

Hitachi Construction Machinery Group Codes of Conduct

Preface

Our Vision is “To pass on a productive environment and prosperous cities to future generations. HCM Group helps to create comfortable living spaces.” In striving to accomplish this, we embrace the values of the Hitachi Construction Machinery Employee Spirit “Kenkijin Spirit”, and we are working to create new value aimed toward achieving our “Vision.” The Hitachi Construction Machinery Group will maintain the values of the Hitachi Founding Spirit: Harmony, Sincerity and a Pioneering Spirit.

The Hitachi Construction Machinery Group Codes of Conduct consist of rules and principles intended to assist officers and employees in making decisions and taking actions in accord with the Hitachi Founding Spirit. All officers and employees of Hitachi Construction Machinery Group companies shall understand and follow the Codes of Conduct and act with sincerity and fairness in a highly ethical manner.

1. Toward a Sustainable Society

- (1) We will contribute to resolving social issues by promoting innovative solutions, accelerating collaborative creation with partners and stakeholders, and further integrating social and environmental responsibility into our business activities.
- (2) We will strive to develop technologies that contribute to social development and use them with due consideration of their impact on society.
- (3) We envision a low-carbon society, a resource efficient society, and a harmonized society with nature. To this end, we will endeavor to reduce CO₂ emissions, use water and other resources efficiently, and minimize impacts on natural capital throughout our value chain.
- (4) As a corporate citizen, we will make efforts to build rapport with communities and contribute to their development by working together to resolve social issues.

2. Sincere and Fair Business Activities

2.1 Fair Trading

- (1) To ensure fair and open competition, we will observe the fundamental rules of trade, including domestic and overseas competition laws and regulations, and act in compliance with legislation and sound corporate ethics.
- (2) We will have no relationship whatsoever with antisocial forces anywhere in the world, and resolutely reject involvement in improper or antisocial transactions.

(3) We will not trade shares using undisclosed information regarding the group, affiliated companies, business partners, or customers that could affect the judgment of investors (insider information).

(4) We strictly prohibit and will have no involvement in bribery and other corrupt business practices. We will neither give or receive gifts nor extend or accept invitations to business entertainment beyond socially accepted limits, as we recognize that such practices can foster corruption. When working with political entities, we will build and maintain sound and transparent relationships.

(5) We will help maintain international peace and security through compliance with all applicable laws and regulations concerning import and export, and will operate appropriately according to our internal rules and policies.

(6) We will comply with applicable laws, respect social cultures and practices, and act sincerely and fairly in countries and regions where we have operations. Furthermore, we will do so guided by international norms and standards even in areas where legislation is not adequately enforced.

2.2 Relationships with Suppliers

(1) With a global vision, and mindful of the long-term perspective, we will find qualified suppliers and build fair and equal partnerships with them, working together to build mutual understanding and trust.

(2) In selecting suppliers, we will thoroughly review the quality, reliability, delivery time, and price of the materials they provide as well as their business stability and technological capability. We will give due consideration to their adoption of social responsibility practices, including areas such as the abolition of unfair discrimination, the elimination of child labor and forced labor, and environmental conservation.

(3) We will not accept any personal benefits from suppliers in procurement transactions.

2.3 Relationships with Customers

(1) We will provide products and services that meet the needs and requirements of our customers, complying with relevant laws and standards and ensuring quality and safety by setting additional standards of our own where necessary.

(2) We will communicate with customers sincerely, address defects and customer complaints quickly and in good faith, and strive to determine causes in order to eliminate them and prevent recurrence.

3. Respect for Human Rights

(1) We will promote our understanding of internationally recognized human rights, and will respect and not infringe on the human rights of all those involved in our business activities.

(2) We will implement human rights due diligence appropriate to the social circumstances of the countries and regions where we have operations and the nature of our businesses, products, and services there.

(3) We will assess and prevent potential violations of human rights. In the event of such a violation, we will promptly take internal and external actions to correct and remedy the situation.

(4) We will respect individual human rights in the recruitment and treatment of employees and during all other company activities. We will not engage in any acts that may impair individual dignity or discriminate on bases such as sex, sexual orientation, age, nationality, race, ethnicity, ideology, belief, religion, social status, family origin, disease, disability.

(5) We will hire employees in compliance with the relevant laws and regulations in each country and region, and in accordance with international norms and standards. We will not use child labor that employs children below the minimum working age or forced labor that is against the will of employees.

(6) We will strive to resolve issues through sincere and constructive discussion between management and employees, in compliance with the laws, regulations, and labor practices of each country and region, and in accordance with international norms and standards.

4. Building a Work Environment That Brings Out Employee Strengths

(1) Prioritizing health and safety above all else, we will strive to ensure the safety of employees and the workplace. In addition, we will promote the physical and mental health of employees and their families.

(2) We will support flexible work styles and respect diverse values, creating workplaces that provide employees with a sense of accomplishment and personal growth, and we will promote the sustainable growth of the organization and individuals.

(3) We will invest in educational programs to help employees expand their capabilities and exercise their strengths. Supervisors will fairly and appropriately support, guide, and educate their employees to develop their abilities.

5. Information Management and Communication

(1) We will promote the ethical handling of information, so as to ensure respect for human rights and security, through the proper management of personal information based on our Personal Information Protection Policy.

(2) We will properly manage and protect confidential information related to our business activities in compliance with domestic and international laws and regulations as well as our internal rules and policies.

(3) In order to maintain and expand our trusting relationship with the Hitachi Construction Machinery Group's diverse stakeholders, we will disclose information openly and transparently, and respond to stakeholders responsibly through dialogue and other means of communication.

6. Protection of Intellectual Property and Brand

(1) We will protect our own intellectual property, respect third-party intellectual property, and use both effectively for smooth business operations.

(2) We will manage our own and third-party confidential information by importance and manage and handle it appropriately based on this ranking.

(3) We will protect and enhance the value of the Hitachi Brand, recognizing it as an important management asset.

7. Securing Corporate Assets

We will use all our corporate assets only for business activities and other appropriate purposes, and manage them properly to protect their value.

8. Crisis Management

We will make concerted efforts throughout the Hitachi Construction Machinery Group to secure employee safety and business continuity in case of disasters and threats such as earthquakes, tsunamis and floods, cyberattacks, and terrorism.

9. Responsibilities of Employees

Employees shall pledge to comply with the Codes of Conduct. If they become aware of any non-compliant activity, they shall immediately report to their manager or via the internal reporting system.

10. Responsibilities of Top Management

Top managers shall take the initiative in complying with the Codes of Conduct and make their best efforts to conduct business based on corporate ethics and the law. In the event of violation of the Codes of Conduct, top managers shall swiftly take corrective measures and actions to prevent the recurrence of similar incidents, while at the same time strictly disciplining themselves as well as those involved in the violation.

Supplementary Provisions to the Hitachi Construction Machinery Group Codes of Conduct
The Hitachi Construction Machinery Group Codes of Conduct shall apply to all officers and employees of Hitachi, Ltd. and its consolidated subsidiaries. The consolidated subsidiaries shall establish their own codes of conduct by adopting or revising the Hitachi Construction Machinery Group Codes of Conduct at a policymaking meeting, ensuring that all their officers and employees fully understand the provisions of the codes.

Each subsidiary shall streamline its organizational structure and systems (e.g. internal reporting system, disciplinary system) to comply with the Hitachi Construction Machinery Group Codes of Conduct. In the event of violation, disciplinary action shall be taken in accordance with the related rules and internal procedures.

Subsidiaries may enact their own codes of conduct, incorporating the contents of the Hitachi Construction Machinery Group Codes of Conduct. Such codes of conduct may vary by country or region in accordance with legal systems, social customs, or business characteristics, or include stipulations that do not exist in the Hitachi Construction Machinery Group Codes of Conduct. Under no circumstances, however, may they contradict the provisions of or weaken the effectiveness of the Hitachi Construction Machinery Group Codes of Conduct.

When a subsidiary institutes a revised version of the Hitachi Construction Machinery Group Codes of Conduct, it shall expressly stipulate that revisions have been made based on or with reference to the Hitachi Construction Machinery Group Codes of Conduct.