

Rules of Conduct

Executives and employees of MOL must act in accordance with the following standards.

- (1) Compliance with laws and regulations and due care of a good manager
 - Comply with domestic and foreign laws and regulations, and Rules, etc. and act with due care as a good manager in accordance with social norms and corporate ethics.
- (2) Respect for human rights and prohibition of discrimination and harassment
 - Comply with MOL Group Human Rights Policies and respect for any types of human rights in accordance with international standards and guidelines.
 - Do not discriminate on the basis of race, belief, religion, nationality, age, gender, family origin, physical or mental disability, or the like.
 - Understand, respect, and aim to harmonize with the culture and customs of each country and region.
 - Do not sexually harass or make sexual remarks that are offensive to others. Do not engage in any act that could be misinterpreted as sexual harassment.
 - Do not use your position or authority in the workplace to aggravate the work environment or cause mental or physical distress to others by words or actions that disrespect their character or violate their personal dignity beyond the appropriate scope of your work-related authority.
- (3) Observance of confidentiality obligations and respect for intellectual property rights
 - Do not leak confidential information of the company to third parties without permission or use it improperly.
 - Comply with Privacy Protection Policies, MOL Policy on Joint Use of Personal Information, and the internal rules and regulations such as the Regulations on management of personal information, and properly treat personal information and confidential information of third parties such as customers and business partners obtained in the course of business in the same manner as the company's confidential information.
 - Observe internal rules concerning the prevention of insider trading, and if you become aware of material insider information about MOL or other companies in the course of your duties, do not sell or purchase their shares or other securities until such information is made public (prohibition of insider trading).
 - Do not illegally acquire or use confidential information held by third parties.
 - Do not engage in acts that infringe on the intellectual property rights of third parties, such as unauthorized copying of computer software.
- (4) Distinction between public and private matters and prohibition of acts in conflict of interest

- Do not engage in any act that is in conflict with the interests of the company.
 - Do not use company assets or expenses against the interests of the company.
- (5) Resolute response to antisocial forces
- Take a firm stand against antisocial forces and groups that threaten the order and safety of civil society, and do not be complicit in antisocial activities.
- (6) Conduct with a consciousness of social responsibility
- Strive to actively contribute to society in order to realize a better society, as a “good corporate citizen” in the international society and local communities
 - Actively disclose corporate information to gain the understanding and support of various stakeholders and conduct highly transparent management, recognizing that we are a member of society.
- (7) Proactive initiatives for safety and environmental preservation
- Voluntarily and proactively work to preserve the marine and global environment by ensuring safe vessel operations, complying with environmental laws and regulations, and complying with the MOL Group Environmental Policy Statement.
- (8) Development of good relationships of trust with customers and business partners
- Strive to build good relationships of trust and partnership, with honesty, fairness, and transparency.
 - Respect laws and regulations in Japan, including the Antimonopoly Act and the Act against Delay in Payment of Subcontract Proceeds, Etc. to Subcontractors, as well as similar laws and regulations outside Japan, and observe MOL’s Rules of Conduct Related to antitrust laws in order to maintain and promote free and fair competition.
 - Comply with MOL Group Anti-Corruption Policy and the internal rules and regulations such as “Regulations to Prevent Bribery etc.” and do not give money, expensive gifts, entertainment, or other economic benefits of an inappropriate value to executives or employees of business partners or the like. Further, do not accept any economic benefits of an inappropriate value from executives or employees of business partners or the like.
 - Do not give, offer, or promise bribes or illegal profits to public servants in Japan or overseas.
- (9) Guidance and supervision of these Rules of Conduct by employees in management positions and officers
- Employees in management positions and officers provide guidance and supervision to executives and employees so that the Rules of Conduct are followed faithfully, and request observance of the Rules of Conduct to contractors which dispatch their employees to MOL Group Companies and MOL.

(10) Reporting and consultations upon discovery of an act suspected to be a violation

- When an executive or employee has discovered a violation or an act suspected to be a violation, the executive or employee immediately reports to or consults with the compliance officer of the division or the branch which the executive or employee belongs to, the general manager of Corporate Audit Division who concurrently serves as the Compliance Committee administrative office stipulated and the internal compliance advisory service desk stipulated, or the external compliance advisory service desk stipulated and does not tacitly approve or cover up violations by another executive or employee.
- Executives and employees cooperate with investigations regarding the existence of violations.
- MOL strictly maintains the confidentiality of executives or employees who report or consult on violations or cooperate in investigations and guarantees that those individuals will not be subjected to any prejudicial treatment.