

Behavior Guidelines for Compliance

In the spirit of the “Basic Stance” and the “Behavior Charter”, we the executives and regular employees of ClassNK agree to comply with all laws, regulations, and our rules as well as to conduct ethical business activities and aim to adhere to the “ClassNK Mid-Term Plan (2017-2021)” in order to improve our business conditions and continue the steady growth of our company.

Basic Stance

In order to faithfully carry out the “Articles of Incorporation of ClassNK”, “ClassNK Mid-Term Plan”, and “Management Philosophy and Future Vision”, each person who engages in work for ClassNK shall regard the “ethical decisions based upon one’s conscience” as the root of compliance and the basis for all activities, and act accordingly to it during all business operations of ClassNK as well as in their private life. In this manual, “ethical decisions based upon one’s conscience” means that the person examines the appropriateness of their own actions from the standpoint of an impartial third party by temporarily putting aside any personal, internal, or business interests.

“Each person who engages in work for ClassNK” refers to any person engaged in the business operations of ClassNK or any of its group companies.

Behavior Charter

ClassNK is constantly looking for ways to positively contribute to the safety of life and property as well as environmental protection and other related matters through its various business activities. This includes efforts to fulfill customer demand, provide high quality services, and support the global activities of its customers by providing various services such as classification, inspection, registration and certification as well as by establishing various technical standards and conducting various research and development projects, etc.

In order for ClassNK, an independent organization, to continuously and stably provide high quality, fair, transparent, and appropriate service, all executives and regular employees of ClassNK shall have a deep sense of ethics for gaining social trust and aim to practice fair and faithful behavior.

1) Vision (future image or goal)

- As a technical organization, we always pursue technical improvements and utilize our technical capabilities for sincere business, aiming to establish trust with our

customers.

- We keep an organizational culture of openness with a free exchange of views and utilize various individual abilities to a maximum, aiming for an evolving organization.
- We open the way to the future with our technical capabilities, aiming to become a global leader.

2) Consistent fair and transparent activities

- We comply with laws and regulations for fair trade.
- We maintain healthy and normal relationships with political and governmental organizations both domestically and internationally.
- We are firmly opposed to any antisocial activities, forces, and bodies that threaten social order, security, and stability, and never have any connection with them.

3) Promotion of corporate governance

- The management endeavors to show its leadership by thoroughly ensuring this charter is known throughout the entire organization and its group companies.
- It establishes, operates, and maintains an effective internal control system.
- It proactively discloses information to society and practices a highly transparent organizational operation.
- It respects improvements and other propositions, aiming for an organization open to society.

4) Respect for individuality

- We respect the personality and individuality of each other, ensure a safe and pleasant working environment, and achieve an affluent and wealthy life.
- Each of us willingly and voluntarily acts to self-manage our own tasks.

5) Response to globalization

- We respect laws and international norms, including human rights as well as the cultures and customs of other countries and regions to carry out our work and contribute to the development and prosperity of local economies and societies.
- We establish a global organizational operation system which is understood and accepted in harmony with local societies.

6) Social contribution and commitment to global environment

- We are aware of our responsibilities as a member of the international community and willingly support social contribution activities through our business.
- As a member of the international community, we voluntarily act for global environment issues which are common to all humanity and contribute to the

protection of a healthy global environmental.