

Nippon Sanso Holdings Group Anti-Corruption Policy

We aim to prevent any form of corruption including bribery and anticompetitive acts and to establish and maintain fair trade practices in accordance with the Code of Conduct of the Nippon Sanso Holdings Group.

1. Observance of Laws and Regulations

Directors, auditors, executive officers, advisors, consultants and Employees of our group companies (including contract employees and temporary employees) (hereinafter referred to as "Officers and Employees") shall comply with this policy and relevant anti-bribery laws and regulations of relevant countries and regions and respect international standards on anti-corruption.

2. Prohibition of Providing Bribe

Officers and Employees shall not, directly or through a third party including an agency, an agent, or a consultant, provide a bribe to public institutions, public officials (including employees, etc. of a company substantially controlled by the government), and private organizations and private citizens (hereinafter collectively referred to as the "Target Person(s)"). In this policy, provision of a bribe means to provide, or to offer or promise to provide, money, gifts, entertainment, or other benefits to a Target person, for the purpose of acquiring or maintaining unjust benefit, to (i) cause the Target Person to conduct or omit an act relating to his/her duty; or (ii) to arrange a third party to conduct or omit an act relating to such third party's duty by using the Target Person's position.

3. Prohibition of Receiving Bribe

- (1) Officers and Employees shall not receive money, anything equivalent to money, highly liquid paintings, ornaments such as jewelry, or unreasonable gifts or entertainment, in principle.
- (2) When Officers and Employees receive a gift, entertainment, payment or the like from their customer, agency, client company, etc., Officers and Employees shall confirm whether such gift, entertainment, payment, or the like is not for acquiring or maintaining unjust benefit or for other unreasonable purposes, and whether it is excessive.
- (3) If Officers and Employees deem that a gift, entertainment, payment, or the like is or is highly likely to be for acquiring or maintaining unjust benefit or for other unreasonable

purposes or that it is or is highly likely to be excessive, Officers and Employees shall refuse such gift, entertainment, payment, or the like.

- (4) For confirmation procedures to receive a gift, entertainment, payment, or the like, the guidelines set forth in Article 5, paragraph 5 shall apply.

4. Accounting Records

Our group companies shall accurately and appropriately record in their accounting books and other similar records all expenditures including payments to third parties in reasonable detail including on necessary taxation to evidence that no bribe has been paid to any Target Person.

5. Compliance System

- (1) In the case of any doubt in the interpretation, etc. of this policy, Officers and Employees shall consult with a manager or contact person of compliance facilitation, or internal control facilitation or legal department of their company or Nippon Sanso Holdings Corporation.
- (2) In addition to the preceding paragraph, if Officers and Employees observe that an act of corruption is committed or is to be committed, Officers and Employees shall consult with a manager and other Officers and Employees or contact for internal reporting to prevent such corruption.
- (3) In Japan, the contact for internal reporting shall be the group chief compliance officer, external attorney's office, and members of the Audit & Supervisory Board, and in each overseas region in North America, Europe, and Asia, it shall be the region chief compliance officer and external attorney's office of each region. Consultation may be made anonymously at any of the contact for internal reporting in the relevant region, and an informer shall be thoroughly protected through entire process of investigation and correspondence for the reporting and shall not suffer disadvantageous treatment.
- (4) A manager or contact person of compliance facilitation of our group companies shall cause the Officers and Employees of his/her company to comply with this policy.
- (5) Our group companies shall establish guidelines to supplement this policy according to the applicable laws and regulations of each country or characteristics, etc. of each country. A manager or contact person of compliance facilitation of each of our group companies shall cause the Officers and Employees of his/her company to comply with the above guidelines as well as this policy.

6. Sanctions

Our group companies shall impose an internal sanction on an Officer or Employee in accordance with the rules of employment, etc. if such an Officer or Employee violates this policy.

This policy may be revised or abolished by the Board of Directors of the Company.

Established on February 2nd, 2021