Ethics Policy

All officers and employees of the Company and its affiliates shall keep this policy in mind at all times and practice it in their business operations to serve society as a whole. In addition, we expect all business partners and stakeholders, including suppliers, to understand and comply with the principles of this policy.

1. Fair and Equitable Transactions

In addition to complying with laws, regulations, and social norms, we perform our duties with integrity and social common sense, and conduct fair and equitable transactions in accordance with company rules and standards. In doing so, we thoroughly ensure compliance with competition laws (anti-monopoly laws), prohibition of bribery and other improper gifts and entertainment, prohibition of bribery of public officials, prohibition of conflict of interest activities, prohibition of insider trading, non-involvement in money laundering, securing the transparency of political funds, and prohibition of other fraudulent acts.
Furthermore, regarding employees and others who report these fraudulent acts, we thoroughly protect whistleblowers in accordance with the Whistleblower Protection Act and the Company's Whistleblower Protection Regulations.

2. Appropriate Information Management and Confidentiality

Information assets, intellectual property, personal information, etc. are appropriately and strictly managed in accordance with laws, regulations, and internal rules.

3. Eradication of Relationships with Anti-Social Forces

We do not conduct transactions or provide benefits to anti-social forces that pose a threat to social order and safety, maintain a resolute stance, and have no relations with them whatsoever.

4. Educational and Awareness Activities

The Company conducts necessary education and training to thoroughly inform all officers and employees of this policy and perform business activities in accordance with it.

5. Implementation System

The President and Representative Director serves as the chief executive responsible for promoting this policy, and the Administrative Management Division regularly reports the compliance status to executive management. Firm disciplinary action will be taken against any acts violating this policy in accordance with internal rules. Furthermore, taking into account changes in social conditions and business risks, we regularly review this policy.

6. Information Disclosure

The Company and its affiliates will appropriately disclose information regarding initiatives and compliance status based on this policy.

February 5, 2026
Asahi Sangyo Kaisha, Ltd.
President
Mikio Kodama