NH Foods Group Action Standards

(Japan edition)

NH Foods

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NH Foods Group Action Standards (Japan edition)

The Basic Concepts in the Action Standards (Japan edition)

Based on NH Foods Group's corporate philosophies and management principles, we shall fulfill our responsibilities as a member of society, and contribute to the development of society.

(1) We shall comply with all the laws and regulations that relate to company activities and to the spirit of those laws.

(2) We shall determine company actions always bearing in mind society's ethics.

(3) We shall strive to provide safe and good quality products and services that satisfy our customers.

(4) As well as dealing sincerely and fairly with all of our customers, clients, suppliers, and shareholders and investors, and everyone in the local community, we shall be proactive in disclosing information to everyone.

(5) We shall positively tackle environmental problems and social problems as a trusted company.

(6) We shall fulfill the roles of a good corporate citizen, supporting society and progressing together with society.

(7) We shall respect the human rights of our employees and all people.

(8) We shall strive to create a workplace environment which is always safe and easy to work in.

(9) We shall research in advance risks (such as natural disasters and fires) that might have a large impact on business activities, and we shall strive to take countermeasures so that the group business activities do not stagnate.

Scope of the Action Standards

All officers and employees at the domestic NH Foods Group are subject to these Action Standards.

1. Action Standards toward Customers (Consumers)

We shall always strive to offer safe and good quality products and services that satisfy the customer, with the same feeling we have when we provide food to our own families, and we shall aim to be "the best company in the world that delivers the Joy of Eating."

(1) Product Safety

As the principles required for our products and services, the NH Foods Group enlists 3 qualities: safety quality, attractive quality, and social quality. Among these, safety quality is the fundamental quality. We shall assume the viewpoint and feeling of our customers, and based on the viewpoint that we hold "the bounty of nature" dearly, we shall make each individual product carefully, and deliver safe products to the customers.

[Detailed description of actions]

a) To gain greater trust from our customers, we shall understand the importance of rules protecting product safety, comply with them, and target quality in all products and service improvements.

b) However busy we are, we shall uphold the rules for entering the workplace (hanging rollers, washing hands, etc.), manufacturing procedures, cleaning procedures, and product standards, and conduct accurate recording and administration.

c) When loading and unloading or storing products, as well as keeping to the predetermined temperature range for each product, we shall take sufficient care in product handling.

d) In all processes, we shall secure food safety by taking sufficient care for contamination of food allergy substances, classification and identification management of raw materials, performing appropriate cleaning of machines and equipment, and being continuously thorough in supervision, recording and administration, and we shall strive to make products that the customer can eat with reassurance.

e) In all processes from procurement of raw materials to sales, we shall be thorough in food defense and food fraud countermeasures.

(2) Appropriate Labeling

We shall assume the standpoint of the customer who trusts the product packages and advertisement information when making a purchase, and we shall correctly conduct appropriate and easy-to-understand labeling based on the laws and regulations concerning food labeling, so as not to cause misunderstandings or damage to health.

[Detailed description of actions]

a) We shall thoroughly check that there are no mistakes in label items connected to customer safety and health, such as the expiry date indications, raw material labels, storage methods, food allergy substances, and so on.

b) If there is an enactment or revision of a law or regulation, we will respond to it promptly.

c) We shall not use labeling that encourages misunderstanding.

(3) Information Management (Raw Materials, etc.)

We shall successively collect, verify, and correctly record information regarding safety, quality, and standards of raw materials used in order to deliver safe and reliable products to customers.
In addition, we shall manage the inventory in an appropriate manner and use the raw materials.

[Detailed description of actions]

a) We cannot tell, from the appearance of raw materials (including meat), their places of origin, variety, rank, production/rearing methods. So, we acquire certificates of raw materials for origin-designated products.

b) If raised by special methods, we shall record the feedstuff, variety, and rearing methods so that they can be certified.

c) Some agricultural, forestry and fishery products are registered and protected as intellectual properties under the protected geographical (GI) indication system. We shall present appropriate labels to avoid misleading among customers.

d) All processed food produced in Japan are required to have labels that indicate the places of origins of the raw materials. Using raw materials from places of origin not included in the label is a labeling violation. We shall explicitly identify the raw materials we receive and use them while verifying the consistency with the corresponding label information during the manufacturing processes.

(4) Prohibition of Misleading Representations and Unjustifiable Premiums

We provide customers with accurate information about the characteristics of our products. We shall avoid misleading representations of product characteristics and/or quality that misguide customers, and we shall not provide unjustifiable premiums.

[Detailed description of actions]

a) When creating marketing materials, advertisements, and/or brochures, we shall strive for appropriate representations and descriptions by checking the content against the actual product characteristics. For transaction with the clients, product description at store floors, and descriptions on websites as well, we shall strive for appropriate representations and descriptions in the same manner.

b) In some campaigns, restrictions may apply to premiums to be offered. We shall run the campaigns within the applicable premium restrictions, including the maximum values and limitations.

(5) Food Accident Response

If we find evidence of a food accident or risk of occurrence of one, we shall prioritize customer safety in our actions. We shall promptly investigate the causes and facts, and communicate them accurately to the person concerned including customers.

[Detailed description of actions]

a) In manufacturing and pre-shipment processes, if product contamination with foreign matters is found, or if any possibilities or signs of rotting due to microbial contamination or food poisoning are seen, inform the manager and relevant departments, then take appropriate actions to prevent hazard and damage to the customers and the problem from spreading.

b) When an accident has occurred related to the product, consider customer safety to be the top priority, and we shall take prompt measures such as recovery and disposal.

c) We shall investigate and find out the causes, we shall be thorough in implementing recurrence prevention measures formulated based on the causes, and we shall strive to prevent similar food accidents.

d) We shall never tamper inspection results or records as it may lead to significant product incidents.

(6) Response to Inquiries and Feedback

We shall respond to inquiries, feedback, and comments from customers in a timely and polite manner, taking them as invaluable advice to our company.

[Detailed description of actions]

a) We shall listen to customers to understand the reasons for their disappointment and background information.

b) We communicate the voice of customers to the relevant departments in the company for product improvement and service enhancement.

c) We shall respond to customers with integrity to increase customer satisfaction to harness their loyalty to the NH Foods Group.

2. Action Standards toward Clients

We shall pay maximum attention to guaranteeing product safety and quality up to the delivery of products to customers. In dealings with clients, we shall comply with the relevant laws and regulations, we shall strive toward fair and transparent dealings, and we shall aim toward a company greatly trusted by customers and clients.

(1) Product Management in Distribution and Stores

Our first consideration shall be the customer, and we shall ask our clients for cooperation to strictly adhere to the storage methods and handling methods displayed on the products up to the customer receiving the product in hand.

[Detailed description of actions]

a) Overloading of products in refrigerated cases or display outside refrigerated cases and other displays that does not enable appropriate temperature management shall not take place.

b) Even if clients request deviations from appropriate storage methods or handling methods, we shall clearly communicate NH Foods Group's basic stance, and request appropriate temperature management and handling methods of the client.

c) If delivery work or the like is conducted in the store or backyard, other companies' products shall also be handled carefully in the same way as our products.

(2) Response to Unjustifiable Requests from Clients

The employees shall report clients' requests for article purchases and entertainment to their managers, and respond to them as a part of the company, not as individuals.

[Detailed description of actions]

a) We decline requests outside the socially acceptable range, such as a purchase request for jewelries.

b) We shall not engage in any activities that lead to unjustifiable business transactions, such as complying with an article purchase request from a client in return for the client's promise of prospective introduction of our new products.

(3) Response to Unreasonable Requests

We shall decline a client's request as a company, if such a request contains risks of product safety and stable supply as it can lead to a potential breach of our customers' trust.

[Detailed description of actions]

a) The employees shall report, contact, and consult with their managers when they cannot determine how to respond to unreasonable requests from clients, and make appropriate responses as a part of the company.

b) When the employees cannot respond to the client's request with their best effort due to technical, physical, and/or temporal difficulties, they shall explain the situation in a sincere manner and decline the request politely.

c) We shall be careful to avoid equivocation as well as vague and unclear communication in declining a customer request as such communication can mislead the client and result in losing their trust.

(4) Accurate Voucher Processing

As a prerequisite for appropriate product management, sales management, and credit management, we adhere to accurate voucher processing according to the stipulated company rules.

[Detailed description of actions]

a) We shall issue vouchers correctly according to the contents to deliver.

b) We shall always verify that there is no conflict between the products delivered and those listed on the voucher and that there is no errors in quantity and unit prices.

c) If we find a mistake in an issued voucher, we shall immediately notify the client and make a correction.

d) We shall never engage in issuing a voucher for a false delivery, price increase without client consent, inappropriate self-purchase of our products, or filling monetary deficiency. In addition, we shall not make our subordinates or junior colleagues do so.

(5) Antitrust Law Compliance

In order that the client can select good products and services freely, fair and free competition must be secured in the market.

1) Prohibition of Unfair Business Practices

In any situation, we shall conduct dealings with a client from a fair standpoint with respect to quality, price, and service.

[Detailed description of actions]

a) We shall understand the spirit of the antitrust law , and comply with it.

b) In the proposal document or estimate, do not use expressions "list price" or "selling price," which restrict the resale price. The price should be cited as just a "reference retail price" or "proposed price."

2) Prohibition of Unreasonable Transaction Restrictions (Cartel, etc.)

In order to strive toward fair and free competition, we shall not participate in a cartel or bid rigging such as conducting agreements or arrangements with industry peers or in an industry group concerning price, quantity or companies that are dealt with.

[Detailed description of actions]

a) We shall not connect with competitors and discuss or exchange information on (i) sales price, (ii) production quantity or retail quantity, (iii) transaction conditions with clients, (iv) economic benefits provided to clients to promote sales, (v) division or allocation of sales regions, customers, or products, etc.

b) If we find ourselves in a position where arrangements are being discussed, we shall change the topic there and then, or remove ourselves from the place, and report the goings on to a manager.

3. Action Standards toward Suppliers

Based on "NH Foods Group Sustainable Procurement Policy," it is important to collaborate with the clients to promote sustainable initiatives based on the trust relationship with the clients for prosperous coexistence. In addition to ensuring the safety of the raw materials, our products and services, we shall comply with the relevant laws and regulations to conduct fair and free trade with our clients, striving for business trades to enhance mutual trust.

(1) Establishing Trust Relationship and Collaboration with Clients

We shall select clients through comprehensive review of their quality, services, price, experiences, reliability, and so on. We shall establish trust relationship with the clients for collaboration on and promotion of sustainable initiatives in our procurement activities based on prosperous coexistence.

[Detailed description of actions]

a) When procuring raw and other materials, we shall ensure that our clients comply with the laws and regulations and that they are free from problems with safety and quality management.

b) We shall collaborate with the client to improve matters like following when identified through client surveys and communication: compliance with the laws, regulations, and social principles; product/service quality and safety; fair trade; respect for human rights; industrial health and safety; environmental conservation.

(2) Ensuring Safety of Raw and Other Materials and Product Safety

We need to be responsible to ensure safety of the final products that the customers consume. We shall proactively verify the raw and other materials, product safety, as well as suppliers' quality management and legal compliance.

[Detailed description of actions]

a) We shall obtain certificates from the suppliers for verification of quality and safety of raw and other materials and products (e.g., presence of allergens).

b) We shall verify the names, codes, expiration dates for use, and other information about the raw and other materials and products upon reception.

(3) Prohibition of Abuse of Predominant Position against Clients (Compliance with Act against Delay in Payment of Fees, etc. to Small and Medium-sized Entrusted Business Operators in Manufacturing and Other Specified Fields)

We shall not abuse our dominant position, and shall avoid speech and behavior, including implicit ones, that express demands to clients for money and valuables or entertainment. We shall always engage in fair trades with the clients.

[Detailed description of actions]

a) We shall make it clear that the purchase decision should be based on the client's free will when we introduce our products to the client. If the client purchases our product, we shall not reflect their purchase history on their successive business trades.

b) We shall comply with the Act against Delay in Payment of Fees, etc. to Small and Medium-sized Entrusted Business Operators in Manufacturing and Other Specified Fields, and refrain from activities that unjustly impair clients' profits (e.g., rejection of reception, delay and reduction in payment, unjustifiable return).

c) When subcontracting and assigning tasks to subcontractors, we shall clearly specify the job descriptions, monetary amount, payment terms, and other information at the time of placing order, and retain the records related to the transaction.

d) The person in charge use the transaction management system operated by Nipponham (Ltd.) Legal Department to apply for subcontract agreements.

(4) Prohibition of Unjustifiable Gifts and Entertainment from Clients

We do not accept gifts or entertainment that is beyond common sense from clients, even if there is no direct interests in between.

[Detailed description of actions]

a) We do not accept gifts, including oseibo or end of the year gratitude, or dining with alcoholic beverage from clients if it is considered to potentially affect fair decision (such as price negotiation and selection from multiple suppliers).

b) If such offers are sent to individual employees, they shall report to their managers to avoid potential misunderstanding and handle the matter in an appropriate manner.

c) We do not accept any entertainment, such as dining at a prestigious restaurant, drinking at a salon or nightclubs, which are considered obviously inappropriate from a third person's viewpoint.

d) When the employees accept dining entertainment, they shall avoid nijikai, or after-parties.

(5) Fair Intra-Company Transaction

We shall strive to establish and retain fair, transparent, and healthy relationship in transaction within the company and between Group companies.

[Detailed description of actions]

a) We do not abuse our procuring position to request for unfair business transaction and other favors beyond common sense.

b) Like transaction with our clients and suppliers, quality and price conditions shall be determined based on the authentic criteria, and we shall not be engaged in transactions for personal interests or emotions.

4. Action Standards toward Shareholders and Investors

We conduct company activities using the precious funds entrusted to us by all our shareholders and investors. Therefore, for all our shareholders and investors, we are responsible for conducting business safely and efficiently, and for correctly explaining those business contents. We shall fulfill these responsibilities, and further deepen the relationship of trust.

(1) Timely Disclosure of Company Information

We shall disclose details about our businesses, especially company information related to investment decisions, to our shareholders and investors in a timely, fair, and continuous manner.

[Detailed description of actions]

a) We shall strive to disclose our company information in an accurate and timely manner according to the "NH Foods Group Company Information Management Regulations."

b) The employees shall report to Nipponham (Ltd.) Compliance Department at an extraordinary event (e.g., a natural disaster, accident, client bankruptcy) as "a critical matter" immediately.

c) The employees shall report to Nipponham (Ltd.) Quality Assurance Department immediately as well when "a critical matter" related to product anomaly.

(2) Creation and Reporting of Accurate Records

We shall daily record and report information correctly regarding company activities in accordance with laws and regulations, and company rules.

[Detailed description of actions]

a) We shall accurately record and confirm the facts according to laws and regulations and company rules at each stage such as purchasing, manufacturing, distribution and sales, so that there are no mistakes or falsehoods in the reports. In addition, when required we shall make reports and do so correctly.

b) We shall properly store the recorded information for a fixed period so that it can be confirmed at any time.

c) We shall daily confirm the quantity of stocked products and expiry dates, accurately record and manage this.

d) We shall accurately record and manage the progress status and results, and so on, of research and product development.

e) We shall take the accounting process as an important element to support the growth and reliability of our company, and conduct it in an appropriate manner.

(3) Consideration on Internal Audit

We shall cooperate with audits and JSOX assessments regarding accounting audit, operational audit, quality audit, environmental audit, compliance status, and strive to improve operational quality.

[Detailed description of actions]

a) All employees, in addition to office managers, managers, and personnel in charge, shall understand the meaning of internal audit and participate in it as a natural duty.

b) We shall improve and report items pointed out at an audit.

5. Action Standards toward Society

Aside from all our customers, clients, partners, shareholders and investors, we are legally, socially, and ethically responsible for innumerable stakeholders. Within these circumstances and enjoying the freedom of market competition, we must be certain to fulfill our legal responsibility as a natural prerequisite. In addition, our aims shall not be limited to compliance with all laws, regulations and rules, but we shall also aim to deepen good relationships with regional communities and develop together.

(1) Compliance with Relevant Laws and Regulations

We shall correctly understand, comply with and put into practice not only food manufacturing and sales laws and regulations, but also other various laws, regulations and guidelines.

1) Compliance with Traffic Laws and Regulations

As individual members of NH Foods Group, we shall comply with traffic laws and regulations both publicly and privately. When driving a vehicle, we shall respect the spirit of safety first and give way to other road users, and shall strive to prevent traffic accidents.

[Detailed description of actions]

a) It goes without saying that we shall not drive without a license, with an expired license or with expired vehicle inspection, as well as we shall never carry out, or allow others to carry out, behaviors that violate traffic laws and regulations such as speeding, parking violations, using a smartphone (cellular phone) while driving, not wearing a seat belt, and malicious and/or dangerous driving that falls to the so-called tailgating prohibition law.

b) If we have violated traffic laws and regulations, we will immediately report this to the safe driving manager and the manager.

c) In preparation for the unlikely event of an accident, we will join optional insurance that makes up the shortfall in liability insurance.

d) Employees commuting to work in their own cars are asked to submit to the company (i) their driving license, (ii) a certificate of vehicle inspection, and (iii) an optional insurance certificate. Employees possessing private cars should regularly check expiry dates of these documents.

2) Compliance with Local Laws and Regulations Overseas and Respect to Cultural Practices

We shall understand international rules as well as local laws and regulations, history, cultural practices overseas correctly, and strive to comply with and respect them.

[Detailed description of actions]

a) In addition to compliance with local laws and regulations overseas, we shall correctly understand and respect local history and cultural practices, and pay sufficient attention to our speech and behavior.

b) We shall actively execute our responsibilities as the members of a local corporate citizen when operating business overseas.

c) We shall respect international treaties and rules, and we shall not engage in child labor or forced labor activities. We shall also check if related suppliers are engaged in such activities.

(2) Healthy Relationship with Politics and Governments

We shall follow the "NH Foods Group Anti-Corruption Policy" and comply with the laws and regulations regarding entertainment and gifts for civil service officers, avoiding relationship that may lead to social misunderstanding.
Civil service officers refer to personnel who are engaged in public services provided by the government or municipalities, including those who engaged in affairs at public corporations, those who engaged in public affairs at public institutions, and those who with delegated authorities from the government, as well as assistant public officers at public service corporations, public corporations, special corporations, and similar business organizations.

[Detailed description of actions]

a) We shall treat politicians, election candidates, political parties, and political organizations in the same manner as public service officers, and we shall not make political contributions or donations that can conflict with the laws and regulations and internal rules.
b) In overseas, we shall respect the local laws and regulations in terms of relationship with public service officers, and we shall not offer entertainment, gifts, or other interests to obtain unjustifiable profit. In addition to direct interest offering, we shall be extremely careful not to violate the laws and regulations related to indirect interest offering through, for example, consulting companies.
c) We shall not be engaged in provision or reception of monetary and other interests, or making such offering or promise with private individuals if such an activity is considered as bribery under the applicable laws and regulations.
d) If requested or forced for favors by public service offers and/or private citizens, the employees shall not make a decision by themselves, but contact their managers, administration department, or Nipponham (Ltd.) Legal Department for instructions. The employees shall also record the details and responses accurately so that they can fulfill their accountability.

(3) Report to Relevant Government Agencies and Cooperation in Investigation

When a significant violation or accident occurs, we shall not conceal it, but report to the relevant government agencies immediately and cooperate with external organizations for investigation and cause-finding.

[Detailed description of actions]

a) For product related accidents, we shall prioritize customer safety, and engage in swift reporting and response to minimize potential health hazard.
b) We shall recall the product in issue and disclose information quickly to maintain the reliability of our company.
c) We shall examine details of violations and accidents if they occur, and fulfill our accountability by releasing information externally as well as internally.

(4) Handling of Antisocial Forces

We shall comply with "NO 3 Initiative plus One" principle against antisocial forces that are considered to be threat to social order and civic life (NO use of, NO fear of, NO monetary provision to antisocial forces, plus NO relationship with antisocial forces). We shall handle such antisocial forces with a resolute attitude as an organization.

[Detailed description of actions]

a) We shall take all appropriate responses, including legal actions, against unjustifiable demands from antisocial forces.

b) We shall not have any relationship, including business trade, with boryokudan, or gang organizations.

c) The employees shall report to their managers and/or personnel in charge when demanded for unjustifiable favors from antisocial forces, and report to and consult with Nipponham (Ltd.) Compliance Department and General Affair Department. We shall ensure, through periodical audits and assessments, that we do not have any relationship with antisocial forces, as well as retain and enhance our compliance system.

d) If there is a suspicion that a business partner is involved in antisocial forces, the employees shall report to their managers and personnel in charge. If such a relationship is identified as true, we shall immediately terminate our relationship with that partner.

(5) Contribution to Society

We shall aim to co-exist with regional communities and mutually prosper, and by fulfilling our role as a good corporate citizen, we shall contribute to the development of a sustainable society.

[Detailed description of actions]

a) We shall voluntarily participate in activities contributing to the growth and development of regional communities.

b) Not only shall we contribute to society through business activities, but also we shall contribute to the sound development of society through food and sports.

c) We shall actively engage in environmental conservation activities and retain a sustainable global environment.

d) We shall contribute to the development of the next generation through educational support programs.

e) We shall focus on diversity and inclusion, and strive to achieve a society where everyone is respected.

(6) Responsible Behavior in Public Places

We shall always act in public places with awareness and responsibility as members of society, and even in private we shall keep in mind, with the mindset of members of the NH Foods Group, that we individually bear the brand of the NH Foods Group, and shall endeavor to speak and act with respect and appreciation.

[Detailed description of actions]

a) We shall not talk on a cellular phone or use a smartphone while walking, smoke while walking or litter with cigarettes.

b) When driving, following traffic rules is a major prerequisite. We shall be aware that doing so not only avoids bothering others, but also leads to prevention of accidents.

c) We will positively engage in cleaning activities and giving people in trouble a helping hand, and so on.

d) We shall ensure to sort trash to help recycle.

e) We shall not converse loudly or play music at a big volume at a public place.

(7) Continuation of Business Activities

We shall strive to minimize damage and continue our business activities by developing measures against various potential risks that may have significant impacts on our business activities.

[Detailed description of actions]

a) We shall systematically prepare for potential risks, including natural disasters (earthquakes, storm, flood), large-scale accidents, outbreak and spread of infectious disease, and supply chain disruption of raw and other materials.

b) We shall conduct trainings for accidents and natural disasters on a periodical basis so that we can make a quick response at an emergency event.

c) When we are victimized, we shall confirm the safety of our employees, minimize damage at work places, continue priority businesses, and strive to restore our business as soon as possible.

d) We shall ensure to prevent outbreak of infectious diseases and animal diseases. At an outbreak, we shall immediately report the incident and implement countermeasures to prevent spread of the disease.

e) To prevent the spread of infectious disease, we shall comply with requests from the national government and municipalities when the entire society's cooperation is required.

f) We shall strive to comprehend various social trends so that we will be able to respond to various risks, including cyberattack and country risks.

(8) Importance of Information Management

We shall understand the importance of the various information that we handle in our work, and shall strive toward proper acquisition, appropriate use and thorough management.

1) Information Management

"Information management" refers to the management of various information to effectively gather, process, communicate, store, search and dispose of information required in our work.

[Detailed description of actions]

a) Through appropriate information storage, we shall prevent problems such as information leaks or tampering.

b) We shall comply with laws and regulations related to personal information and intellectual property. Regarding intellectual property, we shall respect not only those NH Foods Group companies own rights, but also the property that belongs to other companies and individuals.

c) We shall not obtain, use, or disclose other companies' confidential information in an unlawful way.

2) Correct Information Handling

When using information acquired through work, we shall use it after understanding the purpose of use, uses and points to heed.

[Detailed description of actions]

a) We shall use information and personal information we have come to know through work only in the required instances within the extent of the usage purposes indicated when the information is acquired, and we shall not provide or disclose the information to a third party without approval, unless stipulated by laws and regulations.

b) We shall be aware that retirees have already left the company, and shall not discuss company information with them unnecessarily.

c) There are cases of unknowing infringement of copyright through use of image or videos on the internet. When using such items, we shall be sure to confirm the terms of use, then, unless stipulated by laws and regulations, in the case of use of copyrighted work, obtain permission in advance from the copyright holder before using.

d) When using social media or the like, we shall take sufficient care in handling confidential information and personal information. Information on the internet is seen by innumerable, anonymous people. We shall not write anything leading to defamation or leaks of information such as company information or personal information related to NH Foods Group or companies involved with our jobs.

e) Personal information shall only be saved according to the methods recognized by the company, and shall not be saved on PCs or smartphones (cellular phones) owned privately, or on external storage media such as external hard disks or USB drives.

f) When disposing of personal information, we shall dispose of it using the stipulated method, such as shredding with a shredder or a dissolving process.

3) Information Use Outside the Office

When performing duties outside the office, we shall pay extreme attention to information handling.

[Detailed description of actions]

a) Working from home is becoming more common, and opportunities for performing duties outside the company are increasing. When it is unavoidable that we have to take information outside the Office in our duties, we shall consider the risk of information leaks to third parties when handling the information.

b) In particular when working at a location where many, unknown people can enter and leave outside the home such as when on the move or at a business trip destination, as there is the risk of someone peeping at or taking photos of documents or a PC screen, or of theft, we shall take sufficient countermeasures when performing our duties.

c) We shall not speak or act carelessly outside the Office in a way that leads to leaks of company information or personal information. In addition, inside the Office, too, we shall pay attention when having a conversation or using a smartphone (cellular phone) in places used by many people such as elevators or passages.

(9) Compliance with Insider Dealing Regulations

We fully understand the content of the insider dealing regulations. When trading the company stocks in particular, we comply with the company rules.

[Detailed description of actions]

a) We shall not engage in behavior that could be suspected of being insider dealing. We shall not use internal information we have come to know through our duties to buy or sell that company's stocks.

b) We shall not recommend the purchase or sale of stocks leading to insider dealing.

c) We and our family and friends shall also not have conversations or take off-site information that could lead to insider dealing.

6. Action Standards toward the Environment

The NH Foods Group conducts its business operation utilizing the bounty of nature. Therefore, it is important for us to preserve the natural environment that gives life, as well as to promote response to climate change, decrease environmental burden, and effective utilization of resources. Based on the NH Foods Group Environmental Policy, we engage in business activities that are in harmony with the environment, and each one of us shall put this effort into practice in the workplace.

(1) Responding to Climate Change

We strive to reduce the amount greenhouse gas emission generated from our business activities.

[Detailed description of actions]

a) Each employee shall promote, through business operation improvement at workplaces and energy saving activities, decrease of greenhouse effect gas emissions associated with the use of fossil fuel.

b) We shall promote renewable energies with less greenhouse effect gas emissions, such as solar power and biomass energy.

(2) Sustainable Use of Resources

We use the limited resources well, such as raw materials and water required for business activities, as well as we strive for waste reduction and recycling.

[Detailed description of actions]

a) With priority on safety and quality, we shall tackle reducing the amount of plastic used by lightweighting product packaging materials, simplifying packaging formats, and using environmentally friendly materials.

b) We shall actively engage in 3R (Reduce, Reuse, and Recycle) initiatives of waste along with promoting resource saving initiatives, such as water saving and reduction of food waste.

c) In addition to reduction of waste produced from products and goods of our business activities, we shall be conscious of the amount we can eat and strive to minimize leftovers when eating at home and commercial dining places.

(3) Biodiversity Conservation

We shall promote biodiversity conservation, with awareness of dependency on and effect to the natural resources in terms of our business activities. We shall also pay sufficient attention to the effects to the surrounding environments of our offices, factories, and farms when conducting business activities.

[Detailed description of actions]

a) We shall follow the laws, regulations, and our own standards related to waste, waste water, bad smell, noise, air pollution, and so on, and strive to preserve regional environments.

b) We shall strive toward cooperation and harmony with local communities through a variety of environmental activities.

7. Action Standards to Create a Better Company Atmosphere

We shall respect each other's human rights and personalities, and always connect with people with a compassionate heart. We should actively engage in communication, aim to share information within the workplace, and create a workplace which is easy to work in and where the work is worthwhile.

(1) Respect for Fundamental Human Rights

Based on the "NH Foods Group Human Rights Policies," we respect human rights of all people involved in our business, and we shall not discriminate anyone for sex, age, nationality, social status, origin, thoughts, belief, religion, physical feature, sexual orientation, gender identity, illness, or physical disability. We shall also encourage our business partners to refrain from violation of human rights.

[Detailed description of actions]

a) We shall not carry out mental harassment through words and attitudes that damage the character or dignity of others, and shall not carry out annoying behavior.
b) We shall not speak or act in a way that causes others discomfort.
c) We shall endeavor to communicate with our work colleagues, and shall respect each other's ways of thinking and values.
d) For the foreign employees in Japan, we shall strive to understand their motherlands' cultural practices and viewpoints, and create easy-to-work workplace regardless of nationality.
e) We shall encourage our clients and suppliers to respect human rights, as well as to strive to do so.

(2) Creating a Workplace Free of Harassment

In order to create a lively, safe and healthy workplace to work in, we shall comply with the "NH Foods Group Harassment Prevention Regulations."

1) Prevention of Harassment

Harassment in the workplace is unacceptable behavior that infringes on the working person's character or dignity. We will pay careful attention not to cause others unpleasant feelings through our own words or actions, shall deepen our interest and understanding of harassment problems, shall disseminate and enlighten others, and shall respond appropriately when consulted.

[Detailed description of actions]

a) We shall not use a superior position in the workplace such as a boss and subordinate, or regular employee and partner employee, to carry out behavior such as repeating severe rebukes over a long period or to speak or act in a way that repudiates another's character. (Prohibition of power harassment)
b) We shall not act or speak sexually against another's will, for example, making sexual jokes, unnecessarily touching the body, or forcing a sexual relationship. In addition, in the case of rejection, we shall not carry retaliatory behavior such as dismissal from the company, demotion or salary reduction. (Prohibition of sexual harassment)

c) We shall not speak or act in a way that harms the work environment, such as saying, "we will not entrust important jobs to pregnant women" or, "you are taking childcare leave even though you are a man" (prohibition of harassment for pregnancy, childbirth, maternity/paternity leave, family care leave).

d) We shall not carry out "secondary harassment," inflicting further harm (not attending to a complaint, or harassment) due to a harassment victim requesting consultation or assistance.

e) We shall communicate sufficiently on a daily basis, and build mutually trusting, good human relationships.

2) Handling Customer Abuse (or so-called Customer Harassment)

We shall be careful about not only harassment at our work environment, but also external harassment and abuse/bullying. We shall pay attention to relationships with various stakeholders, including the clients, suppliers, shareholders, general customers, as well as relationships between the Group employees to establish healthy relationships.

[Detailed description of actions]

a) If we encounter a situation that is considered to be customer abuse during our work, we shall immediately ask the manager and colleagues for help, and explain that we cannot comply with the request as a company with a resolute attitude.

b) Each of us, too, is a general consumer. We shall pay attention to our own speech and behavior so that we will not be an offender of customer abuse/bullying.

(3) Prohibition of Violent Behavior

We shall not carry out violent behavior for any reason.

[Detailed description of actions]

a) If we see an argument in the workplace, we shall caution those arguing so that it does not escalate any further.

b) If we witness violent behavior in the workplace, we shall not pretend not to have seen it, but shall immediately caution the persons involved to stop, and shall report it promptly to a manager or person in charge.

c) If we have been the target of violent behavior, we shall not worry alone, but shall be sure to report it to a manager or person in charge.

d) If in the unlikely event that we end up carrying out violent behavior, we shall be sure to report it ourselves to a manager or person in charge. We shall report even trivial cases even if we are not sure whether or not they constitute violent behavior.

e) When cautioning or giving guidance, when we become emotional or end up arguing with colleagues, we shall take a deep breath, count for 6 seconds and wait a little time, then we shall handle the matter calmly after our feelings have calmed down.

(4) Creating an Open Workplace

We shall create a workplace in which anything can be discussed, and if there is a problem we shall not pretend not to see it, but shall strive to improve the workplace. We shall aim for a workplace in which anyone can exchange opinions freely, a rewarding workplace in which diverse values are respected and flexible working is possible.

[Detailed description of actions]

a) On a daily basis, we shall use greetings and speak directly to people, positively use polite forms of address, to create a bright and open workplace.

b) All employees shall have a sense of unity; we shall change to a highly productive way of working.

c) We shall examine our daily work and engage in telecommuting along with physical commuting to achieve effective operation. We also shall utilize available ICT systems for active communication.

d) We shall report, communicate and discuss problems or concerns in the workplace promptly with a manager or senior colleague, with the administration department or job satisfaction leader, or with a job satisfaction promotion committee member. If improvement is still difficult, we shall use NH Foods Group Consultation Desk.

(5) Fair HR Assessments and Treatment

In HR appraisals we are assessed comprehensively not only on work results, but also on awareness of legal compliance, ability, attitude, and motivation.

[Detailed description of actions]

a) By always conducting a fair assessment, employees feel a sense of purpose, and can willingly tackle their work duties.

b) We shall strictly assess based on the assessment standards and assessment period, and avoid being influenced by individual emotions or the most recent events.

c) We shall be sure to feedback the assessment results to the person, and try to connect it to an increase in the person's ability.

d) If there are any unclear points or unconvincing points in the contents of our superior's assessment of us, we should discuss it there and then.

(6) Securing a Healthy Workplace Environment

We shall always strive to establish a safe and healthy work environment by complying with labor-related laws and regulations as well as understanding the "NH Foods Group Occupational Health and Safety Basic Policy" and "NH Foods Group Basic Health Policy." Safe and healthy work environments must be achieved for all people working in every workplace.

[Detailed description of actions]

a) The health and safety of employees are our primary concerns, and provide appropriate treatment and concerns by comprehending employees' health conditions. We shall provide appropriate guidance for the operational methods of equipment and tools and for the handling of fuel or toxic substances, etc. If there are any health and safety problems, we shall resolve them and conduct improvements, and we shall strive to comply with safety obligations, including prevention of worsening and industrial accidents.

b) As a general rule, overtime work and holiday work are carried out on the instructions of the manager, and we shall make applications in advance to gain approval.

c) We shall apply for working hours accurately. We shall never illegally stamp the time card or make false applications, nor do overtime outside the office without permission. In addition, we shall not make our subordinates or junior colleagues do so.

d) To prevent our mental and physical disorders, we shall manage our physical conditions (self-care) as well as care about others' conditions (line care).

e) We aim to realize work-life balance to enable a sense of purpose in our jobs and to enable a fulfilling life.

8. Action Standards as a Member of the Organization

For our own or a third party's profit we shall never carry out actions such as causing damage to the company, or privately diverting tangible or intangible company property. We shall be aware as individual members of NH Foods Group, and act responsibly.

(1) Respect for Company Property

We shall use the company's machines, vehicles, equipment, fixtures, software, etc., for the company business activities or the purpose approved by the company.

[Detailed description of actions]

a) We shall only use company internet and email for work-related purposes, regardless of whether during or outside working hours.

b) When on a business trip or working from home, we shall obtain approval from our manager before taking lent items out of the workplace.

c) Of course, we should not make personal calls, but also, if we receive a personal call, we should finish the call promptly.

d) We shall not personally divert company equipment.

e) We shall never settle expenses improperly.

(2) Appropriate Use of Social Expenses (Dining and Golf)

We shall comply with the "NH Foods Group Social Expense Policy" for social expenses. We shall also use social expenses for client entertainment in an appropriate way, taking cost-effectiveness into consideration.

[Detailed description of actions]

a) We shall apply in advance for client entertainment.

b) We shall report the name of the event or meeting, purpose, name of the venue, budget, number of the participants, name of the company (or companies), and name of the participants when applying for social expenses (dining and golf).

c) We shall not practice inappropriate accounting of social expenses by, for example, reporting an internal dining as a client entertainment. We shall never falsely report our personal dining or golf as client entertainment.

d) We shall not divide receipts inappropriately or falsely increase the number of participants.

e) We shall use social expenses within common sense.

(3) Prohibition of Conflicts of Interest

We shall be careful that our own profit and the company's profit shall not conflict in our actions.

[Detailed description of actions]

a) We shall not pursue individual profit using business chances, human relationships, customer lists or credit information obtained through the job.

b) We shall not request improper benefits (money, goods, entertainment, conveniences, etc.) using our job status or authority.

c) We shall not select a company linked to ourselves individually as a supplier without passing through the internal company procedure.

(4) Communicating Company Information

We shall communicate company information in a timely manner. Information disclosure for mass media shall be done through Nipponham (Ltd.) PR Department.

[Detailed description of actions]

a) We shall not immediately answer inquiries from the press, including newspapers, TV stations, magazines, with the decision of individuals or the office. In such an occasion, we shall first contact our manager and relevant department for instructions.

b) We shall take actions for information disclosure for mass media and for inquiries accurately and promptly.

(5) Compliance with Company Rules

We shall carry out our jobs faithfully and sincerely in accordance with company rules such as, not only the "NH Foods Group Action Standards (Japan edition)," but also work regulations, job authority rules, quality assurance regulations, and NT regulations and procedures.

[Detailed description of actions]

a) We shall perform our duties daily with the awareness that compliance with company rules is a prerequisite for fulfilling our responsibilities to society.

b) Regulations including the work rules shall be stored in a place where anyone can view them at any time, and managers shall let everyone know where they are.

c) When regulations are enacted or amended, we shall be sure to confirm them, and understand them, and comply with them.

(6) Animal Welfare Consideration

We shall cherish the bounty of nature and strive for animal welfare consideration.

[Detailed description of actions]

a) We shall breed livestock in a comfortable environment, shall collaborate with business partners to reduce stress and illness, and shall progress livestock breeding management, production system improvements and continuous technology innovations, etc.

b) We shall strive to improve animal welfare through information disclosure and dialog with stakeholders.

(7) Eradication of Drunk Driving

As individual members of NH Foods Group who act sincerely with respect to trust from society, to eradicate drunk driving, we shall implement thoroughly, "if I have drunk, I won't ride or let ride," "if I am going to drink, I won't ride," and "if I am going to drink, I won't go by car."

[Detailed description of actions]

a) We shall never drunk drive or let someone drunk drive. We shall each one of us be aware that drunk driving is a serious crime.

b) Even a little amount of alcohol paralyzes brain functions. We shall be fully aware that driving under such a condition can turn a vehicle or bicycle into a weapon.

c) Even when getting plenty of sleep after drinking alcohol, alcohol may remain in the system. We shall know our own appropriate amount of drinking.

(8) Initial Response in the Event of a Disaster

When we or our families encounter a disaster, we shall make safety the highest priority, and immediately strive to secure our physical safety. If evacuation instructions are announced, we shall act according to those instructions.

[Detailed description of actions]

a) When a disaster occurs outside working hours, we shall secure our own and our family's physical safety such as confirming the safety according to the surrounding situation, and moving promptly to an evacuation area.

b) Once we have secured the physical safety of ourselves and our family, we shall communicate our safety status to the company.

c) When a disaster occurs during work hours, we shall act according to the directions of the self-defense firefighting team or self-defense disaster prevention team established in each place of business.

d) When suffering a disaster, the family may not all be together. So, we should decide on the evacuation area and contact method in advance.

日本ハム株式会社
〒530-0001
大阪市北区梅田二丁目４番９号 ブリーゼタワー 18F
Tel：06-7525-3026（代）
URL：https://www.nipponham.co.jp

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