

Corporate Standard of Business Conduct

Introduction

This Corporate Standard of Business Conduct (this “Standard”) declares the company’s compliance with legal requirements and states general standard of business conduct. It summarizes the high-level principles and business practices that express the company’s commitment to the public at large. This Standard applies to the company and its subsidiaries and affiliates. This Standard is not intended to cover every situation directors, officers or employees of the company may face, nor does it replace other more detailed policies adopted by the company and its subsidiaries and affiliates.

ACCESS is a global company, and its business operations are subject to the laws of different countries. Cultural differences or local laws and customs may require a different interpretation of this Standard. If this situation arises, the Legal Division of ACCESS Co., Ltd. or the legal department of its subsidiaries and affiliates are to be consulted before any action is taken.

The company is committed to continually reviewing and updating its policies and procedures. This Standard, therefore, is subject to modification. This Standard supersedes all other such codes, policies, procedures, instructions, practices, rules or written or verbal representation to the extent that they are inconsistent.

This Standard is not intended to and does not create an employment contract, and does not create any contractual rights between ACCESS and its officers or employees or create any express or implied promise for specific treatment in specific situations. Each officer’s or employee’s employment relationship with ACCESS can be terminated at any time for any reason with or without cause unless the applicable laws or a written contract signed by a representative of ACCESS authorized to enter into such an employment agreement provide otherwise.

1. Honest Business Operations

ACCESS will comply with all applicable laws and regulations, and carry out its business operations with integrity and honesty, in accordance with common sense and prudent business practices. Ethical business conduct is critical to our business.

2. Customer Satisfaction

ACCESS will always strive to lead the industry and provide high quality products and services that would give customers and users positive surprise, excitement and a good impression.

3. Respect of Intellectual Property Rights

ACCESS will protect the works and achievements created by research and development activities,

through intellectual property rights, and will utilize those works and rights actively. ACCESS will also use reasonable efforts not to infringe upon intellectual property rights of others.

4. Management of Personal Information and Customer Information

ACCESS will receive personal information and customer information only to the extent necessary to carry out business operations, and will use them for the purposes contemplated, and in accordance with applicable laws, paying sufficient attention to protection of privacy. Also, ACCESS will use reasonable efforts to manage properly the personal information and customer information so stored and to avoid unauthorized release or misappropriation of such information.

5. Disclosure

ACCESS will disclose necessary and sufficient information in accordance with applicable laws and regulations, in order to make sure that ACCESS' financial conditions and results of operations will be appropriately assessed and understood.

6. Global Businesses

ACCESS will carry out global businesses in a manner that respects local customs and cultures, and will use reasonable efforts to contribute to the social and economic development of each community.

7. Confrontation with Anti-social Powers

As a good corporate citizen, ACCESS will, firmly without any compromise, confront with anti-social, violent powers and groups (e.g., gangsters; yakuza) that are willing to threaten social orders and safety of communities.

8. Discovery of Issues and Prompt Measures

ACCESS will establish appropriate internal systems and structures for corporate governance, in order to grasp internal issues in a timely manner and to promptly take precautionary actions against them. Should there be any problem during the ordinary course of business, ACCESS will cope with such problems, properly and promptly, and initiate any necessary corrective measures with all due speed.

9. Social Contribution

ACCESS will commit itself to active contributions to societies/communities, and will support the employees' voluntary participation to social activities.

10. Opportunities to Enhance Individual Capabilities

ACCESS will provide opportunities to the employees that want to work hard or to enhance or expand their own capabilities, while respecting diversity, individual character, and the personality of each employee.

11. Arrangement of Better Work Environment

ACCESS will create and maintain comfortable work environments, paying attention to workplace safety as well as focusing on comfort, orderly arrangements and cleanliness.

12. Protection of Environment

In view of international environment standards, ACCESS will use reasonable efforts to accomplish resource-saving, energy-saving, recycling and environmental preservation.

Adopted on May 22, 2006