

JDI Ethics

Japan Display Inc. has adopted the Japan Display (JDI) Ethics as an internal code of ethical conduct applying equally to all directors and officers (including individuals in equivalent positions) and employees (including seconded, temporary, part-time, and dispatched workers) (hereinafter collectively referred to as "Personnel") of each of the JDI Group Companies (i.e., JDI, its subsidiaries, and affiliates (hereinafter each referred to as the "Company"))).

Each Company's CEO is responsible for leading the thorough dissemination of JDI Ethics to all Personnel; and all directors, officers, and managers are expected to demonstrate initiative in exemplary compliance with JDI Ethics and ensure that all Personnel they supervise are familiar with and understand JDI Ethics.

When an ethical issue arises, the CEO shall address the issue and fully support its treatment and resolution, using best efforts to identify its cause, implement appropriate remedial and/or preventive measures, and promptly and fully report any incidents to stakeholders as necessary.

Any director, officer or employee who breaches JDI Ethics may be subject to disciplinary action up to and including termination, pursuant to the internal rules of each of the JDI Group Companies, and legal action.

1. Basic Principles

- (1) Recognizing that we must be socially responsible at all times, we will act in good faith and in accordance with good public morals in performing corporate activities.
- (2) We will comply with all applicable laws, rules, and regulations, including internal policies, procedures, and programs established by the Company from time to time, and adhere to the ethical code set out in JDI Ethics, in order to ensure fair and proper conduct of corporate activities.

2. Relationship with Society

- (1) We will be sincerely engaged in protecting the global environment.
 - ① Each of us will pay proper attention to the environment in all areas of our corporate activities to realize sustainable society coexisting with the environment.
 - ② We will contribute conserving resources and energy in all product-manufacturing processes and reduce negative effects on the environment on a continuous basis throughout product life cycles in order to provide environmentally-friendly products.

- ③ We will comply with applicable laws and regulations related to environmental protection, establish and comply with voluntary environmental standards, and freely disclose the environmental impact of our corporate activities.

(2) We will perform our corporate activities with high ethical standards.

- ① We will contribute to human health and welfare and the safety and security of society, utilizing our professional knowledge, technology, and expertise.
- ② Recognizing applicable laws and socially-accepted norms, we will, based on scientific facts and data to the extent possible, exercise equitable and independent judgment, behave honestly, and act in good faith.
- ③ We will generate technical innovations by endeavoring to improve our own professional knowledge and ability on a continuous basis, and offer safe and superior products.

(3) We will maintain respectful and amicable relationships with local communities.

We will endeavor to promote and maintain local communities' understanding toward our corporate activities, respond to requests and expectations from regional societies, and fulfill our responsibilities as a community member.

(4) We will have no connection with antisocial organizations.

- ① We will have no relationship whatsoever with any antisocial organization, such as organized crime.
- ② We will take a firm stance against any antisocial organization and unequivocally refuse to meet with any demand or request of it.

(5) We will make donations and political contributions in compliance with applicable laws and regulations.

- ① We will have a healthy and legitimate relationship with politicians and public administrations.
- ② In making donations or political contributions, we will fully evaluate the necessity and appropriateness in advance, comply with applicable laws and regulations, and follow all legal requirements.

(6) We will comply with import/export-related laws.

- ① We will comply with applicable laws and regulations when we export or import goods or technologies (including software).
- ② We will manage importing and exporting goods and technologies (including software) appropriately, following applicable laws, regulations, and our internal rules.

(7) We will be committed to the protection of personal information.

We understand the importance of the protection of personal information, and will only obtain or collect it in a proper manner and not use any personal information which we learn in the course of our business for any unjust purpose. We will keep such personal information under strict control and confidentiality in accordance with our internal rules.

3. Relationship with Customers and Business Partners

(1) We will, at all times, respond in a sincere manner and endeavor to offer the most optimal solution.

- ① We will be aware of the needs of our customers, and provide technology, products, and services which will please our customers in a timely manner.
- ② We will give full consideration to product safety and quality, and promote quality control and improvement in compliance with applicable laws and regulations.
- ③ We will promptly respond to accidents involving our products, and endeavor to prevent any further damage, while working to identify the cause of such accident and take necessary actions to implement preventive measures. We will also promptly respond to our customer's complaints regarding quality, or customer's requests for improvement.

(2) We will make honest, fair, and equitable transactions with procurement partners.

- ① We will select our procurement partners properly and fairly by fully assessing quality, reliability, appointed dates of delivery and prices of their products, the stability of their management, their business health, abilities to develop technologies, fair and highly transparent disclosure of information, compliance with applicable laws, regulations and social norms, attitude towards CSR and so forth.
- ② We will treat all procurement partners fairly and equitably, and not receive any personal benefit from them.

(The procurement transactions include works and services).

(3) We will maintain equal footing and make good-faith transactions with distributors.

We will endeavor to maintain an appropriate relationship with distributors, and not restrain their trade, require minimum resale prices, or otherwise engage in any unfair or inequitable conduct in doing business with them.

(4) We will not make or offer bribes or improper spending on gifts exceeding socially-accepted norms.

- ① We will not receive or offer articles of value, cash, other gifts or entertainment exceeding socially-accepted norms from or to our customers or business partners.

- ② We will not offer, promise or provide any bribe or other illegal benefits to government officials, directors and officers or employees of state-owned enterprises or any private entities or individuals otherwise regulated by applicable laws and regulations.

(5) We will perform fair promotional and advertising activities.

In performing our promotional or advertising activities, we will avoid misleading, misrepresentative or disparaging expressions in compliance with applicable laws, regulations and our internal rules, and fairly and properly make any statement or expression by following good public morals and public policy.

4. Relationship with Competitors

(1) We will comply with the Anti-Trust Laws.

- ① We will comply with the Anti-Trust Laws and other laws concerned with maintaining fair and free competition in every jurisdiction in which we operate (hereinafter “the Anti-Trust Laws, etc.”), and operate our business properly in accordance with the Anti-Trust Laws, etc. and high ethical standards, and fair, transparent, and free competition.
- ② We will not organize or participate in any meeting with our competitors or otherwise act, in a manner which may give a wrong impression that we are involved in any of the arrangements or discussions which would be a breach of the Anti-Trust Laws, etc.

(2) We will not engage in unfair competition.

- ① We will not obtain confidential information of other entities or individuals by way of unjust means.
- ② We will use confidential information of others only for permitted purposes with their consent.

5. Relationship with Stockholders and Investors

(1) We will maximize stockholder value by utilizing Company assets effectively.

- ① We will regularly review such matters as the structures, system, and management assets of the Company and seek the most feasible way to improve the efficiency of business operations.
- ② We will endeavor to elevate corporate value by properly handling Company assets, whether tangible or intangible, and by optimizing them to the fullest extent.

(2) We disclose information appropriately.

- ① We disclose information concerning the operation, status of business activities and other corporate information of the Company in a timely and appropriate manner in accordance with applicable laws and regulations.

- ② We ensure the accuracy of corporate information we disclose at all times and disclose information in a timely, appropriate, and fair manner, taking into account the need to maintain confidentiality if so required.

(3) We will not engage in any insider trading such as sales of company stock.

- ① We will make, at all times, an effort to prevent divulging corporate information and will not disclose to a third party any material information regarding the JDI Group Companies, business acquaintances (hereinafter including invested companies, entities with which we have any business relationships, whether or not, by contracts or pending contracts).
- ② When we receive the JDI Group Companies' or business acquaintances' unreleased information which may have an influence on investors' investment decisions (insider information), we will not trade or aid or abet any trade of any share or security of the JDI Group Companies and business acquaintances based on insider information, before the time such insider information is released to the public.

6. Relationship with Employees and other Individuals

(1) We will respect and not violate any fundamental human rights.

- ① We will respect the human rights of each and every individual in any corporate activity, such as the recruitment or treatment of individuals and commercial dealings, and will not discriminate based on sex, sexual orientation, age, nationality, race, ethnicity, thought, belief, religion, social status, family origins, illness, or physical disability or any other reasons, nor will we harm the dignity of any individual.
- ② We will hire employees in compliance with applicable laws and regulations. We will not use child labor*.
(*"Child labor" refers to work rendered by any person under the age of 15 (or 14 where the law of the country permits), under the minimum age for employment in the country, or under the age for completing compulsory education.)
- ③ We will not force employees to work involuntarily and will prohibit oppressive and inhumane treatments such as abuse and any type of harassment.

(2) We will provide efficient, pleasant, healthy, and safe work environments.

- ① We will provide work environments under which all employees can work imaginatively and efficiently and will support employees' work-life balance.
- ② We will maintain secure, safe, and clean work environments, and comply with laws and regulations related to safety and sanitation in the workplace.

7. Relationship with the Company and Company Assets

(1) We will not misappropriate any Company asset for private purposes.

We will properly handle all JDI Group Companies assets (whether tangible or intangible) in accordance with our internal rules, and will not misappropriate the same for private purposes or otherwise use the same for non-business purposes.

(2) We will conduct fair accounting and reporting.

We will record accounting data accurately and timely, and will conduct fair accounting, and properly record and report financial information. When there can be multiple reasonable accounting interpretations and treatments, we will use the most conservative and transparent interpretation or treatment.

(3) We will properly handle trade secrets of third parties.

We will respect the value of confidential information of ours and other entities and individuals. We will properly manage and handle all confidential information, whether it is ours or others', in accordance with the JDI Ethics, any confidentiality or non-disclosure agreements, and our internal rules, in order to avoid causing any damage to the JDI Group Companies or others, breaching contracts or violating applicable laws and regulations by divulging or wrongfully using such confidential information.

(4) We will protect, maintain, and utilize our intellectual property rights, and respect the valid and enforceable intellectual property rights of others.

- ① We will proactively create, properly protect by the most appropriate means, and effectively utilize our intellectual property rights (including patents, utility models, designs, trademarks, and copyrights).
- ② We will respect the valid and enforceable intellectual property rights of others. In researching, developing, planning, manufacturing, or distributing new products or technologies, we will not knowingly or willfully infringe the valid and enforceable intellectual property rights of others.

(5) We will properly use the information systems of the Company.

- ① We will use the information systems and information equipment of the Company in accordance with our internal rules, and will not use the same for any improper personal purpose.
- ② We will keep IDs and passwords for the information system of the Company under strict control, and prevent divulgence thereof to outsiders.
- ③ We will not misappropriate IDs or passwords of other individuals, or access their computer systems without authorization.