

Nichia Group Anti-Corruption Policy

Nichia Group Anti-Corruption Policy is established to ensure strict compliance with laws and ethical conduct, to foster a corporate culture that prioritizes integrity and transparency and does not tolerate corrupt practices, thereby safeguarding stakeholders' trust and realizing sustainable growth. Nichia Group will fully understand and comply with the laws and guidelines of the countries and regions in which it operates, and under no circumstances will it permit involvement in corrupt practices, directly or indirectly.

We also respect international instruments such as Principle 10 (Anti-Corruption) of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the United Nations Convention against Corruption, the U.S. Foreign Corrupt Practices Act (FCPA), and other relevant international standards.

For the purposes of this Policy, "corrupt practices" means any act by which a person abuses their position or authority to obtain an illicit or improper benefits, whether directly or indirectly. This includes, but is not limited to: bribery※1 and receipt of bribes; extortion; facilitation payments; excessive, improper, or inappropriate gifts, hospitality, or other benefits; conflicts of interest※2; unlawful receipt of rebates or kickbacks; embezzlement and breach of trust; collusion, bid-rigging, and other unfair competition; "fraud; money laundering; insider trading; and provision of false or misleading information about products or services. In addition to the corrupt practices listed above, improper import/export controls and relationships with antisocial or criminal organizations are also covered by this Policy.

1. Scope

This Policy applies to all officers and employees of Nichia Group worldwide. Nichia Group also expects its business partners and other counterparties (including suppliers, agents, contractors and consultants) to take appropriate measures to prevent corrupt practices.

2. Anti-Corruption Measures and Responsibilities

•Organizational Structure

The Company shall establish an effective organizational framework to prevent corruption and ensure timely and appropriate response in the event of an incident. In advancing these efforts, the Company will define relevant objectives and metrics, and regularly review the status of implementation.

Whistleblowing Channels

We will establish reporting channels that may be used anonymously by any concerned party in the event of an actual or suspected violation of this Policy. Upon receipt of a report, a prompt and impartial investigation will be conducted. If a violation is confirmed, appropriate corrective actions and measures to prevent recurrence will be taken. The reporter will be informed of the investigation results and corrective actions implemented, as appropriate. We will maintain confidentiality to the greatest extent possible and strictly prohibit retaliation against reporters or participants in the investigation.

•Risk Assessment and Audit

We will regularly assess corruption-related risks across our value chain and evaluate the effectiveness of our anti-corruption initiatives. Where necessary, we will conduct on-site audits at our own facilities and within our supply chain to verify compliance and strengthen preventive measures.

•Education and Training

The Company will regularly provide education and training to officers and employees on anti-corruption, including dissemination of relevant guidelines and standards, and will periodically promote awareness of the internal reporting system.

•Record-Keeping and Retention

All Company transactions shall be accurately recorded in the accounting books based on factual information, and all related documents shall be properly retained.

3. Response to Violations

In the event that any officer or employee violates applicable laws or this Policy relating to the prevention of corruption, the Company will implement corrective measures and actions to prevent recurrence. In addition, strict disciplinary

measures, including but not limited to those provided under the Company's internal rules, will be imposed as appropriate.

※1: In the course of business, this refers to the offering or receiving of gifts, loans, gratuities, fees, remuneration, political donations or contributions, or any other tangible or intangible benefits to or from any person (including public officials and foreign public officials) as an inducement to commit unlawful, fraudulent, or breach-of-trust acts, where such offering or receipt exceeds the limits permitted by applicable laws or accepted social norms.

※2: This refers to any act in which a person belonging to the company (such as an officer or employee) privately and improperly seeks to advance their own interests in a manner that conflicts with the interests of the company.

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Hiroyoshi Ogawa
President and CEO
Nichia Corporation