

KOKUYO Group Competition Law Policy

1. Basic Policy

- (1) KOKUYO Co., Ltd. and its subsidiaries (the “KOKUYO Group” and individually, a “KOKUYO Group Company”) are committed to complying with all competition laws applicable to the businesses of the KOKUYO Group in each country and region where the KOKUYO Group operates, including the Antimonopoly Act of Japan (collectively, “Competition Laws”).
- (2) Each KOKUYO Group Company shall establish, implement, and maintain internal rules to ensure effective compliance with the Competition Laws.

2. Scope of Application

This Policy constitutes an internal rule of KOKUYO Co., Ltd. and applies to the entire KOKUYO Group. Each KOKUYO Group Company is responsible for ensuring that its officers and employees — including directors, auditors, executive officers, and other officers, as well as all full-time and part-time workers, temporary staff, and contract employees — comply with this Policy and with any Competition Law related internal rules established by their respective KOKUYO Group Company. Furthermore, each KOKUYO Group Company shall seek the understanding and cooperation of all external parties involved in its business activities to support adherence to this Policy.

3. Whistleblower Reporting System

The KOKUYO Group Hotline, which is available to all officers and employees of the KOKUYO Group as well as business partners of the KOKUYO Group in Japan, accepts reports regarding actual or suspected violations of Competition Laws by any organization or individual within the KOKUYO Group. In accordance with the operational rules of the KOKUYO Group Hotline, any retaliatory or otherwise disadvantageous treatment of whistleblowers for having made a report is strictly prohibited.

4. Principles of Conduct

(1) Compliance with Laws and Regulations

Each KOKUYO Group Company shall comply with the Competition Laws applicable to its businesses in each country and region where it operates, as well as with its own internal company rules.

(2) Prohibition of Cartels and Bid Rigging

No KOKUYO Group Company shall engage in any price-fixing agreements, production coordination, market allocation, bid rigging, or any other cartel or collusive conduct that violates Competition Laws.

(3) Principle of Prohibiting Information Exchange with Competitors

No KOKUYO Group Company, in principle, shall exchange competitively sensitive information with competitors. This prohibition also applies to contacts through industry associations, joint research, exhibitions, and similar forums. Contact with competitors shall be properly managed.

(4) Maintaining Appropriate Relationships with Business Partners

No KOKUYO Group Company shall engage in any conduct that violates any applicable Competition Laws and unfairly harms its business partners or other business operators in the course of their business activities.

(5) Prohibition of Private Monopolistic Practices

No KOKUYO Group Company shall engage in any conduct that constitutes private monopolization under the Antimonopoly Act of Japan or any similar prohibited conduct under other applicable Competition Laws.

(6) Prohibition of Violations through Agents

No KOKUYO Group Company shall cause any of its agents, distributors or other third parties to engage in acts that violate any of the prohibitions set forth in sub-sections (2) through (5) above.

(7) Cooperation in investigations with Competition Authorities

Each KOKUYO Group Company will respond in good faith if they receive an inquiry or are subject to an investigation from a competition authority having jurisdiction over its respective locations.

5. Framework for Compliance with Competition Laws

Each KOKUYO Group Company shall continuously work to establish and maintain an effective framework for developing internal rules aimed at ensuring compliance with all Competition Laws and related laws and regulations, as well as for the proper implementation of those rules. In addition, each KOKUYO Group Company will provide education and promote awareness among its officers and employees regarding this Policy and its respective Competition Law related internal rules.

6. Disciplinary Action

Each KOKUYO Group Company may impose disciplinary action, in accordance with its internal rules, on employees who violate any applicable Competition Laws, this Policy, or the Competition Law related internal rules of their respective KOKUYO Group Company.

Effective Date : January 1st 2026

KOKUYO Co., Ltd.
Director,
Representative Corporate Officer,
President and CEO
Hidekuni Kuroda