

## **NHK SPRING Group Anti-Corruption Policy**

We, all directors and employees of NHK SPRING Group, have established this policy to promote group-wide efforts to prohibit bribery to a public official in Japan and foreign countries, and transfer of improper benefits to customers, business partners, and other parties.

### 1. Compliance with Laws

All NHK SPRING Group directors and employees will comply with anti-bribery laws and regulations in the relevant countries and regions in connection with the performance of their duties.

### 2. Prohibition of Entertainment and Gifts to Public Official

All NHK SPRING Group directors and employees will not make any provision, offer or promise any money or other benefits, directly or indirectly, to a public official in order to obtain illegal benefits of the business.

### 3. Prohibition of Entertainment and Gifts beyond the Extent of Social Norms

All NHK SPRING Group directors and employees shall not make any provision, offer or promise, directly or indirectly, to customers or business partners for money or other benefits beyond the extents of social courtesy.

### 4. Prohibition of Receipt of Improper Benefits

All NHK SPRING Group directors and employees shall not receive, demand or promise, directly or indirectly, illegal or improper benefits in connection with their duties.

### 5. Prohibition of Offering Money or other Benefits to Public Official through Third Party

All NHK SPRING Group directors and employees shall not instruct bribery to a public official through agents, consultants or distributors third parties or acquiesce any bribery by third parties.

### 6. Intensive Recording and Management

All NHK SPRING Group directors and employees shall accurately record all transactions in the books of account and appropriately retain all relevant materials.

### 7. Audit

NHK SPRING Group shall conduct audits of the compliance and operation status of this policy and the regulations related to this policy.

### 8. Response to Violations

- 1) NHK SPRING Group will promptly conduct an internal investigation and fully cooperate with the relevant authorities in investigating any violation or threatened violation of this policy.
- 2) Directors and employees of NHK SPRING Group who violate the Company's regulations including this policy shall be strictly disciplined in accordance with the regulations of the Company to which they belong.

NHK SPRING Co., Ltd.

April 2024

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