## Teijin Group Anti-Corruption Policy

Resolution by the Board of Directors of TEIJIN LIMITED on September 30, 2021 Revision on May 1, 2025

The Teijin Group does not tolerate corruption at any time. Corruption leads to violations of human rights, distorts the market and negatively impacts all societies and economies. To prevent corruption, we (Note 1) hereby establish the "Teijin Group Anti-Corruption Policy".

## 1. Fundamental Principles

In this policy, "corruption" refers to the abuse of entrusted power for an improper gain, including but not limited to all forms of corruption, such as extortion, bribery (Note 2), conflicts of interest (Note 3), and illicit receipt of rebates and kickbacks. We recognize that the prevention of bribery is a particularly important issue. Therefore, we strictly prohibit any direct or indirect involvement with bribery in violation of applicable laws and regulations. In addition, we do not permit any facilitation payment that is made for the purpose of obtaining an improper gain (Note 4).

We comply with all applicable anti-corruption laws and regulations. We prohibit any direct or indirect involvement with corruption in violation of laws and regulations. We meet our stakeholders' expectations by sincerely working to combat corruption through our business activities.

Furthermore, we broadly promote fair business practices and act to contribute to the realization of peaceful, just, and inclusive societies.

## 2. Implementation of a compliance program under the commitment of top management

The Teijin Group CEO will assume full responsibility for taking necessary measures to implement this policy within the Teijin Group, including; repeatedly communicating this policy both inside and outside the company; maintaining and allocating appropriate authority and resources to the Chief Human Resources Officer / Chief Sustainability Officer; and establishing a group compliance program that includes procedural rules and appropriate organizational structure.

#### 3. Adopting a risk-based approach

To identify corruption risk within the Group, we assess risk from various aspects, including the nature of our business operations, our business relationships, our products or services, and the scale and location of our business activities. We will take measures to prioritize business activities with a high risk for corruption.

### 4. Education and training

We establish and implement a system for conducting regular education and training on the implementation of this policy and related procedures for Group officers and employees.

### 5. Third party due diligence

We not only prohibit direct involvement of our company in corruption, but also our involvement through third parties such as sales agents. We strictly control contracts and transactions with third parties such as agents, and develop procedures for monitoring third party activities regularly in order to prevent any involvement in corruption through a third party.

## 6. Effective operation of the whistleblowing hotline system

We establish and implement an effective whistleblowing hotline system that allows all the officers and employees to make a report whenever they become aware of corruption. We keep these reports confidential and prohibit any disadvantageous treatment against the reporter.

## 7. Appropriate responses when any misconduct is identified

If corruption is detected or suspected, we prudently investigate any allegation, analyze the root cause of the misconduct, and take remedial action to prevent recurrence. Any officers and employees who are involved in corruption shall be subject to strict disciplinary action regardless of their position in the company.

#### 8. Control measures before and after mergers and acquisitions

We carry out due diligence of any candidate company from a perspective of corruption risk prior to the merger and/or acquisition. This includes business alliances. We also integrate the new company into the compliance program of our Group through post-merger integration.

# 9. Monitoring and continuous verification / review

We regularly monitor the implementation of this policy, verify its effectiveness and, if necessary, review it under the supervision of the Board of Directors.

# 10. Recording and reporting our efforts

We keep accurate records in our accounting books to avoid any doubt of our involvement in corruption. We also disclose our anti-corruption efforts to the best extent possible, recognizing that anti-corruption is an important concern for both internal and external stakeholders.

Note 1: "We" refers to the Teijin Group and its officers and employees.

Note 2: "Bribery" refers to any payment of money, any provision of entertainment, gifts, or any other benefit, any payment of expenses, any donations or subsidies, etc. to public officials, etc. (including private citizens when commercial bribery is prohibited) to obtain an improper gain in violation of any applicable laws and regulations. This includes cases where we receive bribes in violation of any laws and regulations.

Note 3: "Conflict of interest" refers to a situation in which any individual or company is confronted with conflicts between the duties and demands of their position, and their own private interests.

Note 4: "Facilitation payment" refers to a small amount of payment to public officials, etc. for the purpose of facilitating procedures related to ordinary administrative services.