

Notice of establishment of Oji Group Tax Policy

Drawing on the fundamental values and the behavior principles that the Oji Group (the "Group") has carried down as a company since its founding, the Group has formulated the Oji Group Corporate Code of Conduct by which the Group as a whole engages in corporate activities with an awareness of its responsibility as a corporate citizen and a strong sense of ethics. In taxation, we understand that by ensuring proper tax payment in compliance with the tax laws and regulations of each country where we operate, we can enhance corporate value and become a socially trusted company.

We hereby establish the "Oji Group Tax Policy" and clarify the basic principles as follows.

Tax Governance

The finance officer is responsible for the Group tax governance. If any significant tax risks are identified, we establish response policies in accordance with this Group Tax Policy and they are decided upon by the board of directors.

The establishment and amendment of the Group Tax Policy require a decision by the board of directors.

Tax Compliance

The Group complies with the spirit as well as the letter of the tax laws, regulations, and rules of each country where it operates and ensures proper tax filings and payments.

Tax Risk Management

The Group utilizes advice from external tax specialists and an advance ruling system with tax authorities to mitigate tax risks in areas of high tax uncertainties where differences in interpretation of laws, regulations, etc., may arise with tax authorities.

Transfer Pricing

The Group complies with the OECD Transfer Pricing Guidelines and therefore determines the transaction prices between the group companies in accordance with the arm's length principle based on the functions and risks of each group company. We do not set prices intended to transfer created value to low-tax jurisdictions without business substance.

Tax Planning

The Group does not engage in tax planning without business substance or arbitrary tax avoidance utilizing tax havens.

Relationship with Tax Authority

The Group strives to build a mutually beneficial and healthy relationship with tax authorities in each country.

Contact

Accounting Department, Corporate Financial Division, Oji Management Office Inc.

Phone: +81-3-3563-4390

Public Relations and Investor Relations Department, Corporate Governance Division,

Oji Holdings Corporation

Phone: +81-3-3563-4523 Email: oji-holdings@oji-gr.com