

Mitsubishi International Corporation

Code of Business Conduct

The Mitsubishi International Corporation Code of Business Conduct is based on the Mitsubishi Corporation Code of Conduct, which was adopted in 2000. The Code is based on the following eleven principles with which all officers and employees of Mitsubishi International Corporation must comply.

Principle One

Respect human rights and do not discriminate on the basis of race, gender, age, national origin, religion, disability, sexual orientation, or on the basis of any other class protected by law. Do not engage in any form of harassment.

Principle Two

Maintain a high regard for environmental considerations in conducting our business operations, work toward achieving environmentally sustainable practices, and conduct business in accordance with environmental laws and regulations.

Principle Three

Promote fair business practices and comply with laws, rules, regulations, and internal corporate rules and policies.

Principle Four

Comply with the laws, treaties, and regulations governing international trade.

Principle Five

Protect the Company's intellectual property rights and the confidential and proprietary information of the Company and others.

Principle Six

Do not engage in insider trading, stock tipping, securities fraud, or any other activity in violation of securities laws and regulations.

Principle Seven

Avoid conflicts of interest with the Company by maintaining a clear distinction between Company business and personal business.

Principle Eight

Record and report accounting and financial information accurately and in a timely manner.

Principle Nine

Maintain proper legal and ethical standards with respect to giving and receiving gifts and entertainment.

Principle Ten

Do not provide support for, or enter into business with, entities or individuals engaged in any criminal activity, such as organized crime, narcotics trafficking, money laundering, or terrorism.

Principle Eleven

Promptly report violations or suspected violations of the law or this Code to your department or division manager or to those responsible for the Company's legal, compliance, or human resources matters, or through the compliance helpline. The Company prohibits retaliation against employees for making good faith reports of suspected misconduct.