

Nichia Group Responsible Mineral Procurement Policy

Based on the “Nichia Group Policy” and “Nichia Group Procurement Policy,” Nichia Group strives to avoid using conflict minerals (tin, tantalum, tungsten, gold, mica) that may serve as a source of funding for armed groups and promote conflict, or that may be involved in human rights violations, labor issues, environmental destruction, etc., as well as cobalt, natural graphite, lithium, nickel, and compounds derived from these raw materials used in the manufacture of lithium-ion batteries (hereinafter referred to as “related minerals”).

Nichia Group advances the following initiatives in accordance with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" (hereinafter, the "OECD Guidance") and the European Battery Regulation, shares this information with all suppliers, and promotes responsible mineral procurement throughout the entire supply chain.

1. Establishment of Mineral Procurement Management System

- Nichia Group confirms, through contractual provisions and other relevant terms, that the smelters/refiners of related minerals comply with the OECD Guidance and agree to this policy.
- Nichia Group will establish a Procurement Management Committee and build an internal management system to report supply chain risks in the procurement of related minerals to the said committee and periodically evaluate and verify its effectiveness.
- Nichia Group will establish a grievance mechanism that allows our stakeholders to express and record concerns or complaints. Through this, we strive to correct and improve human rights risks throughout the entire supply chain related to mineral procurement. In addition, we provide appropriate support and education related to mineral procurement to suppliers deemed necessary.

This policy applies to all executives and employees of Nichia Group worldwide. Nichia Group also expects its business partners and other counterparties to take measures to prevent corrupt practices.

2. Identification and Assessment of Risks in the Supply Chain

Nichia Group identifies and assesses risks for suppliers of related minerals through the activities shown below.

- We conduct a survey using the CMRT (Conflict Minerals Reporting Template) and EMRT (Extended Minerals Reporting Template) in accordance with the RMI (Responsible Minerals Initiative, an organization addressing issues such as conflict minerals, participated in by more than 500 companies/organizations worldwide).
- We confirm that minerals originating from CAHRAs (Conflict-Affected and High-Risk Areas) and serving as a source of funding for armed forces or anti-government organizations are not used in Nichia Group's products. In addition, records of conflict minerals procurement investigations and communications with suppliers are retained with a set retention period.

3. Implementation of Measures to Address Identified Risks

Nichia Group requires our suppliers to implement corrective measures for the risks identified in the preceding paragraph. For suppliers whose corrective measures are not confirmed over an extended period, we take actions such as temporarily suspending or terminating transactions.

4. Confirmation of Due Diligence Status of Smelters/Refiners by an Independent Third Party

Nichia Group confirms that the smelters/refiners of related minerals are certified under the Responsible Minerals Assurance Process (RMAP). For smelters/refiners that are not certified under RMAP, we trace back the supply chain and encourage them to obtain the certification.

5. Report on the Status of Initiatives Regarding Due Diligence

Nichia Group reports our status of the initiatives on responsible mineral procurement to internal and external stakeholders via the Nichia website and



other channels.

In the event that Nichia Group changes mineral suppliers, we confirm the risks of the suppliers and proceed with the change only after obtaining prior consent from our business partners. We cooperate with our business partners to support responsible mineral procurement.

We also provide periodic training and education to internal personnel involved in conflict minerals procurement.

This policy will be periodically reviewed to determine whether revision is necessary and will be revised as appropriate.

February 25, 2026

Hiroyoshi Ogawa
President and CEO
Nichia Corporation