

YKK EMEA Group / PARTNERS' CODE OF CONDUCT

YKK EMEA Group (hereinafter “YKK”) has always been committed to developing its activities in accordance with the highest ethical standards.

The YKK EMEA Group Partners' Code of Conduct (hereinafter “Code of Conduct”) defines the ethical principles and specifies YKK's expectations toward its partners: manufacturers, sub-contractors, suppliers, and distributors (hereinafter together referred to as “Partners”), on ethical, social and environmental grounds.

YKK expects from its Partners respect for / compliance with the principles listed in this Code of Conduct.

YKK PHILOSOPHY CYCLE OF GOODNESS

“No one prospers unless he renders benefit to others.”

An enterprise is an important member of society, and as such, it must coexist with other elements of society. Its value will be recognized by the benefits it shares with society.

Tadao Yoshida, YKK's founder, carefully considered this need for mutual prosperity as he planned his business endeavors. He determined that contributions to society could best be achieved by the continual creation of value through innovative ideas and inventions. The resulting business expansion would bring prosperity to consumers and trading partners, thus benefiting all society.

For example, if a more efficient machine can be developed, productivity will be enhanced; or, if the material loss rate can be reduced, lower cost in the final product will be attained while making the best use of limited resources.

Also, Tadao Yoshida felt strongly that the fruits of these innovative ideas must not be retained by any individual. Instead, they should be distributed widely to society, thereby circulating the benefits. In this way, one can prosper while making a contribution to the enrichment of all humankind. Tadao Yoshida called this the *Cycle of Goodness*, and he made this idea his fundamental philosophy of business. We retain this concept as the ongoing business philosophy of YKK.

■ YKK MANAGEMENT PRINCIPLE

“YKK seeks corporate value of higher significance.”



Seeking corporate value of higher significance,
YKK will pursue innovative quality in the following **seven** areas

In order to maintain our employees', our customers' and society's trust, YKK Group will continue to enhance the value of our products, technology and management. To make decisions in our business and management activities, we rely on fairness as our guide.

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I. Compliance with Laws and Regulations

Partners must take whatever steps are necessary to fully comply with all laws and regulations that apply to conducting business activities.

II. Company Property including Confidential Information

Partners must, in an ethical and efficient matter, utilise and protect their own assets and information, as well as YKK's confidential information.

III. Privacy and Employee Confidentiality

Partners pledge to comply with data protection obligations. Access to personal data is strictly limited to authorised employees who have a business reason for processing the data. Those with access to personal data must only use it for the purpose for which it was collected and must adhere to high standards of confidentiality. Personal data must be accurate and kept up to date. YKK uses accounting and administration systems hosted on systems outside of the EEA. Partners agree that permission has been obtained for any personal information provided to or held by YKK to be stored, controlled and processed on these systems for purposes related to YKK Group's business relationships with partners.

IV. Harmony with the Environment

Striving to be environmentally friendly, Partners pledge that they will address and promote harmony with the environment, as the highest priority of their business activities. Partners acknowledge the significance of environmental activities and the high priority in which they are regarded within our business activities. Partners must comply with applicable environmental laws and regulations.

V. Health and Safety

Partners pledge that they will make the utmost effort to remove any items or practices in the workplace, which are harmful or dangerous, and to maintain and increase the physical and mental well-being of all employees. They pledge to use their best efforts to accomplish these goals. They must comply with all applicable laws related to health and safety.

VI. Quality and Safety of Products

Partners highly value the trust that YKK has placed in their business, and pledge to continue providing products and services with the highest commitment to quality. They must comply with all applicable laws related to product safety.

VII. Human Rights

Partners respect the human rights, individuality and the personality of all individuals in all their operations, in every country and region in which their operations reside.

Partners must take whatever steps are necessary to eliminate any sort of violence, or other forms of intimidation in the workplace.

Partners will respect the rights of employees to associate, organise and bargain collectively in accordance with local laws.

Employment of all persons must be voluntary and the use of any forced or involuntary labour is prohibited.

Employees will be paid at least the minimum wage set by local laws or regulations.

Child labour is prohibited. Partners will comply with all local laws and regulations with regards to minimum working age and maximum working hours.

VIII. Relationship with Business Partners and Government Agencies

Partners will take whatever steps are necessary to ensure they conduct business transactions in a fair and equitable manner. Partners must take whatever steps are necessary to fully comply with all applicable competition laws which apply to all their business activities, in order to continue to maintain fair and equitable dealings in the marketplace.

Partners will require their suppliers to comply with the principles contained in the Code of Conduct.

Partners will take whatever steps are necessary to undertake lawful and appropriate conduct and continue to develop fair and good faith relationships with all relevant government agencies.

Partners will not engage in the giving or receiving of bribes or other illicit payments or improper benefits intended to achieve a business or personal advantage or a financial gain and will avoid any actual or apparent conflicts of interests.

IX. Workplace Dignity and Respect

Partners acknowledge that bringing together and supporting employees from different backgrounds, perspectives and cultures helps create a dynamic business. Partners pledge to provide equal opportunities for all their current and former employees and job applicants who will receive fair treatment regardless of age,

race, religion or belief, colour, nationality, ethnic or national origin, sex, marital status or disability. Partners will work to ensure that all relationships in the workplace are free from discrimination, bias and harassment.

X. Audits

Partners agree to cooperate with YKK or their representatives' access to all places of business and all records and personal documentation at all times, with or without notice, to ensure compliance with these standards. Sufficient documentation to allow YKK to monitor compliance will also be maintained.

Partners understand that should they be found not to be complying with these principles, YKK itself may be in jeopardy of losing its customers and therefore YKK may terminate any contracts that are currently in place and will compensate YKK for any loss or damages this may cause.

Receipt and acknowledgement

We confirm receipt of the YKK EMEA Group PARTNERS' CODE OF CONDUCT and confirm that we have read and understood the contents and undertake to fully comply with all provisions of the Code.

Company Name:

Signature:

Date: