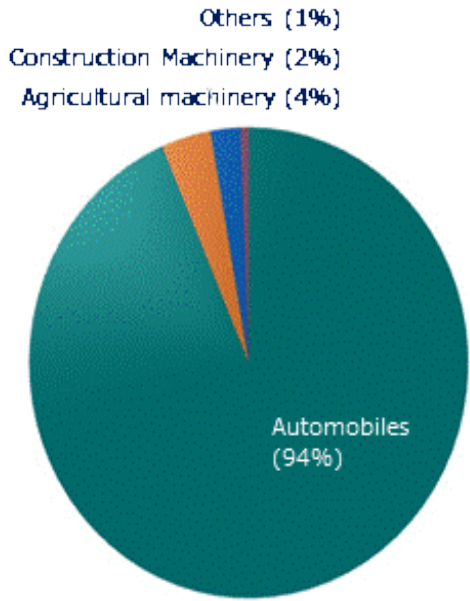
Company information



Company Name	USUI CO., LTD.
Established	February 11, 1941
Address	131-2 Nagasawa, Shimizu-cho, Sunto-gun, Shizuoka-ken,411-8610 Japan TEL : 055-972-2111
Capital	JPY 305 million
Employees	730/Global 10,500 (2020/12)
Net Sales	JPY 108.5 billion (Consolidated basis for the year ended Mar, 2021)
Overseas subsidiaries	<p>USUI International Corporation</p> <p>USUI International Corporation (Thailand) Ltd.</p> <p>USUI International France S.A.S.</p> <p>USUI International Germany GmbH</p> <p>USUI Automotive Parts(Shanghai) Co., Ltd.</p> <p>USUI Automotive Part(Foshan) Co., Ltd.</p> <p>Shanghai USUI Engine Parts Co., Ltd.</p> <p>USUI PIPE SYSTEM (HEFEI) CO., LTD.</p> <p>JIAXING USUI TSURUMI PRECISION TUBE INDUSTRY Co.,Ltd</p> <p>USUI International Korea Co, Ltd.</p> <p>USUI SUSIRA INTERNATIONAL Private Limited</p> <p>PT.USUI INTERNATIONAL INDONESIA</p> <p>USUI INTERNATIONAL MANUFACTURING MEXICO, S.A. DE C.V.</p> <p>USUI INTERNATIONAL PHILIPPINES CORPORATION</p>

1. Company Profile

Sales Ratio, Products



Fuel Injection Tube
USIT®-SP



High-pressure fuel for
Gasoline Direct Injection
Rail & Pipework



Fuel Rail UFRID®



High-Pressure Hydrogen
Tubes for Fuel Cell



AHI Tube



Push Rod



EGR Tube



ECFD®



OIL & WATER TUBE for
Turbo Charger



Plastic Cooling Fan &
Fan Drive®



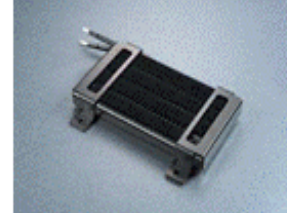
BreFin TUBE®



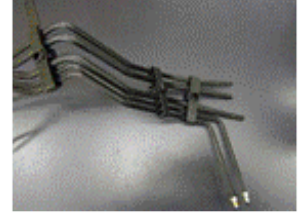
Brazing products



Fuel Cooler



ULLT®



Major customers

Domestic

[Automobiles]

- Automotive Parts Industry Co., Ltd.
- Calsonic Kansei Corporation
- Daihatsu Motor Co., Ltd.
- DENSO CORPORATION
- Hino Motors, Ltd.
- Honda Motor Co., Ltd.
- Isuzu Motors Ltd.
- JATCO Co., Ltd.
- Mazda Motor Corporation
- Meiji Flow System Co., Ltd.
- Mitsubishi Fuso Truck & Bus Corporation
- Mitsubishi Motors Corporation
- Nichirin Co., Ltd.
- Nissan Motor Co., Ltd.
- Nissan Shatai Co., Ltd.
- SUBARU Co., Ltd.
- Suzuki Motor Corporation
- Toyota Motor Corporation
- UD Trucks Corp.

[Agricultural Machinery & Construction Machinery]

- IHI Shibaura Corporation
- Komatsu Ltd.
- KUBOTA CORPORATION
- Mitsubishi Heavy Industries, Ltd.
- Yanmar Co., Ltd.

Overseas

- Audi AG
- AvtoDizel (YaMZ)
- BMW Motoren GmbH
- CAT
- China First Automobile Vehicle Grp.
- Chrysler
- Continental
- Cummins Inc.
- Daimler AG
- Denso Manufacturing
- Deutz AG
- Delphi Diesel Systems
- DMAX, Ltd.
- Dong Feng Motor Industry Group
- FCA
- Ford Motor Company
- General Motors Corporation
- Hyundai Kia Motors
- Iveco SPA
- John Deere
- Mack Trucks
- MAN Truck & Bus AG
- McLaren
- NMISA
- PSA PEUGEOT CITROËN
- Renault s.a.s.
- Robert Bosch GmbH
- Robert Bosch
- ThyssenKrupp
- TME
- Volkswagen AG
- Volvo Car Corporation
- Volvo Trucks
- Zavolzhsky Motorny Zavod (ZMZ)

Others: approx. 230 companies

※Without honorifics, alphabetical order

Domestic Network

【Iga-Ueno Satellite】



【Suzuka Satellite】



【Okazaki Satellite】



【Ichinoseki Satellite】



【Mizushima Satellite】



【Tochigi Satellite】



【Hiroshima Satellite】



【Koga Satellite】



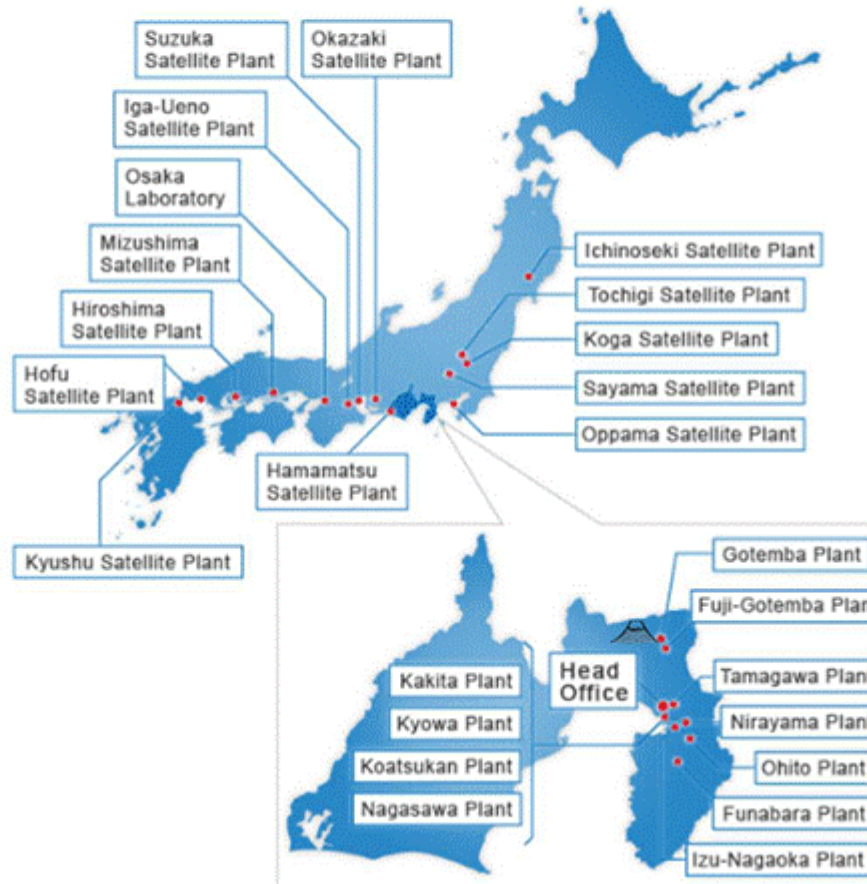
【Hofu Satellite】



【Sayama Satellite】



【Kyushu Satellite】



【Hamamatsu Satellite】



Global Network



Certifications and Patents

Acquisition of Certification

IATF16949:2016 Acquire certification

- USUI CO., LTD./Gotemba Production Dept. and Koatsukan Production Dept. (including Head Office)
Scope: Manufacturing of Injection Tubes and Fuel Tubes
- UIC (U.S.)/Ohio Plant (including Michigan Office)
Scope: Design and Manufacturing of Plastic Cooling Fans, Fan Drive, Fuel Tubes and Fuel Rails
- UIC (U.S.)/Virginia Plant (including Michigan Office)
Scope: Manufacturing of Injection Tubes and Oil Tubes for Brakes, etc.
- UICT (Thailand)
Scope: Manufacture of Tubes for the Automotive Industry
- Shanghai USUI Engine Parts Co., Ltd. (China)
Scope: Design and Manufacturing of Injection Tubes, Fuel Tubes, and Fuel Rails
- USUI Automotive Part(Foshan) Co., Ltd. (China)
Scope: Manufacturing of Automotive Tubes
- USUI SUSIRA (India)
Scope: Precision Machining for Engine Valve Push Rods, Piston Cooling Nozzle Assy, and other Automotive Components
- PT. USUI (Indonesia)
Scope: Manufacturing of Low Pressure Tubes, Injection Tubes, and Cooling Fans and Fan Drive

ISO9001:2015 Acquire Certification

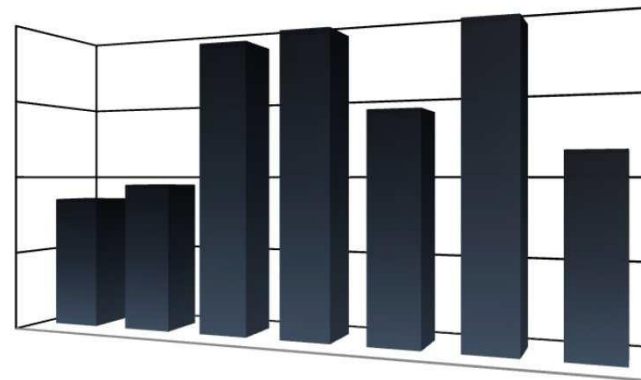
- Head Office, Functional Components Dept., Kyowa Production Dept. (Kyowa Plant), Kyowa Production Dept. (Kakita Plant), Ohito Production Dept., Tamagawa Production Dept., Nirayama Production Dept., Nagasawa Production Dept. (Nishi Plant), Hiroshima Satellite

ISO14001:2015 Acquire certification

- Head Office, Nagasawa-Nishi Plant, Koatsukan Plant, Kyowa Plant, Hiroshima Satellite, Izu-Nagaoka Plant, Okazaki Satellite, Kakita Plant, Tamagawa Plant, Ohito Plant, Nagasawa Plant, Tochigi Satellite, Nirayama Plant and Gotemba Plant (JAB:P08/070474)(UKAS:JP98/012032)
- UIC (U.S.)/Ohio Plant (including Michigan Office)
- UIC (U.S.)/Virginia Plant (including Michigan Office)
- Shanghai USUI Engine Parts Co., Ltd. (China)
- USUI Automotive Part(Foshan) Co., Ltd. (China)
- UICT
- PT.USUI
- USUI SUSIRA

Number of Applications for Industrial Property Rights

(including overseas)



USUI CO., LTD. and overseas subsidiaries (referred to below as USUI Group) aim to be a “Trustworthy Company” for our customers and other stakeholders by practicing an approach to CSR based on the management philosophy “Contribution to Society” based on the “Customer First principle.”

Management Philosophy

Contribution to society with a Spirit of Creation and Harmony

Policy

Being a Trustworthy Company to our Customers around the World

Organization Chart



CSR Activity Declaration

USUI Group will promote CSR activities in every aspects of its business activities as a member of the global community in accordance with the philosophy and the “Company Policy” in order to realize the “Management Philosophy.”

To further enhance CSR activities within USUI Group, we develop “USUI CSR Policy” and ensure that all USUI Group employees are fully aware of it.

In addition, we position quality, human rights, labor, safety, environment, compliance, risk management, and social contribution as important areas of our CSR activities, and will develop proactive CSR activities.

Basic CSR Policies

- Based on its “Management Philosophy”, USUI Group, as a member of the global community, aims to contribute to the stable and sustainable development of the global community through its business activities.
- Based on “USUI Code of Conduct”, USUI Group conducts its business activities in good faith in accordance with the laws, ethical standards and human rights of each country in which it operates.
- As a member of the global community, USUI Group contributes to solving various social issues and responds to stakeholder expectations.

Corporate Ethics Policy

In order for a company to continue to exist, it is important for society to recognize its existence value and to grow together with society.

The Corporate Ethics Policy aims to fulfill its social responsibility (CSR) as a corporate citizen and to earn the broader trust of society.

1. Compliance with Social Ethics

As a member of society, we must comply with laws and regulations and act in accordance with internal regulations and business manuals.

2. Response to Customers

We will deal with all of our customers with whom we do business in good faith.

3. Provision of Services

We will always provide services that satisfy our customers from the standpoint of them.

4. Management of Customer Information (Management of Confidential Information)

Manage confidential information obtained in the course of business so that it is not leaked to external.

5. Safety and Health

We will strive to create a workplace environment that is easy to work in and that ensures safety and health.

6. **Fair Competition**
We will engage in fair and transparent free competition, and will not act in a way that impedes such competition.
7. **Fair Trade**
We will not accept bribes or improper profits from domestic and overseas public officials or other customers, suppliers, or business partners.
8. **Distinction from Antisocial Forces**
We will blocking all relationships with antisocial forces that revolve social order.
9. **Provision of Corporate Information**
We will provide appropriate corporate information to our stakeholders.
10. **Environmental Issues**
We will make and effort to make effective use of resources, recycle, and conserve energy.
11. **Respect for Human Rights**
We will respect the fundamental human rights of our employees and will not discriminate against them in any way.

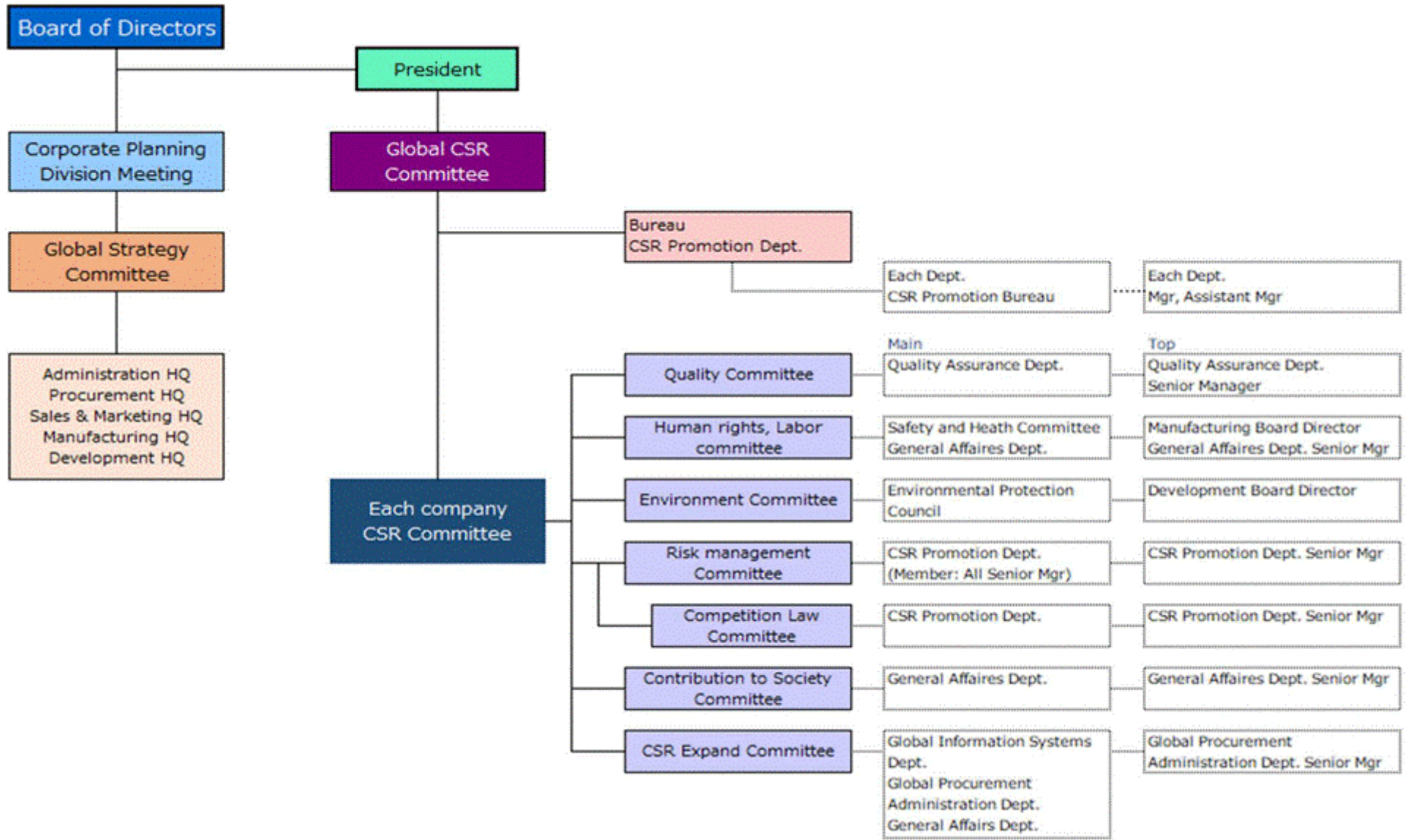
CSR Operational Guidelines

Field	Initiatives		Field	Initiatives	
1 Quality	1-1	Providing Products that meet Customer Needs	4 Compliance	4-1	Compliance with Laws and Regulations
	1-2	Providing Product Information Properly		4-2	Compliance with Competition Laws
	1-3	Ensuring the Safety of Products		4-3	Anti-Corruption
	1-4	Ensuring the Quality of Products		4-4	Management and Protection of Confidential Information
2 Human Rights and Labor	2-1	Elimination of Discrimination (Equalization of Employment Opportunities)		4-5	Export Control Management
	2-2	Respect for Human Rights (Prevention of Harassment)		4-6	Protecting Intellectual Property
	2-3	Prohibition of Child Labor	5 Risk Management	5-1	Company-wide Risk Management Framework
	2-4	Prohibition of Forced Labor		5-2	Formulation of BCP
	2-5	Wage	6 Social Contribution	6-1	Contributing to Local Communities
	2-6	Working Hours		7 Implementing CSR	7-1
	2-7	Dialogue and Consultation with Employees	7-2		Structure and Deployment of CSR-related Activities to Suppliers
	2-8	Safe and Healthy Working Environment	7-3		Disclosure of Information to Stakeholders
	3 Environment	2-9	Human Resource Development		
3-1		Environmental Management			
3-2		Greenhouse Gas Reduction			
3-3		Prevention of Environmental Pollution in air, water, soil, etc.			
3-4		Resource Conservation and Waste Reduction			
	3-5	Managing Chemicals			

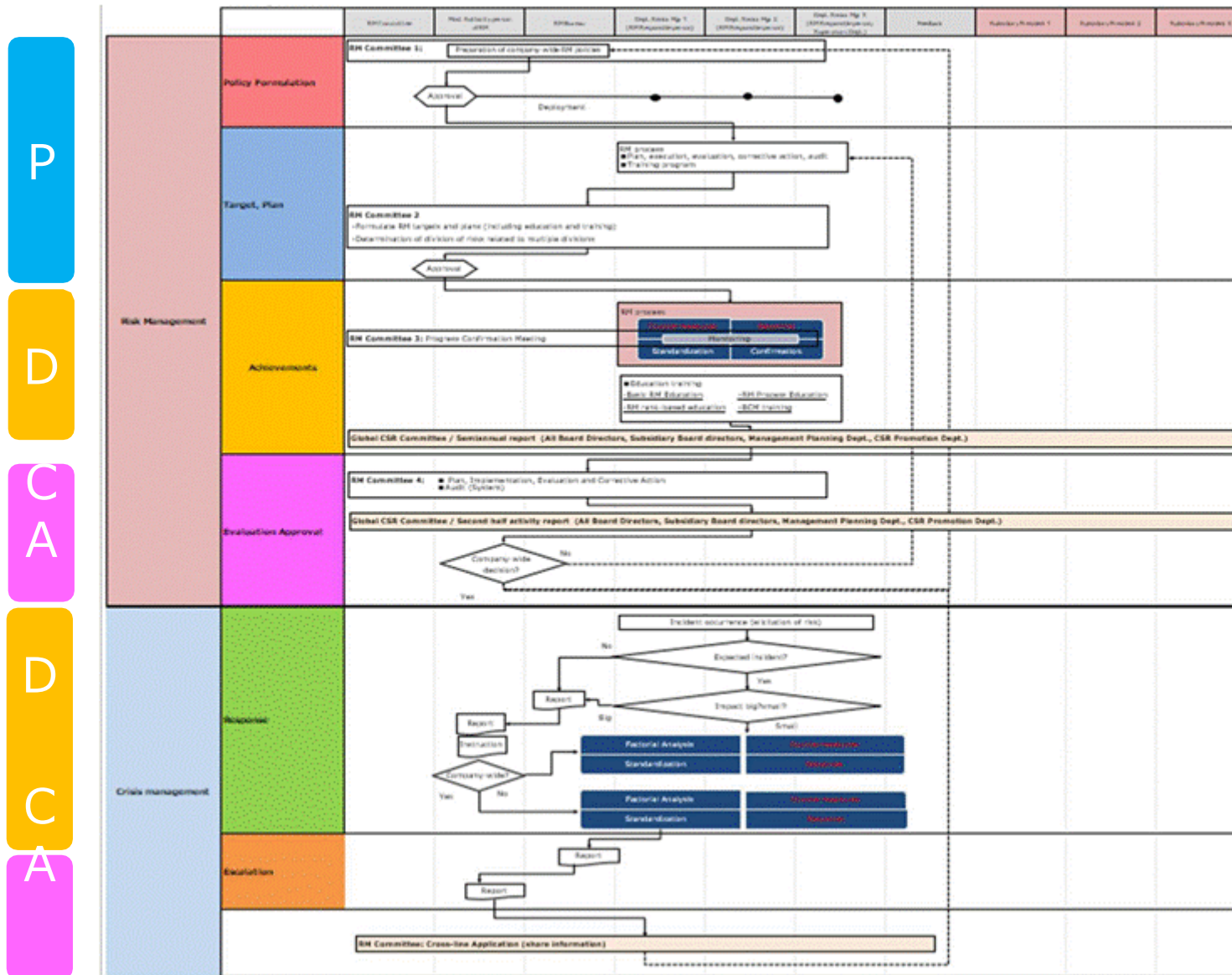
CSR Action Guidelines

		As a member of USUI
		As a member of USUI Group, we will always act under the motto of "Integrity" for the trust of all stakeholders.
Major Items	Medium Items	Conduct Guidelines
1 Quality	<p>"Quality Policy"</p> <p>"Being a Trustworthy Company to our Customers around the World"</p> <p>We will achieve 100% customer satisfaction by producing the world's best products that satisfy customers with the following requirements and continuously improving the effectiveness of the QMS.</p> <p>1-1 Safe and people-friendly plant</p> <p>1-2 Ensuring Quality that customers satisfy</p> <p>1-3 Achievement of annual quality objectives</p> <p>1-4 Complies with all requirements, including all necessary laws and regulations.</p>	<p>1. Providing high-quality and safe products</p> <p>(1) We will give careful consideration to safety at each stage of product development, design, manufacturing, inspection, and transportation, and strive to ensure quality.</p> <p>(2) We will respond promptly and sincerely to product defects and customer complaints, thoroughly investigate the causes, and strive to prevent recurrence.</p> <p>(3) We will establish and operate an appropriate quality management system and strive to provide necessary sufficient and accurate product information.</p>
2 Human rights and labor	<p>2-1 Elimination of discrimination (equalization of employment opportunities)</p> <p>2-2 Respect for Human Rights (Prevention of Harassment)</p> <p>2-3 Prohibition of child labor</p> <p>2-4 Prohibition of Forced Labor</p> <p>2-5 Wage</p> <p>2-6 Working Hours</p> <p>2-7 Dialogue and consultation with employees</p> <p>2-8 Safe and healthy working environment</p> <p>2-9 Human Resource Development</p>	<p>2. Respect for Human Rights and Creation of Safe and Comfortable Workplace Environments</p> <p>(1) We will respect human rights and will not discriminate on the basis of nationality, gender, or disability, or engage in child labor, forced labor, or harassment.</p> <p>(2) We will strive to maintain and manage mental and physical health and ensure safe operations.</p> <p>(3) We will strive to create a workplace environment that ensures safety and hygiene by complying with laws and regulations related to safety and hygiene and the rules of the company.</p> <p>(4) We will comply with labor-related laws and company rules, such as the Work Rules, and faithfully perform our duties in accordance with social decency.</p> <p>(5) We will strive to improve operations and improve productivity by participating in internal and external training and engaging in self-improvement in order to improve our own knowledge and abilities, and by utilizing the acquired technologies and knowledge.</p>
3 Environment	<p>"Environmental Policy"</p> <p>In designing, developing and manufacturing automotive components, we will recognize that global environmental conservation is one of the most important issues facing humankind as part of its corporate social responsibilities. In order to build a sustainable society, we will strive to "maintain human health" and "protect the global environment" in all aspects</p>	<p>3. Addressing today's critical environmental issues</p> <p>(1) We will comply with environmental laws, regulations, and our own standards and strive to conduct our business.</p> <p>(2) We will strive to prevent environmental pollution and global warming at our plants and offices, recycle resources, and actively manage chemical substances.</p> <p>(3) We will strive to prevent environmental issues from occurring, and will promptly take appropriate measures to minimize environmental loads in the event of environmental accidents.</p> <p>(4) We will actively participate in various environmental activities promoted by the company, such as energy-saving activities in the workplace, reduction of waste, and</p>
4 Compliance	<p>4-1 Compliance with Laws and Regulations</p> <p>4-2 Complying with Competition Laws</p> <p>4-3 Anti-corruption</p> <p>4-4 Management and protection of Confidential Information</p> <p>4-5 Export Control Management</p> <p>4-6 Protecting intellectual property</p>	<p>4. Strengthening Compliance</p> <p>(1) We will comply with the Anti-monopoly Act, subcontract Act, Unfair Competition Prevention Act, Personal Information Protection Law, and other laws, internal rules, and regulations.</p> <p>(2) We will not engage in collusion, cartel activities, etc. that restrict free corporate activities.</p> <p>(3) We will properly and strictly manage confidential information disclosed by our business partners, as well as proprietary information.</p> <p>(4) We will not attempt or require our business partners to provide personal benefits or convenience.</p> <p>(5) Reports and notifications required by laws and regulations to administrative organs shall be made appropriately.</p> <p>(6) We will adopt a firm stance toward antisocial forces and organizations, and blocking any relationships.</p> <p>(7) In conducting transactions with overseas customers, we will comply with export and import regulations (export control laws such as the Foreign Exchange and Foreign Trade Control Act).</p> <p>(8) We will respect other companies' intellectual property rights, such as Patent Rights, Trademark Rights, and copyrights, and pay careful attention not to infringe on these rights.</p>
5 Risk Management	<p>5-1 Company-wide risk management framework</p> <p>5-2 Formulation of BCP</p>	<p>5. Risk Management</p> <p>(1) We will identify risks that may occur in the workplace and strive to prevent them from occurring.</p> <p>(2) Even in the unlikely event of a risk, we will respond promptly and appropriately to minimize damage.</p> <p>(3) Along with the globalization of the supply chain, we will strengthen our response to suppliers and production systems.</p> <p>(4) To strengthen our response to earthquake risks, we have begun formulating a Business Continuity Plan (BCP) and will continue to revise and implement it.</p>
6 Social Contribution	<p>6-1 Contributing to local communities</p>	<p>6. Contributing to Society</p> <p>(1) We will strive to contribute to society through our corporate activities.</p> <p>(2) We will be aware of various issues facing local communities and local communities, and will actively participate in volunteer activities and other social contribution activities.</p> <p>(3) In the event of a social crisis caused by a disaster, etc., we will strive to participate in recovery and support activities in the affected areas.</p>
7 Implementing CSR	<p>7-1 Initiatives and development of CSR activities within the company</p> <p>7-2 Structure and deployment of CSR-related activities to in-house → suppliers (m)</p> <p>7-3 Disclosure of information to stakeholders</p>	<p>7. Implementing CSR</p> <p>(1) As a member of society, we will always be aware of the roles that we should fulfill within the company and society, and strive to respond to the expectations of all our stakeholders.</p> <p>(2) We will fully understand our "Management Philosophy," and engage in daily operations toward the goals set forth in company-wide and workplace policies.</p> <p>(3) We will ensure smooth communication with society by fulfilling our accountability to stakeholders.</p>

Global CSR Committee



Risk Management and Crisis Management Structure



Risk Management Basic Rules

Risk Management Basic Rules

Article 1 Purpose

These regulations stipulate the basic concept of risk management in USUI (including Group companies).

Article 2 Scope of Application

This rule shall be applied USUI (including Group companies).

Article 3 Subject

Our employees (including board members, employees, contract employees, assignee from other companies, part-timers, and temporary employees) must comply with these rules.

Article 4 Definition of Terms

Risk :

Various impacts on our business activities

Risk Management:

Identify, analyze, and evaluate risks, and take preparations based on prevention and occurrence with all employees' participation.

Article 5 Basic Policy

"As we fulfill our social responsibilities through sustainable growth, we will always manage risks appropriately in order to minimize losses and maximize profits."

Article 6 Conduct Guidelines

1. "I will strive to discover risks and promptly report the risks that I discover."
2. "I will take action on my own to reduce risks."
3. When a risk occurs, the company will concentrate all our efforts of its employees to ensure prompt response and recovery.
4. The company shall conduct education and training for all employees on an ongoing basis.

Article 7 Organizational Structure

1. Risk Management Committee
A Risk Management Committee is established under our Board of Directors and Corporate Planning Division Meeting.
The members shall consist of the Chief Risk Management Officer, Risk Management Representative, and the Risk Management Bureau, and shall deliberate issues and proposals for countermeasures concerning risk management from each department as needed, and report the findings to Board of Directors and the Corporate Planning Division Meeting.
2. Chief Risk Management Officer:
President is responsible for convening the Risk Management Committee and directing our risk management.
However, in the event that the highest risk management responsibility is not fulfilled

due to unforeseen circumstances, etc., President may delegate authority to the lower Board of Director.

3. Risk Management Representative:
Heads of specialized departments with experience and knowledge to promote the execution of each risk with responsibility and authority.
4. Risk Management Bureau:
The Risk management Team shall act as the bureau of the Risk Management Committee and collaborate with the Risk Management Representative as a promoter to compile activities conducted by each department, conduct education and training, and engage in information provision, etc.
5. Risk Manager:
Senior Manager of the Risk Management Bureau, who are responsible for the related operations of the bureau, and promote risk management practices at the company.
6. Persons in charge in each department:
In accordance with the instructions of the Senior Manager of the department to which he/she is responsible for risk management, he/she is responsible for responding to risks within his/her department during normal times and emergencies.

Article 8 Risk management process

- 1 The Risk Management Committee shall formulate and decide company-wide risk management annual policies at a committee meeting convened by Risk Management Representative for risk management at a convening meeting and notified within the company.
- 2 Based on the annual risk management policy determined by the Risk Management Committee, the Risk Management Representative shall implement a series of risk management processes: planning, action, evaluation, self-checking, and corrective action to appropriately manage various risks related to the functions and businesses of each department in charge.
- 3 The Risk Management Committee deliberates and decides on issues that extend across departments and on major risks, and escalate to Board of Directors and Management Committee if necessary.

Article 9 Risk Assessment

Items to be implemented as risk assessment shall be the identification of risks, analysis of risks, and evaluation of risks, and shall be conducted in accordance with the investment details separately stipulated.

Article 10 Risk management

Prepare based on the results of the risk assessment on the premise of prevention and occurrence of risks.

Article 11 Education and Training

The Risk Management Bureau shall formulate and implement education and training plans concerning risks in cooperation with the Risk Management Representative.

Article 12 Risk management system observation

The Internal Audit Department shall regularly audit the effectiveness of the risk management system and make recommendations for remedial action if there are any

problems. Check whether the corrective measures are implemented in accordance with the recommendations.

Article 13 System of regulations

In addition to these regulations, the guidelines and detailed regulations shall be separately stipulated.

Supplementary Provisions

1. Revisions to these regulations shall be submitted to the Risk Management Committee by the Risk Management Bureau and deliberated and decided by the Risk Management Committee.
2. This Rule shall be established and enforced on January 6, 2018.

Compliance Declaration

USUI Group regards the implementation of compliance as a top management priority, recognizing that this thorough implementation will lead to strengthening of the management foundation. We will conduct fair and transparent corporate activities in line with social norms as well as compliance with laws and regulations required for corporate activities.

Basic Compliance Policy

1. Compliance with Laws and Regulations
2. Trust with customers
3. Relationship with Suppliers
4. Relationship with Employees
5. Respect for Human Rights
6. Information Management
7. Environmental Conservation
8. Fair Transactions

Compliance Action Guidelines

1. Compliance with Laws and Regulations

- 1) We will comply with laws, regulations and social norms in our business.
- 2) We will be aware of being a member of society and taking moderate actions.

2. Trust with Customers

- 1) We will constantly strive to satisfy our customers, listen sincerely to their opinions, accurately grasp their needs, and strive to earn the satisfaction and trust of our customers by providing appropriate products and services.
- 2) We will not act in a disciplined manner in the execution of our customers' operations, nor will we act in a manner that impairs the trust and reputation of our customers.
- 3) In the area of entertainment and gift giving and receiving, we will act in accordance with sound business practices and social common sense.

3. Relationship with Suppliers

- 1) We will maintain fair and free relationships with our business partners and will not make unfair demands.
- 2) We will compete with our peers in a sound manner and comply with the Anti-Monopoly Act and other trade laws.
- 3) We will not deal with Anti-Social Forces such as organized crime groups.

Compliance Action Guidelines

4. Relationship with Employees

- 1) We will comply with labor-related laws and aim to build a fair and honest corporate culture.
- 2) We will strive to prevent harassment activities and maintain a highly moral working environment.
- 3) We will respect the individuality of working people and create an attractive working environment.

5. Respect for Human Rights

- 1) We will not cause or encourage human rights to be adversely affected through our corporate activities. We will take appropriate measures in the event of an adverse impact on human rights.
- 2) We will respect the human rights of our employees and will not discriminate against them in terms of race, creed, gender, religion, nationality, age, employment due to physical disability, remuneration, promotion, etc.
- 3) We will respect the character and individuality of our employees and establish rational and fair personnel systems and working conditions.
- 4) Not only within USUI Group but also parties deeply involved with USUI Group, such as business partners, we will collect information to ensure that there are no risks that could cause a negative impact on human rights and in an effort to prevent risks from occurring.
- 5) If human rights are adversely affected or there is a risk of adverse impacts, we will have opportunities to engage in dialogue with stakeholders and engage in earnest consultations.

Compliance Action Guidelines

6. Information Management

- 1) We will strictly manage information acquired through our operations in compliance with relevant laws.
- 2) We will build an advanced information security environment and handle information appropriately.
- 3) We will strictly comply with laws governing the protection of personal information.

7. Environmental Conservation

- 1) We will establish an environmental management system, set targets, engage in business activities, review them regularly, and strive for continuous improvement.
- 2) We will strive to raise the level of environmental conservation by accurately grasping not only related laws and regulations, but also the demands of society, and establishing our own standards.
- 3) We will promote manufacturing that is conscious of minimizing environmental loads at every stage, from planning, designing, developing products, purchasing, manufacturing, logistics, and sales.
- 4) We will enhance our environmental management system from a global perspective and continuously improve our environmental loads.

Compliance Action Guidelines

1. Fair Transactions

1) Prohibition of Bribery

USUI Group will not permit bribery activities, including the provision, promise or offer of money or any other benefit or convenience (referred to below as "money") to others, directly or indirectly, for the purpose of obtaining or maintaining business or business convenience for the Group.

2) Prohibition of Accepting Bribery

USUI Group will not permit accepting bribery activities, including the receipt or demand of money to others, directly or indirectly, for the purpose of obtaining or maintaining business or business convenience for the Group.

3) Response to Government Officials

USUI Group will conduct its business activities in compliance with the bribery-related laws of each country so as not to engage in bribery activities against government officials in each country.

4) Response to Third Parties

USUI Group will not tolerate bribery of government officials through agents or third parties such as consultants.

5) Recordkeeping

USUI Group shall observe the bribery-related laws of each country, accurately record accounting books and other records based on facts, and properly store related books and records.

Information Security Declaration

USUI Group will manages the information safely, completely, efficiently and inexpensively at any time. To achieve this, we aim to build and operate a global information infrastructure, a global information management system, and a global core system. We aim to realize this target, including stakeholders who share information.

Basic Information Security Policy

1. SECURITY

USUI Group ensures confidentiality, integrity and availability of data properties in accordance with International Standards (ISO27000 Series).

For this reason, we will take appropriate measures organizationally and technologically.

2. COMPLIANCE

USUI Group will comply with laws, regulations, and other regulations relating to the handling of information.

3. OPEN

USUI Group will build information infrastructure and information management systems using open information technology products in accordance with international standards and international industries.

This makes it easier to coordinate information with stakeholders. At the same time, it enables us to assess the soundness of USUI Group information management.

4. COLLABORATION

USUI Group will enhance the efficiency of each process by establishing and operating procurement, production, and logistics in accordance with the International Industry Standards (MMOG/LE).

In addition, we will optimize joint work by sharing information in an optimal manner in collaboration with stakeholders.

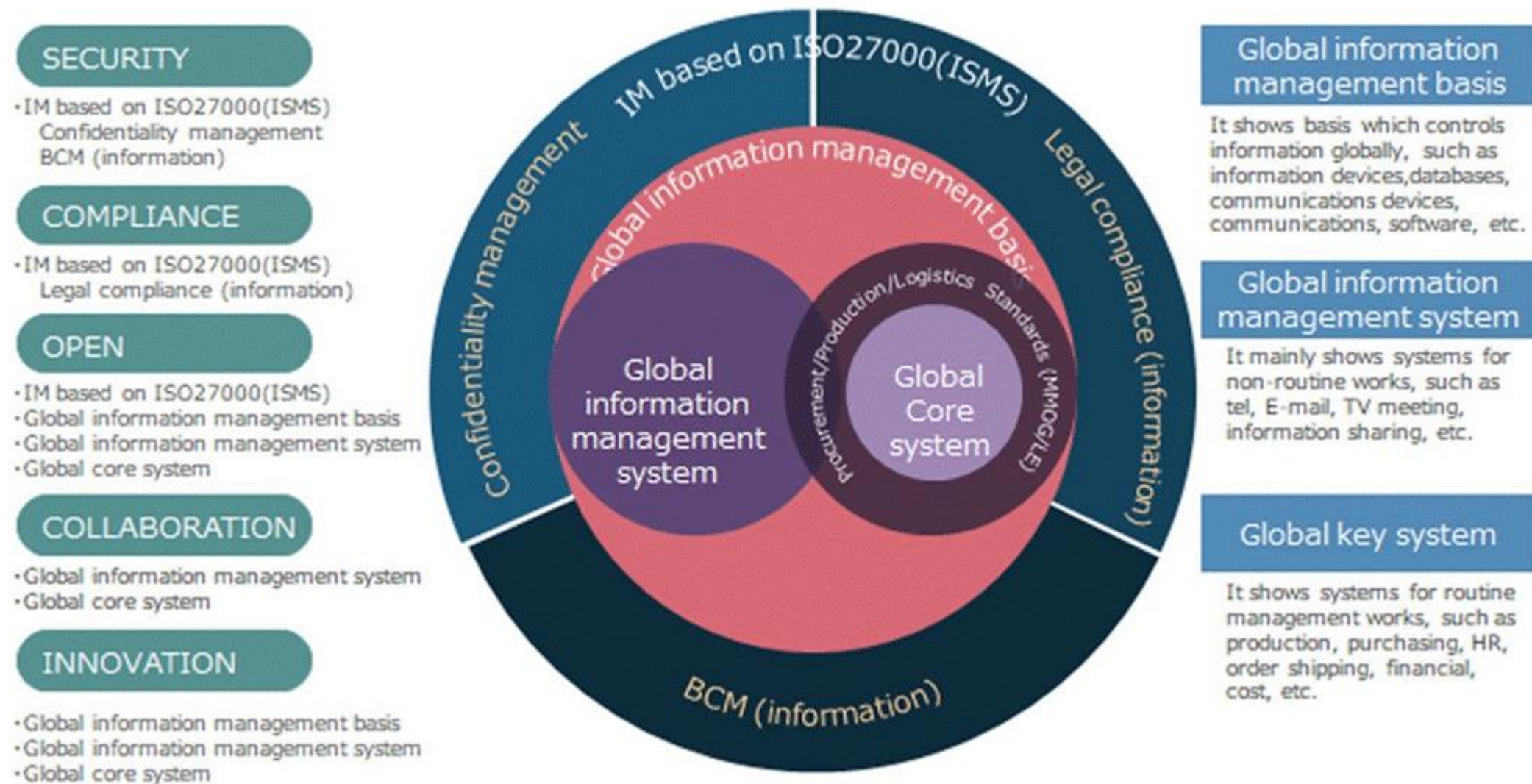
5. INNOVATION

USUI Group will recognize that information technology is constantly evolving, so that it can incorporate and use optimal information technology.

If the technology requires a renewal of the information infrastructure, we will promote reform the system which has been renewed at the optimum time.

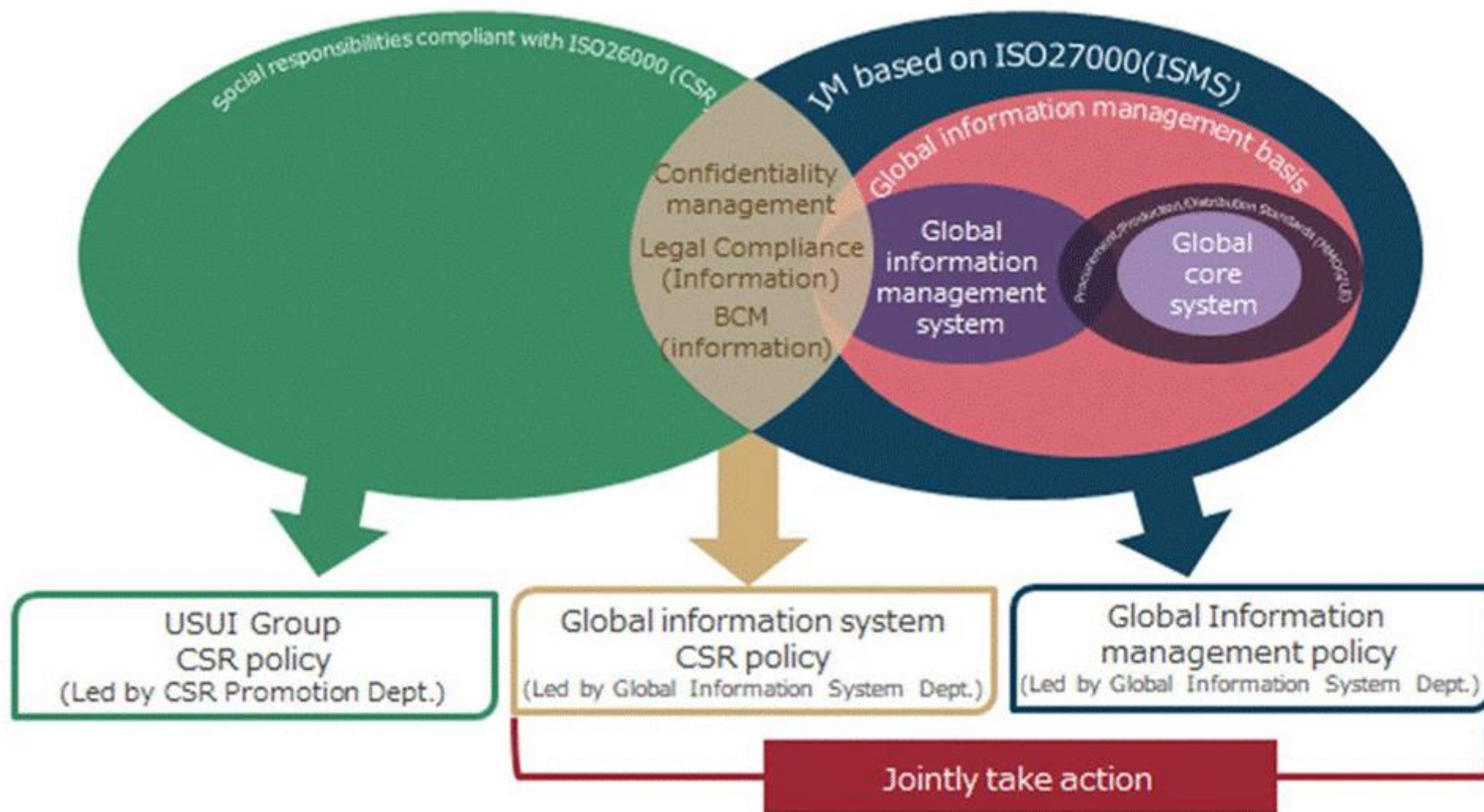
N.B.: MMOG/LE Standards Organization: AIAG,
Content: Material Management Guidelines/Evaluation Methods for Logistics

Information Security Action Guidelines



Information Security Action Guidelines

We will enforce confidentiality management, legal compliance (information), and BCM (information), which are common action based on ISO26000 and ISO27000. These activities are enforced with global information management policy activities.



Basic Personal Information Management Policy

USUI Group complies with laws related to the protection of personal information, EU-wide data protection regulations, and other relevant laws and regulations, and properly handles personal information provided by customers and business partners.

Personal Information Management Action Guidelines

1) Proper Acquisition of Personal Information

We will acquire personal information to the extent necessary for business and by legal and fair means.

Unless otherwise provided by law, prior consent shall be obtained from the employee when acquiring sensitive information.

2) Clarification of the Purpose of Use

We will Process personal data only for the purposes described below.

- Order processing in fulfilling contracts with customers and business partners, delivery of products and services, provision of support, issuance of quotes/invoices, management of business partners' relationships
- Information of USUI Group services/products/events
- Conducting surveys to develop new products and improve services of USUI Group
- Response to inquiries regarding USUI Group applications for services/products/recruitment
- Honoraria, congratulations, sympathies, and greetings for customers and business partners
- Performing other business incidental thereto.

Personal Information Management Action Guidelines

3) Disclosure and Provision to Third Parties

USUI Group does not disclose or provide personal data to third parties unless one of the following applies.

In addition, in no event shall personal data, including sensitive information, be disclosed or provided to a third party, except as provided by law or as expressly agreed to by the employee. Provided, however, that in the event that USUI Group jointly uses personal data or entrusts the handling of personal data, in whole or in part, to the extent necessary for the achievement of the Purpose of Use, and in the event that personal data is provided to said entruster of business, such personal data shall not be deemed to be disclosed or provided to a third party.

- With the consent of the principal
- When required to disclose or provide information in order to fulfill legal obligations
- When it is necessary for the protection of life, body, or property of a person and it is difficult to obtain consent from the person
- When it is necessary for the State or local public entities to cooperate in the implementation of public affairs and there is a risk that the execution of such affairs will be hindered by obtaining consent from the person in question.
- Cases where the provision is made upon succession of business due to merger, company split, transfer of business or for any other reason

Personal Information Management Action Guidelines

4) Entrustment of Business

USUI Group may provide its business partners with personal data to the extent required to achieve the objectives of using the Guidelines.

In this case, we shall properly manage and supervise the outsourcees, including the conclusion of contracts for the processing of personal data with these outsourcees.

- Some of the processing of personal data may be entrusted to a forwarding agent for the purpose of logistics operations such as warehousing and delivery.
- A part of the processing of personal data may be entrusted to an inspector for quality assurance.
- In order to use general communication tools such as e-mail systems, business card management systems, and web conferencing systems for business negotiations, conferences, and contact management with business partners, we may outsource part of the processing of personal data to a cloud service provider.
- In order to fulfill contracts with customers and business partners, we may outsource part of the processing of personal data to partner companies that manufacture products, conduct shipment inspections, etc. on USUI Group premises.

5) Transfer outside the EEA

When USUI Group transfers personal data to third countries outside the EEA region, including subcontractors and joint-use partners, the Group will take necessary and appropriate measures in accordance with standard data protection matters in accordance with GDPR established by the EU.

Personal Information Management Action Guidelines

6) Ensuring Accuracy

USUI Group strives to keep personal data up to date and to correct any errors or shortages.

7) Retention Period

USUI Group do not store collected personal data beyond the limits required to collect the data.

8) Security

In order to ensure the accuracy and security of personal data, USUI Group shall take reasonable measures against the risks of unauthorized access to personal data, leakage, loss, or damage of personal data, etc.

Procurement Activity Declaration

USUI Group aim to establish a procurement foundation with an organic network so Global USUI can securely carry out the most timely and stable procurement of the best product in the world at the lowest price. At the same time, we build a strong partnership with the business partners based on transparency and fairness, and work together to fulfill the social responsibility for maintaining healthy society

Basic Procurement Policy

We provide equal and fair opportunities to business partners desiring to do business with us, regardless of the nationality, scale of company and past transaction results. For this, we develop business partners globally to maintain competition.

When placing an order, we appropriately and objectively evaluate and select the business partner from the standpoint of the competitiveness, such as quality, supply, price, technology and management, and the social responsibilities such as compliance with laws, regulations and social customs, respect for human rights, unjustifiable discrimination in employment and occupation, elimination of child labor and forced labor, environment conservation, and social contribution activities.

4. Supply Chain Management

Basic Procurement Policy

We seek for coexistence and co-prosperity with the business partners by sharing a goal from a long-term and global viewpoint, deepening the relationship of trust through communications, and improving ourselves.

We comply with various laws and regulations, corporate ethics and corporate rules, consider conservation of the global environment and reduction in the impact on the ecosystem, and contribute to the international and local communities.

Green Procurement Guidelines

USUI Group position Green Procurement Activity as an important role in the environment management activities. To deal with current increasingly strict environmental regulations, we must share the information with all suppliers, both environmental enhancement and promotion.

This “Green Procurement Guideline” is summarized procurement requirements based on this belief.

Conflict Minerals Issue Response Policy

USUI Group does not trade or use materials (materials, parts, etc.) including 3TG that may be involved in human rights infringement, environmental destruction, etc. in the Democratic Republic of the Congo and neighboring countries.

We will also develop and investigate our suppliers in order to establish a responsible supply chain.

Conflict Minerals Issues Action Guidelines

Response to Conflict Minerals

1) When purchasing materials and parts, we conduct surveys and do not purchase conflict minerals (tantalum, tin, gold and tungsten) that may be a source of funds for armed forces produced in the Democratic Republic of the Congo and neighboring countries.

In addition, we will not purchase if the supplier is not confirmed.

2) We will cooperate with surveys on conflict minerals conducted by our customers and work together to eliminate conflict minerals and conduct responsible procurement activities.

Human Rights and Labor Declaration

As a company that is a member of society, USUI Group recognizes the importance of respect for human rights in any activities. We believe that this is one of our social responsibilities in the development of sustainable corporate activities, and have formulated a basic policy on human rights and labor.

Basic Human Rights and Labor Policy

USUI Group is convinced that human rights are a crucial issue. Based on the recognition that efforts to respect these values are social responsibilities that companies must fulfill, we aim to establish a corporate structure that respects human rights in order to build a safe, secure, and prosperous society.

- 1) Elimination of Discrimination
(equalization of employment opportunities)
- 2) Respect for Human Rights
(Prevention of Harassment)
- 3) Prohibition of Child Labor
- 4) Prohibition of Forced Labor
- 5) Wage
- 6) Working Hours
- 7) Dialogue and Consultation with Employees
- 8) Safe and Healthy Working Environment
- 9) Human Resource Development

Human Rights and Labor Action Guidelines

- 1) No discrimination
We will never discriminate on the grounds of nationality, race, ethnicity, age, gender, religion, disability, etc.
- 2) Prohibition of Harassment
We will not tolerate any form of harassment in the workplace, including harassment related to pregnancy, childbirth, childcare leave, sexual harassment, and power harassment, as well as inhumane treatment such as violence, verbal abuse, and physical and mental coercion.
- 3) Prohibition of child labor
We will not engage in hazardous work for young workers under the legal working age, the age for completing compulsory education, or under the age of 18.
- 4) Prohibition of forced labor
We ensure that all work is voluntary and that employees are free to leave their jobs, and we do not allow any form of forced labor.
- 5) wage
We will comply with laws and regulations regarding minimum wages, overtime, wage deductions, and other benefits.
- 6) working time
We will comply with laws and regulations regarding employees' working hours (including overtime) and the granting of holidays and annual paid leave, and will prohibit excessive working hours by properly managing them.

Human Rights and Labor Action Guidelines

7) Dialogue and discussion with employees

We will respect employees' freedom of association (including the right not to associate) and the right to collective bargaining, and will engage in sincere discussions and dialogues with employee representatives or employees.

8) Safe and healthy working environment

We will identify and assess risks to safety and health in the workplace, and ensure the physical and mental safety and health of workers through appropriate design, technology and management measures.

9) The development of human resources

We will work to develop highly qualified human resources so that each and every employee can achieve personal growth and maximize their abilities.

Human Rights and Labor Action Guidelines

Respect for Human Rights and Create Safe and Comfortable Workplace Environments

- 1) We will respect human rights and not discriminate on the basis of nationality, gender or disability, or engage in child labor, forced labor or harassment.
- 2) We will strive to maintain and manage mental and physical health and ensure safe operations.
- 3) We will strive to create a workplace environment that ensures safety and hygiene by complying with laws and regulations related to safety and hygiene and the rules of the company.
- 4) We will comply with labor-related laws and company rules, such as the Work Rules, and faithfully perform our duties in accordance with social decency.
- 5) We will strive to improve operations and improve productivity by participating in internal and external training and conducting self-improvement in order to improve our own knowledge and abilities, and by utilizing the acquired technologies and knowledge.

Diversity Declaration

In order to become a company that can grow sustainably with stable results, USUI Group aims to permeate and establish diversity globally and become a company in which each employee can work with flexibility and a sense of motivation.

Diversity Policy

USUI Group will improve the working environment and organizational culture and reform awareness so that each employee can contribute to the sustainable growth of the organization and make the most of the diversity of each individual in a daily manner.

Diversity Action Guidelines

By providing opportunities to touch with diversity from a variety of perspectives, we will eliminate resistance to diversity, experience the effects of utilizing diversity, and create an environment and reform awareness so that we can revise the way we have done so far and take a positive approach to change.

Human Resource Development Declaration

USUI Group will develop highly qualified human resources in order for all employees to realize their own growth and maximize their capabilities.

Human Resource Development Policy

In order to maximize the capabilities of our employees, USUI Group will realize the following.

- Establish education system and strengthen training system
- Develop and build a human resource foundation to realize global strategies
- Staffing aimed at global optimization

Human Resource Development Action Guidelines

- 1) Securing Human Resources
 - Promoting diversification of recruitment activities
- 2) Fostering and utilizing human resources
 - Review of education system
 - Enhance language skills required of global human resources
 - Develop female candidates for managerial posts
 - Create a database of educational and evaluation results

Safety and Health Declaration

USUI Group considers it a corporate social responsibility to ensure the safety and health of all employees based on the basic philosophy of respecting human beings, based on the principle that "Safety comes before everything." We recognize this as a priority issue of the utmost importance.

Basic Health and Safety Policy

Safety means considering dangers.

We cannot achieve safety without making efforts to eliminate dangers and continue to maintain the danger-free situation.

Safety and Health Action Guidelines

To prevent the reoccurrence of occupational accidents that have occurred in the past, we will check whether past problem history measures are continuing and taking root, and educate all employees on safety and health to improve their understanding.

1) Reaffirmation of Past Problem History Measures

We will classify past disasters as causes, confirm the status of countermeasures, and incorporate them into the system.

2) Activities to Improve Employee Understanding

Deployment at daily meetings and regular education are provided.

Safety and Health Action Guidelines

- 1) Safe and healthy working environment
In addition to complying with relevant laws and regulations, identify and assess risks to workplace safety and health,
We ensure the physical and mental safety and health of our workers through design, technology and management methods.
- 2) Occupational Injuries and Illnesses
In order to prevent work-related accidents and illnesses, when an accident or trouble occurs, we will accurately grasp the situation and take appropriate measures.
- 3) Preparedness for emergencies
In preparation for emergencies that may endanger human life and physical safety, we will create the action procedures and safety measures necessary to avoid or minimize damage, and ensure that everyone in the workplace is aware of them.
- 4) industrial hygiene
We will identify situations in which we come into contact with chemical substances, noise, odors, etc. that may have a harmful effect on the human body, and manage them appropriately.
- 5) Work that puts a load on the body
We will identify work that puts a strain on the body and work that may cause health damage, and manage it appropriately to prevent occupational accidents and illnesses.
- 6) Machine safety measures
We will identify hazards related to machines and equipment used in the workplace and take appropriate safety measures.

Safety and Health Action Guidelines

7) Health and safety communication

Education and training that enable workers to learn about hazards that may impair the safety and health of workers

Provide training opportunities.

Quality Activity Declaration

USUI Group is forging ahead “Being a trustworthy company to our customers around the world” through obtaining higher customer satisfaction. To accomplish this, we have acquired IATF 16949 certification, which is specified requirement of Automotive Quality Management System Standard.

Basic Quality Policy

We will obtain 100% customer satisfaction through providing our products, which will possess the No.1 quality in the world so that customers are pleased to have the products, with the requirements listed hereunder and also with continual improvement on our QMS effectiveness.

- Safe and human friendly plant
- Secure appropriate quality on our products for customer satisfactions
- Achieve and/or exceed quality target of current year
- Comply with all requirements including applicable laws and regulations

Quality Action Guidelines

Providing high-quality and safe products

- 1) We will give careful consideration to safety at each stage of product development, design, manufacturing, inspection, and transportation, and strive to ensure quality.
- 2) We will respond promptly and sincerely to product defects and customer complaints, and thoroughly pursue the causes to prevent recurrence.
- 3) We will establish and operate an appropriate quality management system and strive to provide necessary sufficient and accurate product information.

Basic Environmental Policy

USUI Group who engages in designing, development and manufacturing parts for automotive industry, recognizes the protection of the global environment as the most important issue among all things, as a part of company's social responsibility. Aiming at building the society where "Health maintenance" and "Protection of global environment" are ensured, we will make every effort to contribute to them.

Environmental Action Guidelines

1. Reduction and protection for environmental pollution
 - 1) Try to minimize quantities of natural resources and energy (Reduce CO₂ emissions)
 - 2) Cut down waste and facilitate recycling
 - 3) Cut down harmful chemicals in use
 - 4) Prevent environmental pollution from occurring
 - 5) Try to protect the environment
2. Set up and review the object, other target and continue further improvement
Based on the policy, we determine the objects and the targets of environment, continuously reviewing them, and improve the environment management system.
3. Comply with the rules
Comply with any applicable legal requirements related to environmental aspects or any other related requirement.

Global Environmental Protection Activity Philosophy

Aiming to realize a sustainable society, USUI Group aims to improve environmental issues through its business activities and to harmonize people and the environment in all aspects of its corporate operations.

Global Environmental Conservation Activities Declaration

In order to improve the global environment and pass it on to the next generation, we will conduct activities aimed at realizing the following through our environmental management system.

- To build a low-carbon society
- To build a recycling-oriented society
- Environmental conservation and a society in harmony with nature

Global Environmental Conservation Activities Action Guidelines

- 1) Promote activities to improve environmental performance in compliance with laws and regulations
- 2) Visualization of information through sharing and unified management of environmental information
- 3) Promote personnel exchanges and human resource development that can promote environmental conservation activities