

YKK EMEA Group

Code of Business 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 recognised by the benefits it shares with society.

Tadao Yoshida, YKK's founder, carefully considered this need for mutual prosperity as he planned his business endeavours. 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 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.

Dear EMEA Employees:

As a global organisation, YKK has established principles for our business which can apply across the world, ensuring that all our customers, wherever they are, can feel confident that YKK companies will maintain the high standards that we have set ourselves. YKK Corporation requires us to apply these standards in all aspects of our work.

In EMEA too, we want our customers to have the same confidence in YKK brands that they have elsewhere. Our customers want to know that they are dealing with a company with high ethical standards, that is respected in the communities in which we operate and which produces a high quality, reliable product. In this way, our business practices can contribute significantly to our customers' satisfaction.

For these reasons, I encourage you to familiarise yourself with this Code of Conduct that has been adapted to meet the varied circumstances of our EMEA region. Its simple guidelines will help you take the decisions that you come across in the course of your work and will help us all focus on the global principles that make YKK part of the 'Cycle of Goodness' in our communities.



YKK Europe Ltd.
Managing Director
Toru Yamamoto
2019.1.25

YKK EMEA GROUP'S CODE OF BUSINESS CONDUCT

Introduction

The YKK Group is a leading global business, with employees in 73 countries/regions worldwide and the YKK EMEA group, as one of the major regional business units in the YKK group, operates its business in 40 countries in the Europe, Middle East and Africa region.

In order to offer our customers effective solutions, it is imperative that the YKK EMEA Group operates according to high moral principles. This Code of Business Conduct (the Code) defines the ethical standards by which the YKK EMEA Group should conduct business.

This Code of Conduct also defines standards of social compliance as to how YKK treats and protects its employees, its business partners, the environment and YKK's corporate social responsibility commitments.

This Code is an overview but is not intended to replace the laws and regulations that apply to each of us in our various locations. Where a conflict exists, you must either apply the Code or local law - whichever sets the highest standard of conduct. This Code does not purport to explain detailed rules concerning all the matters addressed in this Code, and individual internal rules, procedures and/or policies will be established, where appropriate, by jurisdiction, YKK Group Company or office, which will complement this Code.

Observance of the Code is obligatory for all directors, officers and employees. Failure to observe the Code could lead to disciplinary action, which could involve termination of your employment.

1. Compliance

YKK EMEA Group pledges to take whatever steps are necessary to fully comply with all applicable laws, regulations, and all company policies and procedures.

YKK also commits to high standards of social compliance, ensuring that employees are treated fairly and work under safe and supportive working conditions, that YKK's business is compliant with environmental law and regulation, that YKK is a social responsible cooperate citizen.

You must maintain the highest standards of integrity, and professionalism in your work for the YKK Group, since any adverse behaviour may result in reputational risk or damage to the YKK Group.

YKK also commits to continuous improvements in labour standards across its organisation, from the maintenance of safe and secure working environments for all employees, adherence to health and safety regulation and respect for employment and workers' rights. You must consider these commitments in your work for the YKK Group.

1. Compliance with Laws and Regulations

You must take whatever steps are necessary to fully comply with all laws and regulations that apply to conducting business activities. In the event that you are unsure as to whether any laws or regulations apply to your conduct, you must consult with the local Compliance Officer designated for your region/country before proceeding with any business activities.

2. Compliance with Internal Rules and Policies

You must fully comply with related internal company rules, regulations, and policies when conducting business activities. In the event that you are unsure as to whether any internal company rules, regulations, or policies apply to your conduct, you must consult with your local human resources department or the local Compliance Officer designated for your region / country.

2. Company Property including Confidential Information

You must, in an ethical and efficient matter, utilise and protect YKK Group assets, including confidential information, because you recognise that they are valuable to our business activities.

Confidential information is information, including proprietary information that you create, develop or use during your employment (including sales and technological data) which is not generally known to the public about the YKK Group, its customers, business partners or employees.

Unauthorised access, use or distribution of confidential information is strictly prohibited and your obligations continue even after you have left employment with the YKK Group. Similarly, you must not bring with you proprietary confidential information which you have obtained from a previous employer.

You must comply with any applicable YKK Group policies or local law relating to confidential information. In particular, you must follow the following guidelines:

- Only access confidential information that you need and are authorised to view.
- Do not display or discuss confidential information in public places.
- Only communicate confidential information, to other YKK Group employees and authorised agents (e.g. legal counsel or external auditors) who have a legitimate business reason to know the confidential information and who have no duties or responsibilities which could lead to a conflict of interest.

You agree that you will use your best efforts to appropriately control company assets to prevent loss and unauthorised use.

You must comply with all applicable information security policies and you should only use YKK Group assets, including telephone, computer networks and e-mail and remote access capabilities in accordance with the rules of your local company.

3. Privacy and Employee Confidentiality

The YKK EMEA Group pledges to comply with its 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.

Personal data will be handled in accordance with laws and regulations and the “EMEA Data Protection Policy” and procedures of your region/country (if any), and will not be held by the YKK EMEA Group for longer than is necessary.

4. Harmony with the Environment

The YKK Group has issued the “YKK Group Environmental Pledge”. Striving to be an environmentally friendly company, YKK EMEA Group pledges that it will address and promote harmony with the environment as the highest priority of our business activities.

You acknowledge the significance of environmental activities and the high priority in which they are regarded within our business activities.

You must take whatever steps are necessary to comply with applicable environmental laws and regulations, as well as with all internal company rules and policies.

You must immediately report to your immediate supervisor or to the local Compliance Officer designated for your region / country, any potential violation of applicable laws, regulations, or internal company rules and policies that you become aware of in the workplace.

5. Health and Safety

The YKK EMEA Group pledges that it 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. We pledge to use our best efforts to accomplish these goals.

You must take whatever steps are necessary to comply with all applicable laws, regulations and internal company rules and policies related to health and safety.

You must stop any work that becomes unsafe and only undertake tasks for which you are trained.

You must immediately report in accordance with your local reporting rules, or seek help from your local Compliance Officer, any kind of potential harm, danger or defect you become aware of in the workplace. You must never assume that someone else will report such a risk or concern.

6. Quality and Safety of Products

The YKK EMEA Group highly values the trust that our customers have placed in our business, and pledges to continue providing products and services with the highest commitment to quality.

You must take whatever steps are necessary to comply with all applicable laws, regulations and internal company rules and policies related to product safety.

You must immediately report in accordance with local reporting rules or seek help from your local Compliance Officer, any potential danger or defect which could affect the safety of our products.

7. Human Rights

The YKK EMEA Group respects the human rights, individuality and the personality of all individuals in all our operations, in every country and region in which our operations reside.

You must respect the human rights of all individuals, and you must take whatever steps are necessary to eliminate any sort of violence, or other forms of intimidation in the workplace.

Child labour is prohibited. YKK will comply with all local laws and regulations with regards to minimum working age and maximum working hours. If, despite all diligence in complying with law and regulation by YKK, any underage worker is nevertheless discovered to be working directly or indirectly for YKK for whatever reason, YKK will immediately upon discovery implement remedial action by ceasing further work by such underage worker, and assisting in remedying the underage worker's circumstances by referring the matter to local governmental social or child services for support and care.

The YKK EMEA Group also prohibits unlawful discrimination in its organisations (including, but not limited to, whether it be on the basis of sex, race, disability, medical status or condition) and YKK respects the rights of employees to be treated equally and fairly, on the basis of their ability and qualification and not on personal characteristics. YKK and employees are prohibited from questioning individuals' medical status or condition (pregnancy, illness etc.)

8. Relationship with Business Partners

The YKK EMEA Group will take whatever steps are necessary to ensure we conduct business transactions in a fair and equitable manner.

You must take whatever steps are necessary to fully comply with all applicable competition laws, and the “EMEA Competition Compliance Manual” established separately, which apply to all our business activities, in order to continue to maintain fair and equitable dealings in the marketplace.

You must not undertake any personal activity that conflicts with the interests of YKK Group or its customers. You are responsible for identifying and managing actual conflicts or the appearance of any conflicts and for bringing these to the attention of your supervisor.

You are prohibited from giving or accepting gifts, entertainment, free or subsidised travel or accommodation or other considerations of value unless they are in accordance with the “EMEA Anti Bribery Policy” Please note that the giving or receiving of cash to or from business partners is never permitted under any circumstances. You must refer to the “EMEA Anti Bribery Policy” for further details.

9. Relationship with Government Agencies

The YKK EMEA Group 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.

You must take whatever steps are necessary to develop and maintain fair relationships with government agencies.

You are prohibited from giving or accepting gifts, entertainment, travel, payments and other considerations of value to or from an employee of any governmental agency unless they are in accordance with the "EMEA Anti Bribery Policy".

10. Workplace Dignity and Respect

The YKK Group's diverse workforce is one of our greatest strengths. Bringing together and supporting employees from different backgrounds, perspectives and cultures helps create a dynamic business that reflects the range of customers we serve.

Therefore the YKK EMEA Group is committed to providing equal opportunities for all its employees and job applicants who will receive fair treatment regardless of personal traits, including but not limited to, age, race, religion or belief, colour, nationality, ethnic or national origin, sex, gender reassignment, marital status or disability. It is our aim that all relationships in the workplace are free from discrimination, bias and harassment.

You must ensure that you do not, by your own actions, behaviour or attitude, directly or indirectly discriminate against job applicants or fellow employees. In some countries employees can be held personally liable for acts of discrimination they commit.

11. Criminal Organisations

YKK has a zero tolerance to crime and criminal enterprises, crime syndicates, and other criminal organizations(anti-social groups), and are committed to preventing crime and ensuring that such criminal organisations are not able to form relationships with any part of YKK. You must not have any relationship whatsoever with any such criminal organisations and in the event that any crime by employees is discovered, relevant employees will be subject to appropriate disciplinary action accordingly.

12. Raising Concerns and Reporting Misconduct

If you have genuine concerns regarding conduct - whether by another employee, a supervisor, customer, consultant, agent, supplier, other third party or yourself - that may violate the law, regulations or company policy, you will report the activity at the earliest practicable stage by contacting any of the following:

- The appointed person under any applicable local disclosure/ escalation procedure or policy.
- Your immediate supervisor.
- Your local human resources representative.
- By using the “EMEA Whistleblowing Policy”.

By reporting your suspicions, in good faith, you are ensuring that the YKK Group is not exposed to any unnecessary risks and that the YKK Group’s image is not tarnished.

It may sometimes be easier to ignore potential misconduct. However, your commitment to the integrity of the YKK Group means that any legal or ethical issues must never be ignored. Malpractice within the YKK Group is taken very seriously and you will not be victimised or subjected to any detriment if you raise concerns in good faith.

Please speak to the local compliance officer in your region/country or YEU Legal Department if you have any questions, queries or concerns about YKK EMEA Group Code of Business Conduct.

Please refer to the EMEA Bulletin Board for the list of the local compliance officers.

YKK Europe Ltd. Legal Department

Email: emeacompliance@ykk europe.com