

Weathernews Group Code of Conduct

Third Revision

2022/03/01

Our Corporate Vision

Always WITH you!

We believe that the value of weather information lies in protecting human lives and property, and our mission is to provide such information.

In order to fulfill this mission, we provide weather solution services to address weather- and environment-related themes to our customers around the globe, 24 hours a day, 7 days a week, based on our commitment to "helping out in times of need".

To continue to provide such socially important services, it is necessary to share information with all of our Supporters (customers, local communities and staff) based on mutual trust, and jointly enhance the value of our weather contents.

To this end and in order to fulfill our social responsibilities and achieve sustainable growth and development, we will establish and comply with this Code of Conduct; enhance the value of our company, shareholder and weather content; and contribute to a prosperous human society that coexists with nature.

Value Creation: Challenge to Create New Value

Our basic concept is to become the world's greatest and largest "Weather Content Maker" by creating and providing the largest variety of, as well as the fastest and state of the art weather content services in cooperation with each individual around the world. As the front runner of the weather content market, we will maximize corporate value by cultivating new markets and producing "Supporter Value Creation" in innovative ways.

Innovation: Make Innovative Approaches

By thinking out of the box, we will create innovative services for our Supporters with unconventional ideas, understand the significance and necessity of such services by passionately considering "How wonderful" before the "How much" as a business, and constantly endeavor to be the first penguin to jump into the water without fear of failure.

Trust: Provide Reliable Services

We will strive tirelessly to improve service quality and forecast accuracy, which are prerequisites for our services. Furthermore, we will provide reliable services to our Supporters around the globe, 24 hours a day, seven days a week, through optimum IT systems and operation staffing because weather never sleeps.

Supporter Driven: Take Action From the Viewpoint of Supporters

As an Aggressively Adaptable Company (AAC), we will be sensitive to and understand changes in the market. We will proactively anticipate Supporter needs and wants to continue to be a content maker who is favored and trusted by our Supporters.

Co-Creation: Co-Create Weather and Environmental Services Based on Eye-servation

Instead of providing services unilaterally to our Supporters (whether business or individual), we work with them in all steps of the forecasting process—including observation, eye-servation, forecasting, and content development—to create and expand services which create value based on meteorology.

This does not use a top-down approach, is not mass-produced or mass-consumed, but rather a network-type service that increases in value as more Supporters participate. This business design addresses common themes and issues that need to be resolved throughout an entire industry and beyond its borders. Furthermore, we will create new value by connecting the companies that provide services with the individuals that receive them.

Social Contribution: A Company that Contributes to Society

Our dream is to become "an information exchange platform for 7.7 billion people around the world", and we believe that weather is the fifth public asset—in other words, the fifth public infrastructure in addition to water, electricity, transportation and communications—and aim to provide weather services to reduce risks which threaten the lives and property of all businesses and individuals around the world. In addition, we encourage our Supporters to take the initiative in the observation (eye-servation), analysis, forecasting, distribution and sharing of weather information, as well as seek new approaches in co-creating value in weather services that contribute to the global society and environment.

This Code of Conduct sets forth the basic standards observed by all executives and employees (hereinafter referred to as "WNI Staff" or "our staff") of the WNI group (hereinafter, "WNI Group", "the Group" or "We") as they endeavor to conserve the environment and conduct corporate activities.

All WNI staff shall comply with this Code of Conduct in conducting business activities.

Code of Conduct for the WNI Group

1. Basic Policy

1.1 Sincere and Ethical Activities as a Member of the Global Community

The basic policy of the WNI Group is to conduct business activities in an honest and ethical manner in compliance with all applicable laws and regulations in each country or region where we conduct business. All WNI staff shall comply with all laws, regulations, internal rules and policies related to their operations. It is the responsibility of each staff to review and understand the laws, regulations, internal rules and policies applicable to their work.

1.2 Relationship with Supporters

Because of the nature of weather and environmental information, the Group's business activities have an impact on society in a variety of ways, both directly and indirectly. To conduct sound business activities, we recognize that it is necessary to make management decisions that meet the expectations of all Supporters (WNI Group stakeholders, including: shareholders, customers, staff, business partners, communities, and other institutions). WNI staff shall carry out the business of the WNI Group in light of this.

1.3 Diversity

We perform business activities in a diverse and global environment. Socially and professionally acceptable practices in one culture or community may be perceived differently in other cultures or communities. Our staff shall be aware of this and conduct business with due regard to cultural and regional differences. In addition, diversity brings opportunity and power to WNI, and in light of the fact that the needs and wants of Supporters are diversifying, our own diversity leads to the value of being able to meet these needs in a more suitable way.

1.4 Avoiding Conflicts of Interest

In making business decisions, WNI staff shall--based on sufficient information--be honest and fully convinced that that is the best choice for the Group. Our staff shall also ensure that their decisions meet at least the following criteria:

- 1) It is legal and justifiable (Compliant with applicable laws, internal rules and policies).
- 2) It does not involve interests between the related parties (There are no personal interests or dealings involved).
- 3) The staff is authorized to make the decision (They are eligible to make the decision within the scope of authority granted by the Company).
- 4) It is based on careful consideration (The decision was made based on sufficient information after making reasonable efforts to be familiar with the relevant facts as much as possible).
- 5) It is based on sincere consideration (There is reason to conclude that it is the best choice for the company).
- 6) There is no abuse of discretion (Judgment is based on the exercise of reasonable discretion).

Organizational structures that involve conflicts of interest may make it extremely difficult for individual employees to make business decisions in accordance with the above. Accordingly, the Group's directors, officers and leaders shall exercise due diligence in this regard when organizing company organizations.

1.5. Prohibition of Participation in Antisocial Acts

The WNI Group will block any relationship with antisocial activities and forces. We also work closely with police, lawyers, and other external professional organizations to ensure the safety of all WNI staff.

1.6 "WNI Helpline" for Internal Reporting

We encourage all our staff to promptly report anything related to the Company's policies, business activities or other actions that are in violation of, or have a possibility of violating law, regulations or internal rules and policies, including this Code of Conduct. We will establish and maintain multiple internal reporting systems comprehensively called the "WNI Helpline" which is independent of the normal chain of command so that any cases of concern can be promptly reported, and such reports appropriately processed.

We will treat any staff--that provide such reports in good faith--in a fair and respectful way. We will not tolerate any retaliatory measures against such whistleblowers unless such

whistleblowers are complicit in the violation and will endeavor to maintain the anonymity of such whistleblowers to the extent possible.

2. Respect for Human Rights

2.1 Equal Opportunity in Employment

We will not discriminate anyone in the recruiting, hiring, training, promoting procedures--including job applicants or hired staff--based on race, religion, color, country of origin, age, sex, disability or other factors not related to the legitimate business interests of the Group.

2.2 Prohibition of Forced Labor or Child Labor

We do not allow any form of forced or involuntary employment.

In addition, we do not allow children to work. The term "child" here refers to persons under the age of 15 (or under 14 years of age, if permitted by local law) or--if the legal age for employment is higher than this--persons under that age.

2.3 Sound Employment and Labor Conditions

Our basic policy is to ensure sound employment and labor conditions, and to provide an environment in which our staff can exercise their abilities unstintingly while constantly complying with applicable laws and regulations of the country and region in which they operate.

2.4 Workplace Environment

We endeavor to maintain a healthy, safe and productive working environment, free from unfair discrimination and harassment. Our staff shall not speak any improper language or conduct any actions in the workplace that may be considered as harassment, make any slurs or jokes in regards to race or religion, or engage any other conduct that may result in a hostile working environment. Ensuring safety in the workplace is an important issue for the WNI Group. Our staff will comply with laws, internal regulations, and policies applicable to health and safety.

3. Fair and Honest Business Activities

3.1 Safety and Quality of Services

Because "Creating value for Supporters" is our core principle, the safety and quality we provide to the users of our services is of the first and utmost importance to us. We will continue to pursue and implement measures to meet or exceed legal standards in order to maintain the level of safety offered through our services at all stages of our business activities, including planning, sales and service. We aim to provide our customers with accurate, easy-to-understand and easy-to-read explanations and information in regards to their safety and service quality. In the event that an accident or safety issue is reported with respect to our services, we will promptly conduct a fact-finding investigation and take appropriate action.

3.2 Conserving the Environment

Our basic policy is to continuously seek to help conserve the global environment through our services and business activities. In order to implement such basic environmental policies, we will consider and practice measures as appropriate to meet or exceed statutory standards. When considering a project or business, one important criteria we shall consider is its impact on the environment.

3.3 Fair Competition

We will comply with all laws and regulations regarding the prohibition of monopoly, as well as perform fair competition and fair trade, which are applicable in the countries and regions in which we operate. These laws and regulations prohibit entering into agreements or commitments with third parties that impede or destroy market principles, such as maintaining sales prices, dividing markets, or restricting supplies. In some countries and regions, laws and regulations relating to the prohibition of monopoly and relating to fair competition may also apply to business activities outside the said territory should this affect a market within it.

All WNI staff will review and comply with these laws and regulations relating to their operations. Should they have any doubts to the legality of a presented act or contract, they shall promptly consult with the "WNI HELP Line".

3.4 Advertisements

We will sell our services based on their value. Our policy is not to make false or misleading advertisements or advertisements that defame others. In some countries, comparative advertising is prohibited by law. Even in countries where comparative advertising is permitted, comparisons made by reference to competitors, their products or services must be supported by factual evidence, as well as accurate and unmisleading.

3.5 Disclosing Corporate Information

Based on our corporate philosophy of transparency, we will not only disclose information as required by law, but also actively disclose our corporate philosophy, culture, management strategy, business model, and vision for creating future value, and present the concept--which is the foundation of our corporate value--to build mutual trust with our Supporters and conduct co-creation to enhance corporate value over the medium- to long-term.

At the same time, we are a public company and our shares are listed on the Japanese stock market. Accordingly, we have an obligation to disclose various information in accordance with Japanese securities laws and regulations. We will comply with all laws and regulations regarding information disclosure.

We comply with the "Disclosure Controls and Procedures" in order to disclose information in a timely, legal, full, fair, accurate, and understandable way. Any staff involved in the submission or notification of information to the Tokyo Stock Exchange or other competent authorities, or in any other information disclosure made by the WNI Group must ensure that the information disclosed is sufficient, fair, accurate, timely, and understandable, as well as in accordance with the "Disclosure Controls and Procedures". Our staff who provide information in the course of such disclosure are similarly responsible for the information they provide.

3.6 Personal Information

We respect the personal privacy of all Supporters. We have established policies and rules to protect personal information. Our staff will comply with relevant laws, regulations, internal rules and policies in the collection, storage, use, disclosure, disposal and other handling of personal information.

3.7 Intellectual Property

We respect intellectual property rights including patents, designs, trademarks, trade secrets, and copyrights including that of computer programs.

1)WNI Group Intellectual Property Rights: We strongly encourage research and

development activities through the protection of our intellectual property rights.

2) Intellectual Property Rights of Others: In addition to actively protecting the rights of the WNI Group itself, we respect the rights of others. Our staff will not knowingly misuse or infringe the intellectual property rights of third parties.

3) Ownership of inventions and creations made by WNI staff: All inventions and creations made by our staff belong to the WNI Group to the extent permitted by applicable laws and regulations. Our staff shall follow the instructions of the Company to preserve the rights of the Group with respect to such inventions and creations.

3.8 Confidential Information

Information is an important asset of the company. We secure not only the information we receive from our business partners and customers, but also our own confidential information. In general, "confidential information" refers to information that is not generally disclosed or that could give rise to a competitive advantage, or that could cause damage if disclosed prematurely or improperly. Common examples include inventions, creations, know-how, trade secrets, financial information, corporate strategies, sales plans, and information related to our customers, suppliers, and business partners. Disclosure and dissemination of confidential information is prohibited without Company consent. Our staff will use this information only for the Group's business.

3.9 Fair Procurement

We select service suppliers, contractors, and original equipment manufacturers (OEM) partners based on price competitiveness, quality, delivery times, and other objective criteria. We make procurement decisions based on the business interests of our Group and our customers. This is a policy that all staff involved in the purchasing process should adhere to and not just those directly involved in the purchasing process.

We expect our suppliers, contractors, and OEMs to agree to our basic policies concerning compliance with relevant laws and regulations, respect for human rights, environmental conservation, and the safety of products and services.

3.10 Gifts and Entertainment

The basic policy of the WNI Group is to compete in the market based on the advantages and price competitiveness of our products and services. Bribery is illegal in many countries and subject to criminal penalties. Even countries in which this is not prohibited by law, we strictly prohibit granting money to customers or individuals employed by business partners for acquiring or continuing business, or otherwise receive any other favorable business treatment. In addition, we will not accept any money, goods, or entertainment that is intended or likely to affect our business decisions.

In many countries, the provision of goods or money to government officials is expressly prohibited by law and we take extra precaution when working with such persons. Some countries have extraterritorial application of laws and regulations governing the provision of goods and/or money to government officials for acts done outside their territory. We will not provide government officials--whether directly or indirectly--with goods or money intended for or which can be seen as intended for preferential treatment.

In addition to the above basic policies, our staff will comply with local laws and regulations, as well as internal rules and policies regarding the receipt and delivery of goods, entertainment,

and other benefits specified by each company.

3.11 Political Contributions and Donations

Based on our corporate philosophy of Transparency (transparency), we will clarify the purpose and social significance, comply with laws and regulations, and conduct donations in a manner that ensures properness and transparency when making donations to political funds or organizations, etc.

3.12 Records and Reports

All records and reports, including accounting and financial records, must be accurate, complete, truthful, and timely. Our staff must not engage in actions that cause inaccurate records, or create misleading or false records. This policy will be observed by all WNI staff and not just those responsible for finance and accounting.

4. Ethical Behavior

4.1 Insider Trading

Trading stocks and securities while knowing "important undisclosed information" is illegal in many countries and subject to civil and criminal sanctions. "Important undisclosed information" means any undisclosed information that may affect a reasonable investor's decisions for trading stock or securities. While it is not possible to list all "important undisclosed information" without exception, the information this includes are financial conditions such as profit and dividend plans, alliances with other companies, divestments, acquisitions, new services, progress in research and development, and all other important business activities. We have established internal rules and policies regarding the trading of our shares and securities by our staff. WNI staff must be familiar with and comply with these internal rules and policies. Unless expressly permitted by these internal rules and policies regarding insider trading, our staff will not trade WNI Group shares, convertible bonds, bonds with warrants or other securities in the knowledge of material undisclosed information regarding the Group or our business partners. We also prohibit the disclosure of material undisclosed information to induce others (e.g. family, friends, customers, and other WNI staff) to engage in such transactions.

4.2 Personal Conflict of Interest

All business decisions and activities must be carried out in the best interests of the Group. WNI staff must not engage in conduct that would or could cause a conflict of interest with the Group. No staff shall have financial or other business relationships with suppliers, customers, or competitors that undermine the independence of decisions that should be made in the best interests of the Group (or be potentially damaging). Staff must report to their superiors, in accordance with the internal rules of their respective companies, any circumstances that cause or are likely to cause a conflict of interest or disagreement between themselves and the WNI Group. Prior reporting of potential conflicts of interest is an important step in complying with this policy.

4.3 Corporate Assets

WNI Group assets should only be used for legitimate business purposes by authorized staff (or the person designated by such staff). WNI staff are responsible for protecting our assets from loss, damage, misuse, theft or destruction. These assets include intangible assets such as brands, trademarks, know-how, confidential information and information systems, in addition to tangible assets. Our assets may not be used for personal gain. We reserve the right to monitor and inspect the use of assets by our staff to the extent permitted by applicable law. This includes monitoring and viewing data and files stored on email, PCs, and other network terminals.

4.4 Relationship with the Media and Public Statements

Our business activities are closely watched by media and securities analysts, including newspapers, magazines, radio, television and Internet media. The information provided to these groups and individuals is often interpreted as the official opinion of the WNI Group and is thus communicated publicly. In order to provide clear and accurate information to the public, it is extremely important to provide comments to the press and reporters solely through the appropriate employees such as the investor relations and public relations departments. WNI staff shall not contact the media or respond to inquiries from the media on behalf of or to represent the Group without the consent of the team authorized to deal with public relations, IR or other media.

When expressing an opinion on a social issue as a citizen, our staff shall make it clear that it is an individual opinion and not give the impression that they are expressing an opinion or acting on behalf of the WNI Group.