



**FREIGHT SYSTEMS**  
Supply Chain Solutions

# FSL GROUP BUSINESS CODE OF CONDUCT

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Since its founding, FSL business practices have been governed by integrity, honesty, fair dealing and full compliance with all applicable laws.

FSL employees worldwide have upheld and lived this commitment in their everyday responsibilities ever since, and FSL's reputation remains one of the Company's most important assets today.

The FSL Corporate Business Principles prescribe certain values and principles which FSL has committed to worldwide. This Code of Business Conduct specifies and helps the continued implementation of the Corporate Business Principles by establishing certain nonnegotiable minimum standards of behaviour in key areas.

The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities. Employees should seek guidance when they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of each employee to "do the right thing", a responsibility that cannot be delegated.



## Respect for human rights

- Respect for International Norms on Human Rights – We respect international norms on human rights and will not engage in acts that violate human rights and the dignity of the private individual in any of our business activities.
- Eradicating All Forms of Discrimination – We respect the rights of all persons and will not engage in discriminatory action or make discriminatory remarks based on gender, age, nationality, ethnicity, creed, religion, occupation, social status, appearance, illness or disability.
- Prohibiting Harassment – We will not engage in libelous or slanderous acts that violate human dignity, abusive acts that may be regarded as harassment or any other act that may be misinterpreted as harassment, without any exception.
- Prohibiting Forced Labor or Child Labor – We will pay due attention to the social responsibility of business corporations and will neither allow forced labor or child labor nor conduct trade with business enterprises engaged in such acts.
- Equal Opportunity in Employment – We will promote equal opportunity in employment, personnel administration, wages, training, promotion, etc., and will observe labor contracts and other agreements with attention to the protection of the rights of workers established in international treaties and in laws and regulations of each country or region.

## Building a friendly work environment

- Importance of Diversity – We embrace the diversity of employees in personality, individual traits, ways of thinking, value perception, etc., and will realize sustainable growth of the Group by tapping into a wide range of human resources and generating vitality as an organization.
- Assuring Balance between Work and Private Living – We support work styles that realize balance between work and private living (work-life balance) and pay attention to the creation of a work environment in which each employee is able to work with a sense of satisfaction and fulfillment. For employees who need allowance for maternity, childbirth, child care, nursing care for family members, etc., we will develop a work environment that enables such employees to do so while working, through the creation of various work schemes and leave programs
- Assuring a Safe and Healthy Work Environment – Maintenance of a safe and healthy work environment is the top priority for FSL. We engage in the prevention of accidents and occupational injury on a daily basis. We engage in keeping the work environment comfortable for the workers by actively conducting measures that maintain and promote the sound physical and mental health of workers.

## Fair and sincere business activities

- Providing Logistics Services of Outstanding Quality and Safety - As a global Supply Chain company, we provide services of outstanding quality and safety, with careful attention to fairness and integrity in our business activities, in order to win the trust and satisfaction of our customers.
- Compliance with Laws and International Rules - As a global company engaged in international business activities, we observe the laws and regulations of the countries where we operate and the international conventions and rules pertaining to trade practices, in addition to the laws and regulations of our home country. At the same time, we honor and respect the cultures and customs of the various regions of the world.
- Prohibition of Bribery - As a global supply chain company we observe strict policy that prohibits corrupt practices and bribe. Domestically or internationally, against any public or private individuals, directly or indirectly, we will not provide, offer or promise to pay, nor will we accept, request or agree to receive any sort of bribe or similar transaction in order to gain unlawful benefit.
- Prohibiting Conflict of Interest - Individuals belonging to the FSL Group will not serve as director, advisor, employee, agent, etc., for other business enterprises or organizations, except with the approval of the Company. We will not make use of the Company's assets or facilities without permission obtained in advance. We will engage in trade with vendors with fairness and impartiality and will not compromise the interests of the Company by promoting the interests of oneself, relatives, friends or acquaintances or designated organizations.
- Cooperation with Research by Administrative Authorities - We will cooperate with requests from relevant government organizations or other government-related organizations for research, notification or report and act accordingly in good faith. We will cooperate actively with internal audits and inspections related to the state of compliance with Company regulations and with laws and regulations. Should need for improvement, be pointed out, we will act promptly to address the issue, unless logical reason exists to do otherwise.

## Information & Assets

- All employees are required to protect FSL Group's assets and ensure their efficient use. They are to be used for legitimate purposes and for FSL Group business only. All employees must use FSL Group's communication system for business related purposes only and do so appropriately and according to the laws.
- It is forbidden to download or distribute any material that is illegal, offensive or could reflect negatively on FSL Group's reputation. We should also exercise discretion and diligence when drafting e-mails to ensure that our communication is professional and appropriate.
- The success of FSL Group as a business is based on the knowledge of its employees. Employees must ensure that the operational and business secrets of FSL Group as well as its business partners do not become known outside of the company. It is forbidden to publish operational or business secrets without permission, to pass them to third parties, or to utilize them for one's own purposes without permission.
- Appropriate Use of Information Systems - We comply with internal regulations on information security and, in use of the Company's information system devices, implement measures to prevent damage or loss of hardware, software, network recording media making up the system, to prevent data leakage and to protect ourselves from external cyberattacks.

## Relationship with society

Assuring Information Disclosure and Corporate Transparency - We will properly disclose Information demanded by society as needed with laws and regulations. At the same time, we proactively provide information beyond that which is required by law. We promote communication with our customers, shareholders and investors, employees and other stakeholders to achieve corporate transparency.

Sound Corporate Accounting - We assure the soundness of our financial statements by engaging in accounting and financial reporting in compliance with relevant laws and regulations, fair and rational accounting standards.

Rejecting Transactions with Antisocial Forces - We will not establish any relation whatsoever with antisocial forces—or parties that are suspected to be related to such forces—that may threaten order and security of civic society. Furthermore, we will categorically reject any demand for monetary payment or offer for transaction that transgresses legal authority from such an organization and shall act to eliminate such organizations with the resolution. Without exception, we will not be involved in terrorism, money laundering or any other form of organized crime and will furthermore conduct careful study into the processes for transactions to ensure they are not used in such crimes.

Political and Religious Activities - FSL Group does not support any specific political or religious movement. Furthermore, as a general rule, the Group will not allow such activities to take place on Company premises, during business activities and its extent.

Social Contribution Activities - We promote harmony with regional communities and international society as a good corporate citizen and actively engage in social contribution activities through our business operations and sustainable advancement of our corporate value.

Attention to the Environment - We observe and comply with treaties, laws and regulations and rules related to environmental protection and engage actively in protection and preservation of the environment.

## Handling the media

Providing the public, including the media, with clear, dialogue-oriented and consistent information strengthens the global image of FSL. Official statements, especially to the media, may therefore only be made after consultation with the Managing Director of relevant area.

## CMT responsibilities

The Core Management Team (CMT) should exercise initiative in complying with the Code of Conduct herein and strive for business management founded on fair corporate ethics and compliance with laws and regulations. In case a director or an employee violate the Code of Conduct, top management should clarify both internally and externally that it will take charge to resolve the problem, determine the cause of infringement and make efforts to prevent similar violations in the future, At the same time, top management should promptly make full public disclosure, explain what has occurred, and, upon determining the source of competence and responsibility, impose strict disciplinary action against those held responsible, including top management itself.



## Contact us

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**Our reputation is  
the pivotal asset of  
our group**