DYNAM Group Charter of Corporate Behavior

DYNAM JAPAN HOLDINGS Co.,Ltd

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The raison d'être of a company is to achieve sustained growth in line with the expectations of stakeholders, including shareholders, managers, employees, partners, financial institutions and customers, and to achieve a scale and a level of reliability that enable it to contribute to society. All employees of the DYNAM Group share this principle.

The DYNAM Group calls the stakeholders described above "partners in trust." We are committed to strengthening our relationship with these partners through our business activities, so that we can develop according to a far-reaching vision. As it grows, the Group will strive to fulfill the roles expected of it by each stakeholder, to ensure that stakeholder trust also grows.

Trust, however, is fragile, and even a momentary lapse of focus can damage it forever. To ensure that it can continue to conduct its business without compromising that trust, the DYNAM Group has adopted new internal control systems to improve its operations. These systems also clarify and eliminate factors that have the potential to lead to misconduct or violations of laws and regulations.

All DYNAM Group employees, including those that work in the field, constantly take initiatives with full knowledge that such actions help to improve their operations. Through these initiatives, each member strongly believes that the DYNAM Group can achieve stronger operating results and more effectively contribute to society.

1. Principle of Customers First

All Group companies of the DYNAM Group conduct their operations with a constant focus on customers' perspectives in providing products and services and giving customers the highest priority:

- (1) Group companies shall provide products and services to all customers in a fair and equal manner, with integrity.
- (2) Group companies shall take requests and complaints from customers seriously, and respond to customers sincerely and promptly.
- (3) Group companies shall carefully manage personal information that is received from customers in accordance with internal rules, ensuring that no such information leaks to third parties.
- (4) Group companies shall take all necessary steps to prevent the occurrence of accidents or problems related to their products or services. If any problem occurs, Group companies shall give priority to securing customer safety, and take measures to prevent further aggravation of accidents or problems.

2. Information Disclosure

All Group companies of the DYNAM Group will strive to collect and record accurate information in an organized manner, and carry out fair, transparent management by disclosing relevant information.

- (1) Group companies shall record all information related to their businesses, including accounting information, in accordance with laws, regulations and internal rules, and shall appropriately maintain such information for a predetermined period.
- (2) Group companies shall disclose information related to management promptly, accurately and consistently in accordance with relevant laws, regulations and rules.
- (3) Group companies shall prohibit their employees from pursuing personal gain by using specific information, personal relationships or customer information obtained through operations, or taking advantage of positions in their companies.
- (4) Group companies shall determine which parties to use to make their official announcements and shall take steps to manage information appropriately to ensure that information is announced and disclosed fairly, simultaneously and without bias to shareholders and investors.
- (5) Group companies shall ensure that the details of business negotiations and other related matters are recorded objectively and specifically so that those Group companies can clearly confirm transactions and fairness in order receipts or placements.

3. Chain Store Management

All Group companies of the DYNAM Group are committed to achieving growth through their chain store management. They shall strive to develop sound, harmonious and equal relationships with their business partners from legal, social and ethical perspectives for shared business development.

- (1) Group companies shall ensure the safety and reliability of products and services that they provide by complying with relevant laws, regulations and rules, and carrying out business activities in compliance with sound social customs and socially accepted ideas.
- (2) Group companies shall engage in business activities while respecting relevant national and regional cultures and customs.
- (3) Group companies shall refuse any requests that may violate laws, regulations or internal rules, or that contradict socially accepted ideas.
- (4) Group companies shall be prohibited from exploiting dominant bargaining positions to demand of their business partners transaction conditions that could put partners at a significant disadvantage.
- (5) Group companies shall fairly judge and select business partners after comparing and examining prices and details of services, among other factors. To achieve this, the Group companies are prohibited from receiving rebates, kickbacks and excessive entertainment or gifts.
- (6) Group companies shall make the necessary inquiries in advance to confirm that their business partners do not have any relationships with so-called antisocial forces or illegal organizations, with whom transactions could result in significant loss of trust in the DYNAM Group, and confirm that business partners do not violate laws, regulations or ethics in their operations.

4. Human Resource Training

All Group companies of the DYNAM Group shall focus on training their human resources to maximize their potential. The Group companies shall also strive to maintain appropriate working environments in accordance with laws and regulations so that all employees of the Group can work comfortably in pleasant environments while striving to sustain the growth of the Group's business activities.

- (1) Group companies shall comply with relevant laws and regulations, such as the Labor Standards Act and the Industrial Safety and Health Act, and strive to maintain sound working environments.
- (2) Any serious abuse of human rights by taking advantage of internal positions, including sexual harassment and power harassment, shall be prohibited.
- (3) When recruiting or dealing with their employees, Group companies shall respect basic human rights, and shall not practice discrimination based on nationality, gender, religion, philosophy, physical characteristics or any other criteria that are not related to the abilities or commitment of respective employees. Group companies shall evaluate individual employees based on general evaluation criteria, including the employees' abilities, commitment, personal characteristics, awareness of legal compliance and contribution to operating results.
- (4) Group companies shall prohibit their employees from lending and borrowing money that have the potential to cause unnecessary problems, excessive entertainment or formal provision of money or goods to customers or business partners, or among employees.

5. Social Contribution

All Group companies of the DYNAM Group are committed to cooperating and collaborating with local communities, and to contributing to their development. Group companies will eliminate any activities that can encourage criminal activities by antisocial forces or organizations, and strive to maintain sound social environments.

- (1) Group companies shall actively support activities that contribute to the development of local communities, and each shall fulfill its responsibilities as a corporate citizen.
- (2) Group companies shall reject any antisocial forces or organizations that compromise social order and the safety of citizens, and strive to secure the welfare and safety of communities by eliminating any activities that may promote criminal activities.
- (3) Group companies shall respect the copyrights of third parties and intellectual property rights, including patents and trade secrets, and shall comply with relevant laws and regulations.
- (4) Group companies shall respect the National Public Service Ethics Act and the code of ethics of workers at public offices, and shall prohibit their employees from entertaining or giving gifts to workers of interested parties at supervisory authorities.

- DYNAM Group Principles of Action -

To achieve progress in the five areas described above, all officers and employees of the DYNAM Group shall carry out their duties in accordance with the following principles of action:

- 1. Comply with laws, regulations and rules, and treat people with respect.
- 2. Take decisive action and value teamwork.
- 3. Confirm the facts on site, and present it quantitatively.