

## NHK Spring Group Anti-Corruption Policy

All executive officers and employees of the NHK Spring Group are committed to prohibiting bribery of domestic and foreign public officials, etc. as well as the improper offering or receipt of benefits involving customers and suppliers. To this end, we have established this Policy and will promote its implementation across the entire Group.

### 1. Compliance with Laws and Regulations

All executive officers and employees of the NHK Spring Group shall comply with all applicable anti-bribery laws and regulations of the countries and regions in which they operate in the course of performing their duties.

### 2. Prohibition of Entertainment and Gifts to Public Officials, etc.

All executive officers and employees of the NHK Spring Group shall not, either directly or indirectly, provide, offer, or promise money or any other benefit to public officials, etc. for the purpose of obtaining improper business advantage.

### 3. Prohibition of Entertainment and Gifts Beyond the Scope of Social Courtesy

All executive officers and employees of the NHK Spring Group shall not, either directly or indirectly, provide, offer, or promise money or any other benefit to customers, suppliers, or other parties beyond the generally accepted scope of social courtesy.

### 4. Prohibition of Receiving Improper Benefits

All executive officers and employees of the NHK Spring Group shall not, in connection with their duties, either directly or indirectly, receive, request, or agree to receive any improper or unjust benefits.

### 5. Prohibition of Providing Benefits to Public Officials, etc. Through Third Parties

All executive officers and employees of the NHK Spring Group shall not instruct, authorize, or condone bribery of public officials, etc., through agents, consultants, distributors, or any other third parties.

### 6. Accurate Recording and Proper Management

All executive officers and employees of the NHK Spring Group shall accurately record all transactions in the accounting books and properly retain all related documentation.

### 7. Audits

The NHK Spring Group shall conduct audits regarding compliance with and the implementation status of this Policy and related internal regulations.

### 8. Response to Violations

- 1) In the event that the NHK Spring Group discovers any act that violates or is suspected of violating this Policy, it shall promptly conduct an internal investigation and fully cooperate with any investigation conducted by the relevant authorities, etc.

- 2) Executive officers and employees of the NHK Spring Group who violate this Policy or any other company rules shall be subject to strict disciplinary action in accordance with the rules and regulations of their respective companies.

NHK Spring Co., Ltd.

Established: October 2015

Revised: April 2024