

Fast Retailing Group Code of Conduct Guideline

Index

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1. Customer satisfaction
 - 1.1 Provision of products and services
 - 1.2 Safe products and stores
 - 1.3 Publicity and advertising activities

2. Respect for human rights
 - 2.1 Respect for human rights and prohibition of discrimination
 - 2.2 Prohibition of sexual harassment and abuse of power

3. Legal compliance
 - 3.1 Understanding of local customs and legal compliance
 - 3.2 Compliance with labor laws
 - 3.3 Compliance with the Antitrust Law
 - 3.4 Compliance with import-export laws
 - 3.5 Security-related trade controls
 - 3.6 Compliance with corrupt practices-related acts
 - 3.7 Charitable and political donations to political organizations

4. Fair relations with partners
 - 4.1 Fair dealing
 - 4.2 Prohibition of advantage, entertainment and personal benefits
 - 4.3 Request for compliance with laws to business partners

5. Appropriate disclosure of information
 - 5.1 Timely disclosure of company information
 - 5.2 Fair and transparent financial reporting
 - 5.3 Prohibition of insider trading

6. Work environment
 - 6.1 Maintaining safe work environment
 - 6.2 Establishing a pleasant work environment

7. Human resource development and fair evaluation
 - 7.1 Equal employment opportunities and human resource development
 - 7.2 Fair evaluation and proper treatment

8. Appropriate information management
 - 8.1 Handling of personal information
 - 8.2 Handling of confidential information
 - 8.3 Proper use of information systems

9. Exclusion of antisocial groups

9.1 Severing links with antisocial groups

10. Protection of company property

10.1 Appropriate use of company's property

10.2 Protection of intellectual property

10.3 Conflicts of interest

11. Environmental conservation and contribution to the community

11.1 Reducing environmental impact

11.2 Contributing to the community

12. Distinction between professional and personal lives

12.1 Responses to media

12.2 Communicating information via social media and similar

12.3 Activities based on political or other ideas

1. Customer satisfaction

We shall endeavor to provide customers with high-quality products and caring service that surpasses their expectations and earns their trust.

1.1 Provision of products and services

- 1.1.1 We shall pursue high quality and reasonable prices from the customers' point of view and provide compassionate services and products that offer value.
- 1.1.2 We shall deal sincerely with all customers and make every effort to understand their needs quickly and accurately and to improve and develop products accordingly.

1.2 Safe products and stores

- 1.2.1 In all processes, from product planning through production to distribution and sales, we shall carry out thorough safety control of products and assure quality in compliance with laws, regulations and appropriate standards concerning product safety.
- 1.2.2 We shall carry out thorough safety control of stores to ensure a safe and secure shopping experience for customers.
- 1.2.3 In the event that a safety concern arises due to a product or regarding a sales venue, we shall immediately confirm and analyze the situation, publish accurate and necessary information in a timely manner and take swift and proper action. Moreover, we shall determine the cause and thoroughly carry out measures to prevent any recurrence.

1.3 Publicity and advertising activities

- 1.3.1 We shall provide customers with accurate information about corporate policy, products and business activities of the Fast Retailing Group.
- 1.3.2 We shall make efforts to accurately express and display the product quality and shall not use misleading expressions.
- 1.3.3 When conducting advertising and public-relations activities, we shall obey all applicable local laws and shall extend consideration not to injure the credibility of the other company.

2. Respect for human rights

We shall respect the basic human rights of all people and shall not commit acts of discrimination or harassment that may undermine a person's dignity.

2.1. Respect for human rights and prohibition of discrimination

- 2.1.1. Based on the Universal Declaration of Human Rights, International Covenants on Human Rights and other international human rights standards, we shall respect the human rights of each and every person.
- 2.1.2. We shall value diversity, and each and every person, and shall not discriminate against anyone for any reason, including on the basis of race, ethnicity, nationality, birthplace, age, gender, religion, sexual orientation or disability, or any other unlawful reason.
- 2.1.3. We shall not infringe upon anyone's human rights by forcing them to perform tasks through violence, slander, libel or by threat or harassment.
- 2.1.4. Under no circumstances shall we tolerate the labor of children under the minimum working age or forced labor against a person's will.
- 2.1.5. We shall respect freedom of association, right to collective bargaining and other basic human rights of employees.
- 2.1.6. We shall make every effort to avoid taking part in the infringement of human rights in cooperation with business partners and other stakeholders.

2.2. Prohibition of sexual harassment and abuse of power

- 2.2.1. We shall not undermine a safe working environment for employees through any action, language or behavior that could be deemed to be sexual harassment. We shall make every effort to eliminate sexual language and behavior or similar actions.
- 2.2.2. We shall not use a position of power or authority to harass or intimidate others. We shall make every effort to eliminate such behavior.

3. Legal compliance

We shall understand the customs of each country and region where we conduct business, comply with all applicable laws and regulations and conduct ourselves in a socially acceptable manner.

3.1 Understanding of local customs and legal compliance

- 3.1.1 We shall understand the customs of the countries and regions in which we do business and obey the laws of those places.
- 3.1.2. In cases where national or local customs of the countries and regions in which we do business and the Fast Retailing Code of Conduct conflict, we shall immediately consult with our superiors or the related department.

3.2 Compliance with labor laws

- 3.2.1 We shall strictly comply with all labor laws. If any aspect of these laws is unclear, we shall immediately consult with our supervisors or the related departments.

3.3 Compliance with the Antitrust Law

- 3.3.1 We shall not abuse the position of dominance or otherwise violate relevant laws, and shall ensure free and fair dealings with all business partners.

3.4 Compliance with import-export laws

- 3.4.1 We shall follow appropriate import-export procedures in accordance with relevant laws when importing and exporting products.
- 3.4.2. We shall not import or export prohibited items.
- 3.4.3. We shall not export indirectly or trade through a third party to evade the laws regarding import and export.

3.5 Security-related trade controls

- 3.5.1 We shall not export any goods or related technologies that are harmful to international peace and security.
- 3.5.2. We shall exercise due diligence on the customer's profile and type of business when conducting export and shall carry out export control and ensuing security so that the exported cargo and technology will not be used to fund or otherwise support the development and manufacture of weapons of mass destruction.
- 3.5.3. Before exporting cargo and technologies or providing related services regulated by the relevant laws, we shall carefully assess whether such transactions are appropriate. We will then carry out the required procedures in accordance with relevant laws.

3.6. Compliance with corrupt practices-related acts

- 3.6.1 We shall not offer bribes, gifts or entertainment to government officials or a person equivalent thereto inside or outside Japan.
- 3.6.2. We shall follow appropriate procedures and ensure fair transactions when dealing with governments or public agencies or when carrying out administrative proceedings necessary for our business activities.

3.7. Charitable and political donations to political organizations

- 3.7.1 We shall maintain healthy and appropriate relationships with political and regulatory organizations, and will not give inappropriate gifts that violate company policy or applicable law.

4. Fair relations with partners

We shall conduct fair transactions with all business partners and build equal, sincere, impartial and fair partnerships with them.

4.1. Fair dealing

- 4.1.1 We shall deal with all business partners sensibly and sincerely, with impartiality and fairness.
- 4.1.2 We shall objectively compare and evaluate quality, price, delivery, technological capability, stability of supply and other qualities in order to select the best possible business partners.
- 4.1.3 We shall conclude agreements in writing, in addition to verbal agreements, to ensure that all terms and conditions are clear.
- 4.1.4 We shall meet all terms and conditions of business deals with business partners as well as all applicable laws, and make all payments on time.
- 4.1.5 We shall not acquire confidential information belonging to other companies through improper methods.

4.2. Prohibition of advantage, entertainment and personal benefits

- 4.2.1 We shall not accept any advantages, such as gifts or entertainment, from any business partners in principle. If there is a possibility of the provision of advantages, we shall follow the required company procedures and behave sensibly within the scope of the laws and company regulations.
- 4.2.2 We shall not offer unjust and improper profit in the form of gifts or entertainment to any business partners in principle. We shall give or accept entertainment or gifts within the scope of sound business practices and standards acceptable to the community.
- 4.2.3 We shall not solicit business partners to give bribes or otherwise request business partners' payments or the equivalent that are improper or contrary to community standards. We shall not ask business partners for favorable treatment of ourselves or our associates.

4.3. Request for compliance with laws to business partners

- 4.3.1 We shall request Fast Retailing Group supplier to obey all applicable laws. We shall indicate our expectations regarding human rights, labor, environment and corruption prevention and expect supplier to meet these expectations.
- 4.3.2 We shall request Fast Retailing Group factories/manufacturers to obey all applicable laws. We shall indicate our expectations regarding human rights, labor, environment and corruption prevention and request factories/manufacturers to meet these expectations.

5. Appropriate disclosure of information

We shall conduct sound corporate management and disclose accurate and appropriate information to shareholders, investors and other stakeholders at the appropriate time.■

5.1. Timely disclosure of company information

5.1.1 We shall disclose information, including information about the company's finances and operations, to shareholders, investors and other stakeholders in an appropriate and timely manner and make sincere efforts to respond in order to maintain their trust.

5.2. Fair and transparent financial reporting

5.2.1 We shall establish and operate an internal control system that ensures fair and transparent financial reporting in accordance with any applicable corporate laws, securities laws or other laws in order to ensure the trustworthiness and appropriateness of financial reporting.

5.3. Prohibition of insider trading

5.3.1 We shall not buy or sell shares of Fast Retailing or business partners by using non-disclosed information of Fast Retailing or business partners or otherwise commit an illegal act that is considered insider trading.

5.3.2. When buying or selling shares of Fast Retailing, we shall do so appropriately, following predetermined company procedure.

6. Work environment

We shall not commit a wrongful act or act in bad faith at work and shall maintain a safe working environment.

6.1. Establishing a pleasant work environment

- 6.1.1 We shall work to build relationships of mutual trust, place emphasis on teamwork and develop a framework of cooperation in the workplace.
- 6.1.2. We shall strictly comply with all employment regulations and other regulations and shall also refrain from any illegal or dishonest acts.
- 6.1.3. If we discover that a wrongful or unfaithful act was committed, we shall report to or consult with our superiors or the in-house consulting service (Fast Retailing Group Hotline).

6.2. Maintaining safe work environment

- 6.2.1 We shall strictly obey all laws concerning workplace safety and health and pay attention to the physical and mental health of each and every person and shall make every effort to establish and maintain a healthy, safe and hygienic work environment.
- 6.2.2. If an accident, malfunction or other problem occurs in the workplace, we shall work to minimize the damage. We shall also promptly prevent recurrence.
- 6.2.3. We shall refrain from activities that have a negative impact on the workplace, such as engaging in immoral, illegal or corrupt activities; including the ingestion, handling or being under the influence of illegal drugs or illegal gambling. We shall also make every effort to prevent these acts.

7. Human resource development and fair evaluation

We shall develop all employees to enable them to fulfill their potential and we will be meritocratic in our evaluation of their work.

7.1. Equal employment opportunities and human resource development

- 7.1.1 We shall hire individuals and develop employees who are capable of exhibiting leadership skills, regardless of country or region of origin.
- 7.1.2. We shall provide autonomous and growing individuals with sufficient opportunity to develop and engage their abilities.

7.2. Fair evaluation and proper treatment

- 7.2.1 In all situations where the company decides on the treatment of individuals, we shall give a fair evaluation and adequately handle the situation based on the evaluation criteria specified by the company.

8. Appropriate information management

We shall respect the importance of personal and confidential information and will strictly manage it to prevent leaks and to avoid using information wrongfully or inappropriately. ■

8.1. Handling of personal information

- 8.1.1 We shall handle with strict care the personal information of customers, employees and business partners and shall not divulge or leak this information during our employment or after leaving the company, without following procedures specified in the company regulations.
- 8.1.2. We shall not use personal information of customers, employees and business partners for any purpose outside the agreed scope of use.
- 8.1.3. We respect one another's privacy.

8.2. Handling of confidential information

- 8.2.1 We shall strictly obey laws regarding information obtained in the course of business, properly keep all records concerning our business activities and will disclose it only at the appropriate time and in an appropriate manner.
- 8.2.2. We shall manage the confidential information of the company and business partners with strict care, and shall not disclose or divulge this information inside or outside the company except for legitimate purposes.
- 8.2.3. We shall not use the information of business partners for any purpose outside the scope agreed upon by the business partners.
- 8.2.4. We shall not steal, or acquire through other improper methods, confidential information belonging to other companies.
- 8.2.5. We shall not leak, or use for any purpose, confidential company information after leaving the company.

8.3. Proper use of information systems

- 8.3.1 We shall use the company's information systems for business purposes only, and not for personal reasons.
- 8.3.2. When using the company's information systems, we shall make sure to follow the instructions given by the department in charge of said systems, company regulations and guidelines.

9. Exclusion of antisocial groups

We shall not have any affiliation with antisocial forces or groups that pose a threat to the social order or to public security.

9.1. Severing links with antisocial groups

- 9.1.1 We must avoid any contact with antisocial groups. We shall keep a resolute attitude against antisocial groups and reject any unwarranted demands.
- 9.1.2. We shall not make use of antisocial influences whether for our personal profit or for the company's.

10. Protection of company property

We shall make proper use of tangible and intangible company property and protect it.

10.1. Appropriate use of company's property

- 10.1.1. We shall use company's assets appropriately and efficiently and manage company assets, both tangible and intangible, to prevent loss or theft.
- 10.1.2. We shall not use company's assets or expenses for personal gain.
- 10.1.3. We shall not deliberately falsify any information or document. We shall also not be involved in any falsification.

10.2. Protection of intellectual property

- 10.2.1. We shall recognize that intellectual property owned by the company brand or the company is an important company asset, and will use it carefully in accordance with the laws and company regulations so as to protect the company's rights to such assets.
- 10.2.2. When the company invents or creates something in the process of manufacturing and development activities, we shall fully cooperate to ensure that the company quickly applies for a patent or claims a copyright to protect the company's intellectual property.
- 10.2.3. We shall not violate the intellectual property rights of other companies. We shall only use the intellectual property of business partners on the basis of an appropriate contract and shall not use it improperly.

10.3. Conflicts of interest

- 10.3.1. We shall not perform or be involved in any actions that create a conflict of interest with the company.
- 10.3.2. We, without the Fast Retailing Group's consent, shall not work as an employee or consultant (or equivalent position) on behalf of competitors or business partners, nor receive any monetary benefits from them.
- 10.3.3. We shall not operate as business partners for the Fast Retailing Group.

11. Environmental conservation and contribution to the community

We shall always consider our environment and shall be committed to preserving it so that the next generation can live a wholesome life.

11.1. Reducing environmental impact

- 11.1.1 We shall recognize the environmental impact of all our business activities from procurement of materials through to provision of products and services to customers and will strive to reduce it.
- 11.1.2. We shall be cognizant of international standards and environmental regulations of countries and regions around the world and will obey all relevant treaties and laws.
- 11.1.3. We shall work to raise awareness of environmental issues and to reduce our environmental impact by saving energy and natural resources and by reducing waste. We will strive to incorporate environmental activities in our everyday work routines.

11.2. Contributing to the community

- 11.2.1 We shall, as members of the community, take part in activities that contribute to the development of local and regional communities
- 11.2.2. We shall understand and respect local society, culture, customs and traditions and support cultural, artistic and sporting activities. We are encouraged to engage in activities that contribute to the community, such as cooperating with regional communities, participating in volunteer activities and otherwise contributing to global society, to bring about a positive impact on society.
- 11.2.3. We shall make donations to activities that contribute to the community after taking due account of the necessity and adequacy of such donations and by following relevant laws.

12. Distinction between professional and personal lives

We shall separate our professional life as an employee of Fast Retailing Group from our personal life and always draw a line between them.

12.1. Responses to media

- 12.1.1 If we receive a request for an interview as an employee of the company or as an individual from a media source, such as a newspaper, magazine, television or Internet media outlet, we shall make sure to contact the PR department and follow their instructions.
- 12.1.2 If it is necessary to disclose information to the media, we shall only disclose the information published on the websites of Fast Retailing and Group companies.

12.2. Communicating information via social media and similar

- 12.2.1 When we convey information via social media and similar, we shall clearly separate information sent as an individual from the information to be officially sent as an employee of the company.
- 12.2.2 Whether as an executive/employee or as an individual, we shall not convey or post non-public or confidential information, or any information that may slander, discriminate against, defame, or infringe the rights of the Fast Retailing Group or third parties.

12.3. Activities based on political or other ideas

- 12.3.1 When we participate in activities based on our political or other ideas, we shall do so only as individuals outside of working hours and outside the company's premises.