

Code of Ethics

Chapter 1: General Rules

Article 1 (Purpose)

The Code of Ethics sets forth ethical standards that should be observed at DISCO CORPORATION and each company belonging to the DISCO Group (hereinafter referred to as “DISCO”) by executives and employees of DISCO (hereinafter referred to as “DISCO Personnel”) based on the ethical concepts stipulated in DISCO VALUES. The Code of Ethics was established to prevent DISCO Personnel from engaging in unethical behavior, including breaking the law, by clarifying behaviors that are prohibited, should be avoided, or should be practiced with moderation and discretion at DISCO. As a result, DISCO aims to secure the trust of society and stakeholders (including customers, suppliers, shareholders, local communities, etc.) so that DISCO can continue to exist and be welcomed as a member of society.

Article 2 (Subject of Activities)

When “DISCO” is used as the subject of a sentence in the Code of Ethics, the sentence describes matters that DISCO as an organization and its personnel should observe. In addition, when “DISCO Personnel” is used as the subject of a sentence, the sentence describes matters that DISCO Personnel should observe.

Article 3 (Adjustment to Laws and Regulations in Each Country)

If the provisions stipulated in the Code of Ethics conflict with, contradict, or become null and void under the laws and regulations of the countries in which DISCO conducts business, the Code of Ethics shall be effective within the limits of those laws and regulations.

Chapter 2: DISCO's Ethical System

Article 4 (Establishment and Purpose of the Ethical System)

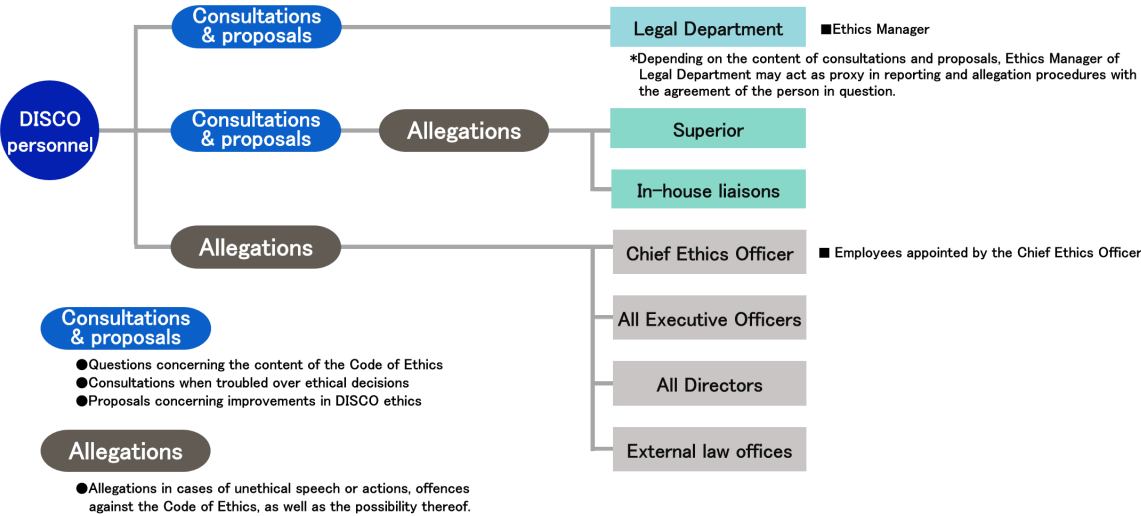
DISCO has built the foundation of its ethical system in order to allow DISCO to “be the best it can be.” To maintain and improve this state, the ethical system is established in accordance with this chapter. The purpose and objective of the system are as follows:

- (1) To prevent unethical issues (which go against the Code of Ethics) from occurring in DISCO’s business activities or in the words and actions of DISCO Personnel when engaging in those activities
- (2) To respond rapidly in cases where unethical issues arise and minimize their impact

Article 5 (Ethical System)

In order to respond to all manner of possible issues, DISCO has established seven channels of contact, as shown in the figure below. In addition, to ensure the appropriateness and effectiveness of the ethical system, DISCO has appointed a Chief Ethics Officer who, as the highest responsible person, bears all

responsibilities for implementing this system, and has granted this Officer the necessary authority to do so. However, if a Chief Ethics Officer is not appointed, the term “Chief Ethics Officer” shall be read as “Chief Executive Officer, President.”



Note: If a Chief Ethics Officer is not appointed, the term “Chief Ethics Officer” shall be read as “Chief Executive Officer, President.”

Article 6 (Reports, Consultations, Proposals, and Whistleblowing Disclosures)

- DISCO Personnel shall immediately contact one of the channels above if they encounter any unethical instances or circumstances in DISCO’s business activities or their own behaviors, or if they foresee the occurrence of such instances or circumstances.
- In order to protect and maintain DISCO’s ethics, the divisions and persons in charge of these channels shall respond to those who have made reports, proposals, or whistleblowing disclosures, while giving due consideration to the following:
 - The persons in charge shall not disclose the contents of ethics reports, consultations, or proposals, as well as whistleblowing disclosures of unethical words and actions, without the permission of the person making them, excluding within the minimum extent necessary to address the issue. In addition, if the person who is subject to the whistleblowing belongs to the same division as that of the person in charge, the persons in charge shall take sufficient care so that the issue is not shared with the person subject to the whistleblowing.
 - The persons in charge shall not take any adverse action against people making valid reports, consultations, proposals, or whistleblowing disclosures which will cause them to suffer any disadvantages due to the fact that they made such reports, consultations, proposals, or whistleblowing disclosures.
 - The persons in charge shall take strict measures against any attempts to prevent people from making valid reports, consultations, proposals, or whistleblowing disclosures.
 - If the person who made the report, consultation, proposal, or whistleblowing disclosure wishes to remain anonymous, the persons in charge shall introduce a channel of contact through which their

anonymity can be ensured.

3. If DISCO Personnel have any questions concerning the contents of the Code of Ethics or they find it difficult to make ethical decisions in their daily duties, the department in charge of the Code of Ethics will answer questions and provide advice.

Chapter 3: Behavior Criteria for DISCO and DISCO Personnel

Article 7 (DISCO Ethics)

1. DISCO defines “DISCO ethics” as words and actions that not only meet legal standards but also conform with or even improve upon social norms.
2. When it comes to DISCO’s business activities, DISCO and DISCO Personnel shall act according to DISCO ethics and shall not engage in any behavior that is in violation of the legal standards or social norms in each region where DISCO does business. (This includes but is not limited to activities that “should not be done” or “should be avoided,” even if such activities are within the bounds of legal standards.) In addition, DISCO Personnel shall not engage in activities that take advantage of areas where legal coverage is inadequate.

Article 8 (Obligation to Observe DISCO Ethics)

DISCO Personnel shall not only observe the Code of Ethics, but also, in the event that they encounter words or actions that are unethical or go against the Code of Ethics, or observe the possibility of such words or actions occurring, DISCO Personnel shall stop or make an effort to stop such words or actions. DISCO Personnel shall recognize that such efforts are included in the obligation to observe DISCO ethics and shall undertake said obligation. If the DISCO Personnel does not have the power to undertake this obligation alone, the DISCO Personnel shall immediately report the situation to one of the channels designated in Articles 5 and 6.

Article 9 (Let One’s Conscience Be Their Guide)

1. Given that the Code of Ethics cannot cover all activities that are prohibited, should be avoided, or should be practiced with moderation and discretion under DISCO ethics, DISCO Personnel shall thoroughly read and understand the “Perspective on Ethics” stipulated in DISCO VALUES.
2. Even with regard to matters that are not covered in the Code of Ethics, legal standards, or social norms, DISCO Personnel shall make judgments through the filter of their own consciences, deciding which of the choices available is the most honest and asking themselves whether they can say with confidence that said choice is the most honest approach. If a DISCO Personnel is ever asked to speak or act in a manner that goes against their conscience, the DISCO Personnel shall always adopt a resolute stance and refuse to comply with such requests.

Article 10 (Compliance with DISCO VALUES and Internal Regulations)

DISCO Personnel shall comply with DISCO VALUES and internal regulations, and they shall make judgments and act in accordance with said values and regulations.

Article 11 (Respect for Human Rights)

1. DISCO respects the internationally recognized principles and rules concerning human rights. In addition, DISCO engages in business activities in accordance with the human rights policy established by DISCO.
2. DISCO Personnel shall respect the human rights of stakeholders. Moreover, DISCO Personnel shall not discriminate against people directly on the basis of gender, sexual orientation, age, nationality, race, ethnicity, religion, educational background, mental and physical disability, illness, etc.

Article 12 (Acting in Accordance with Social Decency)

DISCO, as a corporation, believes being a good citizen is the basis for establishing a good relationship with society. As such, the executives and employees who comprise DISCO are also required to be good citizens.

Article 13 (Compliance with Legal Standards)

1. DISCO Personnel shall not engage in any behavior that goes against laws, regulations, or any other kinds of legal standards.
2. In the event that a DISCO Personnel is found to have engaged in a violation or evasion of the law in relation to their workplace or duties, DISCO will take stern measures against said Personnel, including disciplinary actions or other penalties. In such cases, DISCO will report to the relevant authorities and cooperate with them upon their request.

Article 14 (Compliance with and Decision-Making Criteria Regarding the Laws of Foreign Countries)

1. DISCO Personnel shall act according to the laws of the country in which they are engaged in business activities.
2. Even when the legislation of a country or region is inadequate or differs from legislation in force elsewhere, DISCO Personnel shall not take advantage of the legislation of said country or region to engage in any activity that is prohibited in their own country (i.e. the country in which they are engaged in business activities), even for the benefit of the company.
3. DISCO Personnel shall give the utmost respect to the social norms that prevail in each country or region. However, DISCO Personnel shall not follow conventions or customs that are clearly in violation of legal standards (including but not limited to giving bribes or rebates to politicians or other influential people).

Article 15 (Obligations Including Those Related to Supply Chains)

DISCO respects the human rights of workers in DISCO's supply chain. In addition, DISCO complies with the laws and regulations of each country and region with regards to working conditions, including working

hours and wages, and does not permit any child labor or forced labor.

Article 16 (Healthy Workplace Environment)

DISCO Personnel are obliged to maintain a healthy environment in their workplace and other places related to business activities. DISCO Personnel shall not engage in activities that go against this obligation, including sexual harassment, abuse of authority, and other forms of harassment towards members of DISCO, customers, suppliers, or members of the local community. If such prohibited behaviors are discovered, DISCO will take the necessary measures against such behavior, such as remediation and disciplinary action.

Article 17 (Obligation to Check the Latest Version of the Code of Ethics)

DISCO revises the Code of Ethics as needed to comply with new social demands and changes in the business environment. Each time the Code of Ethics is revised, DISCO promptly notifies DISCO Personnel of said revisions. When notified of such revisions or when otherwise necessary, DISCO Personnel are required to check and gain an adequate understanding of the latest version of the Code of Ethics.

Article 18 (Complying with Anti-Monopoly Laws)

DISCO Personnel shall understand the contents and purpose of the laws and regulations pertaining to competition that are effective in the countries where DISCO does business, comply with said laws and regulations, and engage in fair competition and transactions at all times.

Article 19 (Respect for the Intellectual Property Rights Held by Others)

1. DISCO Personnel shall respect the intellectual property rights held by others and refrain from infringing on these rights when engaging in DISCO's business activities.
2. If it is necessary for DISCO Personnel to use the intellectual property rights held by others in the course of their duties, DISCO Personnel shall take the appropriate measures to secure the intellectual property rights from those who hold said rights, such as by purchasing the rights or obtaining permission to use the rights. DISCO Personnel shall not use intellectual property rights held by others without permission.
3. DISCO Personnel shall strictly respect, in particular, patents, utility model rights, trademarks, design rights, moral rights, copyrights, and trade secrets held by others.
4. In the event that the patent rights held by others are determined to be invalid, the provisions in the preceding paragraphs shall not apply. However, since it is not easy to judge the validity of patents, a department in charge of intellectual property rights will make the final judgment.

Article 20 (Protecting DISCO's Intellectual Property (Rights))

DISCO's intellectual property (rights) are an important asset to DISCO. Therefore, in the event that DISCO's intellectual property (rights) are to be transferred to or used by third parties, DISCO Personnel

shall contact a department in charge of intellectual property rights and complete an official procedure determined by DISCO to obtain approval to do so.

Article 21 (Intellectual Property Created by DISCO Personnel)

The rights and benefits of all intellectual property (including but not limited to inventions, know-how, technology, ideas, theories, methodologies, systems, business models, and trade secrets) created by DISCO Personnel in the course of their duties belong to DISCO. However, if there is a different provision in the law of the country where the creation of the intellectual property took place, such laws shall be prioritized.

Article 22 (Records and Reports)

1. DISCO discloses any important items related to business performance, financial status, and corporate governance in a timely and accurate manner.
2. DISCO Personnel shall complete and maintain all records, data, and reports related to business activities, including financial records, in an accurate manner. In addition, DISCO Personnel shall not falsify or destroy existing records. If it is necessary to modify an existing record, such modifications must be made in a manner in which the state of the document before the modification can be identified.

Article 23 (Prohibition of Insider Trading)

1. DISCO Personnel shall not engage in the trading of securities or derivatives related to important information involving DISCO or DISCO's customers or suppliers that they came to know in the course of their duties before the information is made public. In addition to not engaging in unlawful activities which fall under insider trading according to laws and regulations, DISCO Personnel shall not engage in any activities that violate investors' trust in the fairness and soundness of the securities market.
2. If DISCO Personnel engage in the trading of securities or derivatives of DISCO or DISCO's customers or suppliers, DISCO Personnel must observe the regulations, rules, and guidelines established by DISCO, as well as the provisions of this Article, and handle such trades appropriately.

Article 24 (Acts Involving Conflicts of Interest)

1. DISCO Personnel shall make judgments and decisions in a fair and objective way in the course of their duties in order to achieve the best results for DISCO. DISCO Personnel shall not engage in any activities that may cause damages to DISCO or its stakeholders, nor shall they engage in any illegal activities, such as embezzlement or breach of trust, for their own personal gain.
2. DISCO employees shall not engage in any activities in which the employee's interests conflict or may conflict with the interests of DISCO or its stakeholders. However, in the event that such an activity is determined to be the best course of action for DISCO out of all other options, the employee may engage in such an activity upon obtaining approval from the Executive Committee.
3. DISCO's executives shall not engage in any activities in which the executive's interests conflict or may

be in conflict with the interests of DISCO or its stakeholders. However, in the event that such an activity is determined to be the best course of action for DISCO out of all other options, the executive may engage in such an activity upon obtaining approval from the Board of Directors.

Article 25 (Protecting DISCO Information and the Confidentiality Obligations of DISCO Personnel)

1. DISCO Personnel shall treat as an asset and protect the various kinds of information accumulated through DISCO’s business activities, and they shall strictly handle said information in accordance with the control and management standards stipulated by DISCO. DISCO Personnel shall not disclose, provide, or leak such information to external parties without acquiring approval to do so through the procedures determined by DISCO. In addition, DISCO Personnel shall not use such information for purposes other than the original intent.
2. DISCO Personnel are obliged to keep DISCO information confidential and are required to present a written pledge to DISCO in order to verify this obligation. DISCO Personnel are also required to adhere to this confidentiality obligation even after leaving the company.

Article 26 (Handling Personal Information)

1. DISCO Personnel shall handle personal information held by DISCO (i.e. information pertaining to DISCO Personnel, customer personnel, supplier personnel, shareholders, job applicants, and other stakeholders from which specific individuals can be identified) in a strict manner in accordance with the regulations, rules, and guidelines set forth by DISCO.
2. Out of respect for individuals with regards to their personal information, DISCO Personnel shall be aware of and observe the following items:
 - (1) DISCO Personnel shall not use personal information for purposes other than the purpose previously stated by DISCO or for purposes to which the subject of the personal information did not consent in advance.
 - (2) DISCO Personnel shall destroy personal information in a reliable manner after the information has been used for its intended purpose.
 - (3) All data related to personal information shall be strictly managed by the personal data manager, and DISCO Personnel are never permitted to browse or use personal data without valid reasons.
 - (4) Unless otherwise specified in laws and regulations, DISCO Personnel shall not disclose any personal information to third parties without the consent of the subject of the personal information.

Article 27 (Use of Hardware, Software, Email Addresses, and the Internet)

1. Use of Hardware, Software, Email Addresses, and the Internet
 - (1) DISCO Personnel shall fully acknowledge that hardware such as personal computers and smartphones, software, and email addresses that are lent to or provided to them by DISCO are the property of DISCO, and DISCO Personnel shall comply with the following requirements when using these items for purposes outside of their duties (hereinafter referred to as “private use”).

- Private use shall be limited to momentary use (less than one minute in general). If the use exceeds one minute, it must be recorded as a rest period.

(2) The private use specified in (1) shall be limited to the extent that such use will not have an adverse impact on DISCO's business, the DISCO Personnel's own duties, or other DISCO Personnel.

(3) In the event that DISCO deems that the DISCO Personnel has acted against the provisions set forth in (1) and (2), DISCO will take measures to protect the interests of the company, including prohibiting the DISCO Personnel's private use.

2. Confirmation of Usage Status

(1) DISCO Personnel shall fully acknowledge that DISCO may access the usage records, transmission and reception history, and browsing history of hardware such as personal computers and smartphones, software, and email addresses that are lent to or provided to them by DISCO in order to investigate and prevent information leaks and unauthorized behavior, as well as ensure duties are being carried out in an appropriate manner. DISCO Personnel shall acknowledge that DISCO may utilize the results confirmed through such access.

(2) In the event that DISCO considers it necessary to investigate the DISCO Personnel's use of hardware such as personal computers and smartphones, software, and email addresses that have been lent to or provided to them by DISCO, DISCO Personnel are obliged to cooperate, such as by providing passwords.

(3) DISCO Personnel shall fully acknowledge the contents of this Article and shall not handle any private information that they hope to protect on devices such as the ones mentioned above. If DISCO deems it necessary to investigate such devices, DISCO Personnel shall not assert their rights regarding their privacy during such investigations.

3. Posting on the Internet

(1) If DISCO Personnel need to make posts to internet bulletin boards or social media in the course of their duties, DISCO Personnel shall obey the rules and regulations set forth separately.

(2) DISCO Personnel shall not make posts on the internet which disclose the fact that they are DISCO Personnel nor shall they use expressions that will reveal this fact based on other information, even if such posts are made outside of their duties.

(3) DISCO Personnel shall not make posts to internet bulletin boards or social media that disclose DISCO's confidential information or slander DISCO, DISCO Personnel, or stakeholders.

(4) In the event that DISCO discovers that the rights of DISCO or its stakeholders have been infringed upon due to a violation of this Article, DISCO will take the necessary legal measures against said violation.

Article 28 (Compliance with the Buyer's Pledge)

DISCO Personnel shall receive education regarding the Buyer's Pledge, submit a written pledge after gaining a full understanding of said education, and observe the contents contained therein.

Article 29 (Ensuring Fairness When Selecting Suppliers)

1. DISCO selects suppliers on the basis of fair evaluations. In principle, DISCO Personnel shall select suppliers based on the extent to which potential suppliers can contribute to the realization of the quality of corporate activity to which DISCO aspires (such as whether or not they have creditworthiness, a good corporate stance, or the capacity and readiness to supply the best products and services at the most reasonable cost and leadtime).
2. In the actual selection process, DISCO Personnel shall provide to each potential supplier all information that is reasonably required for the supplier to submit their transaction terms, and DISCO Personnel shall ensure that potential suppliers are evaluated according to the same criteria.

Article 30 (Giving Priority to Companies with a High Level of Corporate Social Responsibility)

1. When selecting suppliers, DISCO Personnel shall not conduct business with companies who do not meet a certain standard of social responsibility.

(Examples of items to be considered when evaluating social responsibility)

- Crimes or accidents that occurred with the company and their responses to such occurrences
 - Consideration for the environment and human rights
 - Statements made by the company's management
 - Working conditions
 - Corporate culture
 - Reputation within the company's business sector and society in general
2. If several potential suppliers offer equal or similar transaction terms, in principle, preference shall be given to suppliers who have a higher sense of social responsibility.
 3. If DISCO Personnel have difficulties deciding the level of social responsibility of a potential supplier, DISCO Personnel shall consult their superiors and adhere to their judgment.

Article 31 (Issuing Purchase Orders in Written Form)

When ordering products and services, DISCO Personnel shall always issue purchase orders in writing, instead of concluding deals with suppliers concerning product or service prices, delivery quantities, delivery dates, and other transaction terms on the basis of verbal agreements alone. In the event that a purchase order is implied verbally, such orders shall be put into writing without delay.

Article 32 (Prohibition of Negotiating Purchase Conditions Based on Promises of Undetermined Future Business)

During the negotiation stage of a purchase with a supplier, DISCO Personnel shall not use a commitment to purchase a certain amount of products in the future as leverage in pricing negotiations with the aim of securing favorable transaction terms for DISCO.

Article 33 (Prohibition of Demanding Unjustified Rebates or Kickbacks)

DISCO Personnel shall not demand any rebates or kickbacks that are not included in their contracts with suppliers.

Article 34 (Response to Demands for Unjustified Rebates or Kickbacks)

If DISCO Personnel receive any demands for rebates or kickbacks that are not included in their contracts with customers or suppliers, DISCO Personnel shall not accept such demands. In such cases, the DISCO Personnel shall immediately report the occurrence to their superiors, and they shall respond appropriately and in accordance with the law.

Article 35 (Gifts and Business Entertainment)

1. DISCO Personnel shall not commit any form of corruption or misconduct which may interfere with the establishment of fair relationships, such as bribery, with any external party including customers, suppliers, and government officials.
2. DISCO Personnel shall not accept any gifts from suppliers. If a DISCO Personnel accepts or is asked to accept gifts, the DISCO Personnel shall immediately report to and discuss the matter with their superiors, and the superiors who received the report shall courteously return the gifts.
3. DISCO Personnel shall recognize that DISCO considers the exchange of information to be the objective of meals or business entertainment with customers or suppliers, and they shall not provide or accept meals or business entertainment that exceed the reasonable limits of the exchange of information.
4. At DISCO, meals or business entertainment for customers must be arranged by the main person in charge and their superiors as part of their duties. DISCO Personnel other than the main person in charge and their superiors will not be forced to participate in such meals or business entertainment nor will they suffer disadvantages due to their refusal to participate.
5. If a DISCO Personnel is invited to dine with suppliers, the DISCO Personnel may only accept the invitation if the DISCO Personnel obtains approval through the procedures determined by DISCO.

Article 36 (Response to Demands for Discounts)

In the event that a DISCO Personnel receives a demand for a discount from a customer, the DISCO Personnel shall respond to said demand in accordance with the rules and regulations set forth separately. In cases where the demands for discounts exceed the reasonable range for a discount or said demands are based on unjustified reasons, the DISCO Personnel shall immediately report to their superiors and follow their instructions.

Article 37 (Creating a Healthy and Fulfilling Work Environment)

DISCO gives top priority to the health and safety of DISCO Personnel and establishes an environment in which those suited to be members of DISCO may excel in their work.

Article 38 (Proper Evaluation at DISCO)

DISCO evaluates DISCO Personnel based on criteria such as their achievements (in terms of both quality and quantity), their trust relationship with others, and their commitment to their work.

Article 39 (Double Employment)

DISCO Personnel are obliged to protect DISCO's assets and interests. Consequently, DISCO Personnel are, in principle, not allowed to engage in double employment, such as taking up employment with companies other than DISCO or starting companies as individual business owners, because doing so may conflict with DISCO's interests or impact DISCO's business operations. However, this does not necessarily apply in cases where such employment is unlikely to conflict with DISCO's interests or impact DISCO's business operations, such as working as a teacher in a culture class or serving as a director in a family business. In such cases, DISCO Personnel shall apply for permission to engage in such employment, in writing or through electronic form, and obtain said permission in accordance with the procedures determined by DISCO.

Article 40 (Transferring to Competitors)

In principle, DISCO Personnel may freely leave DISCO and transfer to other companies. However, in order to protect the interests of DISCO's stakeholders, DISCO Personnel are prohibited from transferring to any of DISCO's business competitors for the following periods.

- Representative Executive Officers: five (5) years from the date of resignation
- Employees of managerial rank and above: three (3) years from the date of resignation
- Other employees: one (1) year from the date of resignation

If DISCO Personnel are in doubt as to whether a company to which they are thinking of transferring is a business competitor of DISCO, DISCO Personnel shall consult the department in charge of human resources.

Article 41 (Hiring from Competitors)

1. DISCO Personnel shall not offer employment to or poach personnel from other companies in order to obtain confidential information from any of DISCO's business competitors or with other unfair objectives in mind. In the Code of Ethics, "confidential information" refers to information that is useful in general, not publicly known, and treated as confidential.

2. DISCO does not allow DISCO Personnel who transfer from other companies (hereinafter referred to as "mid-career employees") to bring any confidential information in any tangible form to DISCO from their previous jobs (including any companies to which they belonged before their previous job). In addition, DISCO does not allow mid-career employees to make confidential information that they have memorized tangible and bring said information to DISCO.

3. DISCO Personnel shall not ask mid-career employees to bring confidential information from their previous jobs.

Article 42 (Disavowal of Antisocial Forces)

1. DISCO does not and will not have relationships with organized crime syndicates, companies affiliated with organized crime syndicates, extortionists, racketeers disguising themselves as political or social activists, special intellectual organized crime syndicates, or other antisocial forces (groups or individuals that pursue economic benefits by making use of violence, force, or deceptive practices) that cause or may cause harm or trouble to society.
2. DISCO Personnel shall not make use of antisocial forces or engage in any acts that may result in the company's involvement in offering funds, cooperation, or assistance to such antisocial forces (including but not limited to money laundering).

Article 43 (Written Submissions, Speeches, and Statements to the Media by DISCO Personnel)

1. DISCO Personnel shall obtain the approval of the executive officer overseeing the department in charge of external relations when submitting material to publications or giving speeches concerning DISCO's business.
2. If a DISCO Personnel receives a request for an interview from the media, the DISCO Personnel shall contact the department in charge of external relations and follow their instructions.
3. If a DISCO Personnel obtains the approval set forth in this Article to submit material for publication, give a speech, or make a statement to the media concerning DISCO's business, the DISCO Personnel shall gain an adequate understanding of the quality of corporate activity to which DISCO aspires and carefully consider the content of their statements in advance to ensure DISCO's reputation, namely the pride and fulfillment that fellow Personnel feel in their work, will not suffer damages through such statements.

Article 44 (DISCO's Stance on Political Activities)

Given the difficulty of representing the full range of political beliefs held by DISCO's stakeholders and the concern that DISCO may distort "the weight of one vote," DISCO does not engage in activities in support of any particular political candidate (including but not limited to providing venues for speeches, dispatching personnel, or lending facilities or equipment) or make political contributions of any kind.

Article 45 (DISCO's Stance on Religious Activities)

From the standpoint of respecting DISCO Personnel's personal religious beliefs, DISCO gives respect and consideration to the religious activities of DISCO Personnel unless otherwise specified in the Code of Ethics. However, given that the religious beliefs of DISCO Personnel are different for each individual, DISCO does not provide support or make donations to specific religious groups.

Article 46 (Political and Religious Activities by DISCO Personnel)

While DISCO respects the thoughts, beliefs, and religions of individual DISCO Personnel, in order to ensure DISCO's corporate neutrality, this Article sets forth the following:

1. DISCO does not get involved in any political or religious activities in which a DISCO Personnel participates using their own private time and resources.
2. DISCO Personnel shall not engage in political or religious campaigns within DISCO's facilities or premises, irrespective of whether such campaigns are held during or outside of working hours.
3. Even in locations outside of DISCO's facilities or premises, DISCO Personnel shall not engage in conduct that correspond to the following items. However, DISCO shall not interfere with an individual's beliefs and activities that are clearly distinguished from their duties.
 - (1) Religious campaigns towards fellow DISCO Personnel without the Personnel's consent, even if such campaigns occur outside of working hours
 - (2) Political or religious campaigns which use DISCO's name, logo, trade name, department names, job titles, etc.
 - (3) Political or religious campaigns wherein the DISCO Personnel takes advantage of their position as Personnel to campaign towards customers, suppliers, or other business partners
 - (4) Other political or religious campaigns which have a concrete negative impact on DISCO's reputation, trustworthiness, or business activities, or where such negative impact can be clearly foreseen
4. DISCO Personnel shall not use the DISCO company name or assets belonging to DISCO in the campaigns specified in the preceding provision.
5. DISCO Personnel shall respect DISCO's policy of not participating in political and religious activities or campaigns as a company, and DISCO Personnel shall not engage in any activities that go against this policy.

Article 47 (Participation in Group Activities or Research Activities)

If a DISCO Personnel wants to participate in any groups or academic conferences for the purpose of business or technology, gathering information, or networking, or a DISCO Personnel wants to engage in joint research with domestic or foreign companies, research institutes, or universities for the purpose of advancing innovation, the DISCO Personnel shall make their objectives clear and, if such activities are determined to align with DISCO's business objectives or future direction, DISCO Personnel may participate in the activities after obtaining approval through the procedures determined by DISCO.

Article 48 (Participation in Community Activities and Donations to Communities)

In order to maintain a good relationship with local communities, DISCO shall strive to contribute to local communities within reasonable limits. However, with regards to donations to local communities and engagement in community activities, if necessary, DISCO shall make decisions regarding their participation in such donations and activities based on the contents and purpose of said donations and activities, while also taking into account DISCO's policies and the state of DISCO's resources.

Article 49 (Donations and Support for Universities and Other Academic Institutions)

When making donations to universities and other academic institutions, in order to express gratitude

towards such academic institutions for cultivating the talents of active DISCO Personnel, DISCO shall determine the donation amounts by considering factors such as the number of active Personnel who are graduates of said institution and the job positions of said Personnel. However, such donations shall be made in accordance with the rules and regulations set forth separately.

Article 50 (Donations in Connection with Disasters)

1. As a member of society, DISCO shall provide assistance, including donations, to people who need support due to disasters that have caused extensive damage to the extent and through methods which DISCO’s stakeholders endorse. In times of disaster, DISCO shall also encourage DISCO Personnel to take interest in providing support and making some kind of contribution as individual members of society.
2. If DISCO makes donations in response to sudden, unexpected disasters, DISCO shall decide the donation amount based on the extent of the damage and the relationship between the donation recipient and DISCO. In addition, if DISCO Personnel collect donations to put towards a sudden, unexpected disaster and if, after considering the intent of the donations and the recipient’s relationship with DISCO, DISCO endorses such donations, DISCO will make a matching donation as a company. However, the ceiling for matching donations shall be as specified in the donation regulations.

Chapter 4: Miscellaneous Provisions

Article 51 (Modification and Termination of the Code of Ethics)

The Code of Ethics may be modified or terminated based on resolution of the Board of Directors.

Enacted November 27, 2005
Revised April 22, 2026