

# Autoterminal Japan Ltd. ("ATJ")

Compliance Code
Dec.2022

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# 1. The Compliance Principles

### **Integrity**

ATJ values inspection activities taking place on a basis that is free, fair competitive, and not abusive. We are pleased to confirm that we will not offer or facilitate, directly or indirectly, any improper inducement or reward to any party.

#### **Conflict of interest**

ATJ shall avoid conflicts of interest with any related entity in which we have a financial or commercial interest. ATJ ensures that employees avoid conflicts of interest by providing regular training. Conflicts of interest must be managed effectively to ensure impartial, professional, and compliant inspection decisions. All ATJ personnel must be acknowledged regarding the policies, disclosed, and put on record.

Conflicts of interest and improper influence may also be anonymously reported by depositing an anonymous letter detailing the nature of the conflict of interest and the improper influence into the internal letterbox set up for that purpose.

#### **Confidentiality and Data Protection**

ATJ shall treat all information received by providing its services as confidential to the extent that such information is not already published, generally available to third parties, or in the public domain.

ATJ's data backup and retention policy clarifies the data security.

## **Anti-bribery**

ATJ personnel are expected to conduct company business in a legal and ethical manner. This policy applies to all prospective or current employees of the ATJ, as well as independent contractors and persons acting on behalf of the company.



#### **Fair Business Conduct**

It is the policy of ATJ that employees comply with all applicable laws, particularly the local laws where ATJ operates. ATJ refuses to work with any group, organization, or individual engaged in unlawful activities, and under no circumstances shall we have any relations with anti-social influences. ATJ shall conduct itself with the highest standards of business ethics and integrity, and shall not do anything which would bring its reputation, or the reputation of TIC Council or the TIC industry, into disrepute.

Autoterminal Japan has company rules and regulation manual that are being confirmed to all personnel during their entry to the company. These company rules and regulations are complying with all applicable laws and regulations.

## **Health and Safety**

ATJ ensures that good health and safety practices are effectively managed in the workplace to comply with the required legislation. ATJ staff, contractors, subcontractors, volunteers, and others related to the work for inspection are being remained safe at all our premises.

#### Fair Labour

We are aware of our social responsibility towards employees, people, communities, and the environment in which we operate and shall respect human rights. We always try our best to serve those in need.

ATJ shall clearly state the working conditions and inform all employees of the work rules. All employees are required to confirm the contents of these rules at the start of their work. These records will be kept with the signatures of the employees and in accordance with appropriate management procedures.