

YOKOGAWA  Co-innovating tomorrow™



CODE OF CONDUCT
Yokogawa Europe B.V. 2022





OUR GOALS

1. OVERVIEW	4	Commitments towards our employees	5
The basis: the 'Compliance Guidelines for the Yokogawa Group'	4	Value employees	5
Regional Code of Conduct	4	Provide equal opportunities	5
Employee Awareness & Understanding	4	Do not accept intimidation	6
	4	Provide healthy and safe working conditions	6
2. SCOPE	4	Commitments of our employees	6
3. CODE OF CONDUCT	5	Preserve company assets	6
Code of Conduct for Yokogawa Europe B.V.; the basic principles	5	Avoid conflict of interest	6
General commitments	5	Behave respectfully	6
Be a responsible partner in society	5	Bribery, gifts and favours	6
Act respectfully	5	Comply with intellectual property laws	6
Comply with applicable national and EU laws and regulations	5	Proprietary or confidential information	6
Be environmentally responsible	5	Internet access and e-mail use	6
Support fair competition	5	4. COMPLIANCE PROCEDURE	7
Be transparent and accountable	5	The purpose	7
Commitments towards our business partners	5	Violation reporting	7
Be a reliable business partner	5	Roles of the Compliance Officer	8
Creating optimal value	5	5. REPORTING STRUCTURE	9
Making transparent business decisions	5	Reporting	9
Company payments	5	6. BREACHES OF THE CODE - DISCIPLINARY ACTION	10
		Disciplinary Action	10
		Employees	10
		Managers	10
		7. IN SUMMARY	11

CODE OF CONDUCT

Message from the president

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The companies of the Yokogawa Group aim to be-, and help our customers to be sustainable. We are contributing to the environment and society through broad-ranging activities in the area of measurement, control, and information. The company anticipates that their employees will combine good citizenship with the courage to innovate.

In order to reach this common goal in Europe, we want to show our stakeholders that we share a set of common and uniting ideals and values. It is therefore very important to commit these basic rules to paper as an overview of how we as Yokogawa colleagues conduct ourselves in society. The Code of Conduct provides a common standard approach to conduct and applies to all employees of companies within Yokogawa Europe, over and above any standards or codes of conduct used at individual companies. The Code of Conduct describes what we agree is constituted and understood as correct business behavior.

Each employee is provided a means to report violations of the Code of Conduct outside of the normal reporting line; for contact information for such reports and for advice, please follow our compliance structure, chapter 5 of the Code of Conduct (available on our intranet). The combination of the Code of Conduct and a means of reporting violations promote a corporate culture where duty and responsibility towards shareholders, our customers, our suppliers, and each other matters more than clinical obedience. By doing so, we are continuously challenging ourselves to meet ethical expectations and gain trust.

I therefore urge everyone to review the Code of Conduct, to familiarize yourself with the contents, and to resolve to conduct yourselves accordingly.



Takayuki Matsubara
President Yokogawa Europe B.V.
April 2022


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CODE OF CONDUCT

Overview and Scope

1. OVERVIEW

The basis: the 'Compliance Guidelines for the Yokogawa Group'

The 'Compliance Guidelines for the Yokogawa Group' informs all Yokogawa employees in every consolidated company worldwide how we are expected to behave in our business relationships with society, within the Company, with other individuals and third parties; it provides common standards of conduct (professional and responsible behavior) which all employees have a duty to uphold. This document can be found on the intranet.

Regional Code of Conduct

To promote understanding of, and compliance with the 'Compliance Guidelines for the Yokogawa Group', these global standards are broken down in this Yokogawa Europe B.V. 'Basic Principles of Business Conduct'

(hereinafter to be referred to as: Code of Conduct). This document describes the standards of conduct that are expected, the specific responsibilities of every employee of a company within Yokogawa Europe B.V. and the process for ensuring compliance.

Employee Awareness & Understanding

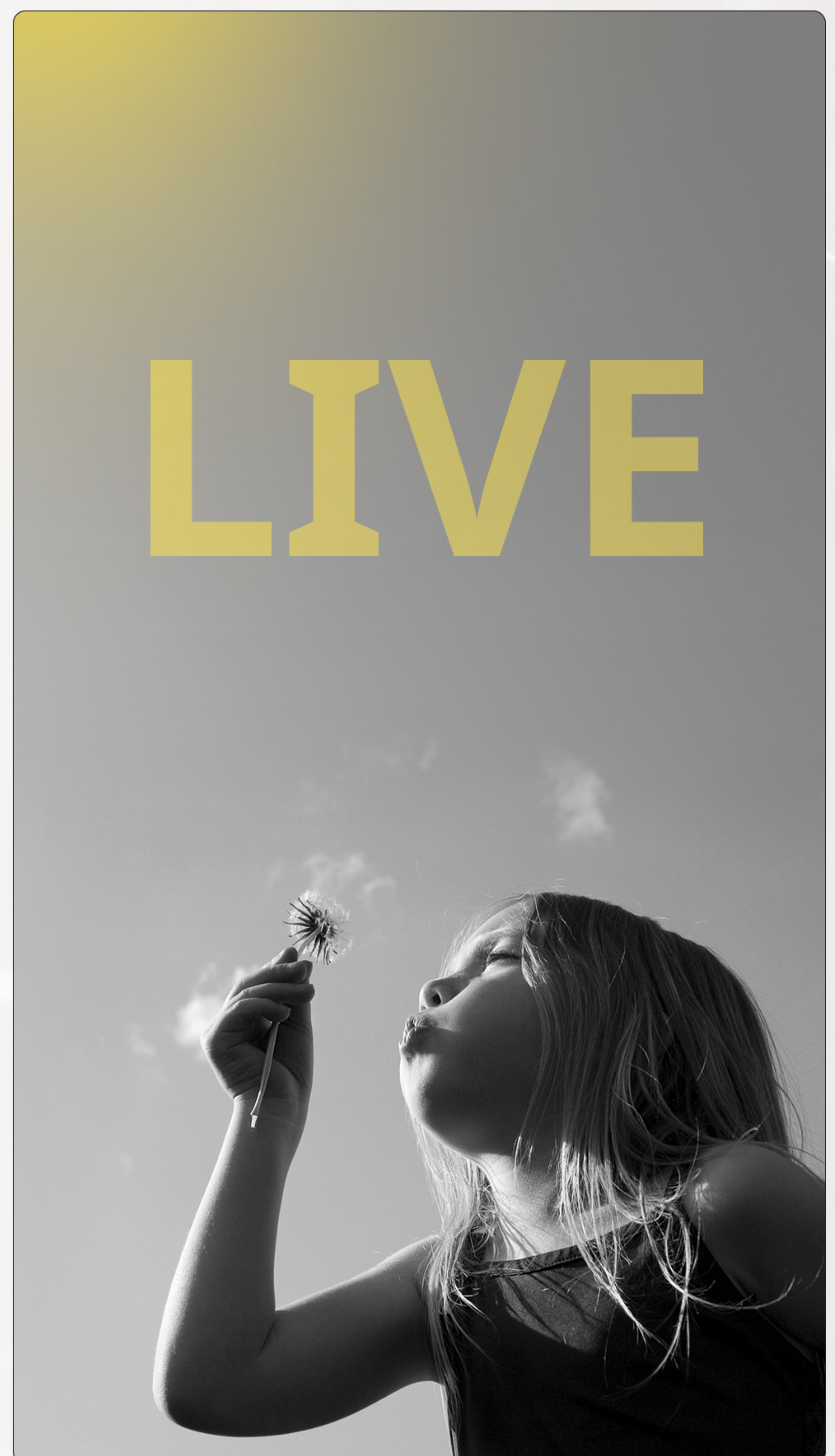
To ensure employee awareness and understanding, a copy of the Code of Conduct is issued to each employee upon hiring. Each employee is required to sign an acknowledgement that he/she has received and read the Code of Conduct and agrees to comply fully with the standards.

Revisions are communicated to all employees via e-mail and will also be published on the intranet.

2. SCOPE

This document applies to all employees of Yokogawa Europe B.V. and its subsidiaries (national sales companies, manufacturing and R&D companies), hereinafter referred to as Yokogawa Europe B.V.

For the purpose of this document the term "employees" includes contractors, interns, trainees, temporary workers and all others who perform services for Yokogawa Europe B.V.



CODE OF CONDUCT

The commitments we keep

3. CODE OF CONDUCT

Code of Conduct for Yokogawa Europe B.V., the basic principles

All employees are expected to adhere to the 'Compliance Guidelines for the Yokogawa Group' and the concrete Code of Conduct derived there from. The procedure for reporting violations of this Code of Conduct is described in chapter 5.

General Commitments

Be a responsible partner in society.

Yokogawa wishes to be a responsible partner in society, acting with integrity towards its customers, employees, suppliers, governments and others who can be affected by its activities.

Act respectfully.

We will treat people with dignity and respect. Cultural differences between and within the countries in which Yokogawa operates will be acknowledged and respected.

Comply with applicable national and European Union laws and regulations.

European Union legislation includes, but is not limited to, legislation on public procurement, financial services, prevention of money laundering and terrorist financing, product safety and compliance, protection of the environment, nuclear safety, food safety, public health, consumer protection, protection of personal data as well as security of network and information systems.

Be environmentally responsible.

In conducting its activities Yokogawa gives due regard to the environment. In developing and manufacturing our products we aim to minimize adverse effects on the environment.

Support fair competition.

We support the principle of fair competition as a basis for conducting our business. Yokogawa employees will abide by the laws and regulations of the country and rules of the Yokogawa company in which they work.

Be transparent and accountable.

Yokogawa will maintain records of all business transactions in an accurate, complete, timely and transparent manner in accordance with Yokogawa's accounting principles.

Commitments towards our business partners

Be a reliable business partner.

We aim to be a reliable partner for our customers, suppliers and other business partners. We deliver our services and products with professional integrity. The safety and quality of our products is the basis for Yokogawa's sustainable development.

Creating optimal value.

We are committed to provide business solutions aimed at creating optimal value for our customers. We focus on the continuing improvement of our services and products.

CODE OF CONDUCT

The commitments we keep

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Making transparent business decisions.

Our employees avoid that personal relationships or interests influence or appear to influence objective business decisions. They will be transparent to colleagues and customers about any (potential) conflicts of interest.

Company payments.

Payments for services to third parties are consistent with local practice, law and ethical standards.

Commitments towards our employees

Value employees.

Yokogawa values its employees as a key resource. An atmosphere of good employee communication, consultation, involvement and responsibility is of great importance. An employee's personal development and optimal use of talents is encouraged.

Do not accept intimidation.

Yokogawa employees have the right to work in an environment that is free of any form of degree of discrimination, intimidation and harassment. Adverse behavior will not be tolerated.

Yokogawa prohibits sexual advances, requests for sexual favors and other unwelcome verbal or physical conduct of a sexual nature which can be seen as threatening or undesirable by the person towards whom they are directed. Yokogawa takes such matters very seriously and treats them as unacceptable.

Provide equal opportunities.

Within Yokogawa every employee has an equal opportunity for personal recognition and career development regardless of race, gender, sexual preference or religious belief. The same policy applies to recruitment of employees

Provide healthy and safe working conditions.

Yokogawa will do all that is reasonable and practicable to provide healthy and safe working conditions for its employees both in office locations and at customers' sites.

Commitments of our employees.

Preserve company assets

Each employee is responsible for the proper use, protection and conservation of Yokogawa's assets and resources. This includes Yokogawa's properties, proprietary interests, financial data, trade secrets, intellectual property and other Yokogawa rights. Yokogawa's assets and resources are to be used solely to pursue and achieve Yokogawa's goals and not for personal benefit.

Avoid conflict of interest.

We avoid any conflict between our personal and business activities and financial interests. If an employee believes there could be a conflict of interest, he or she should promptly disclose it and discuss the issue with his or her superior.

CODE OF CONDUCT

The commitments we keep

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Behave respectfully.

Each employee will behave respectfully towards his/ her business relations and fellow employees. He or she will not perform any act of discrimination, intimidation or harassment or show any other behavior intended to create undesirable circumstances or (sexual) relationships.

Bribery, gifts and favors.

Bribes and corruption in any form are unacceptable. Gifts and favors, in whatever form, should never be made by or accepted by a Yokogawa employee if the gift goes beyond what is allowed according to the applicable Yokogawa policies on gifts & entertainment.

Comply with intellectual property laws.

Yokogawa employees must observe all laws and regulations regarding patents, copyrights, trademarks, trade secrets, etc. which protect the intellectual property rights of companies and individuals. Computer software that is copyrighted and used by employees to conduct company business may not be copied except for "back-up" purposes, nor may copies be made for an employee's personal use. Unauthorized software may not be used on Yokogawa owned or leased computer equipment.

Proprietary or confidential information.

Yokogawa employees may not disclose any non-public information to any outside party, competitor, or news media organization. This includes information related to business operations, financial results, sales results, personnel, technological status, or other information designated as confidential. This also applies to confidential information of third parties, suppliers, customers, or other employees.

Internet access and e-mail use.

Yokogawa employees use the internet and e-mail facilities to support business operations. Employees are not permitted to:

- visit web sites that contain pornographic, racist, terrorist, discriminatory, insulting or offensive material;
- engage in any activity that is illegal or unethical;
- possess or distribute pornographic, racist, terrorist, discriminatory, insulting or offensive material;
- send data from the Intranet via e-mail in such a way that proprietary information is received by a competitor.

4. COMPLIANCE PROCEDURE

The purpose.

Yokogawa Europe B.V. is committed to ensuring professional and responsible behavior in all its business relationships. All employees are obliged to uphold the Code of Conduct and are encouraged to report violations or suspected violations of it. Also, external parties such as customers, suppliers and business partners and their employees are encouraged to report (suspected) violations.

The Compliance Procedure is intended to receive and investigate any reports from employees or external sources of (suspected) violations.

Violation reporting.

If you discover or suspect a violation of the Code of Conduct, you should inform your supervisor, manager and/or Human Resources manager.

Please follow any applicable internal procedures. External parties should inform their regular contact in the company.

However, where you feel it is inappropriate or you feel uncomfortable reporting a (suspected) violation through the above channels you should report it directly to the internal Compliance Officer or the European Compliance Coordinator, who all are held to confidentiality. Contact details can be found on page 9 below.

If you report a (suspected) violation, confidentiality will be maintained according to legal and ethical requirements. You will not be subject to retribution for reporting the (suspected) violation.

If you are in any doubt regarding the Code of Conduct or what is or is not acceptable conduct, please consult with the local Compliance Officer or the European Compliance Co-Ordinator.



CODE OF CONDUCT

Roles of Compliance Officers

ROLES OF THE COMPLIANCE OFFICERS

The role of the **Compliance Officer** is to:

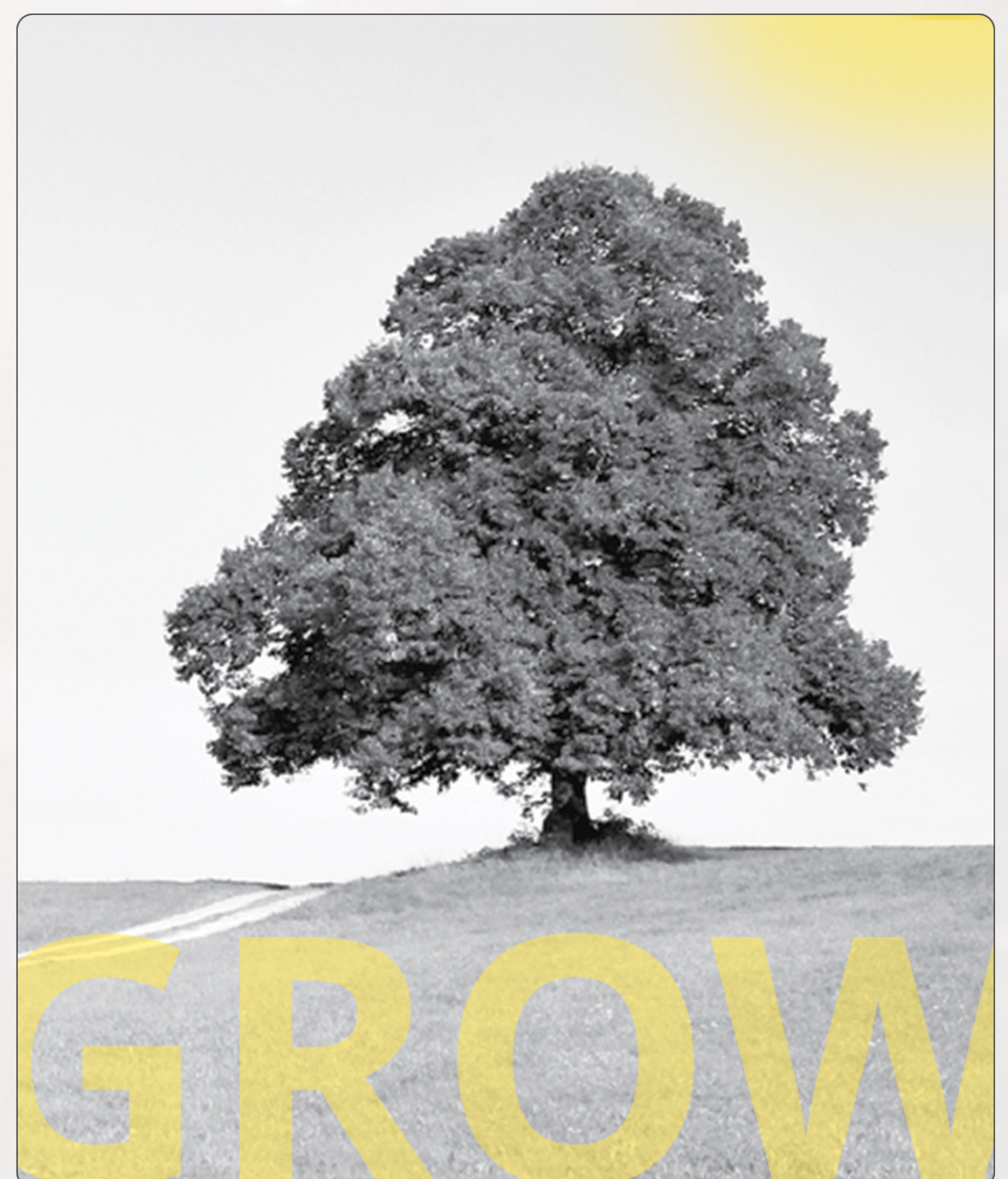
- Promote compliance with the Code of Conduct, e.g. awareness, education and training, good business practices.
- Create an environment and procedures through which employees can report (suspected) violations of the Code of Conduct in confidence and without fear of retribution and which allows the company to respond promptly and effectively.
- Review and assess reports of (suspected) violations of the Code of Conduct and determine whether they should be discussed with the European Compliance Co-ordinator.
- Review the results of the investigation, decide on the appropriate actions to be taken and ensure progress.
- Close the investigation with a written report.
- Recommend improvements to business practices, where appropriate, as a result of the investigations.
- Make periodic reports to the European Compliance Co-ordinator on the number, type, and status of reported violations.
- If the Compliance Officer wishes to consult other people or conduct a further investigation that involves consulting others, they will ask you for permission beforehand.

The role of the **European Compliance Co-ordinator** is to:

- Be responsible, at the European level, for the contents and periodic review of policies and booklets relating to the Code of Conduct,
- Promote compliance with the Code of Conduct (e.g. awareness, education and training, good business practices)

- Receive periodic reports from the local Compliance Officers regarding the number, type and status of reported violations of the Code of Conduct.
- Investigate suspected and reported violations of the Code of Conduct.
- Recommend improvements to business practices to improve compliance with the Code of Conduct.
- Report periodically regarding the number, type and status of violations of the Code of Conduct to the YHQ Compliance Officer.
- Recommend adjustments or improvements of the procedures to uphold the Code of Conduct.

The European Compliance Co-ordinator has no influence on the current roles of management, employee, representatives or employee representative bodies. Where it is decided that a disciplinary hearing is appropriate, the local disciplinary procedure will be followed.



5. REPORTING STRUCTURE

Reporting/consultation is available according to the following communication channels:

1. You can contact the (local) Compliance Officer. Please refer to the HR site for contact data of local Compliance Officers.
2. By phone: +31(0) 6 – 53867204. The European Compliance Co-ordinator will respond adequately.
3. By letter: Yokogawa Europe B.V. Attn. of the European Compliance Co-ordinator, Euroweg 2, 3825 HD Amersfoort, The Netherlands.
4. You can send information regarding compliance matters to the European Compliance Co-ordinator via the quick links on the intranet (right-hand side of the page). Search for Business Ethics (Help) Line and fill out the textbox at the bottom of the page. The sender will be anonymous. If you do not want to remain anonymous you may directly send an email to BEL@nl.yokogawa.com instead of using the text field on the intranet.

The European Compliance Co-ordinator will respond adequately:

5. Within seven (7) days you will receive feedback on your Report.
6. Within three (3) months after confirmation of receipt you will receive feedback on your report.
7. Anyone who reports a (suspected) violation of the Code of Conduct, including a violation of EU Union Law and uses reporting channels set up by national authorities is protected. Such external channels may be appropriate in case the internal reporting is unavailable or inadequate.
8. Protection is also available for those who make a public disclosure of a violation of the Code of Conduct, including a violation of EU Union Law, after having first reported internally and/or externally in case (a) the reporter has reasonable grounds to believe that a (suspected) violation may constitute an imminent or manifest danger to the public interest, (b) no appropriate action was taken in the external procedures under 7. above or (c) there is a risk of retaliation against the reporter in connection with the external reporting mentioned under 7. above.



6. BREACHES OF THE CODE & DISCIPLINARY ACTION

Disciplinary Action:

Failure to comply with the Code of Conduct will render an employee liable to disciplinary action. Appropriate disciplinary action will be taken against:

Employees:

- Who violate the laws or standards of conduct expressed in the Code of Conduct or are guilty of other improper or unlawful conduct
- Who retaliate, directly or indirectly, or encourage others to do so, against an employee for reporting a suspected violation

Managers:

- Who direct, approve or condone violations or have knowledge of such violations and do not move promptly to report and correct them
- Of a violator, in case the circumstances of the violation indicate inadequate supervision or lack of diligence

Disciplinary proceedings will be held in accordance with the laws and regulations of the country, and the disciplinary procedures of the local company in which the employee works.

Disciplinary action will be administered at a level commensurate with the severity of the violation.

7. IN SUMMARY

The Yokogawa Group Guidelines and Code of Conduct for Yokogawa Europe B.V. are intended to protect the interests, security and reputation of the company, its employees and other stakeholders. They describe and represent common, professional and responsible standards of behaviour for all employees.

The Compliance structure of Yokogawa Europe B.V. provides a means for each employee to report violations of the Code of Conduct.

- In confidence
- In a timely and effective manner
- Without fear of retribution

The local Compliance Officer and the European Compliance Co-ordinator exist as part of an internal Yokogawa process and are not involved with the national legislation.

They have no influence on the current roles of management, employee representatives or employee representative bodies. Their sole purpose is to ensure compliance with the Code of Conduct and to facilitate your contribution.



TOGETHER



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Yokogawa Europe B.V. 2022

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