

Acting with Integrity

Code of Conduct



AGC

Your Dreams, Our Challenge



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Introduction

What Integrity Means to Us

The legacy of the AGC Group is about more than the high-quality products we make for customers around the world. It's about more than the trust we have gained over our century-long history. It's about more than our continued pursuit of ingenuity, diversification, and global growth. Our legacy is about doing all those things and more, with an ethical foundation. We know a stable moral outlook allows us to fulfill our responsibilities, exceed expectations, and establish consumer loyalty.

The AGC Group Code of Conduct reflects the Shared Values found in the AGC Group Vision **“Look Beyond.”** Integrity is one of those Shared Values. The Code defines requirements for all AGC Group companies and their employees to ensure we do business with integrity according to applicable laws, rules, regulations, company policies, and business ethics. The four Shared Values—Innovation & Operational Excellence, Diversity, Environment, and Integrity—help us achieve the AGC Group Vision, while **the AGC Group Code of Conduct sets forth the Company's expectations for each of us to demonstrate integrity in our daily actions.**



Who Must Follow the Code?

The AGC Group Code of Conduct applies to all of us, from our board of directors to each of our colleagues worldwide. It sets expectations for the exercise of good judgment and ethical behavior to ensure we live our AGC values in our day-to-day roles. We know the AGC Group's reputation is in the hands of everyone who represents us—so we work together to build on the trust that defines our success.

We hope the Code will help everyone understand expectations so we can continue to build on the confidence of our communities and partners.

It's important to incorporate compliance with the Code into your day-to-day activities. Follow the Code, and whenever you are unsure or have questions, ask management or any other Compliance Resource identified on page 5. Speak up if you have any concerns, especially if you notice a possible violation or unethical conduct. Throughout the Code, you will find guidelines and scenarios to help you make the right choices. Remember always to use your good judgment.

Introduction

AGC as a Team

The AGC Group Code of Conduct establishes twelve principles to keep us on the right track as a global team. These principles are divided into three categories: “We are fair and honest in our business,” “We ensure a safe and helpful workplace,” and “We care for our communities.”

The people we work with on a day-to-day basis and the communities where we operate make us proud, so we make it our mission to treat everyone—and our environment—with dignity and respect.

Our open company culture reflects how we all work as a team to achieve our values and vision in business. Honest communication with our colleagues promotes a workplace where everyone feels comfortable and free to express their opinions. We respect our teammates and make the right decisions together. We will never mistreat employees if they speak up in good faith and report something they think is wrong or not in line with our standards at the AGC Group. The AGC Group has a strict non-retaliation policy.

Supply chain management

We hold ourselves, our suppliers, and business partners to the highest standards of ethics and quality. So we focus on doing business with companies, people, and suppliers that respect similar ideals. That’s why we will share the principles of this Code of Conduct with everyone we work with, including our suppliers and business partners, to ensure we all come together to respect the values that make a positive influence in the world.

Always ask yourself:

- Do my actions demonstrate integrity?
- Will customers, suppliers, and society feel trust in my choices?
- Am I turning a blind eye to misconduct?

Even minor violations of the Code of Conduct are prohibited and can damage trust, so ask yourself these questions before taking any action. Managers and supervisors have a particular responsibility to lead by example.



Introduction

The Compliance Organization

Who is the Chief Compliance Officer?

The AGC Group Chief Compliance Officer (CCO) reports to the AGC Group CEO and is responsible for overseeing and managing compliance policies that follow applicable laws and regulations.

What are the Compliance Committees?

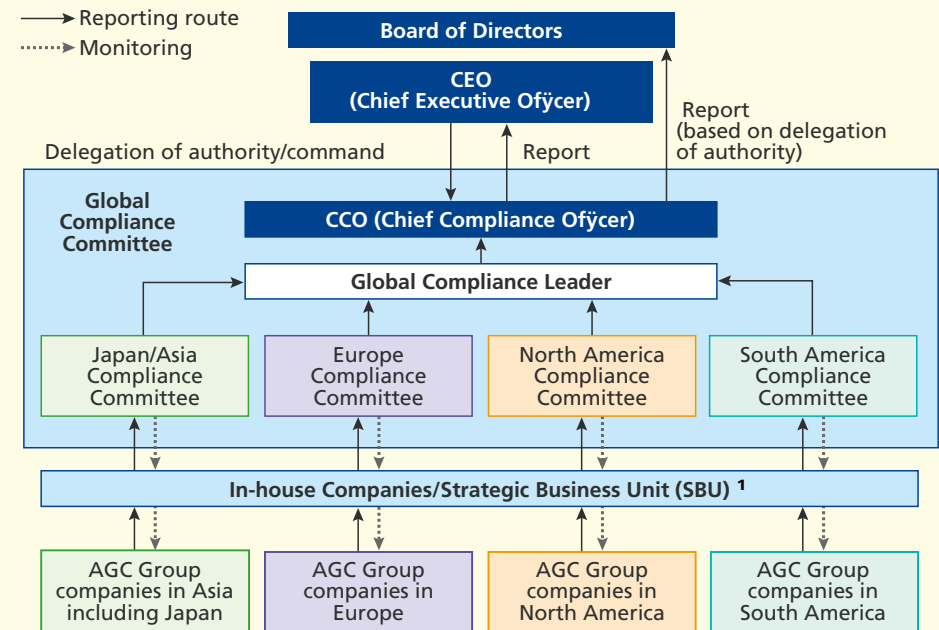
The Compliance Committees develop programs that make and enforce compliance policies at every level and region of the AGC Group. Regional compliance officers and committees operate in Japan/Asia, Europe, North America, and South America to ensure we achieve compliance in each location.

The Global Compliance Committee considers global compliance-related policies and measures to ensure the AGC Group follows compliance according to international laws and regulations. The committee includes the CCO, the Global Compliance Leader, and the Regional Compliance Officers from the Japan/Asia, Europe, North America, and South America Compliance Committees. They periodically report on group-wide policies and compliance measures to the AGC Board of Directors.

Who are the Local Compliance Managers?

In some countries, AGC has also appointed Local Compliance Managers. They oversee complaints concerning the AGC Group Code of Conduct and report to the Regional Compliance Officers.

Global Compliance Organization



¹ SBU is a counter for Strategic Business Units.

In Case of an Actual or Potential Violation

Take action

If you have any questions or concerns about compliance or want to report an actual or suspected compliance violation, use your regional compliance helplines or contact management. You may also use any of the following Compliance Resources: your Compliance Officer, your Human Resources representative (particularly in the case of employee/employment-related matters), your company legal counsel (in the case of legal issues), your Local Compliance Manager, or the AGC Global External Helpline.

Remember, you are not alone. We have processes, guidance, and procedures to help you follow this Code, company policies, and applicable legal requirements. You can provide your identity when making a report or submit a report anonymously. By asking questions and reporting concerns, you are doing the right thing by helping our Company stop and prevent misconduct.

Cooperate with investigations

The AGC Group investigates all reports fairly and thoroughly. Whether you wish to remain anonymous or identify yourself in your report, the AGC Group will respect your choices and conduct its investigation accordingly to the extent reasonably and legally practical. All employees are requested to cooperate fully with Company investigations into potential violations.

Retaliation is prohibited

The AGC Group strictly forbids acts of retaliation against any person who reports a possible or actual violation in good faith, or who participates or assists with an investigation. This policy means that you will not be punished or subjected to an adverse employment

action by the Company for helping to enforce this Code. Acting in good faith means that you come forward with a report you believe to be true. However, intentionally making a false report or submitting false information may result in disciplinary action, up to and including termination.



1 If you notice something suspicious, take the following actions



2 Refer to this Code of Conduct booklet



3 Report immediately any suspected violation

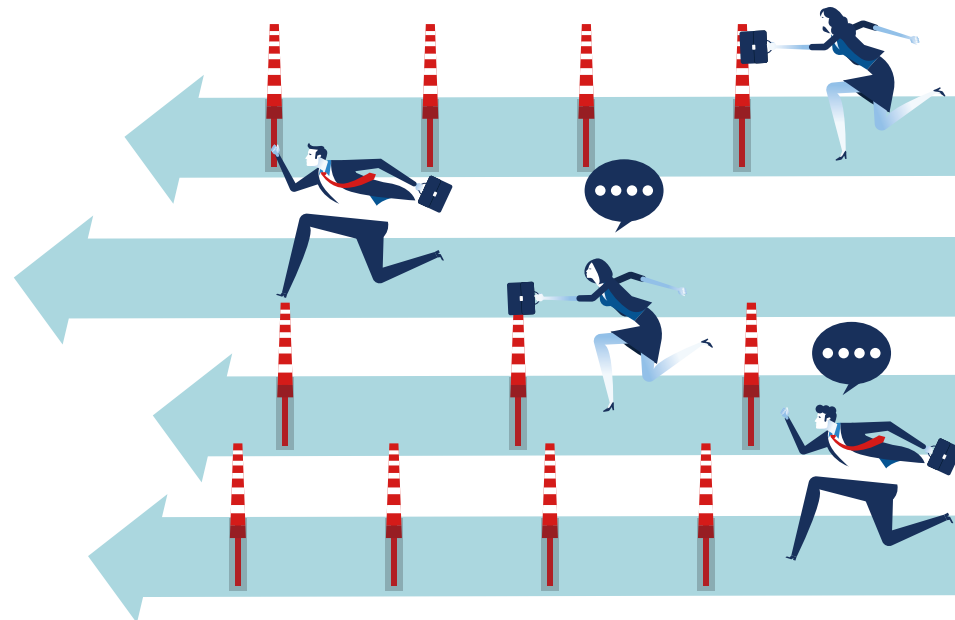


We are fair and honest in our business

1.1 Fair Competition and Antitrust

Play by the rules

We believe in an ethical, lawful marketplace where strong values and business resourcefulness determine success. Antitrust laws are in place to protect and maintain a fair, open, and honest marketplace—consistent with our beliefs at AGC. It is our responsibility to understand how antitrust laws apply to our job and follow them at all times. Along with our own Global Antitrust Guidelines, employees must observe and follow all antitrust laws everywhere in the world.



Learn more

Employees must maintain independence of judgment and action in designing, producing, pricing, and selling our products and services and must avoid even the appearance of conspiring or making an agreement with a competitor. It is illegal to enter into formal or informal agreements with competitors that may prevent, restrict, or distort trade. These agreements include, but are not limited to, arrangements to fix prices, rig bids, or divide or allocate markets, territories, or customers.

Stop the conversation if a competitor tries to discuss any of these topics. Then, immediately report the incident to your supervisor or Legal Department. Remember that a simple discussion or exchange of information with a competitor—even one with no clear agreement—could lead to a violation of Antitrust laws.

Any contact with competitors must be for a legitimate purpose and approved in advance by management or the Legal Department. After contact, you must take extra care to prepare and maintain accurate records of all activities and discussions.

Consequences

Antitrust law enforcement and sanctions are becoming stricter around the world. Penalties and consequences for violating antitrust laws are severe and may include high fines for the Company, imprisonment for individuals, and private lawsuits to recover substantial damages. In addition to legal repercussions, an antitrust violation would result in a serious loss of reputation for the AGC Group.

Keep in mind

Antitrust and relevant laws also prohibit:

- Improper market monopolization.
- Entering into formal or informal agreements or understandings with suppliers or customers that would restrict competition.
- Improperly tying products.
- Imposing fixed or minimum resale prices.
- Boycotting specific customers or suppliers.
- Making false or deceptive comments regarding competitors.



Employees who have to deal with antitrust issues in their work must understand the basic principles of antitrust law and the importance of compliance. Therefore, these employees must attend Antitrust training organized within the Company to ensure a good understanding of the applicable laws and rules. In case a situation raises questions or poses a potential risk, employees must seek help and advice.

The AGC Antitrust Guidelines provide further guidance and details regarding the expected appropriate behavior to be adopted by each employee to avoid Antitrust issues.

Learn more

Export, import, and trade laws cover a wide range of business activities. For example, export compliance rules apply to products and technological information including software and technology. In some cases, disclosing technological information that originated in one country to a person—even another AGC employee—who is not a citizen or resident of that country may violate export laws.

Many laws and regulations also apply to import activity. When we import a product, service, or information from another country, we may be required to pay duties and taxes and file specific documents with government offices.

Keep in mind

- All employees involved in exporting and importing products and technological information must know and comply with applicable laws, regulations, and restrictions.
- Always pay attention to the origin of foreign products because the country of origin's laws may apply outside of that territory.
- If you are unsure about which legal requirements apply, consult with your

Q I will be traveling overseas to present at a technology forum next month. I need to bring my laptop, which contains business files and data for the presentation, along with some samples. What should I keep in mind during my trip?

A When traveling abroad for a business trip, remember that export laws regarding information apply to any technological device that contains company data. Be sure to review applicable export laws before bringing samples, laptops, tablets, or phones that contain technological information. If you are unsure, ask your supervisor or the person in charge of trade control for help.

manager/supervisor and the person in charge of trade control.

- Any proposed dealing with a country or entity subject to sanctions, embargoes, or both, must be reviewed in advance by the person in charge of trade control to determine whether the proposed conduct is allowable.
- Be aware of and comply with all internal policies, including AGC Group Global Trade Control Policy/Regulations or procedures applicable to your specific location.





We are fair and honest in our business

1.3 Gifts and Entertainment

Think before gifting

Giving or receiving an occasional gift is a common business practice that can play a positive role in building healthy relationships with our customers, suppliers, and other third parties. However, a gift or offer that seems harmless could unintentionally create a conflict that damages the Company's reputation or even breaks the law. We may give or accept gifts and entertainment only for legitimate business purposes that are customary, appropriate, and follow local etiquette and principles. All gifts and entertainment must comply with the applicable local gift, travel, and expense policies.



Keep in mind

- Never accept a gift or entertainment which could influence your judgment.
- Turn down any cash or personally beneficial offers.
- Do not accept any entertainment or gifts without reporting it to your management (except those which are allowed by local rules or generally accepted in practice).
- You can allow a supplier or customer to pick up the check at a meal, so long as it is a reasonable amount and there is no intent to influence any decision.
- Respect customers' or suppliers' policies on gifts and entertainment.
- A customary and appropriate business gift depends on the country, and you should never accept an item that would reflect poorly on the AGC Group if the details were made public.
- Check with your manager or a Compliance Resource in advance if you have any questions about a gift or entertainment.

Q A potential supplier sent me a \$100 USD gift card as a thank you after our meeting. Am I violating the AGC Group Code of Conduct if I keep this gift?

A Yes. You should refuse this gift immediately. It is not appropriate to receive a cash equivalent or an expensive gift from a potential supplier as this could influence your decision. You may consult with your supervisor and regional compliance resource if you have questions.





We are fair and honest in our business

1.4 Conflicts of Interest

Don't mix business and personal interests

A conflict of interest happens when we have interests or loyalties outside the workplace that influence something we do inside the workplace. We should always act in the best interests of the Company and avoid conflicts that may directly or indirectly benefit a family member, a friend, or us as individuals. Even the appearance of a conflict poses a risk. This is why it's important to always deal with current or potential customers, suppliers, public officials, contractors, competitors, other third parties, and fellow associates with the utmost care and integrity.



Learn more

Always give priority to our Company's mission and goals when conducting business. Use good judgment and follow high ethical standards to avoid situations that create a conflict between the work we do together at AGC and our relationships with other companies or individuals. Being aware of the rules can help us recognize situations that could negatively affect the Company.

Any outside business activity must be strictly separate from your employment at the AGC Group, not compete with AGC's interests, and not harm your job. AGC's assets may not be used for any outside business activity without prior approval from management. Additionally, holding a position as a board member, advisor, or any other role at a competitor, supplier, or customer of the AGC Group is not allowed without prior management approval.

Keep in mind

Recognize potential conflicts before they happen. Be sure to avoid using your position at the AGC Group for the following:

- Doing business or influencing a business

decision with a company or person where you, your relatives, or close friends hold a managerial position or a position of influence.

- Acquiring new information or business opportunities that directly or indirectly benefit you or any third party, including suppliers, competitors, or entities that should not receive such information or opportunity.
- Entering into a contract with a supplier, partner or any other third party, from which you, your relative, or close friends may benefit.
- Influencing other employees to enter into such activities.
- Directly or indirectly buying, or otherwise acquiring rights to any property or materials, to your benefit when you are aware that the AGC Group may be interested in pursuing such an opportunity.

Remember, avoid engaging in close personal relationships with others who are, or may become, involved in business activity related to the AGC Group, including acting as an AGC Group supplier, customer, or vendor. If a conflict occurs, you should immediately disclose the nature of your relationship to management and Human Resources and remove yourself from any future decision-making. If you supervise or are in a position to exercise influence over any aspect

Q My department decided to revise our products catalog. As my uncle runs a printing company, I thought it would be a good idea to get a quote from his company, as well as a few more companies. The quote from my uncle's company is a bit higher than the others, but I'm considering placing the order with his company because it is facing some financial hardships. Is this a problem?

A This is a conflict of interest because it creates a situation where you or your family member benefits from your role at AGC. You should disclose the relationship to your supervisor in advance while prioritizing AGC's interests and avoid being involved in the decision process. The Purchasing Department or a Compliance Resource will answer any questions you have about conflicts of interest, so please contact them if you have any concerns.

of the performance, compensation, or advancement of a family member, or someone with whom you have a close personal relationship, you must report this relationship immediately to Human Resources.

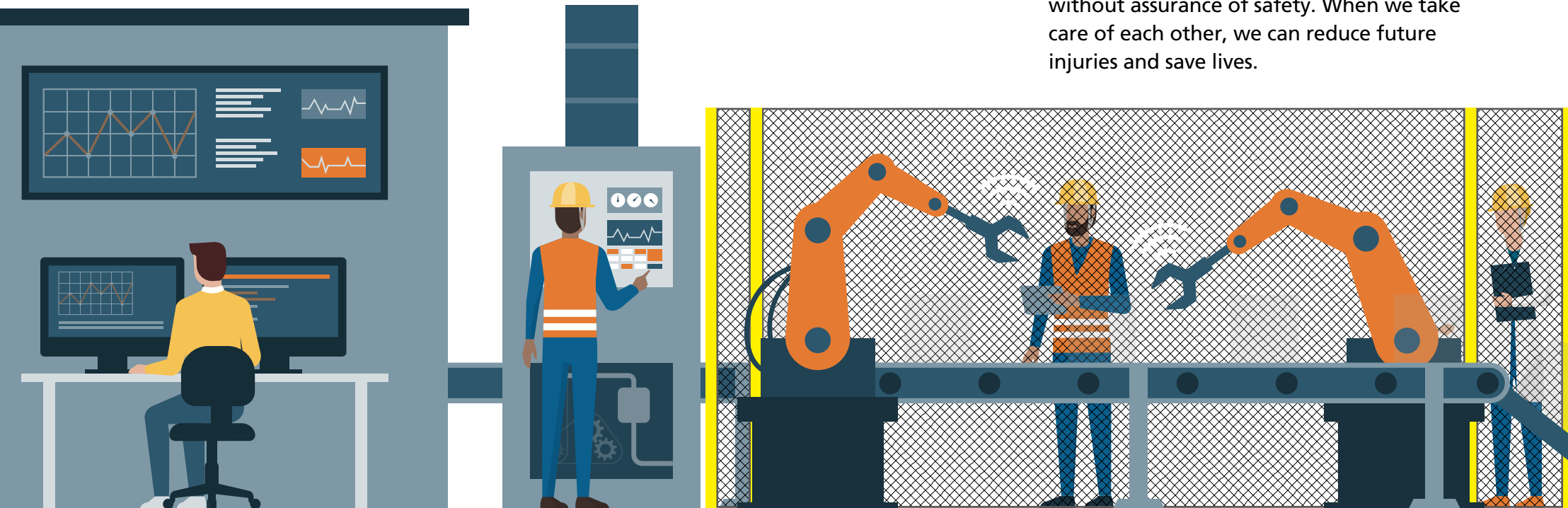


We ensure a safe and helpful workplace

2.1 Workplace Health and Safety

Safety first

AGC prioritizes the health and security of our employees, business partners, visitors, neighbors, and communities everywhere we operate. The Company implements and enforces safety rules and procedures to help prevent accidents. Every employee must follow these safety rules and procedures and promptly notify management of any non-compliance with these requirements. We must lead by example, demonstrate a commitment to health and safety in our daily actions, and actively promote a workplace where everyone can work safely. No production should be operated without assurance of safety. When we take care of each other, we can reduce future injuries and save lives.



Learn more

A safe, healthy workplace keeps a business running. It is the Company's responsibility to ensure our safety rules and procedures stay up-to-date. These rules and procedures must be followed at all times to ensure the continued success of the AGC Group.

Everyone should know what to do if an accident occurs or a problem arises, so we carry out annual drills and safety trainings which require mandatory employee participation. Do not hesitate to ask your nearest safety advisors if you have any questions about health and safety at work.

Keep in mind

To ensure a safe and healthy workplace:

- We perform our duties with safety as the top priority. No production should be operated without assurance of safety.
- We do not hesitate to stop operations to prevent injury.

- We observe all safety-related signs and use designated safety equipment.
- We thoroughly manage hazardous materials and chemicals.
- We perform risk assessments in all of our facilities to reduce the risk of occupational accidents.
- Our manufacturing facilities are free of alcohol and illegal substances. The Company may conduct tests for illegal substance use or alcohol to detect or confirm a suspected violation of Company policy, where local law allows.
- Everyone must follow all Company policies and procedures related to health and safety, as well as all applicable laws, rules, and regulations to help prevent accidents and injuries.
- We employ Lockout-Tagout (LOTO) practices and procedures to safeguard employees from the unexpected energization or startup of machinery and equipment, or the release of hazardous energy during service or maintenance activities.

Q While working at an AGC plant, I witnessed a fellow employee repairing a piece of equipment without disconnecting the power first. I am worried that by not following posted procedures for equipment repairs, my coworker is putting himself and other employees at risk of injury from electric shock or even from a fire or explosion. What should I do?

A Promptly warn the employee, tell the manager, and then follow up with other company resources, as necessary. Safety is our top priority, so corrective measures must be taken immediately. We will not allow retaliation against anyone who raises a concern in good faith, reports suspected misconduct, or provides information related to an inquiry of suspected misconduct as stated on page 5 of this Code of Conduct.





We ensure a safe and helpful workplace

2.2 Diversity and Inclusion

Diversity and respect for all

The people who work for the AGC Group come from a wide variety of experiences and backgrounds—each one with a unique set of strengths, skills, and ideas. We value diversity in our workplace and provide equal opportunities for success. That's why "Diversity" is another one of AGC Group's four shared values, further outlined in the AGC Group Vision "**Look Beyond.**" AGC will not tolerate discrimination or harassment of any employee or individual with whom we have a business, service, or professional relationship.



Learn more

We never discriminate against anyone based on race, ethnicity, religion, nationality, gender, gender identity, sexual orientation, disability, age, or any other legally protected group.

Physical or verbal harassment, sexual harassment, and physical violence of any kind (whether by supervisors, fellow employees, or third parties) harm a positive work environment and are strictly prohibited. These actions are also prohibited outside of work and on social media.

AGC believes in the rights of all workers. We follow all applicable laws concerning human and civil rights and require that all employees treat their colleagues with dignity and respect. AGC has zero tolerance for forced labor, child labor, or physical punishment in any AGC Group operation.

If you need help

If you experience or observe workplace harassment, discrimination, or other unfair behaviors prohibited by this Code of Conduct, you should promptly report the incident to your manager, any other member of management, Human Resource, or a Compliance Resource. AGC takes these claims seriously and will investigate them thoroughly. Employees who engage in harassment, discrimination, or inappropriate behavior are subject to disciplinary action, up to and including termination.

Q I was recently hired. Since my arrival, every day I hear my colleagues whistling at me and making inappropriate comments. I am embarrassed, but I don't want to make any enemies at my new job. Is there anything I can do about this?

A Your colleagues' actions are a clear example of harassment. Our work environment should always be comfortable and free from harassment and discrimination. Report the issue to your manager, a member of Human Resources, or the Compliance Helpline. The AGC Group will promptly investigate and ensure non-retaliation when raising concerns about discrimination or harassment.





We ensure a safe and helpful workplace

2.3 Reports and Records

Be accurate and honest

Providing accurate and helpful records regarding our Company's operations is an essential part of being an ethical company. We present the facts in a clear, truthful way in the data and information we record and communicate. Records (physical or digital) could include finance, accounting, taxation, production, quality, legal, technical, or sales information. We never manipulate data or records, conceal information, or misrepresent our business, product or financial health.



Learn more

Accurate reports and records help inspire trust in AGC by our customers, business partners, investors, stakeholders, and the general public. They also help us manage our priorities and long-term goals as a company so that we can make the best business decisions. Our success depends on it.

To accurately reflect the status of purchasing, inventory control, product quality, sales, and other matters, we must follow all AGC Group record-keeping rules and internal controls. We must also follow applicable laws and regulations regarding accounting, financial, and taxation standards to ensure our financial records and tax returns are accurate. No AGC Group company employee may, under any circumstances, discard, destroy, or change company finance, accounting, or other records without the appropriate authorization, or in violation of any applicable rules. Finally, our communications must avoid exaggeration, guesswork, and insulting remarks or mischaracterizations of data or information.

Keep in mind

- Honestly record and report information about our jobs and responsibilities.
- Honestly record all necessary information about product quality.
- Never report inventory, purchases, or sales that do not exist.
- Do not create false expense reports or entries.
- Do not intentionally record expenses or profits in the wrong period.
- Provide accurate information and reasonable support to internal and external auditors.
- Provide truthful, accurate data, and information during all certification and auditing events.
- Follow all internal policies and procedures relating to record-keeping and document retention, including all directions and instructions from the Legal or other responsible departments.





We ensure a safe and helpful workplace

2.4 Protection of Assets and Confidential Information

Protect our information and property

Each AGC Group member is responsible for protecting our Company's assets—both tangible and intangible—whether we are at the workplace, traveling for business, or in our homes. You must not disclose outside the Company any confidential or sensitive information that belongs to the Company. The same rule applies to any information belonging to any AGC employee or third party that does business with AGC. We must be mindful that improper disclosure of this information could materially harm our business.



Learn more

Our resources and assets include land, buildings, machinery, equipment, inventory, computers, and funds. They also include intangible assets such as confidential information, trade secrets, patents, trademarks, copyrights, computer software, and personal information. We must protect company assets at all times and not allow access to such assets to unauthorized persons or parties. We also must avoid discussing sensitive information in public places where someone might overhear.

Company Property

The Company is free to inspect and restrict the use of company property to make sure everyone uses it with care and in compliance with applicable internal policies. Anything stored or written on company property belongs to the Company. Limit using Company property to work-related matters only.

Personal and Third-Party Information

We equally respect personal information, including that of our employees. As a company, we sometimes collect information about our team, which may include compensation, benefits, home addresses, individual and family health matters, and identifying information. However,

it's our responsibility to protect such information, in accordance with the applicable laws, and use it only for appropriate reasons associated with a legitimate business purpose.

Third parties and our business partners trust us to keep their information and intellectual property safe as well. We protect their information as securely as we would our own.

Using IT Resources

AGC provides access to various electronic communication systems to use in our daily work. We must always safeguard these systems and technologies and follow company policies and procedures regarding information security.

Social Media

Be careful on social media, blogs, and forums. Remember that anything written online becomes a permanent, transferable record of your communications that can affect the interests of the Company and cause harm to others. The Communications or Marketing Department, Legal Department, or both, should first approve any communication on behalf of the Company in accordance with any applicable AGC social media policies and rules. Please remember that you are not authorized to speak on behalf of the

Q Someone who used to work for the AGC Group called me to ask for another former colleague's contact details. The person requesting the information explained that they lost their phone and all their contacts. Since it does not seem to be business-related, am I allowed to send it to them?

A No. We cannot give out personal information, such as contact details of former and present colleagues, to anyone inside or outside the Company. We never know how someone might use that information, even if it seems harmless.

Company without authorization obtained in advance.

Consequences

When something private becomes public, our Company, employees, business partners, or other individuals could be negatively affected. Following proper security policies helps protect everyone, so you must consistently secure your computer and confidential documents.



We care for our communities

3.1 Quality and Safety of Products

Ensure safe, high-quality products

The AGC Group cares deeply about the safety and quality of our products and services. It's one of the main reasons our customers and partners trust us to meet—and go beyond—their expectations in doing business together. Our success depends on maintaining that trust for years to come. We follow all applicable laws, report product quality data and analytical data with honesty and clarity, and demonstrate our commitment to safe and satisfactory products and services through our daily actions.

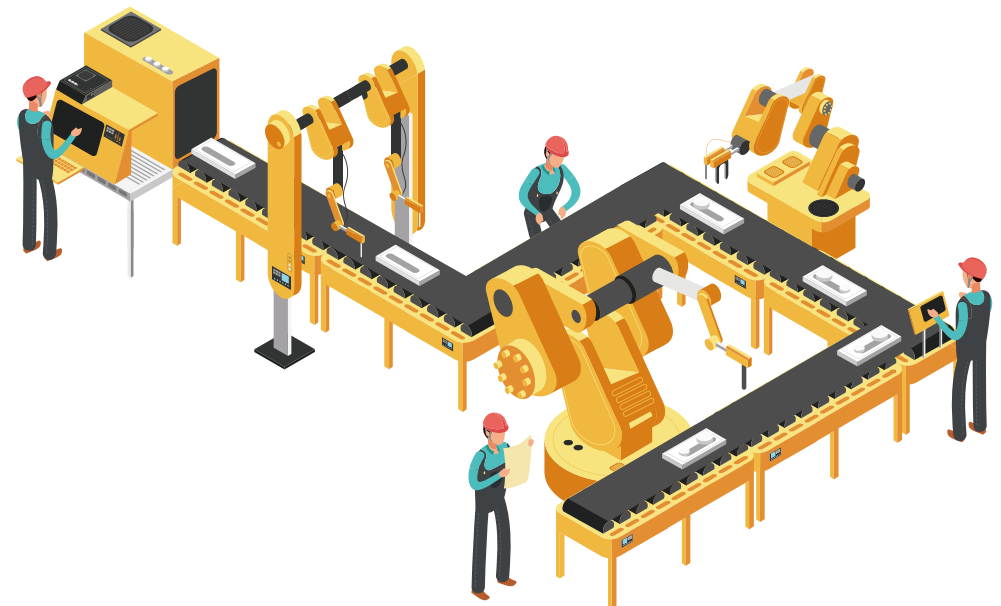


Keep in mind

- Check safety and quality throughout every step of a product's life cycle.
- Always include the applicable safety warnings when you prepare product documentation.
- Explain the safe and proper usage of a product to all who need to know.
- Take immediate action on any risk you may discover with AGC products or services.
- Investigate the root cause of any product safety or quality issue and correct the mistake honestly and immediately.
- Follow all internal policies, rules, and procedures related to quality, recordkeeping, and safety.

Q We received fewer materials for manufactured products than expected due to a shipping problem. I am working to resolve the situation but think it would be good to exchange the material specified in a contract with another material of the same quality. Since the difference was small, I believe it would be less damaging to our relationship with the customer to exchange the material than to deliver the products late. Can I go ahead with my idea?

A No. The first thing to do in this situation is to immediately communicate the issue with your supervisor and then honestly discuss the situation with the customer. Make sure you get approval before exchanging the material or doing something different from the contract. If our customer gives us the appropriate approval, then we can proceed with the alternative plan. However, we should never make changes to our agreements without going through the appropriate steps.





We care for our communities

3.2 Environment

Contribute to a better environment



The AGC Group prioritizes protecting and preserving the environment to achieve a sustainable society. Whether engaging in technological development, planning, design, products, sales, or logistics, we follow environmentally safe business practices. We invest in advanced technologies at our factories to reduce waste and save energy because taking care of our planet is much more than good business. While it means we can create even more opportunities and benefits for our enterprise and stakeholders, it also helps future generations live and grow in the cleanest, safest environment.

Learn more

“Environment” is one of AGC Group’s four Shared Values defined in the AGC Group Vision **“Look Beyond.”** We are committed to creating a sustainable society as an outstanding player in the global materials industry by carefully considering our impact on the natural environment, including climate change and biodiversity.

We also make environmental protection an essential part of our business by assessing and improving our operations, using renewable energy through solar and other methods, recycling where possible, and reducing waste. Our energy-saving innovations in green product development and resource management systems help us reuse chemicals, conserve water, and prevent water pollution. AGC also encourages all our business partners to implement policies and take active steps to care for the environment. We must all work together to stop the consequences of climate change, air and water pollution, deforestation, and many other environmental threats. We strive for continual improvement by developing specific programs that address the environmental cost and impact of our activities, products, and services.

Keep in mind

- AGC prioritizes environmental initiatives in all phases of its business activities, as further outlined in the AGC Group Environment Policy.
- We focus on developing products that benefit the environment rather than harm it.
- We set ambitious goals to shrink our environmental footprint and address sustainability challenges.
- We assess risk at every stage to evaluate and reevaluate new methods of environmental conservation.
- We always take special care to manage chemicals and hazardous materials properly.
- We follow all applicable laws, rules, and regulations related to environmental health and safety.





We care for our communities

3.3 Relations with Government Officials and Politicians

Remain free from corruption



We do not tolerate bribery or corruption in any form—whether public or private, active or passive, or whether consisting of activities which could be considered embezzlement, fraud, theft, or the granting of improper advantages. Fairness, honesty, and transparency are essential elements of integrity that define how we conduct business.

A bribe, corruption, or improper advantages can mean giving or offering a reward (or anything of value) to influence anyone's behavior to gain a financial, business, or personal advantage. Whether dealing with politicians, public officials, business partners, individuals, or third parties, our actions should reflect high ethical principles at every level. We must not directly or indirectly offer or give anything of value to any person, including government officials, to influence official action or to secure an improper advantage as defined by applicable laws.

It is important to remember that perception matters, and your behavior could be considered a bribe or granting of an improper advantage, regardless of your intention.

Learn more

The Company has created and implemented the AGC Anti-Bribery Rules to help us understand how to maintain professional relationships with public officers. Use them to identify problematic situations and avoid impropriety before it happens.

The Company has also established Anti-Bribery Guidelines for specific regions and countries as necessary, which outline procedures when dealing with public officers in countries with a higher risk of corruption.

You must follow the AGC Anti-Bribery Rules and Guidelines (if applicable) at all times.

Keep in mind

Bribery, corruption, or improper advantages could mean any of the following things:

- Cash or gift offers to an individual or family members.
- Inflated commissions.
- Fake agreements.
- Unauthorized rebates.
- Political or charitable donations.
- Kickbacks.

- Special favors or privileges.
- Job offers or loans.
- Anything of value, including but not limited to payments, meals, gifts, entertainment, and travel expenses.

Consequences

Many countries have strict laws and regulations regarding bribes, corruption, and improper advantages. Failure to comply with these laws and regulations may result in criminal and civil actions, such as high fines or imprisonment, against the Company and the individuals involved.

These laws cover a wide range of activities, so it's important that you understand how your job and responsibilities may be affected. Ask management or contact a Compliance Resource if you become aware of any actual or potential arrangement or agreement that could be problematic, or if you have any questions or concerns about applicable laws or policies.





We care for our communities

3.4 Insider Trading

Never trade on inside information

As we work together as a team, we sometimes hear non-public information about our Company or other companies. If this non-public information were to become public, it might influence others to purchase, sell, or hold onto a company's stocks. Using this non-public information for your personal or financial benefit—or for the benefit of anyone else you know—is considered insider trading. It's unethical and against the law. So, we never reveal non-public information to family, friends, or anyone outside the Company.



Keep in mind

What is inside information?

- Inside information refers to non-public information about a company's plans, products, operations, finances or any other matters that, if disclosed, could be used to gain a material personal advantage or would reasonably be expected to affect the price of stocks of AGC Inc. or other listed companies.

Examples of inside information include:

- Financial forecasts.
- Information about Research & Development including new products or technologies.
- Any information related to mergers, acquisitions, divestitures, or new business operations.

Who is an insider?

- Individuals who know inside information about AGC Inc. and other publicly-traded companies.

Who should you not tell inside information to?

- You may only share inside information on a need-to-know basis to individuals with proper authorization to know the information and with proper controls in place.

Q I recently became an account manager of a publicly-traded company. I'd like to have a financial interest in the company, so I plan on buying shares. However, before I went through with the purchase, an employee of that company mentioned that the company would make a profitable acquisition next month. Can I go ahead with my original plan to buy shares?

A No, you cannot. Once you receive inside information about a company—even if you originally planned to buy shares before—you cannot take action until that information becomes public. This rule applies whether you are an employee of that company or not. If you have any concern or uncertainty, please contact the department responsible for communication or a Compliance Resource.

Consequences

Violating insider trading laws can result in criminal or civil penalties for individuals and the Company. If you are concerned that an activity violates insider trading laws or this Code of Conduct, immediately contact Corporate Communications & Investor Relations Division in HQ or a Compliance Resource.



The North America Compliance Organization

North America Compliance Department

The North America (“NA”) Corporate Compliance Department is responsible for overseeing the Compliance Program for NA members of the AGC Group. The NA Corporate Compliance Department is comprised of the North America Compliance Leader, the Chief Compliance Officer, and the Corporate Compliance Administrator.

Compliance Officers

Each NA business of the AGC Group has a Compliance Officer. The duties of the Compliance Officers consist of being the primary point of contact for associates who might have a corporate compliance issue within each business. Compliance Officers have a good working knowledge of the AGC Group Code of Conduct, assist in handling compliance complaints, oversee completion of all required compliance trainings, exemplify the principles of the Code of Conduct, and work closely with the Chief Compliance Officer on compliance-related matters specific to their business.

North America Compliance Leader

The North America Compliance Leader reports directly to the AGC Group Chief Compliance Officer in Japan and is responsible for overseeing the integration of AGC North America's compliance program into the global Compliance organization.

Chief Compliance Officer

The Chief Compliance Officer (CCO) reports to the North America Compliance Leader and ensures that AGC North America complies with its outside regulatory and legal requirements as well as internal policies, bylaws, and Code of Conduct, as well as conducting compliance investigations when necessary. The CCO oversees the day-to-day development and management of the compliance program in North America.

Corporate Compliance Administrator

The Corporate Compliance Administrator reports to the Chief Compliance Officer and is responsible for the day-to-day activities of the Compliance Department including management of compliance initiatives, training implementation, hotline management, investigations, and periodic compliance reporting.

Corporate Compliance Helpline

The Corporate Compliance Helpline is a confidential resource for North America associates to utilize if they have a question about the Code of Conduct or need to report a compliance concern. The Corporate Compliance Helpline can be reached 24/7 at:

- 1-800-468-6905 (U.S. and Canada) or
- 01-800-681-7634 (Mexico) or
- via email at compliance@agc.com.

Reports can be made anonymously.

Global Compliance Helpline

The Global Compliance Helpline is a confidential third-party managed resource for associates to report serious potential compliance violations to the Global Compliance Leaders at AGC Headquarters. This helpline is for reports which could have global concerns or which would involve a member of AGC's senior management staff that an employee might not feel comfortable reporting to the NA helpline. The Global Compliance Helpline can be accessed online at:

- <https://whistle.jp/AGC/>

In case of something suspicious or a concern:



1. Consult the Code of Conduct booklet

If you have any questions or concerns about compliance, please refer to this Code. It will provide you with guidelines and scenarios to help you make the right choices.



2. Report it

If you suspect a compliance violation, report it to your regional compliance helplines or contact management. You may use other Compliance Resources as well.



3. Cooperate with investigations

The AGC Group investigates suspected compliance violations fairly and thoroughly. All employees are expected to cooperate fully with the Company's investigations into potential violations.



4. Retaliation is prohibited

Acts of retaliation against any person reporting a possible or actual violation in good faith are strictly prohibited in the AGC Group.



Your Dreams, Our Challenge

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