

A-b Code of Ethics

● Code of Conduct

HORIBA has drawn the Code of Conduct that encompasses the following eight articles, in compliance with the company motto of “Joy and Fun” and our HORIBA Corporate Philosophy. Board members and employees of HORIBA strictly observe them in order to constantly be aware of our mission and role as well as to pursue sustainable development into the future as an international enterprise.

Our board members and employees value this code, take initiative in practicing it as Horibarians*, and commit to educating and disseminating its content throughout the corporation. Moreover, we will continue to appreciate opinions from both inside and outside the corporation, reflect them to improve efficiency of internal systems and to strengthen our corporate ethics. Should a situation arise that is contrary to the code, we shall promptly disclose accurate information, ensure accountability, carry out an investigation into the cause, and endeavor to prevent a recurrence.

1. We shall comply with all laws, regulations, and social norms.
2. We shall contribute to society by providing excellent products and services.
3. We shall engage in fair, transparent, and free competition. We shall also maintain sound, normal relationships with governments.
4. We shall respect our employees' individuality and create safe, healthy, and comfortable workplaces.
5. We shall respect the opinions of our stakeholders (interested parties).
6. We shall make an active social contribution as a good corporate citizen.
7. We recognize that environmental initiatives are essential to the existence of our company, and we shall voluntarily commit ourselves to them.
8. We shall confront antisocial groups and organizations that threaten the social order and the safety of citizens, and we shall absolutely reject any unlawful or unjustified requests.

● Behavioral Criteria

We have formulated our Behavioral Criteria as a means of putting our Code of Conduct into effect in our corporate activities. This Code of Conduct sets forth principles that HORIBA's board members and employees are required to follow when conducting corporate business. These detailed Behavioral Criteria address important matters and can be practices in our day-to-day business activities.

*** Horibarian**

The common designation for all employees of the HORIBA Group