

SHOWA DENKO HD SINGAPORE PTE LTD
HUMAN RESOURCE POLICIES AND PROCEDURES MANUAL

SECTION 1 : Employment
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POLICY 1.15 : SHDS Ethics Policy

1.0 Purpose

In line with the Corporate Vision and Code of Conduct of Showa Denko K.K., SHDS is committed to exercise the highest standards of integrity and ethics. We commit to take pride in our daily work; we commit to do our work honestly and ethically. As we do not seek business results through illegal or unethical business practices, we are committed to deal fairly and in good faith with the customers, business partners, and other employees, within the boundaries of existing laws, regulations and social norms, so as to win our stakeholders and society's trust and respect. We must not engage in any conduct or activity that may raise questions as to SHDS's honesty and impartiality, or otherwise cause discomfort and/or embarrassment to SHDS's reputation.

We are committed to SHDS Code of Ethics as follow:

1) Business Integrity

To conducts its business with the highest standards of integrity in all business interactions. We prohibit any and all forms of corruption, extortion and embezzlement.

2) No Improper Advantage

To understand and ensures fair business practices such that employees and stakeholders work together in a professional manner with no bribes and improper advantage are not to be offered or accepted.

3) Disclosure of Information

To provide information about our business to corporate, organization bodies and relevant business partners to enhance corporate transparency, while at the same time respect and protect information from improper uses.

4) Intellectual Property

To understand and recognize intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

5) Contribution to Society through Fair Business and Competition

To contribute to the building of a prosperous and vibrant society by providing safe, high-quality products and uphold the highest standards of ethics, fair business and competition.

6) Protection of Identity

To ensure the confidentiality and protection of supplier and employee whistleblowers are maintained.

7) Responsible Sourcing of Minerals

To support activities taken to eliminate Conflict Minerals from our Supply Chains

8) Privacy

To provide protection for the reasonable expectation of privacy of personal information of all stakeholders

9) Non Retaliation

To provide an environment where all personnel are able to raise any concerns without fear of retaliation

Annual Review

The Ethics Policy will be reviewed on an annual basis by Ethics Office.

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