

Fair business practices policy

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Version 3.0

Policy written by SDPI*

The Miyoshi Kasei Group is in full compliance with all applicable fair trade laws of the countries and regions in which it operates, and conducts business with partners that are in compliance with such laws. We conduct business fairly and sincerely, with the highest ethical principles, to ensure a high level of trust among the group and its various stakeholders.

This policy's aim is to describe our group provisions in regard to fair business practices.

It applies to all Miyoshi Kasei Group workers, who are encouraged to abide by it in the course of their work, and are the most involved to prevent any potential breaches of the group's ethical charter.

I. Corruption

○ Fraud

The Miyoshi Kasei group condemns all forms of fraud and is committed to actively preventing and detecting it. We have a whistleblowing procedure in place, provide regular training to our employees, and undertake to cooperate with authorities in case of suspected fraud. Employees involved in fraudulent activities will be subject to sanctions in accordance with our internal policies and applicable laws.

○ Bribery

The Miyoshi Kasei group strictly prohibits bribery and corruption in conducting business with our partners.

We will not offer, promise, give or demand any bribes, and will refuse the solicitation of bribes to conceal or disguise the origin of materials. Specifically for minerals, we will refuse to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

* SDPI : Sustainable Development Performance Initiative : Miyoshi Kasei executive body for CSR questions, including assessment, action planning, reporting, strategy building.



- Anti-competitive practices and anti-trust issues

The Miyoshi Kasei group prohibits any practice that has, or could have the effect of restricting, distorting or preventing competition. We operate in total autonomy with respect to competitors, preventing any agreed practices or exchanges of confidential information.

- Conflicts of interest

All employees must avoid engaging in activities, using their position with the company or acting in ways that may place the Miyoshi Kasei Group to disadvantage, compromise its legality or profit a competitor.

- Money laundering

We strongly prohibit money laundering, funding of criminal activities, and any activity designed to conceal or disguise the true origins of criminally derived proceeds to make them appear as legitimate.

With the understanding of the specific risks involved in our supply chains, and taking into account the importance of minerals in our business, we commit to support efforts to contribute to the effective elimination of money laundering across our supply chain.

In the anti-corruption field :

- All of our employees are trained on basic awareness regarding anti-corruption practices. We aim at keeping them updated with regular follow-up trainings.
- We aim to include this awareness training during the integration of any new permanent employee.
- All of our employees of Sales, Procurement and Finance departments are provided with specific in-depth trainings. We aim at keeping them updated with regular follow-up trainings.

II. Whistleblowing

In 2023, our companies have generalized a common whistleblowing procedure. The aim was to create an effective channel, communicate on it to our employees and stakeholders, train our employees, and ultimately, create a company culture around this matter.

Today, 100% of employees are trained on whistleblowing procedure.

Our targets on this are:

- Keeping our employees updated with regular follow-up trainings.
- 100% of reporting investigated.

III. Information security

We ensure that the confidential and personal information we hold or are responsible for is safeguarded where necessary against inappropriate disclosure. We are committed to preserve the confidentiality and integrity of documents and data supplied by our employees, suppliers and customers. We have a policy on information disclosure in place, for all sites to refer to, in case the need arises in communicating with stakeholders.

We aim:

- To train 100% of our employees on general information security and data disclosure management by 2025.
- To provide corrective actions against 100% of identified security breaches.

Sales managers, IT managers, Human resources managers, or any people in charge of these topics through the companies, are responsible to enforce this policy.

This policy will be reviewed every 2 years or as soon as the need arises.