

Star Micronics Group

Sustainability Code of Conduct



Star Micronics Group Sustainability Code of Conduct

The “Star Micronics Group Sustainability Code of Conduct,” hereinafter referred to as the “Sustainability Code of Conduct,” is based on our Corporate Philosophy and Basic Sustainability Policy. It sets forth standards of conduct for all officers and employees to follow in their daily actions. These standards help ensure that the Star Micronics Group conducts fair and appropriate management in harmony with society and pursues sustainable development as a company.

In line with the fundamental concept of the Basic Sustainability Policy that “the Company and its employees will grow together and contribute to society,” the Sustainability Code of Conduct presents norms in accordance with the three guidelines for growing together set forth in our Corporate Philosophy: “Enhance corporate value in a sustainable way,” “Contribute to the sustainable development of society,” and “Enrich the lives of employees and their families.”

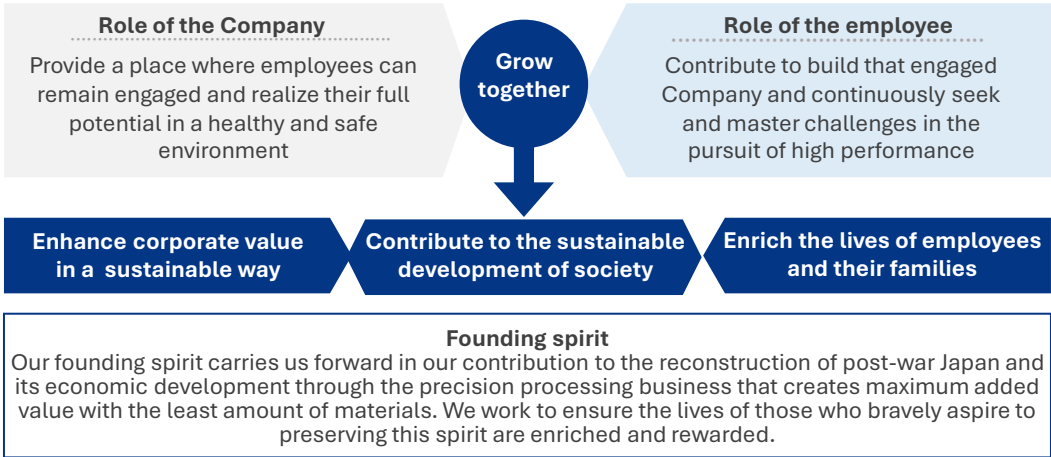
Officers and employees of the Star Micronics Group shall fully understand the content of the Sustainability Code of Conduct, comply with laws and regulations, respect social norms, and act sincerely with good judgment and a sense of responsibility.

The term “employees” in the Sustainability Code of Conduct refers to all individuals engaged in the business of the Star Micronics Group.

We also expect all business partners involved in our products and services, including our suppliers, to understand and respect the Sustainability Code of Conduct.

Corporate Philosophy

A company and its employees must constantly evolve through a process of steady development while also making every effort possible to improve the lives of each individual. This growth must happen together.



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1. Enhance Corporate Value in a Sustainable Way

To sustainably enhance corporate value, the Company must continue to provide new value to society.

At the same time, all officers and employees of the Star Micronics Group must always respect laws and regulations, social norms, and compliance requirements, and act in ways that uphold society's trust.

1-1. Compliance with Social Norms and Internal Rules

We will comply with social norms and our internal rules, acting with good judgment at all times.

1-1-1. Compliance with Work Rules and Other Internal Rules

1. We will always comply with all internal rules, regulations, policies, and other standards, including work rules and the Sustainability Code of Conduct.
2. We will not engage in fraudulent or dishonest conduct and will strive to maintain workplace discipline.

1-1-2. Appropriate Accounting Treatment

When making entries in accounting books or completing vouchers, we will record information accurately in accordance with relevant laws, regulations, and internal rules. We will not make false or fictitious entries or create off-the-book assets.

1-1-3. Compliance with Import and Export Laws and Regulations

1. With respect to import and export transactions involving products, technologies, and other items, we will manage such transactions appropriately and in full compliance with security-related laws and regulations applicable in each country.
2. We will not export or import any goods prohibited by applicable laws or regulations.
3. In conducting international transactions, we will comply with international rules and local laws and will also respect local cultures and customs.

1-2. Fair Trade and Ethics

We will conduct fair and equitable transactions and carry out business activities based on high ethical standards.

1-2-1. Compliance with Antitrust and Competition Laws

We will not engage in cartels, predatory pricing, tie-in sales, resale price maintenance, abuse of superior bargaining position, or any other conduct that violates antitrust or competition laws. We will engage in fair and free competition in the marketplace.

1-2-2. Prevention of Unfair Competition

We will never acquire another company's trade secrets through theft or other improper means. We will also not use another company's trade secrets if we know they were acquired through improper means.

1-2-3. Fair Transactions with Suppliers and Other Business Partners

1. We will conduct transactions with suppliers, manufacturing subcontractors, and other business partners fairly and equitably, and with sincerity and good judgment.
2. When selecting and evaluating suppliers and other business partners, we will compare them fairly based on objective criteria—including quality, price, delivery, technical capabilities, human rights practices, environmental considerations, and social responsibility—to determine the most appropriate partners.
3. We will not use our position of influence in the selection or evaluation of business partners to provide preferential treatment to any specific supplier or subcontractor.
4. We will not personally accept rebates, commissions, gratuities, or other personal benefits in transactions with business partners.
5. In transactions with business partners, we will comply with all applicable laws, regulations, and internal rules. We will not engage in unjustified delays in payment, unjustified price reductions, unilateral changes to transaction terms, or any other conduct that causes an unfair disadvantage to business partners.

1-2-4. Fair Transactions with Customers and Sales Partners

1. We will always treat customers and other sales partners fairly and equitably and conduct transactions with integrity in accordance with relevant laws, regulations, and contracts.
2. When providing rebates, commissions, discounts, or price reductions for sales promotion purposes, we will follow the prescribed approval procedures.
3. We will not pay rebates or similar benefits by any method not stipulated in the contract, or to any party other than the contracting party.

1-2-5. Business Entertainment and Gifts

1. We will not provide entertainment or gifts to public officials or persons in equivalent positions.
2. Entertainment and gifts to customers, business partners, and others shall be limited to reasonable and appropriate business courtesies. When providing entertainment or gifts, we will always obtain the necessary prior approval.
3. Entertainment and gifts received from customers, business partners, and others shall be accepted only as reasonable and appropriate business courtesies.
4. In international transactions, we will not provide, promise, or offer money or other benefits to foreign public officials to obtain or retain improper business advantages.

1-2-6. Donations and Political Contributions

When making political contributions or donations to various organizations, we will comply with all applicable political funding and election laws. We will not engage in bribery, provide improper benefits, or make illegal political contributions. We will also refrain from any conduct that could create the appearance of improper ties with political or government entities and will strive to establish sound and transparent relationships with such entities.

1-2-7. Severing Relationships with Antisocial Forces, Including Organized Crime Groups

1. If we receive unreasonable demands from antisocial forces, including organized crime groups, or similar organizations, we will not provide money or other benefits to resolve the matter. We will take a firm stance and maintain no business relationships whatsoever with such parties.
2. We will not use antisocial forces for corporate or personal gain. We will also not conduct any transactions with antisocial forces or with business partners connected to such forces.

1-2-8. Avoiding Unnecessary Formalities and Gifts

Except for ceremonial occasions within the bounds of socially accepted courtesy, we will not give or receive ceremonial gifts or similar items within the Company. We will also not give or receive money, gifts, or other benefits to or from employees or business contacts inside or outside the Company for personal gain.

1-2-9. Political and Religious Activities

1. We will not engage in political, ideological, religious, or similar activities within the Company.
2. When engaging in such activities outside the Company as individuals, we will take care not to create the impression that our actions are being conducted on behalf of the Company or in our official capacity.

1-3. Respect for Corporate Information and Assets

We will handle corporate information and assets appropriately.

1-3-1. Protection of Privacy

1. We respect the privacy of our customers, business partners, and all officers and employees of the Star Micronics Group.
2. Personal information obtained through our business activities will be used only for legitimate business purposes and managed strictly. We will not disclose such information inside or outside the Company without the explicit consent of the individual.

1-3-2. Appropriate Use of Corporate Assets

1. Recognizing the need to use corporate assets efficiently and keep them available for use at all times, we will handle both tangible and intangible assets appropriately to prevent damage, theft, and other losses.
2. Corporate assets, information systems, and expenses will be used only for business purposes and never for personal use.
3. We will strictly safeguard IDs and passwords for the Group's information systems to prevent unauthorized disclosure. We will not misappropriate another person's ID or password or engage in unauthorized access to any computer system.
4. To the extent permitted by relevant laws and regulations, the Company may monitor and inspect the use of corporate assets and information systems, including emails, data, files, and other information stored on company devices or systems.

1-3-3. Prohibiting Insider Trading

1. If we become aware, in the course of business, of material, non-public information concerning the Star Micronics Group or another company, we will not disclose such information to anyone else until it is officially announced. We will also not buy or sell shares or other securities of the company concerned, nor encourage any officers, employees, family members, or acquaintances to do so.
2. When buying or selling shares or other securities of Star Micronics, we will always obtain the prescribed prior approval and follow the proper clearance procedures.

1-3-4. Prohibition of Conflicts of Interest

1. We will not become involved in businesses that compete with the Star Micronics Group or in activities that seek to benefit ourselves or third parties at the expense of the interests of the Star Micronics Group.
2. We will not work for competitors or business partners as employees, consultants, or in any other capacity, nor will we hold financial interests in them.
3. As a general rule, we will not become a counterparty to transactions with the Company, nor will we pressure those responsible for such transactions to conduct business with our close relatives or acquaintances.

1-3-5. Management of Confidential Information and Trade Secrets

1. We will strictly manage the Group's trade secrets and those of third parties, and will not disclose them outside the Company or use them for unauthorized purposes. When disclosing confidential information outside the Company, we will take appropriate safeguards, such as entering into non-disclosure agreements (NDAs), to prevent unauthorized disclosure.
2. Even after leaving the Company, we will not disclose the Group's confidential information or any confidential information obtained from third parties, nor will we use such information for any purpose.

1-3-6. Protection of Intellectual Property Rights

1. Recognizing that the Group's intellectual property is a vital corporate asset, we will use it appropriately and strive to protect and maintain the Group's rights.
2. With respect to work-related inventions, we will promptly apply for patents and otherwise strive to strengthen the Group's intellectual property portfolio.
3. We respect the intellectual property rights of others and will not infringe upon or misappropriate such rights.

1-3-7. Appropriate Disclosure of Information

In accordance with applicable laws and regulations and industry standards, we will appropriately disclose information concerning labor practices, health and safety, environmental performance, business activities, organizational structure, financial position, business performance, and human rights initiatives. We will engage in dialogue with society and give sincere consideration to stakeholder feedback.

1-3-8. Protection of Whistleblowers

1. If we become aware that misconduct—such as bribery, corruption, extortion, or embezzlement—has occurred or may occur, we will promptly raise a concern or file a report with the Compliance Consultation Desk or other appropriate contact point.
2. We will strictly protect the confidentiality of all information related to such reports and protect the anonymity of whistleblowers. We will not tolerate any form of retaliation or adverse treatment against any individual who makes a report in good faith.

1-4. Responsibilities of Management

Management will strive to enhance corporate value as the executive leadership of the Star Micronics Group.

1-4-1. Responsibilities of Executive Management

1. Management will take the lead in sustainability and compliance initiatives, including social contributions and environmental stewardship, and will aim to enhance corporate value in a sustainable way.
2. Management will advance the development of internal compliance systems and ensure that all employees are fully aware of the importance of legal compliance and ethical business activities.
3. When problems arise, management will demonstrate leadership in resolving them, strive to investigate the root causes and prevent recurrence, and fulfill the Group's responsibilities to society.

2. Contribute to the Sustainable Development of Society

The sustainable development of society depends on the preservation of our global environment. We aim to minimize our environmental footprint and conduct all business activities in harmony with the environment.

As a responsible member of society, we will actively contribute to the communities and countries where we operate. We aim to grow together with society by delivering high-quality, safe products and engaging in meaningful social contribution activities.

2-1. Environmental Preservation

We will actively promote environmental preservation initiatives to help protect the global environment.

2-1-1. Consideration for the Global Environment

1. Through our business activities, we will work to reduce greenhouse gas emissions and develop environmentally friendly products.
2. We will strive to support a circular economy by maximizing resource efficiency at all stages, from product design to disposal, thereby minimizing our environmental footprint.
3. We will work to prevent leaks or releases of chemical substances to protect water and soil from contamination. In the event of an accidental release, we will act swiftly to mitigate any environmental harm.

2-2. Quality and Safety

We will provide safe, high-quality products and services and appropriately disclose product-related information.

2-2-1. Provision of Safe and High-Quality Products

1. In developing, manufacturing, selling, repairing, and providing our products and services, we will always prioritize safety, comply with all relevant laws, regulations, and safety standards, and strive for higher levels of safety.
2. We will always strive for customer satisfaction, provide socially valuable products and services, and continuously maintain and improve quality and reliability.
3. We will develop and enhance systems to promptly collect and appropriately manage information on product defects, safety incidents, and other quality issues. We will strive to prevent recurrence.

2-2-2. Fair Advertising and Marketing

We will provide accurate and appropriate information concerning our products so that customers can make informed decisions. In our advertising and promotional materials, we will not use expressions that disparage competitors, nor will we use any content that could lead to social discrimination.

2-3. Social Contribution

We will actively promote initiatives that contribute to the development of society.

2-3-1. Corporate Citizenship and Social Contribution

1. As good corporate citizens, we will actively participate in social contribution activities to support the sustainable development of society. We will continue our efforts, including collaborating with local communities and contributing to the international community.
2. We will support our employees' voluntary participation in social contribution and volunteer activities.
3. We will widely communicate the Star Micronics Group's social contribution activities to the public, fostering transparent dialogue and engagement with society.

3. Enrich the Lives of Employees and Their Families

To enable our employees to collaborate effectively as a highly motivated, unified team, we must build a safe, healthy workplace environment free from discrimination and harassment.

Furthermore, our business activities are supported by a diverse range of stakeholders. Respecting diversity and one another enriches the lives of all colleagues and ultimately enriches employees' own lives.

3-1. Human Rights and Labor Practices

We will conduct all business activities based on respect for human rights and human dignity, with the aim of promoting well-being and prosperity.

3-1-1. Respect for Human Rights and Prohibition of Discrimination

1. We will not use labor obtained through coercion, detention, inhumane prison labor, slavery, or human trafficking. We will also protect the right of employees to leave employment or voluntarily terminate their employment without being forced to work.
2. We will not allow children under the minimum working age to work. We will also not allow young workers to engage in hazardous work that may impair their health or safety.
3. We will not require employees to work beyond the limits prescribed by applicable laws and regulations, and we will appropriately manage working hours, breaks, and holidays.
4. We will pay wages and compensation appropriately in compliance with applicable local laws and regulations.
5. We will not engage in or tolerate inhumane treatment, such as mental or physical abuse, coercion, or harassment.
6. We will give due consideration to religious practices within a reasonable scope.

7. In accordance with applicable local laws and regulations, we respect workers' freedom of association and right to collective bargaining so that workers and management can consult on working environments, wages, and other labor standards.
8. We strictly prohibit discrimination based on birth, nationality, race, ethnicity, skin color, creed, religion, gender, sexual orientation, age, disability, educational background, or any other status protected by applicable law.
9. We will not abuse our status or position within the Company to pressure or coerce others.

3-2. Occupational Health and Safety

We will strive to foster a safe, healthy, and supportive workplace environment that promotes overall health and well-being.

3-2-1. Commitment to Occupational Health and Safety

1. We will comply with all relevant laws and regulations and strive to maintain a safe, healthy, and comfortable workplace environment.
2. If a workplace accident occurs, we will follow established response and reporting protocols to minimize its impact and prevent recurrence.
3. We will not impose excessive workloads, and managers will always monitor and support the physical and mental well-being of their team members.

4. Supplementary Provisions

4-1. Revision and Abolition

Revision or abolition of the Sustainability Code of Conduct shall be subject to the approval of the Board of Directors.

4-2. Compliance Hotline

1. If employees have any questions or concerns regarding compliance with the Sustainability Code of Conduct, they should first consult with their supervisors. Supervisors who receive such consultations should, as necessary, consult with higher-level managers or the Compliance Hotline and respond appropriately.
2. If employees are unable to consult with their supervisors or find it difficult to do so, they should contact the Compliance Hotline directly.

4-3. Penal Provisions

Any person who violates the Sustainability Code of Conduct may be subject to disciplinary or other action in accordance with work regulations and other applicable rules.

Date of Enactment, Revision, and Abolition

1. The “Star Micronics Code of Conduct” came into effect on March 1, 2005.
2. The Code was partially revised and came into effect as the “Star Micronics Group Code of Conduct” on November 1, 2008.
3. The Code was partially revised and came into effect as the “Star Micronics Group Sustainability Code of Conduct” on March 1, 2023.
4. The Code was partially revised and came into effect on July 1, 2024.
5. The Code was partially revised and came into effect on August 1, 2026.

Compliance Hotline

Purpose

The Compliance Hotline is intended to detect compliance violations at an early stage and take corrective action before problems become more serious.

Who May Use the Compliance Hotline

The hotline may be used by directors and employees of Star Micronics Group companies, including temporary staff and agency workers, as well as individuals within one year of leaving the company; independent contractors, freelancers, and other service providers with a business relationship with Star Micronics Group companies, as well as individuals within one year after the relationship ends; and job applicants and candidates.

Matters That May Be Reported or Discussed

You may report or discuss concerns about a possible compliance violation, any compliance violation you become aware of, or conduct that may involve a suspected compliance violation.

Consultation Contacts

The hotline has two contacts. Both accept the same types of consultations. You may use whichever contact is easiest for you. Consultations may be made under your name or anonymously.

1. Compliance Committee Secretariat “General Affairs Office Manager”

Email: c-soudan@star-m.jp / Phone: +81-54-263-0201

Mail: Compliance Hotline / Compliance Committee Secretariat, STAR MICRONICS CO., LTD., 20-10 Nakayoshida, Suruga-ku, Shizuoka-shi, Shizuoka 422-8654, Japan

2. External Reporting Channel “Outside Counsel”

Email: makita-law@car.ocn.ne.jp / Phone: +81-54-255-5231

Mail: Ms. Akiko Makita / Makita Law Office, Shin-nakacho Building 2F, 10-209 Otemachi, Aoi-ku, Shizuoka-shi, Shizuoka 420-0853, Japan

Investigation and Feedback

The facts of each consultation will be confirmed promptly. The reporter will be informed of the investigation results and the company’s response.

If the consultation is anonymous and the reporter cannot be contacted, feedback may not be possible.

Protection of Reporters

Retaliation or unfair treatment, identifying or attempting to identify a reporter without a legitimate reason, and asking someone not to report or pressuring someone to remain silent are prohibited. If you experience unfair treatment as a result of using the Compliance Hotline, please contact the Compliance Hotline.

Contact :
Star Micronics Co., Ltd.
Sustainability Committee Executive Office
General Affairs Office, General Affairs Department