

# Miyoshi Kasei Group

## Governance Policy

March 2026 - Version 1

Policy written by SDPI\*

### Purpose

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The Miyoshi Kasei Group conducts its business in full compliance with the laws and regulations of the countries and regions in which it operates.

Beyond legal compliance, we are committed to upholding the highest standards of integrity, transparency, and fairness in all our business activities.

Through this Policy, Miyoshi Kasei aims to prevent corruption, conflicts of interest, fraud, and money laundering, while promoting responsible digital practices and ensuring transparent and ethical interactions with public and political stakeholders.

Our goal is to foster a culture of trust, accountability, and ethical behavior across the organization and throughout our value chain.

### Scope

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This Policy applies to all entities, sites, and activities of the MIYOSHI Kasei Group worldwide (manufacturing, R&D, logistics, and offices).

All employees, officers, and directors are expected to comply with this Policy and to uphold the highest ethical standards in their professional conduct. Any breach of the commitments described in this policy may lead to appropriate follow-up actions towards employees.

All employees are presented with the engagements described in this policy during their onboarding and sign an onboarding document to acknowledge this.

In addition, suppliers, distributors, and business partners are expected to respect and apply equivalent ethical standards as set forth in this Policy.

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



## Guiding principles & standards

In 2025, MIYOSHI Kasei Group conducted a double materiality assessment to identify the key issues related to its activities and its entire value chain.

Our actions are primarily focused on these material topics, making them more relevant, effective, and impactful.

Our commitments have been defined mainly on this basis, while also addressing other topics considered pertinent in light of our activities and values.

In this process, we have sought to align our commitments and practices on business ethics as much as possible with major international standards and frameworks, such as GRI, the OECD Guidelines for Multinational Enterprises, the UN Global Compact Principles, and the UN Convention against Corruption, as well as emerging regulatory requirements including the CSRD/ESRS and due diligence legislations.

## Main commitments & Objectives

To achieve this ambition, the Miyoshi Kasei Group is committed to:



### Prevention of Corruption, Fraud, Conflicts of Interest and Money Laundering

- Maintaining zero tolerance for corruption, bribery, conflicts of interest, fraud, and money laundering in any form. We promote integrity in every transaction and decision made on behalf of Miyoshi Kasei Group.
- Ensuring a working environment where employees or partners can safely and confidently report any unethical, illegal, or policy-violating behavior without fear of retaliation.

Objective	Target (unit)	Deadline
Train in-depth a given rate of specific employees on corruption	<b>100%</b> (employees)	<b>Every 2 years</b>
Train a given rate of employees on whistleblowing procedure	<b>100%</b> (employees)	<b>Every 2 years</b>
Ensure a given rate of reporting investigated after whistleblowing	<b>100%</b> (cases)	<b>Each year</b>



## Cybersecurity and Data Protection

- Ensuring that the data and digital systems of the Group, its employees, customers, and partners are protected from unauthorized access, misuse, or breaches. We promote a culture of vigilance and responsibility in handling information.

Objective	Target (unit)	Deadline
Train a given rate of our employees on general information security and data disclosure management	<b>100%</b> (employees)	<b>Every 2 years</b>
Maintain a given rate of corrective actions implemented after identified security breaches	<b>100%</b> (number of actions)	<b>Each year</b>



## Political Engagement and Lobbying Activities

- Ensuring transparency, integrity, and compliance in all interactions with public officials, industry associations, and political representatives. Any political or lobbying activity must reflect Miyoshi Kasei's values of independence, responsibility, and transparency.

Objective	Target (unit)	Deadline
Keep an upright position during all interaction within working groups, associations, or all other official circumstances	<b>100%</b> (time)	<b>Each year</b>

## Implementation & Review

Presidents and vice-presidents of each company are accountable for ensuring the implementation of this Policy, with the support of CSR Managers, Compliance Officers, IT Managers, and any person responsible for these topics across the companies.

This Policy will be reviewed every two years or as soon as the need arises.

**Hitoshi USUI,**

President of Miyoshi Kasei, Inc.,  
representing Miyoshi Group companies