



VENDOR CODE OF CONDUCT

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STATEMENT OF POLICY

This Vendor Code of Conduct (“VCOC”) is the standard of business practice that applies to all Vendors of Kintetsu World Express, Inc. and its group of companies (collectively referred to herein as “KWE”). KWE expects its Vendors to share its commitment to achieving the standards of conduct and integrity in its business dealings. By “Vendor”, KWE means any company, corporation, firm or individual that provides products or services to KWE and/or KWE’s customers, including without limitation the Vendor’s employees, agents and sub-contractors.

GENERAL PRINCIPLES AND STANDARD OF CONDUCT

Our business success and relationships are built upon a culture of excellence and commitment, which in turn rest on the foundations of integrity, trust and respect for the individual and adherence with the law. The principles of conduct which we expect of our Vendors are further explained below:

1. COMPLIANCE WITH LAWS

All Vendors shall conduct their business activities in full compliance with the applicable laws, international conventions and/or regulations of their respective countries and operating locations.

(1) Competition & Antitrust Laws

Vendors shall conduct business in full compliance with applicable antitrust and fair competition laws. Vendors shall avoid unlawful agreements or understandings that improperly limit the supply or affect the price of goods or services provided to, or offered by, KWE.

(2) Anti-Corruption, Anti-Bribery

Vendors shall comply with all applicable international anti-corruption and anti-bribery laws. Vendors must not give, or offer to give, anything of value, or make any improper payments, directly or indirectly, to any government official, employee of a government-controlled company, or political party, customer or private third party, in order to obtain any improper benefit or advantage.

(3) Gifts & Entertainment

Vendors acknowledge that KWE's employees are prohibited from accepting anything more than occasional and modest gifts from Vendors, including meals and entertainment. Vendors are not authorized to give or receive gifts, hospitality or entertainment on KWE's behalf.

(4) Data Protection

Vendors shall comply with all applicable data privacy laws and regulations. Vendors who are engaged in collecting, processing or controlling personal data on behalf of KWE must comply with KWE's corporate rules and policies relating to such services and shall prevent the improper and unauthorized use or dissemination of such data.

(5) International Trade Controls & Trade Sanctions

International trade control ("ITC") laws and regulations and country-specific trade sanctions affect international transactions involving goods, services, technology and financial transactions. Vendors shall operate in full compliance with all applicable ITC laws and regulations, including but not limited to any applicable regulations issued by the United States' Office of Foreign Assets Control. Vendors must have full and up to date knowledge about international restrictive measures adopted against certain countries, governments, organizations, entities, companies, individuals or assets and shall not engage in business with them, where doing so is prohibited by applicable laws and regulations.

(6) Anti-Money Laundering & Counter Terrorism Financing

Vendors shall comply with all applicable Anti-Money Laundering and Counter Terrorism Financing laws and regulations. Vendors shall not knowingly participate in a scheme to launder money related to criminal or terrorist activity. Vendors shall not directly or indirectly do business with any person included on any lists of terrorists or terrorist organizations compiled by the United States or any other national or international organization. Vendors are committed to conduct business with customers and Vendors involved in legitimate business activities and whose funds are derived from legitimate sources.

(7) Insider Trading

During the provision of services to KWE, Vendor may receive confidential and non-public information relating to KWE, its parent Kintetsu Group Holdings Co., Ltd., and/or other third parties which amounts to 'inside information'.

While in possession of such inside information, Vendor must always comply with applicable insider trading laws and regulations, including complying with any prohibition on trading in relevant securities (or on encouraging others to do the same).

2. BUSINESS PRACTICES

Vendors must be committed to the highest standards of legal and business conduct when

dealing with their employees, Vendors, and customers, including KWE.

(1) KWE Property

Vendors undertake not to convert and/or unlawfully appropriate the property of KWE, property bailed or sub-bailed to KWE and/or property belonging to KWE's customers and/or sub-contractors.

(2) Accurate Business Records

Vendors shall maintain accurate and timely financial and accounting records of all transactions related to their business with KWE and retain them as required by applicable law, but in no case less than 3 years. No accounting or financial entry shall be made that conceals or disguises the true nature of any transaction or record.

(3) Confidential Information

Vendors shall protect KWE's confidential information and shall not share them with any third party unless authorized to do so in writing by KWE.

(4) Intellectual Property

Vendors shall protect KWE intellectual property in a manner consistent with the law and respect valid patents.

(5) Honest & Legal Conduct

Vendors undertake not to engage in any conduct which would, under any applicable law, constitute willful misconduct, a criminal offence and/or tortious deceit.

3. ETHICAL PRINCIPLES AND CONFLICT OF INTEREST

Vendors shall conduct their business in a manner to conform to the highest level of ethical business behavior. Vendors should avoid unfair practices and any conflict of interest or appearance of conflict of interest in all their dealings.

4. HEALTH AND SAFETY

Vendors shall provide a safe and healthy working environment for their employees. Vendors shall maintain and enforce anti-drugs and alcohol policies.

5. LABOUR

Vendors shall be in compliance with all applicable laws relating but not limited to wages, working hours, conditions, and prohibition on child labor.

Vendors shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, military status or marital status in hiring and employment practices such as promotions, rewards, and access to training.

6. VENDOR MANAGEMENT

All Vendors shall maintain appropriate and meaningful compliance policies and programs consistent with this VCOC. Vendors will be required to acknowledge in writing that they understand and will comply with this VCOC.

KWE shall have the right to audit Vendors' compliance at a mutually agreed time and place, and Vendors shall extend full cooperation to KWE in such event.

7. ENVIRONMENTAL COMPLIANCE

Vendors shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment and shall comply with all applicable environmental regulations.

CONSEQUENCES OF BREACH

In the event that the Vendor is in breach of any term of this VCOC, KWE shall have at its sole option, without prejudice to KWE's rights and remedy at law and at equity the right to terminate the contract(s) with the Vendor upon written notice to the Vendor within thirty (30) days of KWE becoming aware of the breach.

KWE ETHICS REPORTING RESOURCE

If you wish to report questionable behavior or a possible violation of this VCOC, you are encouraged to work with your primary KWE contact in resolving your concern. If that is not possible or appropriate, please contact KWE by filing a report via the website.

(KWE.ethicspoint.com)



KWE will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Vendor Code of Conduct.

TRANSLATION

This VCOC may be translated into other languages to facilitate familiarization and understanding by Vendors worldwide. In the event of any discrepancy between the original English version and any translation, this English version shall prevail.

Date

Company name

Name / Title

Signature