

<Code of Conduct for Dealings with Business Partners>

All KHI personnel (officers, employees, temporary employees, part-time personnel, etc.) who are involved in procurement, design, quality assurance, or other such dealings with materials suppliers will observe the Code of Conduct described below pursuant to the Kawasaki Heavy Industries Corporate Ethics Rules and Internal Control Management Regulations and in line with the intent of the Basic Policies for Material Procurements. We will be conscious of the fact that we represent KHI and will be sensible on our role in all procurements. We will maintain fair and sincere relationships with business partners as we carry out our duties.

1. Compliance

The Subcontracting Act, the Construction Industry Law, the Antitrust Act, the Unfair Competition Prevention Law, other related laws and ordinances, and general laws and social norms, as well as company regulations and the spirit of those laws and regulations will be respected and complied with.

2. Respect for the Human Rights and Prohibition of Discrimination

We will respect the human rights of our business partners and never perform any act leading to discrimination.

3. Fair and Impartial Procurements

We will work within an environment of fair and impartial competition to procure the most superior products and services in terms of quality, price and delivery schedule.

4. Prevention of Relationships with Anti-Social Forces

We will have no contact whatsoever with antisocial groups or individuals.

5. Prohibition of Insider Trading

We will not disclose important facts that could have an impact on the prices of KHI shares or those of subsidiaries or affiliates. Even if we were to learn of facts that could affect the share prices of business partners, we would not do any trading in those companies' shares or other securities until that information has been announced.

6. Prohibition of Improper Acquisition, Improper Use and Leakage of Corporate Secrets

We will not engage in improper acquisition of corporate secrets belonging to business partners. Corporate secrets that we acquire legitimately will be kept under appropriate control, and will not be used improperly or leaked to third parties.

7. Harmony with the Global Environment Through Green Procurement

We always endeavor to engage in green procurement that takes conservation of resources and energy, minimization of waste and promotion of recycling into consideration.

8. Prohibition on Giving and Receiving Excessive Hospitality and Entertainment

We will not engage in any giving and receiving of hospitality, entertainment, or gifts that go beyond common sense or that could affect evaluation, selection, or other such actions with regard to business partners.

9. Distinction of Official and Personal Matters

We will discriminate between official and personal matters in conducting business, and will perform our duties with rectitude, integrity and good faith. We will also endeavor to protect the tangible and intangible assets owned by KHI and by our business partners, as well as to maintain the confidentiality of information, and we will not use such assets or information for any purpose other than the conduct of business.