

# Kubota Group Charter for Action & Code of Conduct

## Kubota Group Charter for Action

### 1. Winning Customer Satisfaction

- The Kubota Group seeks to win customer satisfaction and confidence by offering innovative products, technologies, and services that meet their needs.
- The Kubota Group strives to produce superior quality products while securing product safety.

### 2. Conducting Corporate Activities Based on Compliance with Legal Regulations and Ethical Principles

- The Kubota Group conducts its corporate activities with high moral standards while observing the letter and spirit of the laws and regulations of the countries and regions in which we do business; while embracing sound social ethical principles and integrity.

### 3. Respecting Human Rights

- The Kubota Group respects the human rights and dignity of all people, and does not violate human rights.
- The Kubota Group respects the privacy of individuals and works to protect personal information.

### 4. Building up a Safe Work Environment in which Employees Can Feel Growth and Job Satisfaction

- The Kubota Group maintains a safe and healthy working environment and continually works to improve and safeguard workplace conditions.
- The Kubota Group respects the diversity, creativity, and challenging spirit of its employees and promotes a work environment in which each and every employee can feel growth and job satisfaction.

### 5. Conserving the Global and Local Environment

- The Kubota Group aspires to create a society where sustainable development is possible on a global scale.
- The Kubota Group contributes to the conservation of global and local environments through its environmentally friendly operations, products, technologies, services, and corporate activities.

### 6. Achieving Symbiosis with International and Local Societies

- The Kubota Group respects the cultures and customs of all countries and regions and seeks to build relationships of trust through our actions and communications with local societies, while striving to be a good corporate citizen.

### 7. Fulfilling Responsibilities for Improving Management Transparency and Accountability

- The Kubota Group makes appropriate and timely disclosure of corporate information and fulfills its responsibilities for transparency and accountability in corporate activities.

## Kubota Group Code of Conduct

### 1. Winning Customer Satisfaction

#### (1) Product Safety and Superior Quality

- We strive to offer products, technologies, and services that are safe and of superior quality to win customer satisfaction and confidence. We comply with all applicable legal regulations, specifications, standards, and contractual obligations with our customers and business partners. Moreover--in each of our processes from development to manufacturing, sales, and service--each related department assumes the responsibility of ensuring safety and superior quality in our products and services.
- If we discover that a safety issue has arisen, we act swiftly and report the issue accurately and appropriately to each responsible department and then proactively work to correct the issue and eliminate them from reoccurring.
- We believe that "For the Kubota Group, there is no greater revenue or profit that has to be pursued to the extent worth jeopardizing our brand and company image." Quality is a top priority for our customers, and the Kubota Group will in good faith adhere to our standards, specification and regulations in an effective and ethical manner.

#### (2) Responding to Customer Requests and Complaints

- When we receive requests or complaints from our customers, we place ourselves in their situation and respond promptly and accurately.
- We work on customer requests and complaints to improve quality and avoid future customer dissatisfaction, and we also make appropriate disclosures of necessary information regarding serious quality problems.

#### (3) Appropriate Advertising and Labeling

- We appropriately inform our customers about the features and other aspects of our products. In advertising and labeling products, we avoid expressions and labels that may create misunderstandings about product performance, quality, and price, or infringe the rights of third parties.

### 2. Conducting Corporate Activities Based on Compliance with Legal Regulations and Ethical Principles

#### (1) Legal Compliance and Observance of Corporate Ethics Are Basic Conditions for Corporate Activities

- We are aware that strict compliance with laws and corporate ethics is the foundation for conducting business activities, and, in all aspects of our corporate activities, we act in accordance with governing laws and corporate ethical principles, as well as carry out operations honestly and in good faith.

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## **(2)Observance of Laws of Individual Countries and Regions, as well as International Rules**

- We review and observe the laws and regulations of all relevant countries and regions thoroughly and conduct our business operations in accordance with the laws.
- In international transactions, we comply with treaties, agreements, and other international rules.

## **(3)Early Detection and Prevention of Misconduct**

- We report concerns that arise regarding possible violations of laws and corporate ethics promptly to the appropriate management personnel or contact and seek advice through in-house reporting channels.
- We take special care to protect the privacy of the employees reporting these matters to ensure that they will not be retaliated against.

## **(4)Compliance with Fair Trade Laws and Regulations**

- We respect “fair and free competition.” We comply with the provisions of Anti-Monopoly Laws and other related laws and regulations, and do not engage in unfair transaction practices.

## **(5)Compliance with Export and Import Laws and Regulations**

- We observe the provisions of all relevant laws and regulations, as well as internal rules, in exporting and importing goods, technologies, etc., with the aim of supporting international peace and safety.

## **(6)Proper Relationships with Political Groups and Government Organizations**

- We comply with all relevant laws and regulations and do not engage in such activities as giving illegal political contributions or offering bribes. When we make political contributions and gifts, we observe relevant laws and the Company’s internal rules.
- We also never offer bribes to any foreign public officials.

## **(7)Rules for Entertainment, Gifts, and Donations**

- We do not exceed the limits for offering entertainment, gifts, or donations to our business associates that are commonly accepted in society and in accordance with the Company’s internal rules. Specifically, we do not offer entertainment, gifts, or donations for the purpose of obtaining unfair advantages.

## **(8)Fairness and Transparency in Transactions**

- We build fair and transparent relationships with our many business partners based on trust and open transaction practices.
- We encourage our business partners to promote their efforts in legal compliance and fulfillment of social responsibility.
- We do not take advantage of our position as buyers to request unethical financial compensation or special treatment from our suppliers.

## **(9)Compliance with Internal Rules**

- We comply with all internal Company rules, including the Charter for Action, this Code of Conduct, and the Rules of Employment, based on a good understanding of the spirit of the “Kubota Global Identity,” the company’s global corporate principles, and carry out our activities honestly, ethically and in good faith.

## **(10)Prohibition of Activities Contrary to the Proper Interest of the Company**

- We do not use our individual positions as management or staff to engage in actions to make personal gains from activities that are against Company policies and not in the best interests of the Company.

## **(11)Preservation of Company Assets**

- We do not use Company assets—including land, buildings, machinery and equipment, and office supplies, etc.--for other than business purposes.
- Also, we do not make use of information assets, including PCs and mobile devices, software contained in PCs and mobile devices, and information systems, etc., for anything other than business purposes.

## **(12)Respect for and Usage of Intellectual Property**

- We have respect for the intellectual property rights of others—including patents, utility model rights, design rights, trademarks, copyrights, and know-how--and do not use them improperly.
- We appropriately manage and preserve our own intellectual property rights so that they are not used improperly by third parties.
- We use our intellectual property rights effectively.

## **(13)Management of Confidential Information**

- We manage confidential information, including information pertaining to business operations, technologies, management, personal information, and other matters (any and all business information not externally disclosed) properly in accordance with laws and internal Company rules.
- Even after termination of employment, we do not take out, use, or disclose confidential information, whether retained electronically or otherwise, without permission from the appropriate Company management personnel.
- When we gather information, we obtain it through the proper methods from persons who have the appropriate authority to disclose it.

## **(14)Security of Electronic Information**

- We adopt comprehensive information security measures to prevent the leakage of electronic information, theft of information by others, and falsification, by promoting proper management in accordance with laws and internal Company rules.

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## 3. Respecting Human Rights

### (1) Respecting Human Rights

- We support the Universal Declaration of Human Rights, and respect the human rights of all people.
- We do not discriminate or violate human rights on the basis of nationality, race, age, gender, sexual orientation, and gender identity (\*), disability, or for any other reason whatsoever.

(\*) Gender identity refers to the concept of “how one identifies in terms of one’s gender.”

- We do not permit forced labor or child labor, and also request our business partners for compliance in this regard.

### (2) Prohibition of Harassment

- We do not allow infringements of human rights, such as any type of harassment, or mistreatment. We regard one another as important partners and seek to build rich and rewarding personal relationships.

### (3) Protection of Personal Information

- We are aware of the importance of privacy and personal information related to our customers, management, employees, and others. We comply with relevant laws and Company rules to handle information properly, and work to prevent the loss, leakage, or other misuse of personal information.

## 4. Building up a Safe Work Environment in which Employees Can Feel Growth and Job Satisfaction

### (1) In-depth Supervision of Safety, Sanitation, and Health

- We engage in activities and initiatives to ensure the safety of our equipment and work methods and to eliminate potential dangerous or harmful factors from the workplace, with the objective of safeguarding the health and safety of our workers.
- In addition, we conduct work activities in a safe manner by observing the laws, standards and internal rules in each of the places we work. In particular, the management of the Company regards safety, sanitation, and health as its primary responsibility, and works to make safety, sanitation, and health the basic foundation for the conduct of its operations, while endeavoring to make relevant improvements in machinery and equipment as well as create a pleasant work environment.

### (2) Building up a workplace in which each and every employee can feel growth and job satisfaction

- We work to create a workplace that promotes dialogue that respects individuality and in which each and every employee can feel growth and job satisfaction.
- We value mutual understanding, and give consideration so that people can feel safe both physically and mentally.
- We respect the diversity and creativity of our employees, and continue to move forward at all times while forgiving failure due to accepting a challenge.

## 5. Conserving the Global and Local Environment

### (1) Environmental Conservation Efforts in All Business Activities

- We promote environmental conservation measures in all stages of our corporate activities, including product development, production, sales, physical distribution, and service.
- We also request that our suppliers understand the importance of environmental conservation efforts and cooperate in this regard.

### (2) Global Environmental Conservation

- We promote global environmental conservation measures intended to mitigate and adapt to climate change, creating a recycling-based society, conserving water resources, and controlling chemical substances.
- We promote global environmental conservation by providing products, technologies, and services that contribute to solving environmental problems.
- We strive to ensure our corporate activities are friendly to the natural environment and biodiversity.

### (3) Environmental Protection to Create a Symbiotic Relationship with Local Societies

- We make efforts in the reduction of environmental risks and promote our business activities with proper consideration for the protection of local environments, including pollution prevention.
- We actively participate in environmental beautification/education activities in local communities.

### (4) Our Voluntary and Organized Efforts in Environmental Conservation

- By introducing the environmental management system and establishing voluntary targets and action plans, we work on our daily business operations.
- We endeavor to enhance environmental awareness through active environmental education/enlightenment activities.
- We actively provide the stakeholders with environment-related information.
- We collect stakeholders’ opinions broadly through environmental communication, and reflect the findings in our environmental activities.

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## 6. Achieving Symbiosis with International and Local Societies

### (1) Respect of Culture and Customs of All Countries and Regions

- We deeply understand the history and social conditions of all countries and regions, and respect their cultures and customs.

### (2) Elimination of Relationships with Antisocial Elements

- We take a strong stance against antisocial elements and groups that threaten the order and safety of society and cooperate with the police and other organizations to ensure the thorough elimination of any relationships of such elements and groups. We never respond to improper requests made by these antisocial elements.

### (3) Contributing to Society

- We proactively offer support for social, educational, and cultural activities, communicate and associate with local communities, participate in beautification projects, and engage in other various volunteer activities.

### (4) Firm Commitment to Safe Driving

- We obey traffic laws and regulations and thoroughly reinforce safe driving.

## 7. Fulfilling Responsibilities for Improving Management Transparency and Accountability

### (1) Appropriate and Timely Disclosure of Corporate Information

- We properly disclose information, in accordance with related legal provisions, on the management of the Company, its business operations, and other matters in a timely manner and according to appropriate methods.
- We promote active communication with a broad range of stakeholders, including not only shareholders and investors, but also consumers, employees, and local communities, etc., and fulfill our responsibilities for transparency and accountability in corporate activities.

### (2) Proper Accounting / Taxation Treatment

- We properly follow all relevant laws, accounting standards, and internal rules in accounting for sales, expenses, and other financial statement items.
- We comply with all relevant laws and regulations, properly file tax returns, and pay taxes.

### (3) Emphasis on Internal Audits

- We place emphasis on internal auditing, including internal control audits related to financial reporting, closing audits, internal control audits related to the basic functions of the Company and compliance-related internal control audits, etc., with the goal of enhancing the quality of our operations.

### (4) Prohibition of Insider Trading

- We do not engage in trading the shares of the Company or other listed companies based on material, non-public information that might give rise to suspicions regarding “insider trading.” This includes information related to increases or reductions in capital, mergers and acquisitions, or alliances. Moreover, we do not divulge such material, non-public information to third parties, including members of our families.