Nichino Europe Co. Ltd
Anti-Bribery and Anti-Corruption Policy Statement
30 September 2026

1. Our Commitment

1. Nichino Europe Co. Ltd ("Nichino Europe", "we", "our" or "us") is committed to conducting business honestly, fairly and with integrity. We have zero tolerance for bribery and corruption in any form.
2. We comply with the UK Bribery Act 2010, applicable anti-bribery and anti-corruption laws in the countries where we operate, and relevant national measures implementing the EU anti-corruption framework as they take effect. We maintain proportionate procedures designed to prevent, detect and address bribery and corruption.

2. What We Prohibit

3. We prohibit offering, promising, giving, requesting, agreeing to receive or accepting any financial or other advantage intended to induce or reward improper conduct. This prohibition applies whether the conduct is direct or carried out through another person.
4. We also prohibit bribery of public officials, including offering anything of value with the intention of influencing an official to obtain or retain business or a business advantage, except where expressly permitted by applicable written law.

3. Who This Statement Applies To

5. This statement applies to Nichino Europe's directors, officers and employees. We also expect agents, consultants, contractors, distributors, suppliers, intermediaries, joint-venture partners and others performing services for or on our behalf to uphold equivalent standards appropriate to their relationship with us and the risks involved.
6. Breaches may result in termination of employment or business relationships, referral to relevant authorities and other action permitted by law. Individuals and organisations may also face criminal or civil penalties, exclusion from public procurement, confiscation of proceeds and reputational damage.

4. Our Expectations

7. Anyone acting for or on behalf of Nichino Europe must not offer, give, request or accept a bribe, kickback or other improper advantage, or permit another person to do so.
8. Business partners must act transparently, avoid undisclosed conflicts of interest, maintain accurate records, cooperate with proportionate due diligence and promptly raise any concern connected with work undertaken for us.
9. We may include appropriate anti-bribery obligations, audit rights and termination rights in our contracts and may decline or end a relationship where integrity concerns cannot be satisfactorily addressed.

5. Facilitation Payments

10. We do not permit facilitation payments: small, unofficial payments intended to secure or speed up a routine action. This prohibition applies even where such payments are regarded as customary.

11. Where a payment is demanded because of an imminent threat to health, safety or liberty, personal safety takes priority. Any payment must be limited to what is necessary, recorded accurately and reported to us as soon as reasonably practicable. Commercial pressure, delay or inconvenience does not justify a payment.

6. Gifts and Hospitality

12. Reasonable and proportionate gifts and hospitality may support legitimate business relationships, but they must never be used to influence a decision improperly or create an expectation of favourable treatment.

13. Gifts and hospitality involving Nichino Europe must have a genuine business purpose, be lawful, appropriate in value and frequency, transparent and accurately recorded. Cash and cash equivalents must not be given or accepted, and particular care is required during tenders, contract negotiations and dealings with public officials.

7. Charitable Contributions and Sponsorships

14. Charitable contributions and sponsorships must be lawful, transparent, made for a genuine purpose and subject to proportionate due diligence and approval. They must never be used to secure an improper advantage or conceal a payment to a public official, customer or other third party.

15. We do not make charitable contributions in cash and require appropriate evidence of the recipient, purpose and receipt.

8. Political Activity

16. Nichino Europe does not make political donations and is not affiliated with any political party, candidate or organisation whose activities are primarily political.

17. Personal political activity must be undertaken in an individual capacity, without using Nichino Europe's name or resources and without seeking an improper business advantage.

9. Risk Assessment and Due Diligence

1. We assess bribery and corruption risks and apply proportionate, documented due diligence before entering or continuing higher-risk relationships and transactions.

2. Factors considered may include country and sector risk, dealings with public officials or state-owned entities, ownership and conflicts of interest, the use of intermediaries, the reasonableness of fees, payment arrangements, adverse integrity information, and willingness to accept appropriate compliance, audit and termination terms.

10. Training and Communication

1. We provide proportionate anti-bribery and anti-corruption training and communications to relevant personnel. We also communicate appropriate standards to business partners where justified by the nature of the relationship and the risks involved.

11. Books, Records and Controls

1. We require payments, expenses, gifts, hospitality, contributions, sponsorships and third-party remuneration to be supported by appropriate documentation and recorded accurately. Off-book accounts, false or misleading descriptions, undisclosed side arrangements and circumvention of controls are prohibited.

12. Speaking Up, Monitoring and Review

1. We encourage employees, business partners and other stakeholders to raise suspected bribery or corruption concerning Nichino Europe through their usual Nichino Europe contact or the reporting channel identified on our website. Reports will be considered promptly and handled as confidentially as reasonably practicable.
2. We do not tolerate retaliation against anyone who raises a genuine concern in good faith or on reasonable grounds, or who refuses to participate in bribery.
3. Our Board and senior management oversee our anti-bribery framework. We monitor compliance, investigate concerns, address identified weaknesses and review this statement periodically and following material legal, organisational or risk changes.