NIDEC ACIM (APPLIANCE, COMMERCIAL AND INDUSTRIAL MOTORS)

COMPLIANCE
CODE OF CONDUCT
合规行为准则

8 June 2026

Nidec ACIM Code of Conduct
Nidec ACIM 行为准则

The Nidec Group's business philosophy is to grow healthily and contribute to the global society (the "royal road of business management"). Our reputation for honesty and integrity among our customers, shareholders, investors, and other stakeholders is a key to the growth and prosperity of the Group. We will not achieve any results through violations of laws or regulations or through unscrupulous business transactions.
尼得科集团的商业哲学是健康成长，为全球社会做出贡献（“企业皇家管理之路°） 我们在客户、股东、投资者和其他利益相关者中的诚信声誉是集团发展和紫荣的关键。我们不会通过违反法律法规或不道德的商业交易取得任何结果。

This Nide Group Compliance Code of Conduct (this "Code of Conduct") along with Nidec ACIM Compliance Policies provides for specific guidance for all Nidec ACIM executives and employees to comply with not only domestic/foreign laws, rules and regulations but also social rules, ethics, etc. in the Company's daily business activities, in order to keep the royal road of business management and in response to the increasing demand for compliance with Nidec's globalization.
尼得科集团合规行为准则（以下简称为“行为准则°）以及Nidec ACIM合规政策为所有 Nidec ACIM管理人员和员工提供了具体指号，使其在公司的日常经营活动中，不仅道守国内外法律、法规，也遵守社会规则、道德规范，以保持-企业皇家管理之路 并应对日益增长的Nidec全球化的需求。

This Code of Conduct will apply to Nidec Corporation, its consolidated companies, and all of their executives and employees after undergoing these companies' required procedure.
本行为准则在历经所有公司所需的程序后，适用于Nidec公司、其合并公司及其所有高管和员工。

Nidec ACIM Code of Conduct
Nidec ACIM 行为准则

THE BASIC PHILOSOPHY
主要原则

The Seven Compliance Principles
七条合规原则

We hereby establish the following "Seven Compliance Principles" as the basic philosophy of this Code of Conduct, and, as the global society's legal, regulatory, and corporate requirements change with the times, we will always keep in mind the spirit of the Principles, promote healthy business activities, and stay on the royal road of business management" as a global manufacturer that contributes to establishing a sustainable society.

我们在此确立以下•七尔合规原则-作为本行为准则的基本理念，随者全球社会法律、法规和企业要求的与时俱进，我们将始终车记这些原则的精神，促进健康的商业活动，作为一个为建立一个可特线发展的社会做出贡献的全球制造商，我们将维续走°企业皇家管理之路°。

Nidec ACIM Code of Conduct
Nidec ACIM 行为准则

THE BASIC PHILOSOPHY
主要原则

1. We will comply with all laws and regulations and act based on noble business ethics.

我们应遵守全部法律法规，并格守高尚的南业道德标准行事。

2. We, as a global manufacturing company, will ensure we produce defect-free and quality products.

作为一家全球性生产型企业，我们应确保生产无瑕疵、高品质的产品。

3. We will ensure we disclose timely and accurate information.

我们应确保披露及时、准确的伯息。

4. We will ensure we properly manage and use Company information and assets.

我们应确保我们怡当地管理与使用公司的信息与资产。

5. We will ensure we keep our work environment safe and comfortable.

我们应确保保持我们的工作环境安全与舒适。

6. We will compete freely and fairly, and we will not engage in any anticompetitive conduct.

我们应自由、公平地参与竞争，不能从事任何限制竞年的行为。

7. We will ensure we create and maintain a compliance system that is necessary and sufficient to comply with the Nidec Group Compliance Code of Conduct.

我们应 确保建立并维护一个合规体系，以必要并充分地遵守尼得科集团的合 规行为准则。

Nidec ACIM Code of Conduct
Nidec ACIM 行为准则

COMPLIANCE WITH ALL LAWS, REGULATIONS, AND BUSINESS ETHICS
選守所有的法律、法规和商业道德

We will comply with all laws and regulations and act based on noble business ethics.
我们会这宁所有法律，法规，并这站方火道德行事。

Staying on the "royal road of business management"
坚持“企业皇家管理之路”

We must recognize ourselves as members of the international society, comply with each country's domestic and international laws and regulations, fulfill the Company's social responsibilities based on high business ethics and stay on the
"royal road of business management."
We will avoid acts that can be misunderstood by society as improper or against corporate ethics.
我们必须承认自己是国际社会的一员，遊寸各国国内外法律法规，遊循商业道德
履行公司的社会责任，坚持走-企业皇家管理之路"。
我们将避免可能破社会误解大不怡当或进反企业道德的行为。

Respecting basic human rights and banning discriminatory treatments
尊重基本人权并禁止歧视行为

In all of our business activities, we must respect basic human rights, and not engage in any discriminatory treatment.
在我们所有的商业活动中，我们必须学重基本人权，不搞任何歧视性待週。

Nidec ACIM Code of Conduct
Nidec ACIM 行为准则

COMPLIANCE WITH ALL LAWS, REGULATIONS, AND BUSINESS ETHICS
選守所有的法律、法规和商业道德

Ban on bribery, etc., and maintaining transparent political and governmental relations
禁止贿赂等，保持透明的政治和政府关系

We must maintain healthy and transparent political and governmental relations.
Inside or outside our country, we do not provide or promise any improper money, goods, or any other economic profit to any government officials or those equivalents.
我们必须保持健康和透明的政治和政府关系。在国内外，我们不向任何政府官员或类似人员提供或承诺任何不正当的金钱、货物或任何其他经济利益。

COMPLIANCE WITH ALL LAWS, REGULATIONS, AND BUSINESS ETHICS
選守所有的法律、法规和商业道德

Ban on insider trading
禁止内幕交易

We do not engage in any act that violates insider trading regulations, such as trading in the Company's securities while in possession of material non-public information regarding the Company and/or tip or pass on inside information to any other person.
我们不从事任何违反内幕交易规定的行为，例如在掌握有关公司的重要非公开信息的同时买卖公司的证券和/或向任何其他人举报或传递内幕信息。

Environmental protection
环境保护

We realize that global environmental protection is a social responsibility of a global company, comply with individual countries' environmental regulations, use resources proactively and effectively, and make sure to conserve energy.
我们认识到全球环境保护是一个全球性公司的社会责任，遵守各国的环境法规，积极有效地利用资源，节约能源。

COMPLIANCE WITH ALL LAWS, REGULATIONS, AND BUSINESS ETHICS
選守所有的法律、法规和商业道德

Securing self-correcting functions
保证自我纠错功能

If we identify any violation of laws, regulations, internal rules, etc. by our executives or employees, we will correct such violation immediately, and strictly handle such violation.
如果我们发现公司高管或员工违反法律、法规、内部规章等，我们将立即纠正，并严格处理。

Compliance with this Code of Conduct
遵守本行为准则

We recognize that we must comply with this Code of Conduct and that any violation of this Code of Conduct may result in a disciplinary action, etc. based on applicable laws, regulations, internal rules, etc.
我们承认，我们必须遵守本行为准则，任何违反本行为准则的行为都可能导致基于适用法律、法规、内部规则等的纪律处分等。

2. SECURING PRODUCT SAFETY AND QUALITY
确保产品安全及产品质量

We, as a global manufacturing company, will ensure we produce defect-free and quality products.
作为一家全球性的制造公司，我们将确保我们生产出无缺陷和高质量的产品。

Securing product safety
确保产品安全

To secure the safety of our products, we must comply with each country's relevant laws, regulations, rules, etc. on product safety, quality and reliability, and otherwise properly ensure the safety of all of our products.
为保证我们产品安全，我们必须遵守每一个国家的关于产品安全、质量和可靠性 的相关法律、法规及规则，并恰当地确保我们所有产品的安全性。

Prevention of misrepresentation, accidents and disputes
防止失实、事故或争议

We will not present or advertise any information in any misleading way to our customers, and we will do our very best to prevent accidents and disputes by preparing easy-to-understand specifications, user manuals, etc. 我们不得以任何误导的方式向客户展示或凸显任何信息。我们应尽全力通过准备　容易理解的说明书、用户手册等，预防事故或争议的出现。

2. SECURING PRODUCT SAFETY AND QUALITY
确保产品安全及产品质量

If a defect is found or suspected in any of our Company's products, we must report it to an appropriate senior officer and must consider the product user's interest as the first priority. We must also immediately take all actions to minimize negative consequences such as quickly communicating the defect to the product's users. 一旦我们公司的任何产品被发现或被怀疑有瑕疵，我们必须向适当的高级别人员　予以汇报，而且必须将产品使用者的利益放在首要位置加以考虑。我们也必须要　立即采取行动，例如：快速与产品使用者对瑕疵进行沟通，以将不利后果最小化。

Providing high-quality products
提供高质量产品

To respond to society's and our customers' expectations, we will ensure that we efficiently produce and supply high-quality products.
为回馈社会及客户对我们的期望，我们应确保我们有效地生产并提供高品质的产 品。

3. PROPER INFORMATION DISCLOSURE
恰当的信息披露

We will ensure we disclose timely and accurate information.
我们将确保及时准确披露信息。

Timely disclosure of Company information
公司信息及时披露

To ensure our business management's transparency, we will disclose our Company information to our shareholders, investors, and other stakeholders proactively, timely, properly, and coherently as a listed company.
为保证我们业务管理的透明度，我们应如上市公司一样，向我们的股东、投资者、及其他利益相关者，对我们的公司信息予以前瞻性地、及时地、恰当地、连贯性 地披露。

Accurate recording and document filing
准确记录与文件归档

We will properly record all work-related information based on laws, regulations, internal rules, etc., ensure that no misleading or false statement or error will be on internal documents, and comply with the rule of keeping such documents for a specific period of time. 我们应按照法律、法规、内部规章等要求，正确记录所有与工作相关的信息。我 们应确保内部文件中无任何误导性或虚假性的描述、或错误存在。我们应遵守在 一定时间内保存相应文件的规则。

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3. PROPER INFORMATION DISCLOSURE
恰当的信息披露

Proper accounting and account reporting
正确的会计与账目报告

We must always ensure accuracy of our Company's accounting reports based on the proper accounting in compliance with relevant laws, regulations, and standards.
我们必须一直确保我们公司根据符合相关法律、法规和标准所做出的会计报告的 准确性。

4. PROTECTING AND PROPER USE OF COMPANY INFORMATION AND ASSETS
保护并恰当使用公司信息与资产

We will ensure we properly manage and use Company information and assets.
我们将确保我们正确管理并使用公司信息及资产。

Treating confidential information
对待保密信息

Company information and assets includes all Nidec Group Companies' information and assets.
公司的信息与资产包括全部尼得科集团的信息与资产。

We must strictly manage personal information and other confidential information of the Company both during and after employment, based on internal rules, etc. to prevent improper disclosure or leak of such information, and we will not use such information either improperly or unfairly.
为防止对保密信息的不正当披露或泄露，我们必须根据内部规定，严格管理个人 信息、在雇佣期间及之后的公司其它保密信息，并不得为不公平或不恰当的目的 使用如上信息。

We will not unfairly obtain any information on our customers, suppliers or any other business partners, etc., and will use such information we properly obtained in the course of business only for fair purposes.
我们不得不恰当地获取关于客户、供应商、或任何其他业务合作者等人的任何信 息，并且只会将我们在业务过程中正确获得的此类信息用于公平目的。

4. PROTECTING AND PROPER USE OF COMPANY INFORMATION AND ASSETS
保护并恰当使用公司信息与资产

Appropriate management of Company property
公司资产的恰当管理

We must promote the reasonable management and use of the Company's assets and ensure that they are used efficiently and for legitimate business purposes, and must not use any Company assets, tangible or intangible, for personal purposes, or lose or damage any of such assets unfairly.

我们必须促进公司资产的合理管理及使用，并确保公司资产被有效地、并为合法　商业目的而使用，不能为个人目的而使用公司的资产（无论有形资产，还是无形　资产），或不恰当地丢失或毁坏任何公司财产。

4. PROTECTING AND PROPER USE OF COMPANY INFORMATION AND ASSETS
保护并恰当使用公司信息与资产

Appropriate use of intellectual property rights and non-violation of intellectual property rights of others
恰当使用知识产权权利，不侵害他人知识产权权利

The creation of intellectual property rights such as patent rights, trademarks, copyrights, and similar rights, is actively sought, and such rights will be used in an appropriate manner. Violation of the intellectual property rights of others is not tolerated.
知识产权权利的创建，例如：专利权利、商标、著作权、及其它类似的权利正在　被积极地寻求。此类权利应以正确方式予以使用。侵害他人知识产权权利的行为 是不被容忍的。

If intellectual property is created during the course of professional duty, employees shall cooperate with the patent application process of the company, conduct appropriate patent maintenance, and ensure its integrity.
倘若知识产权在履行职务期间被创建，员工应配合公司进行专利申请，对专利进　行恰当维护，并确保其完整性。

4. PROTECTING AND PROPER USE OF COMPANY INFORMATION AND ASSETS
保护并恰当使用公司信息与资产

Ban on acts that cause conflict of interest
禁止引发利益冲突的行为

We will not tolerate any personal act of our executives or employees that results in detriment to the Nidec Group's corporate activities, or that interferes or conflicts, or has the potential to interfere or conflict, with the interests of the Nidec Group.
我们不能容忍管理人员或员工的个人行为损害尼得科集团的公司活动，或干扰、 可能干扰尼得科集团的利益，或与尼得科集团的利益产生冲突或可能产生冲突。

5. SAFE AND COMFORTABLE WORK ENVIRONMENT
安全与舒适的工作环境

We will ensure we keep our work environment safe and comfortable.
我们将确保我们的工作环境安全且舒适

We will give first priority to the respect of human rights, comply with labor-related laws and regulations, and realize safe and comfortable work environments.
我们将把尊重人权放在首位，遵守劳动法律法规，实现安全舒适的工作环境。

Based on the understanding that the most important management resource of a company is its employment force, we endeavor to create comfortable work environments, in which all Nidec Group executives and employees can fully exercise their abilities.
因为我们了解一个公司最重要的管理资源来自于其劳动力，我们努力营造一个舒 适的工作环境，使尼得科集团全部管理人员及员工能够在其中充分发挥各自的能 力。

6. BAN ON UNFAIR COMPETITION
禁止不公平竞争

We will compete freely and fairly, and we will not engage in any anticompetitive conduct.
我们将自由、公平地竞争，不从事任何反竞争行为。

Fair trade and free competition
公平贸易以及自由竞争

We comply with all individual countries' competition and anti monopoly laws, and engage in fair business transactions.
我们遵守各个国家关于竞争及反垄断的法律，并应从事公平商务交易。

We do not engage in cartel, price fixing, bid-rigging, market allocations, or any other act that impedes fair and free competitions, or engage in any act that would cause suspicion for such act.
我们不得实施企业联合、价格固定、串标、市场分配，或其他阻止公平自由竞争 的任何行为，或从事任何可能引起怀疑的行为。

6. BAN ON UNFAIR COMPETITION
禁止不公平竞争

Ensuring transparency in transactions with customers and vendors
确保与客户和供应商交易的透明度

When selecting vendors, a fair and transparent evaluation, based on the strict observance of the applicable law, with such selection standards as safety, quality, environmental aspects, price and delivery time, is conducted. There is no differentiation between domestic and non-Japanese service providers, and our attitude and approach is that of a company open to the entire world.
在选择供应商时，应在严格遵守适用法律的基础上，根据安全、质量、环境因素、 价格和交货时间等选择标准，进行公正和透明的评估。国内和非日本的服务提供 商没有区别，我们的以一家向全世界开放的公司的态度和方法行事。

Ensuring transparent relations with stakeholders
确保与股东的透明关系

When communicating with our stakeholders, we will be open, honest, and moderate.
在与股东沟通时，我们将保持开放、诚实和温和的态度。

We do not offer our private customers any personal rebates, commissions, or any other conveniences.
我们不向私人客户提供任何个人回扣、佣金或任何其他便利。

6. BAN ON UNFAIR COMPETITION
禁止不公平竞争

Prohibition of illegal acquisition of information and attentiveness towards wrongdoing of customers and vendors
禁止非法获取信息和关注客户和供应商的不当行为

Information about other companies must be obtained by appropriate methods and handled carefully. Due care with regards to wrongdoing of customers or partner companies is exercised.
关于其他公司的信息必须应以恰当的方式获取，并小心处理。就客户或合作公司　的不道德行为应谨慎行事。

Prohibition of acts causing obstruction of business
实施阻碍业务发展的行为是被禁止的

Acts aimed at other companies that create barriers to their conducting business, as well as misleading representations of products and similar unfair business practices, are prohibited.
我们严禁针对于其他公司实施对其发展业务制造障碍、做出误导性的表述、及类　似不公平商务活动的行为。

7. DESIGNING A COMPLIANCE SYSTEM
设计合规系统

We will ensure we create and maintain a compliance system that is necessary and sufficient to comply with the Nidec Group Compliance Code of Conduct.
我们将确保我们建立和维护一个合规体系，依靠该体系我们能够充分遵守*Nidec* 集团合规行为准则。

Maintenance and operation of a compliance system
合规体系的维护和运行

In order to continuously maintain and improve our compliance system, (i) the principal executive officer shall maintain and operate the compliance system based on the basic framework for internal control as established by the board of directors, and assume the responsibility for its evaluation, and (ii) management level employees shall be responsible for maintaining and operating a compliance system with regards to the sections and duty assignments under their control.
为持续维持和改善本公司的合规制度，(i)主要执行官应在董事会制定的内部 控制基本框架的基础上维持和运作合规制度，并对其评估负责，以及(ii)管理 层员工应负责维护和运行与其控制的部门和职责分配相关的合规系统。

We will prepare and maintain a detailed compliance manual and systems, and ensure our ability to appropriately address various situations in our daily business activities.
我们将起草和维护一份详细的合规手册和制度，并确保我们能够适当地处理日常 业务活动中的各种情况。

7. DESIGNING A COMPLIANCE SYSTEM
设计合规系统

The Compliance Committee, the Compliance Office as well as the compliance managers who shall be responsible for compliance in each department and at each business unit shall perform a central role at their respective stage in the system.
合规委员会、合规办公室以及负责各部门和各业务单位合规性的合规经理应在系 统的各阶段发挥中心作用。

Utilization of a whistle-blowing system
检举制度的运用

When it is discovered that one's own actions or the actions of any other executives or employees are in actual or possible violation of legal requirements or Company policies or procedures, we will immediately report to the Compliance Office or the Nidec ACIM Ethics Hotline available at our website.
当发现自己的行为或任何其他高管或员工的行为已经或可能违反法律要求或公司 政策或程序时，我们将立即向合规办公室或我们网站上的Nidec ACIM道德热线报 告。

7. DESIGNING A COMPLIANCE SYSTEM
设计合规系统

Any executive or employee who is reporting any possible violation via the whistle-blowing system (Hotline available at our website) may choose to remain anonymous in reporting such possible violation. We prohibit retaliatory action against anyone who, in good faith, reports a possible violation.
任何通过举报系统对可能的违规行为进行举报的高管或员工(可在我们的网站上找到热线)可以选择匿名的方式进行举报。我们禁止对善意举报违规的人采取报复行动。

Systematic response to illegitimate organizations
对非法组织的系统反应

If we are approached by illegitimate organizations, we will promptly take necessary actions including notifying the proper authorities. Illegitimate claims and requests for illegal transactions shall be met with a firm response as an organization.
如果有非法组织接触我们,我们会立即采取必要行动,包括通知有关当局。对非法交易的不正当主张和要求,我们应当予以坚决回应。

7. DESIGNING A COMPLIANCE SYSTEM
设计合规系统

Awareness-raising for executives and employees
提高管理人员和员工的意识

Parallel to informing and teaching about this Code of Conduct through educational and training activities, executives and employees should also deeply internalize the principles embodied in this Code of Conduct, and carry out their proper compliance duties on a daily basis.
在通过教育和培训活动宣传和培训本行为准则的同时,高管和员工还应领悟及遵守本行为准则,并在每日工作中履行合规职责。

Effective monitoring and evaluation
有效的监测和评估

The Internal Audit Department will conduct monitoring and evaluation of the compliance system through systematic operational audits, and, in the event it identifies significant concerns and problems, it will recommend improved corporate controls or other practices to eliminate those concerns and problems.
内部审计部门将通过系统的业务审计对合规制度进行监测和评价,一旦发现重大问题,将建议对公司控制进行改进或其他改进方式,以消除这些问题。

7. DESIGNING A COMPLIANCE SYSTEM
设计合规系统

Responsible conduct in a crisis
危机中的责任

In the case of socially-prohibited behavior, for example illegal or other improper activities occurring within the Company, or if there is a valid suspicion of such behavior, we will immediately take appropriate action, such as informing, and fully cooperating with any investigation by the competent authorities.
对于社会禁止的行为,如公司内部发生的违法或其他不正当行为,若对此类行为有确凿的怀疑,我们将立即采取适当措施(如通报),并全力配合主管部门的任何调查。

Amendments of this Code of Conduct
修订本行为准则

Any amendment of this Code of Conduct will be made only by the Board of Directors and will be disclosed as required or indicated by law or stock exchange regulations.
仅有董事会可以作出对本行为准则的任何修订,并且修订将根据法律或证券交易所的规定或指示予以披露。

WHISTLE-BLOWING SYSTEM
检举制度

Nidec ACIM HOTLINE:
Nidec ACIM热线

COUNTRY 国家	ACCESS CODE 准入密码	PHONE NUMBER 电话
United States 美国	-	1-844-543-8359
Brazil 巴西	-	0800 591 1627
China 中国	-	400-1-200-262
Italy 意大利	800-172-444	800-819791
Mexico 墨西哥	-	800-266-0245
Slovak Republic 斯洛伐克	0-800-000-101	0800-601-182
Russia 俄罗斯	-	Online access only 仅限在线访问
Austria 奥地利	-	0800-298709
Romania 罗马尼亚	-	0800-298709

Nidec Corporation Compliance HOTLINE EMAIL:

Nidec公司合规热线邮箱

Scan the QrCode below and access our Reporting Channel/Hotline:
扫描下方二维码，拨打我们的举报渠道/热线：

(https://secure.ethicspoint.com/domain/media/zhs/gui/66350/index.html)

Business Ethics Policy Acknowledgement
商业道德政策确认书

I have carefully read the Nidec Global Appliance Compliance Code of Conduct
我已经仔细阅读本Nidec GA合规行为准则

I understand and agree to comply with its purposes and provisions.
我理解并同意遵守其宗旨和规定

Signature of Employee员工签字_____

Employee Number员工工号_____

Typed or printed name of employee打印体员工姓名_____

Date日期_____

Name and address of business unit (Company) 公司的名称和地址

_____

Please complete and return this acknowledgment form to your Human Resources Department to be included in your employee personnel file.
请妥善填写此确认表格,并将其交回人力资源部,以纳入员工人事档案。