

PHD Group Code of Conduct

1 . Growth through business activities

Based on our mission to "solving clients' challenges by integrating people and technology," the PHD Group will support social infrastructure and contribute to the realization of a sustainable society by growing alongside with our stakeholders through our business activities.

2 . Compliance with Local, Provincial, and Country-Specific Laws and Regulations

The PHD Group shall comply with all local, provincial, and country-specific laws and regulations and conduct corporate activities in accordance with social common sense.

3 . Respect for Human Rights and Prohibition of Harassment

The PHD Group shall respect human rights, and shall proactively work towards the elimination of all forms of discrimination and harassment.

4 . Maintenance of a Safe Work Environment

The PHD Group shall strive to maintain a safe working environment for all employees.

5 . Human Resource Development

The PHD Group shall strive to develop human resources who will be the source of growth for our business activities.

6 . Accurate and Fair Information Disclosure

The PHD Group shall strive to accurately and fairly disclose company information in order to gain the correct understanding and evaluation of stakeholders and society at large.

7 . Compliance with proper and fair business terms and conditions

The PHD Group will deal with all clients and business partners involved in sales and procurement in good faith, and will conduct fair and proper business transactions with them.

8 . Proper record keeping and management of confidential information

The PHD Group shall correctly prepare, record, and properly store documents and other information required for its business activities, and shall strictly manage such information to prevent its unintentional leakage.

9 . Protection of Personal Information

The PHD Group shall ensure the protection of the personal information of its clients, officers and

employees.

1 0 . Respect for Intellectual Property

The PHD Group recognizes the importance of intellectual property, and strives to protect its own intellectual property rights

1 1 . Prevention of Relationships with Anti-Social Forces

The Group will not engage in any transactions with, and will not have any relationship with, any business partners that are related to antisocial forces (groups or individuals involved in criminal or fraudulent activities).

1 2 . Establishment of a contact point for reporting and consulting on illegal or unethical activities

The PHD Group shall strive to establish a point of contact for reporting and consultation with respect to suspected violations of laws, regulations, rules, and internal rules, etc. for its officers and employees.

Established : November 19, 2024