

# Oji Group Anti-Corruption Declaration

## 1. Fundamental Principles

Oji Holdings Corporation and its group companies (including both domestic and overseas entities; hereinafter collectively referred to as the “Oji Group”) recognize that, as a manufacturing group operating globally, conducting business with integrity, fairness, and transparency is fundamental to sustainable corporate value creation and the trust of society.

The Oji Group does not tolerate, under any circumstances, bribery, corruption, embezzlement, improper provision or receipt of benefits, inappropriate entertainment or gifts, or any other form of corrupt conduct, whether directly or indirectly, in Japan or abroad.

The Oji Group further recognizes that corruption may directly or indirectly cause, contribute to, or exacerbate adverse impacts on human rights, including forced labor, child labor, discrimination, and unfair labor practices. Accordingly, the Oji Group considers the prevention of corruption and the respect for human rights to be mutually reinforcing and strategically linked management priorities.

Based on this understanding, the Oji Group ensures that its anti-corruption initiatives are grounded in its Human Rights Policy and aligned with its human rights due diligence framework.

This Declaration is implemented through the Group’s anti-bribery and anti-corruption-related internal rules (including regulations concerning the provision and receipt of benefits) and relevant guidelines. All officers and employees of the Oji Group—including directors, corporate auditors, other officers, advisors, counselors, and employees (including contract workers, part-time workers, temporary workers, secondees, and dispatched workers)—are required to comply with these rules.

In addition, the Oji Group requests that its suppliers understand and implement anti-corruption requirements in accordance with the Oji Group Sustainability Action Guidelines for Supply Chains and other relevant policies.

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## 2. Scope of Application

This Declaration applies to all officers and employees of the Oji Group.

The Oji Group also requests that its suppliers, distributors, agents, contractors, and other business partners (hereinafter collectively referred to as “Business Partners”) understand and cooperate with the principles of this Declaration.

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### 3. Compliance with Laws and Respect for International Standards

The Oji Group complies with the applicable laws and regulations of each country and supports and respects internationally recognized anti-corruption frameworks and standards, including the United Nations Convention against Corruption (UNCAC), the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the OECD Guidelines for Multinational Enterprises, and the Ten Principles of the United Nations Global Compact.

The Oji Group will never attempt to justify corrupt practices or human rights violations on the grounds of local customs, business practices, or competitive pressures.

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### 4. Prohibited Conduct

The Oji Group prohibits the following acts, whether conducted directly or indirectly (for details, please refer to the Group's internal anti-bribery and anti-corruption rules regarding the provision and receipt of benefits):

- Offering, promising, or proposing improper monetary or other benefits to public officials or persons in equivalent positions
- Providing, promising, or proposing improper benefits, kickbacks, or excessive entertainment or gifts in private business transactions
- Soliciting or accepting improper benefits, or promising to receive such benefits, from third parties
- Engaging in bribery or other corrupt practices through Business Partners or other third parties
- Falsifying records or conducting improper accounting to conceal corruption or human rights violations

These prohibitions apply regardless of local customs, business practices, or competitive pressures.

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### 5. Due Diligence in Overseas Operations and the Supply Chain

The Oji Group conducts **risk-based anti-corruption and human rights due diligence** across its overseas group companies and global supply chain in order to identify and manage corruption and human rights risks in an integrated manner, commensurate with the severity and likelihood of identified risks.

Risk assessments take into account factors including countries and regions of operation, transaction characteristics, industry-specific risks, and the nature of counterparties. Based on assessed risks, the Oji Group determines the scope, depth, and approval processes of due diligence in a tiered manner and conducts ongoing monitoring.

Based on identified risks, the Oji Group ensures responsible business conduct across the Group and promotes such conduct throughout its supply chain by incorporating anti-corruption and human rights clauses into contracts, providing education and training, and implementing corrective actions as necessary.

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## **6. Selection and Monitoring of Business Partners**

The Oji Group requests Business Partners to understand and cooperate with the principles of this Declaration.

When selecting Business Partners, the Oji Group conducts appropriate due diligence and, depending on the level of risk, implements contractual safeguards such as anti-corruption and human rights clauses. After the commencement of business relationships, the Oji Group continuously monitors whether any indirect bribery or other corrupt practices occur through Business Partners.

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## **7. Whistleblowing and Remediation**

The Oji Group requires all officers and employees (including part-time, temporary, and dispatched workers) to promptly report any actual or suspected corruption or human rights violations through the Oji Group's internal whistleblowing system (Compliance Hotline) or through the external reporting channels described below (the Dialogue and Remedy Platform).

The Oji Group also provides access to an external reporting mechanism (the Dialogue and Remedy Platform operated by the Japan Center for Engagement and Remedy on Business and Human Rights), which is available to all stakeholders, including Business Partners, who have reasonable grounds to believe that they have been adversely affected, or may be adversely affected, by corruption or human rights violations.

The Oji Group maintains accessible, confidential, and, where permitted by law, anonymous reporting mechanisms, strictly prohibits any form of retaliation against whistleblowers, and ensures appropriate investigations and remedial actions.

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## **8. Education, Training, and Awareness**

To ensure the effectiveness of its anti-corruption and human rights initiatives, the Oji Group conducts periodic education, training, and awareness-raising activities for officers and employees.

Education and training programs are designed based on risk assessments reflecting business activities and job functions and include scenarios involving high bribery and human rights risks to promote practical understanding and implementation.

This Declaration is also communicated to major Business Partners through appropriate means.

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## **9. Monitoring, Auditing, and Response to Violations**

The Oji Group maintains appropriate financial accounting procedures and record-keeping systems and regularly monitors compliance with this Declaration through internal audits and other compliance reviews.

The Board of Directors oversees the effectiveness of the Oji Group's anti-corruption framework. Where violations or suspected violations are identified, the Oji Group promptly investigates the facts and implements corrective actions and measures to prevent recurrence.

Confirmed violations are addressed strictly in accordance with internal rules. In cases involving Business Partners, the Oji Group may, as appropriate, require corrective action, revise transaction terms, or suspend or terminate business relationships.

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## **10. Governance, Roles, and Responsibilities**

Under the supervision of the Board of Directors, the Oji Group establishes appropriate governance structures to advance anti-corruption and human rights initiatives, including the development of internal rules, designation of responsible departments, and establishment of relevant committees.

The operational status of this Declaration and material risks identified are reported to senior management on a regular basis and as necessary, and, as appropriate depending on their significance, to the Board of Directors. Through these reports, the Board of Directors supervises senior management's initiatives and, where necessary, takes corrective actions or provides guidance, thereby ensuring organizational oversight and informed decision-making. Roles and responsibilities under this Declaration are also clearly defined within each group company.

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## 11. Dialogue and Disclosure

To advance anti-corruption and human rights initiatives, the Oji Group engages in dialogue and consultation with Business Partners and other relevant stakeholders as appropriate.

Furthermore, the Oji Group appropriately discloses and reports its anti-corruption efforts through its corporate website, Integrated Reports, annual securities reports, and other relevant channels.

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## 12. Review and Continuous Improvement

The Oji Group periodically reviews this Declaration, taking into account changes in the business environment, developments in laws and international standards, and evolving corruption and human rights risks, and is committed to continuous improvement by revising this Declaration and related measures as necessary.

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This Declaration has been approved by the Board of Directors of the Oji Holdings Corporation and is signed by the CEO.

**Oji Holdings Corporation**

Representative Director of the Board

President and CEO

**Hiroyuki Isono**

Established: May 15, 2026