Weathernews Group Code of Conduct

6th edition (May 19, 2025)

We want to help people in times of need.

At a time of increasing disasters caused by extreme weather and the climate change crisis, we have established a code of conduct that the WNI Group (the "WNI Group") must comply with in conducting its business activities in order to realize this mission that has been in existence since our founding and to contribute to the development of a sustainable society on a global scale. All officers and staff of the WNI Group shall comply with the Weathernews Group Code of Conduct.

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1. Basic Principles

1.1 Member of the International Community

It is the basic policy of the WNI Group to conduct our business activities in an honest and ethical manner, in compliance with all applicable laws and regulations in the countries and regions where we do business. All WNI staff members are required to comply with all laws, regulations, and internal rules and policies related to their work. It is the responsibility of each WNI staff member to review and understand the requirements of laws, regulations, and internal rules and policies that apply
to his or her work.

1.2 With Supporters

The WNI Group's business activities affect society in various ways, both directly and indirectly, due to the nature of weather and environmental information. Therefore, in order to conduct sound business activities, the WNI Group recognizes that it must meet the expectations of all “Supporters” (including shareholders, customer
s, staff, business partners, local communities, and other institutions WNI staff members recognize the need to make
business decisions that meet the expectations of the WNI Group's stakeholders, and WNI staff members will conduct the WNI Group's business with this in mind.

2. Human Rights

2.1 Respect for Human Rights

The WNI Group complies with human rights standards in the "International Bill of Human Rights" and the ILO Declaration on Fundamental Principles and Rights at Work, and supports and implements the "UN Guiding Principles on Business and Human Rights" based on its management philosophy, code of ethics, and the principles of the "United Nations Global Compact."

Operating in a diverse and global environment, the WNI Group recognizes that interpretations of laws, social norms, cultures, and business practices vary across cultures and regions, and actively engages in training and awareness activities on human rights issues that take this into account. WNI staff perform their duties with full consideration for cultural and regional differences in human rights.

2.2 Respect for Diversity

Diversity brings opportunity and strength to WNI, and given the fact that the needs and wants of our supporters are becoming more diverse, WNI's own diversity is a value that allows us to better meet the diverse needs of our supporters. The WNI Group is fully aware of the diversity of its supporters and its own diversity, and conducts its business activities on the premise of diversity.

Diversity refers to all differences inside and outside a person, including values, culture, religion, personality, experience, sexual orientation, gender identity, race, ethnicity, nationality, language, gender, age, disability, health, family, social status, educational background, and work experience.

2.3 Scope of application

We expect not only the WNI Group's own implementation of this policy, but also the understanding and endorsement of our supporter business partners, and together we will encourage them to fulfill their social responsibility to respect human rights and diversity.

3. Labor

3.1 Equal Opportunity in Employment

It is the WNI Group's policy not to discriminate on the basis of race, religion, co lor, national origin, age, sex, disability, or any other factor not related to the legitimate business interests of the WNI Group in recruiting, hiring, training, promoting, or otherwise treating applicants or WNI staff.

3.2 Prohibition of Forced Labor and Child Labor

The WNI Group does not allow children to work under any form of coercion or against their will. In addition, the WNI Group will not allow children to work. A "child" is defined as a person under the age of 15 (or 14, if the applicable local law permits), or if the applicable local law allows a higher age of employment, a person under that age.

3.3 Sound Employment and Labor

It is the basic policy of the WNI Group to ensure sound employment and labor practices and to provide an environment in which staff members can exercise their abilities sparingly in compliance with the applicable laws and regulations of the countries and regions in which we operate at all times.

3.4 Work Environment

WNI Group strives to maintain a healthy, safe, and productive work environment that is free from unfair discrimination, harassment, jokes, or any other comments or conduct that could create a hostile work environment. WNI staff will comply with applicable health and safety laws, company rules and policies.

3.5 Respecting Staff's Rights to Express Opinions and Engage in Dialogue

The WNI Group values the rights of all staff to voluntarily form groups for common interests and to engage in constructive discussions. We create an environment where the company and staff can exchange opinions frankly, promote dialogue that respects each other's perspectives, and lead to better understanding and resolution of issues on both sides.

4. Environment

4.1 Climate Change Mitigation Efforts

The WNI Group recognizes that it’s now crucial to take action on the major social issue of climate change mitigation, and is committed to contributing to a sustainable society by working with companies, individuals, and research institutions that are responsible for taking action for the survival of the planet to create mechanisms to resolve climate change.

4.2 SDG Initiatives

The WNI Group recognizes that achieving not only the climate and natural environment goals of the SDGs which we contribute to through our business activities, but also all seventeen goals for realizing a “sustainable” world is a common global challenge, and each member of the WNI Group and WNI staff will voluntarily and proactively work to achieve the SDGs.

4.3 Environmental Preservation Initiatives

The WNI Group will strive to consider and implement, as appropriate, measures to meet or exceed the standards set forth in laws and regulations. In addition, when considering a project or undertaking, the environmental impact will be considered as one of the key criteria.

4.4 Resource Conservation Initiatives

Based on the recognition that sustainable use of all resources, including water resources, is essential, the WNI Group strives to conserve, recycle, and save energy with respect to all resources used in its daily business activities.

4.5 Biodiversity Initiatives

Based on the recognition that the preservation of biodiversity is essential to our business activities, the WNI Group, as a company deeply involved in the five elements and climate, will strive to realize a society in which biodiversity can be maintained through our corporate activities, utilizing our knowledge and technological capabilities.

5. Prevention of Corruption

5.1 Internal Whistleblowing System "WNI Helpline"

The WNI Group encourages all WNI staff to promptly report any concerns that they believe a company policy, business activity, or other conduct violates (or may violate) any law, regulation, or internal rule or policy, including this Code of Conduct. The Group will establish and maintain multiple contact points for the internal whistleblowing system "WNI Helpline," independent of the normal chain of command, to ensure that such concerns are promptly reported and that such reports are appropriately handled.

5.2 Prohibition of Involvement in Antisocial Activities

The WNI Group will not have any relationship with antisocial activities or forces (such as radical and organized crime groups.) We work closely with the police, lawyers, and other outside professional organizations to ensure the safety of all WNI staff and customers.

5.3 Gifts and Entertainment

It is the basic policy of the WNI Group to compete in the market on the basis of its products and services, their own superiority and price competitiveness. Bribery i s illegal in many countries and is subject to criminal penalties. Even in countries where bribery is not prohibited by law, it is the basic policy of the WNI Group to prohibit the giving of money or goods to any individual employed by a customer or business partner in order to obtain or retain business, or to receive any other business advantage. The WNI Group's basic policy is to strictly prohibit the giving of money or goods to clients or individuals employed by business partners in order to obtain or continue business or receive any other business advantage. It is also prohibited to accept any money, goods, or entertainment that is intended or likely to influence the WNI Group's business decisions.

Special consideration should be given if the recipient is a government official. In many countries, the provision of goods or money to government officials is expressly prohibited by law. Some countries have laws regulating the provision of goods and money to government officials that apply extraterritorially to acts conducted outside the country's territory. We do not provide, directly or indirectly, any goods or money to government officials for the purpose of, or that could be perceived as preferential treatment.

In addition to the above basic policies, WNI staff shall comply with the laws and regulations of their respective regions, as well as internal rules and policies regarding the giving and receiving of goods, entertainment, and other benefits established by each company.

5.4 Political Contributions and Donations

WNI Group has a corporate philosophy of transparency, and when making donations to political foundations or various organizations, we will clarify the purpose and social significance of the donation, comply with laws and regulations, and follow methods that are legitimate and ensure transparency.

6. Honest and Fair Business Activities

6.1 Safety and Quality of Services

The safety and quality of customers who use our services is one of the most important issues for the WNI Group, which has "Supporter Value Creation" at its core. We continuously pursue and implement measures to meet or exceed the standards set forth in laws and regulations to maintain the safety of our services at all stages of our business activities, including planning, operations, sales, and service. The WNI Group will aim to provide simple but accurate explanations and information on safety and quality to customers. If an accident or safety issue is reported concerning WNI services, the WNI Group will promptly investigate the facts and take appropriate action.

6.2 Advertisements

WNI Group will sell its services based on their value. It is the WNI Group's basic policy not to advertise false or misleading information or content that is defamatory of others. In some countries, comparative advertising is prohibited by law. Even in countries where comparative advertising is permitted, comparisons that reference competitors or their products or services must be supported by facts, and must be complete, accurate and not misleading.

6.3 Fair Competition

It is the WNI Group's basic policy to comply with all applicable laws, regulations, and rules concerning anti-monopoly, fair competition, and fair trade in each country and region in which it operates. These laws and regulations prohibit agreements or commitments with third parties that impede or destroy market principles, such as sales price maintenance, market division, and supply restrictions. In some countries and regions, the anti-monopoly or fair competition laws and regulations of the country or region concerned also apply extra territorially to actions taken outside the territory, if they affect the market within the territory.

All WNI staff shall identify and comply with these laws and regulations relevant to their work. If they have even the slightest doubt about the legality of any action or contract presented, they will immediately consult the WNI Helpline.

6.4 Fair Procurement

The WNI Group selects suppliers of services, contractors, and OEMs based on quality, reliability/security of supply, price, delivery time, and other objective criteria. The WNI Group bases its procurement decisions on the business interests of the Group and its customers.

This is a policy to be followed by all WNI staff involved in the purchasing process, not just those directly engaged in purchasing.

The WNI Group expects its suppliers, contractors, and OEMs to agree with the WNI Group's basic policies regarding compliance with relevant laws and regulations, respect for human rights, environmental conservation, and product and service safety.

6.5 Personal Information

The WNI Group respects the privacy of all individuals, and has established policies and rules regarding the protection of personal information. WNI staff will comply with all relevant laws, regulations, and internal rules and policies when collecting, storing, using, disclosing, disposing

and otherwise handling personal information.

6.6 Confidential Information

Information is a valuable corporate asset, and the WNI Group is committed to ensuring the security of our own confidential information as well as that of our business partners and customers. Generally, confidential information is that which has not been disclosed to the public, would give us an advantage over our competitors, or could cause harm if disclosed prematurely or inappropriately. Common examples include inventions, creations, know-how, trade secrets, financial information, corporate strategies, sales plans, and information about relationships with customers, suppliers, and business partners. Disclosure or dissemination of confidential information is prohibited without the company's consent. In addition, WNI staff shall use such information only for WNI Group business.

6.7 Intellectual Property

The WNI Group respects intellectual property rights, including patents, designs, trademarks, trade secrets, and copyrights including computer software and code.

(1) The WNI Group recognizes that its intellectual property rights are important corporate assets, and shall strive to preserve and effectively utilize such rights.

(2) In addition to actively protecting the WNI Group's own rights, we respect the rights of other companies and individuals. WNI staff will not knowingly misuse or infringe upon intellectual property rights of third parties.

(3) Inventions and creations made by WNI Staff in the course of their employment shall belong to the WNI Group to the extent permitted by applicable laws, regulations, and rules. WNI Staff shall follow the instructions of the Company to preserve the WNI Group's rights in such inventions and creations.

6.8 Corporate Disclosure

WNI has a corporate philosophy of transparency. In addition to disclosing information as required by law, we proactively disclose our corporate philosophy, culture, management strategy, business model, and vision for future value creation to demonstrate our fundamental approach to corporate value, in order to foster mutual trust with our Supporters and co-create medium to long-term improvements in corporate value.

WNI is a public company and its shares are listed on the Japanese stock exchange, so the WNI Group has an obligation to disclose various information to the public in accordance with the securities laws and regulations of Japan.

The WNI Group has implemented "Disclosure Controls and Procedures" to ensure fair, accurate, understandable, timely, lawful, and adequate disclosure. WNI staff involved in filings and submissions with the Tokyo Stock Exchange and other competent authorities, as well as other disclosures made by the WNI Group, are required to ensure that such disclosures are sufficient, fair, accurate, timely, understandable, and in compliance with the "Disclosure

Controls and Procedures." WNI staff who provide information in the course of such disclosures are equally responsible for the information they provide.

6.9 Records and Reports

All records and reports, including books of account and financial records, must be accurate, complete, truthful, timely and properly represent the facts. WNI staff must not engage in any conduct that would cause inaccurate records or create misleading or false records. This policy is to be followed by all WNI staff with respect to their respective responsibilities, not just WNI staff responsible for finance and accounting.

6.10 Acting on Sound Judgment

When making a business decision, WNI staff shall do so on the basis of sufficient information, in good faith, and with a belief that it is in the best interests of the WNI Group as follows:

(1) Legal and legitimate (i.e., conform to applicable laws and regulations as well a s internal rules and policies.)

(2) No conflicts of interest (i.e., no personal interest or self-dealing exists.) (3) Authority (the decision must be within the scope of authority granted by the company.)

(4) Exercise of reasonable care (i.e., the decision was made on the basis of sufficient information after reasonable efforts were made to become as familiar with the relevant facts as possible.)

(5) That you have considered the matter in good faith (i.e., you have a reasonable belief that it is in the best interests of the company.)

(6) The decision is not an abuse of discretion (i.e., the decision is based on the reasonable exercise of discretion).

Organizational structures that involve conflict of interest situations may make it significantly more difficult for individual employees to make business decisions in accordance with the above. Accordingly, WNI Group directors, officers, and leaders shall exercise appropriate caution in this regard when organizing WNI Group companies.

7. Ethical Conduct

7.1 Insider Trading

Trading in stocks and securities with knowledge of material nonpublic information is illegal in many countries and is subject to civil and criminal sanctions. Material nonpublic information is any nonpublic information that could influence a reasonable investor's decision to trade in a stock or security. It is impossible to list every material nonpublic information without omission,

but it includes, for example, financial condition such as earnings and dividend plans, partnerships with other companies, divestitures, acquisitions, new services, progress in research and development, and any other significant business activity, WNI Group has established internal rules and policies regarding trading in WNI Group stock and securities, and WNI staff should be familiar with and comply with these internal rules and policies. Unless expressly permitted by these internal rules and policies on insider trading, WNI Staff shall not trade in WNI Group stock, convertible bonds, warrant bonds or other securities while in possession of material non-public information about the WNI Group or its business partners. Disclosure of material non-public information may not induce others (e.g., family, friends, clients, other WNI staff) to enter into transactions involving WNI Group stock, convertible bonds, warrants, or other securities.

7.2 Company Assets

WNI Group assets are to be used only for legitimate business purposes by authorized WNI staff (or persons designated by such WNI staff), who are responsible for safeguarding WNI Group assets from loss, damage, misuse, theft, or destruction. The WNI Group prohibits the use of WNI Group assets for personal gain. The WNI Group reserves the right to monitor and view the use of WNI Group assets by WNI staff to the extent permitted by relevant laws and regulations. This includes monitoring and reviewing data and files stored on email, devices, and other network terminals.

7.3 Media relations and Public Statements

The business activities of the WNI Group are closely watched by the media, including newspapers, magazines, radio, television and Internet media, and securities analysts.
Information provided to these groups and individuals is often interpreted as the official position of the WNI Group and communicated publicly as such. In order to provide clear and accurate information to the public, it is critical that comments be provided to the press and reporters only through appropriate employees in the Investor Relations and Corporate Communications departments. WNI staff shall not contact
the media or respond to media inquiries on behalf of the WNI Group or on behalf of the WNI Group.
When expressing opinions on social issues as a citizen, WNI staff shall make it clear that these are their own personal opinions and shall not give the impression that they are expressing opinions or working on behalf of the WNI Group.

7.4 Dissemination on Social Media and Networking Sites

In using social media, each WNI staff member will observe the entire Code of Conduct, being aware that many unspecified people are using social media for various purposes, and will exercise independent discipline to ensure that they do not say or do anything that deviates from social common sense as a sensible member of the local community on social networking sites. We will exercise our independence and discipline to ensure that we do not use social networking sites to say or do anything that deviates from social common sense.