

**NISSAN**  
MOTOR CORPORATION

# Code of Conduct Booklet



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# About Our Code

The Nissan Global Code of Conduct (referred to as the “Code” throughout this booklet) includes the nine core principles that support and guide our daily business activities. It reflects Nissan’s mission, values, and principles, and associates them with the standards of professional conduct, ethics, and integrity. The Code helps Nissan operate with honesty and integrity, and in compliance with company policies and rules, established laws and regulations, as well as social norms.





# CEO Message

Dear employees:

Adhering to rules, making compliant decisions and taking correct and appropriate action is the responsibility of each employee. This contributes to delivering value to our customers and society.

The Nissan Global Code of Conduct outlines the fundamental principles for adhering to laws, regulations and social norms and conducting business ethically and responsibly. It represents our corporate culture with an emphasis on values, proper behavior, and an ethical mindset.

The environment in which we operate continues to evolve at a remarkable pace. To ensure that our company continues to be valued by customers and society, we must stabilize our foundation while accelerating our business. Importantly, we must develop more innovations to amplify Nissan's corporate value.

To achieve this, it is crucial for each of us to act appropriately. When business environment, regulations, and society are constantly evolving, making the right decisions can seem challenging. When in doubt, I encourage you to review the code and seek guidance from your managers or colleagues.

In difficult times such as these, it's not unusual for people to want to place blame on someone else. We need to be better than that. Instead of pointing fingers, we must shift our

mindset and focus on supporting one another. This means engaging in open and honest dialogue with the people around us and showing empathy. Understanding the needs and perspectives of those around us - internal and external - is essential; It will help us to make appropriate decisions.

Unfortunately, behavior is not always going to be appropriate. If you see any breaches of the code or come across something that causes concern, please speak up. Nissan guarantees protection for employees who report misconduct in good faith, ensuring they face no retaliation.

Leaders within the organization are expected to exemplify ethical conduct, serving as role models and actively fostering awareness and adherence to the code.

I encourage all of you to thoroughly understand the code and continuously reflect on your actions in your work.

I truly believe that even during this period of transformation, we can tackle any challenge if we have a shared understanding and work together as one team.

Thank you,

Ivan Espinosa

# Using This Booklet

## Making Ethical Decisions

The Code helps us manage ethical dilemmas and make informed decisions at work.

Ethics is not always black and white. Sometimes, identifying a violation can be difficult and confusing. Before acting, ask yourself these three questions:

Is the action legal?

Is the action consistent with our values and the Code?

Is the action in Nissan's best interest?

If the answer to any of these questions is “no” or if you are unsure, stop and seek further guidance.



## Our Responsibilities

The Code applies to everyone at Nissan. We are all responsible for upholding the Code and the Nissan Way.

If you have any ethical and compliance concerns, questions, or know of a violation of the Code, immediately contact your manager, HR, Legal, or Compliance, or report it through the [SpeakUp](#) system. See “[Be Active and Report Violations \(Speak Up\)](#)” for more information.



## The Nine Principles of the Code

The following sections cover each of the nine principles and offer guidance for how to put them into practice in your daily work.

The Do's and Don'ts, examples, and references in this booklet are not a complete list; refer to applicable global, regional, and local resources for additional guidance related to the principles listed in the Code.

# Comply with All Laws and Rules

Nissan Employees must follow all applicable laws, regulations and Nissan policies and rules.

Nissan is committed to being a good steward of the law. Know which laws and regulations affect the work you do and how you do it. When in doubt, ask your manager, HR, Legal, or Compliance.

Nissan maintains policies, rules, procedures, instructions, and a variety of content to guide our work. Know where to find and how to follow the content that applies to your work.

## DO

- When doing a task for the first time, find and learn the rules first.
- Ask your manager to show you where to find the rules and tools.
- Take training.

## DON'T

- Do not intentionally disregard a law or rule.
- Do not improvise or “wing it.”



## LEARN MORE

Nissan's Global  
Policies

# Promote Safety

Nissan is committed to safety and wellness. Nissan Employees must use safe work practices and promote a healthy work environment. Nissan is also committed to the safety of our customers, their passengers and pedestrians, and to do so Nissan Employees should continually promote safety of Nissan products and their safety measures, and raise awareness of road safety.

Nissan cares about the safety of our employees, customers, and our community by making sure product safety is built into our processes and business decisions.

From top management to each individual employee, we must continuously and vigorously strive towards realizing a zero-injury, zero-accident, zero-illness, and safe workplace by optimizing the work environment and promoting individual physical and mental health.



**DO**

- Learn and follow all safety laws, guidelines, procedures, and all guidance related to the Occupational Safety and Health management system (OSHMS).
- Use appropriate PPE (Personal Protective Equipment) when working in or visiting areas that require it.
- Look out for each other in the workplace for safety.

**DON'T**

- Do not be silent about any safety issue. If you see a concern, do stop your work and speak up immediately to your manager.
- Do not begin any workplace activity without the right PPE and proper training.



## The 5S Standards

Following the 5S standards and behaviors helps meet our health and safety goals.

These are:

- Sort
- Set in order
- Shine
- Standardize
- Sustain



**LEARN MORE**

Global Occupational Health and Safety Policy

# Avoid Conflicts of Interest

Employees are expected to act in the best interests of Nissan. Employees must not behave, act, or use information in a way that conflicts with Company interests. Furthermore, Employees must attempt to avoid even the appearance of a conflict of interest.

We build trust through our high ethical standards. Always make sure your business decisions are in the company's best interests and do not involve, or appear to involve, undisclosed personal interests.

If you are in a situation that might be or become a conflict of interest, disclose it. Disclosure processes may vary depending on regional and local rules. Refer to your regional or local compliance office for the applicable process.



## Avoid Conflicts of Interest

### DO

- Learn to recognize a possible conflict of interest.
- Keep your work focused on Nissan's best interests and not your own personal interests or relationships.
- Follow policy when giving and accepting business gifts and meals.
- Remember that most conflicts can be managed with appropriate steps. Disclose any potential conflicts right away.

### DON'T

- Never ask for or offer any payment, gift, or hospitality to influence a business decision or secure an improper advantage.
- Do not engage in a business decision that creates a conflict of interest. For example, do not hire or do Nissan business with a relative or close personal friend.
- Never use proprietary information or contacts acquired on the job for personal gain.

These are some common situations that **may** present a conflict.

- **Financial Interests:** Making a significant investment in, or doing personal business with, a supplier, customer, or competitor.
- **Employment:** Family members working at Nissan or for a Nissan-Connected Entity or Competing Entity.
- **Government and Non-Profit Work:** Accepting a leadership position or a formal role within a non-profit or government entity.



### LEARN MORE

Global Anti-Bribery,  
Gifts & Hospitality Policy

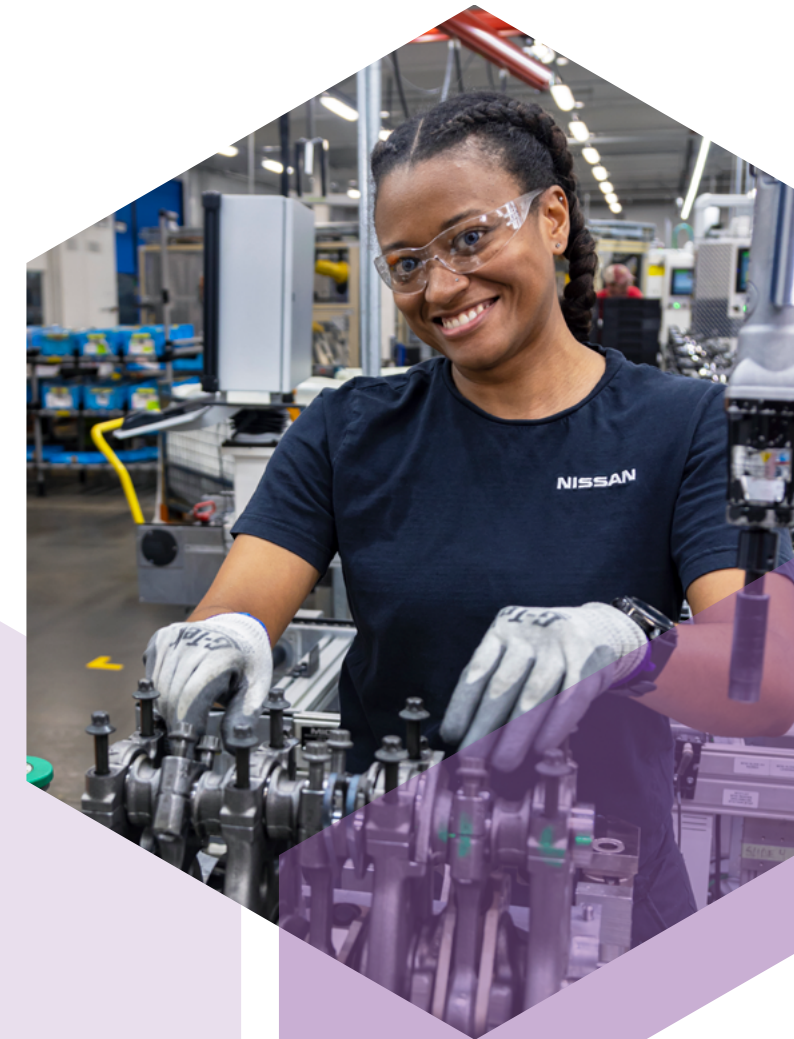
Global Conflict of  
Interest Policy

# Preserve Company Assets

Nissan Employees must preserve and protect Company assets. The unauthorized or improper use of Company assets, including funds, confidential business information, physical property, company vehicles and intellectual property, is prohibited.

Our assets and data make our work possible. Treat all company assets with care and respect. This includes the devices and equipment you use for your work as well as the confidential information that you may encounter in your role. Personal data of employees, third parties, and customers must be preserved with the same respect as company assets.

Nissan assets include but are not limited to tangible assets such as paper records, supplies, equipment, machinery, furnishings, buildings, land, products, parts and scrap and intangible assets such as patents, intellectual property, copyrights, visual identity, ideas, and designs. Nissan assets also include financial and informational assets such as stocks, bonds, loans and deposits, software, systems, and data contained in company files and servers.



## Preserve Company Assets

### DO

- Protect all company assets from damage, fraud, theft, and misuse.
- Use appropriate measures to secure computers and other devices while at work or traveling.
- Follow guidance for handling personal data and confidential information.
- Handle company funds honestly and keep accurate records of financial transactions. (See "[Be Transparent and Accountable](#).")

### DON'T

- Never misuse Nissan devices, servers, information, or communication networks.
- Do not move physical assets without authorization to do so.
- Do not post confidential information on social media.
- Do not use or remove company assets for personal activities outside policy rules.



### LEARN MORE

- Global Data Privacy Policy
- Information Security Policy
- Nissan Intellectual Property Policy
- Preservation and Safeguarding of Digital Nissan Assets
- Global Records Management Policy
- Global Social Media Policy
- Vehicle Cyber Security Management System (CSMS)
- Global Management of Non-Manufacturing Physical Assets Policy

# Be Impartial and Fair

Nissan Employees must maintain impartial and fair relationships with business partners, including dealers, suppliers, and other third parties, as well as other Employees.

Our success depends on the strength of our relationships with our business partners and employees. We base all our relationships on trust and fairness.

When selecting business partners, competing in the marketplace, or managing employees, follow the law, Nissan policies, and risk management procedures to help ensure impartial and consistent treatment.

## DO

- Compete honestly and transparently, following all antitrust, competition, and trade laws and regulations.
- Use fair and consistent metrics to evaluate employees and select third parties.
- Follow risk management procedures with all business partners.

## DON'T

- Never engage in any activities with competitors that could appear to harm fair competition.
- Do not work with any suppliers or other third parties that have not been properly reviewed and selected according to Nissan policies.



## LEARN MORE

Global Anti-Bribery,  
Gifts & Hospitality  
Policy

Nissan Global  
Antitrust Policy

Global Charitable  
Donation Policy

Global Third-Party  
Compliance Risk  
Management Policy

# Be Transparent and Accountable

Employees must maintain accounts and records with integrity. Nissan Employees must make accurate, transparent, timely and appropriate disclosures of the Company's business activities to our stakeholders, including shareholders, management, customers, other Employees, and local communities.

Our business records and information help us make good decisions and plan for the future. Make sure that the information you provide in these records is accurate, complete, and up to date.

You may learn of information that is not yet known to the public about Nissan or other companies in the course of your work. Take special care with this information. Using it to trade or sharing it with others could result in insider trading, which is a serious violation.



**DO**

- Record all transactions, assets, and expenses completely, accurately, and in the proper time period.
- Store and dispose of records according to Nissan policies.
- Check Delegation of Authority (DOA) rules before acting on any corporate decision.
- Only share insider information with those who have a need to know, and protect it from accidental disclosure.

**DON'T**

- Do not make personal investment decisions or encourage others to do so based on insider information or during Nissan's blackout periods.
- Do not mislead or misinform anyone about business operations, KPIs, or finances.



## What Is Insider Information?

Insider information is any information not yet released to the public which a reasonable investor would consider important in deciding whether to buy or sell shares. This can include information about company mergers, new product launches, new business relationships, or financial results that have not been made public.



**LEARN MORE**

- Global Data Privacy Policy
- Global DOA Policy
- Information Security Policy
- Global Regulations on Preventive Control Against Insider Trading
- Quality Manual
- Global Records Management Policy
- Total Industry Volume (TIV) Data Management
- Global Tax Policy

# Value Diversity and Provide Equal Opportunity

Nissan values and respects the principles of diversity, equity and inclusion of our Employees, suppliers, customers and communities. Discrimination, retaliation or harassment, in any form or degree, will not be tolerated.

Nissan embraces the diversity of our global workforce and respects human rights around the world. We work to create an inclusive culture in which different backgrounds, abilities, and perspectives are valued and respected.

We do not tolerate harassment or discrimination of any kind at Nissan. Together, we can support employee well-being and drive innovation to meet the diverse needs of our customers.

We do not condone discrimination or any form of harassment on the basis of race, ethnicity, national origin, culture, religion, gender, sex, sexual orientation, gender expression/identity, disability, marital status or any other characteristic, nor any infringement on human rights in the supply chain, such as forced labor and child labor.



**DO**

- Treat everyone with respect and listen to different points of view.
- Provide equal employment opportunities to all applicants and employees.
- Promptly report any suspected incidents of harassment or discrimination.
- Remember that harassment can be unintended; it is not about what you mean or intend by your words and actions, but how others perceive or react to them.

**DON'T**

- Do not discriminate against others.
- Never tolerate harassment in the workplace.
- Never look the other way if you know or suspect any human rights violation anywhere at Nissan or in our value chain.



**LEARN MORE**

- Global DEI Policy (DEI: Diversity, Equity, and Inclusion)
- Harassment Prevention Policy
- Nissan Human Rights Policy
- Global Third-Party Compliance Risk Management Policy



# Be Environmentally Responsible

Nissan Employees must strive for environmental sustainability and protection when developing products and services, and promote recycling and conservation of materials and energy.

The environment supports and sustains our work and our communities. Nissan is committed to promoting sustainability and environmental responsibility across the organization.

We aim to achieve carbon neutrality by 2050, reduce emissions and our dependence on new material resources, improve emissions and air quality, and reduce water withdrawal. Through your work, no matter where you are, you can help us meet these goals in your local communities and across the globe.

## DO

- Take every opportunity to reduce the environmental impact of your work. Even small actions, such as turning off unwanted lights and machines or setting temperature levels appropriately, can make a difference.
- Report any spills, leaks, or other environmental concerns right away.
- Evaluate environmental performance when selecting and working with business partners.

## DON'T

- Do not compromise any environmental standards to meet deadlines or other business goals.



## LEARN MORE

[Global Environmental Policy](#)

[Global Third-Party Compliance Risk Management Policy](#)

# Be Active and Report Violations (Speak Up)

Nissan Employees are expected to carry out their work in accordance with the Code. Employees who suspect that a violation of the Code has occurred are obligated to report it as soon as possible.

Employees are encouraged to use the SpeakUp system to report their suspicions. Employees may also make a report by alerting their manager, local, regional or global Compliance, Human Resources, Internal Audit or Legal departments indicating they are making a report under the Global Whistleblowing Policy. Employees who act in good faith when reporting suspected violations will be protected from retaliation.

Speaking up is essential to our success. It helps us continually improve and protects our reputation. Speaking up means asking questions and seeking help if you are unsure of the right thing to do in any situation. It also means reporting any ethical concerns or violations of the law, the Code, or Nissan policies.

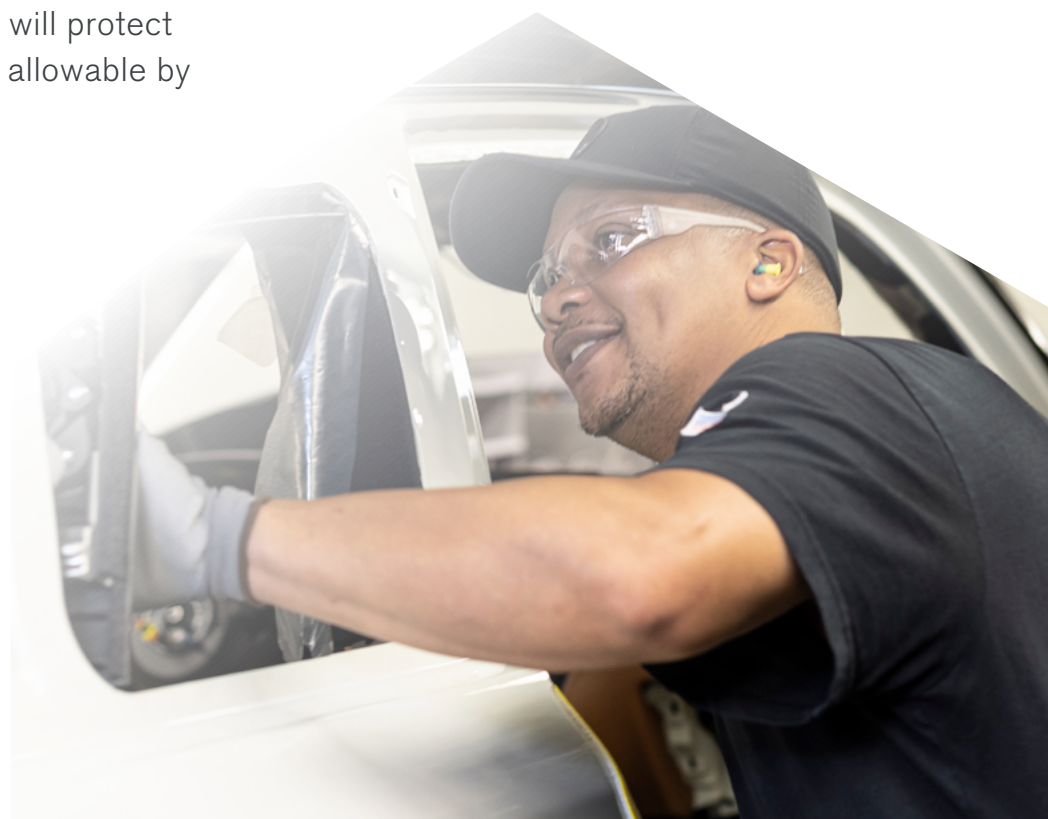


## DO

- Be courageous. Speak up and seek help as soon as questions or concerns arise.
- Raise concerns with:
  - Your manager
  - HR, Legal, or Compliance
  - The SpeakUp system
- Say no to any activities or decisions that do not align with Nissan's Code or values.
- Remember that you may choose to report anonymously. Nissan will protect confidentiality to the extent allowable by local law.

## DON'T

- Do not be silent about any ethical or compliance violation.
- Do not fear retaliation for acting in good faith—raising concerns you believe to be genuine. (Nissan has zero tolerance for retaliation.)



### LEARN MORE

Global Compliance  
Governance Policy

Global Internal Audit Policy

Global Whistleblowing  
Policy



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