Global Code of Conduct

of the Nikkiso Group

LEWA

Creating Fluid Solutions

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Global Code of Conduct

Nikkiso Group

I General Provisions

This Nikkiso Group Global Code of Conduct (the "GCC") shall set internal standards of the highest level with respect to compliance. The GCC provides the basic rules that we must observe to enable us to follow our conscience and to contribute to society as corporate citizens.

II Basic Policy

We will obey the laws, regulations, our articles of incorporation, the social norms and the GCC ("laws/GCC") in all of our business and other activities. In the event we detect a potential violation within the scope of the laws/GCC we will not condone such conduct, but will take the necessary action to deal with it.

III Scope

The GCC applies to Nikkiso Co., Ltd, ("Nikkiso") and its group of companies (meaning the companies in which Nikkiso holds, directly or indirectly, a majority of outstanding voting shares or equity, or companies that Nikkiso substantially controls; collectively the "Nikkiso Group"), and their officers and employees (including the members of the board of directors, auditors, directors, executive officers, corporate advisors, and employees (including non-regular employees, seconded personnel, part-time employees, temporary workers, and dispatched workers).

IV Code of Conduct

1. Fair and honest business activities

(1) Free competition

We will not enter into an agreement with any third party that interferes with the market mechanisms, including price fixing, dividing territories, and restricting the supply of products.

We will not take advantage of our position in a transaction to force unreasonable terms and conditions on our business partners.

(2) Fair transactions

We will select our business partners based on price, quality, delivery term, and other objective criteria in the procurement of products and services.

We will endeavor to maintain and improve mutual understanding and trusting relationships with our customers and business partners from a long-term perspective.

(3) Quality and safety of products and services

We will provide products and services with high quality and safety.

We will confirm the facts promptly and take appropriate action, in the event the quality or safety of our products and services is brought into question.

(4) Gift-giving and entertainment

We will not offer entertainment or gifts to employees who are in public service, such as government employees and local authorities, and foreign public service personnel.

We will not offer the entertainment or gifts to our customers or business partners (including potential customers or business partners) beyond the range acceptable in terms of the law, customary practice, or business courtesy; we will not receive entertainment or gifts beyond that range.

(5) Export control

We will observe the export control laws and regulations of each (including the US Export Administration Regulations) in the exporting of goods and their related technologies, and prevent any unlawful action.

We will not participate in exports that may obstruct the maintenance of international peace and security.

(6) Disclosure and dissemination of corporate information

We will disclose corporate information according to the requirements of the law, value dialogues with our stakeholders, and strengthen two-way communication with society.

We will endeavor to disseminate accurate corporate information while giving consideration to the need for confidentiality.

(7) Prohibition of insider trading

We will not disclose the insider information of the Nikkiso Group or other companies that we come to know during the course of our work to any persons other than those who need to know for the purpose of business, and will control such information in a proper manner.

We will not purchase or sell shares of Nikkiso or other companies using the insider information pertaining to these companies.

2. Protection of corporate assets and management of information

(1) Corporate assets
We will make efficient use of the assets of the Nikkiso Group for our business activities while protecting them against loss, theft, and destruction.

We will not use any assets of the Nikkiso Group for any purpose other than our business.

(2) Conflicts of interest
We will carry out our business activities by making judgments that are in the best interests of the Nikkiso Group.

We will not engage in any act that is, or may be, in conflict with the interests of the Nikkiso Group.

(3) Intellectual property
We will promote research and development activities through the protection and application of the intellectual property rights of the Nikkiso Group.

We will not make unauthorized use of or infringe upon the intellectual property rights of a third party.

(4) Records and reporting
We will prepare records and reports regarding business activities, including accounting and finance, accurately and in a timely manner.

We will not intentionally prepare false records or misleading reports.

(5) Confidential information
We will not disclose or disseminate any information provided by our customers or business partners, or any confidential information of the Nikkiso Group, without due and proper authorization.

We will use such information only to the extent our business requires it.

(6) Personal information
We will respect the individual right to privacy.

We will prevent leakage, loss, or damage of privacy and personal information by taking appropriate security measures.

3. Respect for human rights and harmony with environment

(1) Respect for human rights

We will respect the rights of individuals, and will not force anyone to work against his/her will or employ child labor.

We will not treat any person unfairly on the basis of race, nationality, religion, creed, gender, gender orientation, age, or disability in recruitment, employment, and promotion.

(2) Soundness of workplace

We will encourage each other to improve the safety of the workplace and productivity.

We will not commit any act that could create hostile human relationships, such as discriminatory behavior, sexual harassment, and power harassment.

(3) Conservation of environment

We will promote the development, production, and sale of technologies and products that will contribute to the conservation of the environment.

We will work to prevent global warming, to ensure the cyclic use of resources, and to protect the ecosystem.