

## **NHK SPRING GROUP ANTITRUST LAW COMPLIANCE POLICY**

NHK SPRING Group hereby establishes and shall comply with this Policy as the response guidelines for all officers and employees regarding compliance with antitrust laws.

### **1. Fundamental Position**

Officers and employees shall comply with the antitrust laws and guidelines in each and every country, and are prohibited from engaging in the cartels banned under antitrust law or otherwise acting in violation of antitrust law. In principle, contact with competitors, which increases the risk of violation, is prohibited. If there is a legitimate reason for a need to contact a competitor, please follow internal procedures.

### **2. Regarding Implementation of Compliance Program**

The Company shall establish an antitrust law compliance director with regard to compliance with antitrust law, shall implement educational and enlightenment activities, and shall enact and implement a compliance program covering the submission of written records regarding meetings with competitors, compliance with manuals, the establishment of reporting and consultation desks, and the like.

In addition, the Company shall conduct routine inspections and audits, and revise and improve this program as needed.

### **3. Regarding the Handling of Violators**

Officers and employees who act in violation of antitrust laws and the internal rules and regulations related thereto shall be subject to disciplinary action.

NHK SPRING CO., LTD.

Established: March 2014

Revised: May 2017, November 2024, March 2026