

The Tokuyama Group Anti-Corruption Policy has been established under the Tokuyama Group Code of Conduct, and all officers and employees of the Tokuyama Group must comply with it.

Tokuyama Group Anti-Corruption Policy

Established April 1, 2023

1. Basic Stance

The Tokuyama Group affirms that the prevention of corruption, including bribery of public officials, is a particularly important issue for ensuring fair corporate activities, and that officers and employees must not engage in any form of corruption.

2. Scope

This Anti-Corruption Policy applies to all officers and employees of the Tokuyama Group. We also expect business partners of the Tokuyama Group to embrace this policy, and we encourage them to take corruption prevention measures.

3. Organizational Structure

The Tokuyama Group maintains an effective organizational structure and a whistleblower system to help prevent corruption and respond to incidents.

4. Risk-based Approach

The Tokuyama Group identifies and assesses its corruption risks, and implements focused measures for high-risk business activities.

5. Training and Awareness-raising

The Tokuyama Group trains officers and employees to prevent corruption, further improve their compliance awareness, and ensure that anti-corruption measures remain effective.

6. Intermediaries

The Tokuyama Group does not engage in corrupt practices using intermediaries such as agents.

7. Monitoring and Continuous Verification/Review

The Tokuyama Group regularly monitors the level of group companies and business partners compliance with this Anti-Corruption Policy, verifies its effectiveness, and updates it as necessary.

8. Record-Keeping

The Tokuyama Group maintains accurate accounting records and properly stores related materials so that it can demonstrate compliance with relevant anti-corruption laws and

regulations worldwide.

9. Incident Response

In the event that any corrupt behavior relating to its business activities is discovered and confirmed, the Tokuyama Group will take appropriate corrective action and fully cooperate with any investigations by the relevant authorities.