

## **Code of Conduct (Main Points)**

Mitsubishi Corporation Unimetals Ltd. executives and employees shall:

1. Respect human rights and not engage in any discrimination or harassment.
2. Observe all treaties and laws concerning the environment, and act giving consideration to the global environment.
3. Aim at fairness and observe all laws and regulations in the execution of transactions.
4. Observe all international agreements concerning trade.
5. Appropriately manage and handle all company information, all information obtained from outside the company, and the intellectual property rights and other rights of third parties.
6. Not engage in any unfair trading (insider trading) of shares or other financial instruments.
7. Not engage in any behavior that is contrary to Mitsubishi Corporation Unimetals Ltd.'s interests, and always behave with propriety, with a clear distinction between corporate and private affairs.
8. Engage in timely and accurate recording and reporting concerning financial and accounting matters.
9. Not violate any laws concerning business entertainment and the exchange of gifts, and limit such conduct to within the range of social convention.
10. Resolutely deal with anti-social forces, and absolutely refrain from providing any benefits to such forces or receiving any benefits from such forces whatsoever.
11. Immediately report to the compliance officer or the Internal Auditing Office whenever they judge that any individual or organizational action in violation of this Code of Conduct that is unfair, illegal or unethical (hereafter "illicit behavior") has occurred or is likely to occur, regardless of their own involvement, and thus strive to rectify and prevent said illicit behavior.

### **(Supplement)**

This Code of Conduct applies to all employees and officers of Mitsubishi Corporation Unimetals Ltd. (including advisors, temporary employees, employees dispatched on loan to other companies, and local employees at overseas offices). Also, it applies to employees of its locally-incorporated companies based on agreements with the respective companies.