

Antitrust Law Compliance Policy

The NHK Spring Group has established this Policy as a guideline for ensuring compliance with antitrust laws, and requires all executive officers and employees to adhere to it.

1. Basic Stance

All executive officers and employees of the NHK Spring Group shall comply with the antitrust laws and related guidelines of each country. Any conduct prohibited under antitrust laws, including cartel activities and other violations, is forbidden.

Furthermore, contact with competitors, which may increase the risk of such violations, is in principle prohibited. In cases where contact with competitors is legitimately required, employees must follow the necessary internal procedures as prescribed by the Company.

2. Implementation of the Compliance Program

The NHK Spring Group shall establish and implement a Compliance Program on Antitrust Law. This Program shall include the appointment of an Antitrust Law Compliance Officer, the implementation of education and awareness activities, the submission of record sheets for meetings with competitors, adherence to relevant manuals, and the establishment of reporting and consultation channels.

In addition, regular inspections and audits shall be conducted, and the Compliance Program shall be reviewed and improved as necessary.

3. Disciplinary Measures for Violations

Executive officers and employees who engage in conduct in violation of the Antitrust Law or related internal rules and regulations shall be subject to disciplinary action.

NHK Spring Co., Ltd.

Established: March 2014

Revised: May 2017, November 2024