

### **MOL Group Rules of Conduct**

All company personnel must act within the following Rules of Conduct when carrying out their duties.

- (1) Observe laws and regulations while at all times exercising due caution as a good administrator.
  - Observe the laws and regulations and the like of Japan and all other nations, and act in accordance with social standards and corporate ethics while at all times exercising due caution as a good administrator.
- (2) Respect human rights and refuse to permit discrimination and harassment.
  - Respect every individual's basic human rights; and do not discriminate based on ethnicity, faith, religion, nationality, age, sex, class, disability, and the like.
  - Understand, appreciate, and value the diversity of cultures, customs, and so on, in every area and nation, and work to achieve harmony between them.
  - Do not subject anyone to sexual harassment or make offensive sexual remarks and do not act or speak in a way that might be misunderstood as sexual harassment.
  - Do not cause mental or physical suffering to anyone or act in a way that negatively affects the working environment by ignoring a person's human rights or speaking or acting in a way that does not respect an individual's human rights by using your position or authority in the workplace or exceeding the appropriate scope of your delegated authority.
- (3) Protect confidential information and respect intellectual property rights.
  - Do not reveal confidential company information to a third party without permission and do not use such information improperly.
  - Handle confidential information from third parties such as clients and contractors in the same way as you would handle the company's confidential information.
  - Do not buy or sell shares of the company or outside companies based on knowledge of important internal information of the company or other companies obtained in the course of carrying out duties until that information is officially announced, observing internal business regulations regarding the prevention of insider trading (Insider trading is prohibited).
  - Do not use or obtain confidential information from third parties unjustly.
  - Do not violate the intellectual property rights of third parties, for example, by copying or using computer software without authorization.
- (4) Clearly separate official and personal conduct, avoid conflicts of interest.
  - Do not act against the company's interests.
  - Do not use company property or funds for any activities against the company's

interests.

(5) Stand firm against antisocial forces.

- Take a stern and uncompromising attitude against antisocial forces and groups that may threaten public order and safety, and never take part in antisocial acts.

(6) Act with awareness of social responsibilities.

- Endeavor to make a positive contribution towards realization of a better society as a good corporate citizen in international society and communities.
- Recognize the importance of transparency in management and properly disclose corporate information to promote understanding and trust among various stakeholders, remaining aware that the company is a member of society.

(7) Actively work to ensure safe operations and protect the environment.

- Voluntarily and rigorously work to protect the marine and global environment, by fully enforcing safe operations of vessels, respecting environmental laws and regulations, and observing the MOL Group Environmental Policy Statement.

(8) Build good relationships based on trust with clients and contractors.

- Strive to build strong, trusting business relationships and partnerships with honesty, fairness and transparency.
- Respect various laws and regulations in Japan, including antitrust laws and the Act against Delay in Payment of Subcontract Proceeds, Etc. to Subcontractors, as well as similar laws and regulations outside Japan, and observe the company's Rules of Conduct Related to Antitrust Laws in order to maintain and promote free and fair competition.
- Do not give or accept money, expensive gifts, business entertainment, or economic benefits of an inappropriate value when dealing with representatives of contractors or other parties.
- Do not give, offer or promise bribes or illegal benefits in any relationship with public servants in Japan or overseas.

(9) Alcohol consumption

- In social settings involving alcohol, employees must maintain dignity and decorum as representatives of our company. They should regulate their behavior to avoid harassment, violence, nuisance, information leaks, drunk driving, and other legal violations caused by alcohol consumption.
- Drinking during work hours, resuming work after drinking, and working under the influence of alcohol are strictly prohibited. However, if a supervisor determines that emergency response is necessary due to an unforeseen accident and confirms that the individual's ability to perform their duties is not compromised, the individual must

follow the supervisor's instructions and take the necessary actions.

(10) Provide guidance and supervision of these Rules of Conduct by individuals in management positions.

- Directors, executive officers and employees in management positions shall provide guidance and supervision to company personnel so that the Rules of Conduct are followed faithfully, and request observance of the Rules of Conduct to outsourcing companies which dispatch their employees to MOL Group Companies.

(11) Report and consult on discovering suspected breaches.

- A company individual should report or consult with the Compliance Officer, Compliance Committee Officer, Internal Compliance Advisory Service Desk stipulated in Article 12, or External Compliance Advisory Service Desk stipulated in Article 13 without delay, if he or she learns of a breach or suspected breach of compliance; and not tacitly approve or cover up breaches by company personnel.
- Company personnel shall cooperate with investigations related to any alleged breach.
- The company strictly maintains the confidentiality of company personnel who report or consult about a breach and cooperate in related investigations and will ensure they are not subject to retribution and shall not be treated unfavorably.

Established on 30<sup>th</sup> of November 2001

Revised on 19<sup>th</sup> of April 2024