

SOLASTO GROUP CODE OF CONDUCT

The Group aims to earn the trust of customers and contribute to the creation of a sustainable society by providing useful and advanced services to people. Based on these goals and the Group's corporate philosophy, this Code of Conduct sets forth the standards which the Group's officers and employees should abide by in making decisions and conducting themselves on a daily basis.

Chapter 1 Basic Policy

1. (Respect for Fundamental Human Rights)

- (1) The Group and its officers and employees are committed to respecting fundamental human rights and individual dignity in all business activities, and will not be complicit in human rights abuses.
- (2) If any of the Group's operations, products or services are found to have a negative impact on fundamental human rights, the Group and its officers and employees will address the issue in good faith.

2. (Respect for Diversity)

The Group and its officers and employees believe that the active participation of personnel with diverse values and views is essential to the sustainable and sound development of the Group, and are committed to respecting each other's personal characteristics, and completely eliminating discrimination based on race, gender, social status or other such factors.

3. (Compliance with Laws and Regulations)

The Group and its officers and employees will comply with the laws, regulations and rules applicable to them in all business activities, and will try to act in a restrained manner in accordance with social ethics.

Chapter 2 Workplace and Working Environment

1. (Compliance with Laws and Regulations Concerning Working Conditions and Occupational Safety and Health)

- (1) The Group will comply with the Labor Standards Act, the Industrial Safety and Health Act, and other labor-related laws and regulations, and will work to maintain and improve the working environment on a sustainable basis so that its officers and employees can work safely and with a sense of security.
- (2) Under no circumstances will the Group engage in child labor, any form of forced labor, abuse or corporal punishment that is prohibited by the laws and regulations of Japan and other countries and regions. In addition, the Group will limit the employment of young workers to the extent permitted by applicable laws and regulations, and will assign them only to tasks that do not expose them to danger.

2. (Improvement of Safety and Health in Workplace and Work-Life Balance)

- (1) The Group will develop a system for the planned promotion of occupational health measures to prevent occupational injuries and to maintain and promote the mental and physical health of its officers and employees.
- (2) The Group attaches importance to work-life balance. The Group will develop a system that allows for more flexible work styles so that its officers and employees can balance work with child care, nursing care, medical treatment or other such needs.

3. (Prevention of Harassment)

- (1) The Group and its officers and employees understand that harassment undermines the dignity of individuals and has a material adverse effect on the operation of the organization. The Group and its officers and employees will not participate in or overlook harassment in the workplace.
- (2) The Group will respond sincerely, but firmly, to customers harassing its officers and employees.
- (3) In order to achieve the provisions of the preceding two paragraphs, the Group will establish and operate a system to prevent harassment, and prepare and disseminate harassment-related regulations.

4. (Equality of Wages and Opportunities)

- (1) The Group will never engage in any unreasonable discriminatory practices with regard to job application conditions or treatment of its officers and employees, will comply with the Act on Equal Opportunity and Treatment between Men and Women in Employment, the Act on the Promotion of the Employment of Disabled Persons, and other laws and regulations, and will not discriminate against any person on the basis of gender, disability or other such factors.
- (2) The Group adheres to the principle of equal pay for equal work.
- (3) In order to achieve the provisions of the preceding two paragraphs, the Group will establish a fair personnel and treatment system, and operate the system in an appropriate manner.

5. (Human Resource Development and Support for Career Formation)

The Group believes that, in order to realize the sustainable growth of the Group, it is important to bring out the abilities of its respective officers and employees through the human resource development that takes into account their personal characteristics, aptitude and autonomy. To this end, the Group will provide necessary support.

Chapter 3 Business Activities

1. (Engagement in Sound Economic Activities)

The Group and its officers and employees are committed to respecting others in their business activities, both inside and outside the Group, and will consciously act with integrity and responsibility.

2. (Fair, Transparent and Free Competition; Fair Transaction)

- (1) The Group and its officers and employees believe that fair, transparent and free competition is essential to the sustainable development of the society and economy, including the Group, and will comply with the competition laws and other applicable laws, regulations and guidelines.
- (2) The Group and its officers and employees will never engage in cartel activities, such as price fixing or price restriction among competitors, market allocation or output restriction, or bid rigging.
- (3) The Group and its officers and employees will not engage in any conduct that unreasonably restricts, burdens or limits the business activities of business partners, such as resale price restriction or tying, or unilateral changes in transaction terms or forced purchases through the use of a dominant position.
- (4) The Group and its officers and employees are fully aware of the conduct described in the preceding two paragraphs, and will take the utmost care to prevent such conduct. If such conduct is suspected, it must be reported promptly to the Legal Department.

3. (Appropriate Promotional and Advertising Activities)

- (1) The Group and its officers and employees believe that engaging in appropriate promotional and advertising activities is essential to the sustainable development of the Group, and will comply with all laws, regulations and guidelines relating to representations.
- (2) In advertisements and other materials, the Group and its officers and employees will make reader-friendly representations that are factual and objective, and will not engage in any promotional or advertising activities that use false or exaggerated advertising or other deceptive means.
- (3) The Group and its officers and employees will not use any expressions that defame or libel others, or terms that may lead to social discrimination in any documents or other materials issued in promotional or advertising activities.

4. (Conclusion of Contract)

- (1) When entering into a transaction with a customer or business partner, the Group and its officers and employees will endeavor to prepare written agreements (including written orders and other such forms) in a timely manner, and to enter into contracts with such written agreements.
- (2) The Group and its officers and employees will comply with applicable laws and regulations (including tax laws) when doing business with customers or business partners.

5. (Relationship with Suppliers)

- (1) The Group and its officers and employees recognize that cooperation with and support from suppliers are essential to the Group's business activities, and will endeavor to treat suppliers fairly, and to maintain and build a long-term relationship of trust with suppliers.
- (2) The Group and its officers and employees will select suppliers in an appropriate and fair manner after fully evaluating the quality, reliability, delivery dates and prices of the goods supplied, the stability of management and the capacity for technological development of such suppliers, as well as whether such suppliers fulfill their social responsibilities, including fair and highly transparent disclosure of information,

compliance with laws, regulations and social norms, respect for human rights, elimination of unjust discrimination in respect of employment and occupation, elimination of child labor and forced labor, environmental protection activities, social contribution activities, creation of a comfortable working environment, and sharing awareness of social responsibility with business partners.

6. (Relationship with Stakeholders)

- (1) The Group is listed on the Tokyo Stock Exchange. In order to earn the trust of shareholders, investors and other stakeholders, the Group will maintain and continue transparent management, and will disclose corporate information appropriately and sufficiently.
- (2) Through communication with a wide range of stakeholders, the Group will seek to understand and reflect the needs and opinions of these stakeholders in its business activities.

7. (Restrictions on Entertainment and Gifts)

- (1) The Group and its officers and employees will maintain a sound, normal, open and fair relationship with the administrative authorities, and will not entertain or provide gifts to officers (including former officers) of public bodies such as government agencies and local governments, or to foreign public officials (including former public officials), regardless of whether such entertainment or gifts are prohibited by law or regulation.
- (2) The Group and its officers and employees will not provide customers or business partners with improper profits, such as bribes or kickbacks, or with financial or other benefits.
- (3) The Group and its officers and employees will not accept or provide entertainment, gifts, gratuities or other personal benefits that exceed what is appropriate under generally accepted social norms.

8. (Prohibition of Involvement in Antisocial Forces)

- (1) The Group and its officers and employees will take a firm stance against anti-social activities and anti-social forces, and will not engage in such activities or forces, including business relationships.
- (2) Prior to entering into a transaction, the Group and its officers and employees will endeavor to thoroughly investigate whether the relevant counterparty is an anti-social force or organization.
- (3) The Group and its officers and employees will develop a system to prepare for a situation in which an anti-social force seeks relations with the Group or its officers or employees, or makes an unreasonable demand or request. If the Group or its officers or employees actually receive such a demand or request, they will take a firm stance and respond firmly to such demand or request, while cooperating with police authorities and relevant organizations.

9. (Overseas Business Activities)

In overseas countries or regions, the Group and its officers and employees will endeavor to understand and act with respect for the differences in cultures, customs and languages in the respective countries and regions.

Chapter 4 Security and Crisis Management

1. (Management of Confidential Information)

- (1) The Group and its officers and employees will protect any information obtained from customers and business partners, and any other information as confidential, and prevent any leakage, loss or other incident.
- (2) If the Group or its officers or employees receive confidential information from a third party or disclose confidential information to a third party, they will take appropriate measures in advance, such as entering into a confidentiality agreement.

2. (Management of Personal Information)

- (1) The Group and its officers and employees are fully aware of the confidential and sensitive nature of the personal information they handle in the course of their business, and will comply with the Personal Information Protection Act and other relevant laws, regulations and codes.
- (2) The Group and its officers and employees will process any personal information within the scope of the purpose of use expressly indicated by the relevant individual. In addition, the Group and its officers and employees will not disclose or make available to third parties any personal information received without the consent of the relevant individual or without a legitimate reason.

3. (Crisis Management)

Even under normal circumstances, the Group will thoroughly implement organizational crisis management in preparation for any threats such as terrorism, cyber-attacks and natural disasters.

4. (Cybersecurity)

- (1) The Group and its officers and employees recognize that cyber-attacks and other such incidents are a risk factor that may have a significant impact on the management of the Group, and will take measures to prevent damage from such attacks and develop a system to minimize any damage that may occur.
- (2) The Group will promote an understanding of cybersecurity among its officers and employees, and make efforts to cultivate the skills necessary for early detection, response and recovery.

Chapter 5 Assets and Property of the Group

1. (Management of Corporate Assets)

- (1) The Group and its officers and employees will properly manage and preserve the Group's property in accordance with the rules, and will not use it for any purpose other than business.
- (2) Officers and employees will not seek personal gain through the use of the Group's property.

2. (Management of Intellectual Property)

- (1) The Group will encourage activities to create intellectual property, which is an important management resource for the Group, and will work to protect, utilize and enhance the value of such intellectual property.
- (2) The Group and its officers and employees are committed to respecting the intellectual property rights of third parties in the performance of their duties, and will not infringe such intellectual property rights.

Chapter 6 Decision-making

1. (Decision-making Process)

- (1) When making a business decision, the Group will evaluate objective facts fairly and impartially, and make such a decision after being convinced that it is the best choice for the Group.
- (2) In making a business decision as described in the preceding paragraph, the following conditions must be met:
 - i) The decision is consistent with applicable laws, regulations and rules, as well as internal rules and policies;
 - ii) There is no personal interest or self-dealing involved;
 - iii) The decision is within the scope of authority granted by the Company;
 - iv) The decision is made with due care after making a reasonable effort to become familiar with the relevant facts; and
 - v) The decision is made after good faith consideration and in the reasonable belief that it is the best choice for the Company.
- (3) The Group will endeavor to maintain and improve its decision-making system so that no decision is made that is inconsistent with the preceding two paragraphs.

2. (Lawful and Appropriate Record Keeping and Reporting)

- (1) The Group and its officers and employees will faithfully and accurately prepare and maintain books of account and financial records in accordance with the Financial Instruments and Exchange Act, the Companies Act, and other applicable laws and regulations.
- (2) Officers and employees will not create inaccurate, misleading or false records.

Chapter7 Ethical Behavior of Officers and Employees

1. (Avoidance of Conflicts of Interest)

- (1) Officers and employees are aware that any perceived conflict of interest could undermine the confidence in fair business practices and adversely affect the Group's business, and will avoid any situation in which their interests conflict with those of the Group, even if they have no improper purpose.
- (2) In the event of a potential conflict of interest between the Group's officer or employee and the Group, the officer or employee will promptly and accurately report the details

of such conflict to his or her supervisor in accordance with the internal rules, and seek the supervisor's decision and instructions.

2. (Separation of Public and Private Affairs)

- (1) The Group encourages its officers and employees to voluntarily participate in community activities. However, they must keep in mind the separation of public and private affairs, and if they intend to participate in such community activities as officers or employees of the Group, they must first obtain the permission of their supervisor in accordance with the internal rules, and follow the supervisor's instructions.
- (2) The Group's officers and employees will not engage in any political, religious or private business activities during working hours.

3. (Use of Media and Other Channels)

- (1) The Group recognizes that the appropriate use of the media and other such channels (including so-called social networking services (SNSs); hereinafter the same) is beneficial as a means of communicating information about the Group. When communicating through the media or other such channels, the Group will pay due attention to the language used and the content.
- (2) When the Group's officer or employee contacts the media or other such channels for or on behalf of the Group, or responds to inquiries from the media or other such channels, he or she must always do so through the department in charge of public and investor relations or other persons authorized by the relevant internal rules.
- (3) When the Group's officer or employee makes a statement about the Group as an individual to the media or other such channels, the officer or employee will comply with the relevant internal rules, and will not give the impression that he or she is expressing opinions on behalf of the Group. In addition, if an officer or an employee finds a negative opinion about the Group or a post that requires a response, the officer or employee will refrain from responding directly to the post, but will report it to the department in charge of public and investor relations and the legal department, and ask them to deal with it.

4. (Prohibition of Insider Trading)

The Group and its officers and employees will not use any information that could have a material impact on the price of the Group's stock or the stock of other companies to buy or sell stocks or other securities before such information is made public (insider trading), nor will they take any action toward a third party that could induce insider trading.

Chapter 8 Addressing Social Problems

1. (Addressing Social Problems)

- (1) The Group will contribute to the development of local communities by providing services such as medical administration, nursing care and child care, and by creating a wide range of jobs.
- (2) The Group will create innovation through the use of data, contributing to the sustainable economic growth and solving social problems.

- (3) As members of the local community, the Group's officers and employees will work to contribute to the development of the local community through volunteer activities and participation in local events.

2. (Environmental Consideration)

The Group and its officers and employees recognize that initiatives to address environmental problems are important management issues. In addition to conducting business in an environmentally conscious manner, the Group and its officers and employees will comply with all environmental laws and regulations, and regional agreements, and will voluntarily work to use resources effectively and to conserve resources and energy.

Chapter 9 Practicing Code of Conduct

1. (Operational Structure)

- (1) The Board of Directors of the Group will establish an effective governance system to ensure that this Code of Conduct is embedded in the Group and continuously improved. Under this system, the Board of Directors of the Group will take the lead in familiarizing all its officers and employees with this Code of Conduct.
- (2) The Board of Directors of the Group will share the philosophy underlying this Code of Conduct with its stakeholders, and seek their cooperation in putting it into practice.

2. (Whistleblowing Contact Point)

- (1) In connection with this Code of Conduct, the Group will establish a point of contact for its officers and employees to report violations of laws and regulations in the course of business and performance of duties, and to make inquiries or seek guidance in cases where they are unable to determine what action to take.
- (2) The Group's officers and employees will report to the point of contact identified in the preceding paragraph if they have seen or heard of any illegal or non-compliant acts, or if they suspect that other officers or employees are involved in such acts.
- (3) In addition to the preceding paragraph, the Group will develop and maintain a system for the early detection and prevention of misconduct on an ongoing basis.
- (4) The Group will give due consideration to the anonymity of any officer or employee of the Group who has reported misconduct or who has cooperated in an investigation of misconduct. The Group will treat the relevant officer or employee fairly and appropriately, and will not treat the officer or employee less favorably because he or she has made such a report or has cooperated.
- (5) The Group will not tolerate, and will take strong action against, anyone who has obstructed the reporting of misconduct by the Group's officer or employee or the cooperation in an investigation of such misconduct.