

## Basic Policy on Anti-Corruption and Corrupt Practices

Amvis Holdings, Inc.

### (Purpose)

#### Article 1

This basic policy aims to promote anti-corruption and efforts to prevent corrupt practices, and to earn trust from stakeholders and society.

### (Scope of Application)

#### Article 2

1. This policy shall apply to Amvis Holdings, Inc. and its subsidiaries (hereinafter referred to as the "Group") stipulated in item 3 of Article 2 of the Companies Act, as well as to officers, employees, and other members of the Group.
2. Officers, employees, and others shall mean all people engaged in the business of the Group, including officers, employees, contract employees, part-timers, accepted employees on secondment, and temporary employees.
3. The Group shall demand thorough prevention of corruption and corrupt practices not only within the Group, but also public officials, as well as private customers, business partners, and other businesses (hereinafter referred to as "business partners and others").

### (Compliance with Laws and Regulations Related to Anti-Corruption and Corrupt Practices)

#### Article 3

Officers, employees, and others shall comply with all anti-corruption and corrupt practices laws and regulations applicable in each region, this policy and internal rules, including internal regulations.

### (Prohibition against Offering Bribes)

#### Article 4

1. Except as permitted by related rules and other regulations, officers, employees, and others shall not directly or indirectly provide money or other benefits, or make offers or promises thereof, to business partners and others with corrupt intents.
2. Officers, employees, and others shall not direct bribery through third parties such as agents, consultants, distributors, subcontractors, and others, nor tolerate or condone

such third parties offering bribes.

(Prohibition against Accepting Bribes)

Article 5

Officers, employees, and others shall not directly or indirectly receive, demand, or promise to receive improper or unjustified benefits, with respect to their duties.

(Thorough Record-Keeping and Storage)

Article 6

Officers, employees, and others shall comply with procedures concerning financial reporting, accurately record all transactions in accounting books, and properly store relevant materials.

(Lawful Entertainment, Gifts, and Others)

Article 7

The Group shall properly manage entertainment, gifts, travel expenses, donations, supports, and sponsorships with business partners and others that are lawfully provided for legitimate business purposes, in accordance with the “rules for handling of gifts and entertainment.”

(Establishment of System)

Article 8

The Group shall establish the following systems to thoroughly ensure anti-corruption and corrupt practices.

1. Internal Audit

The Internal Audit Office, which is independent of the business execution divisions, shall conduct annual internal audits of the status of the maintenance and operation of the compliance system with laws, regulations, and the Articles of Incorporation as stipulated in the “rules for internal controls.” It shall confirm that all daily operations are properly conducted, including the risk of corruption, corrupt practices, and other irregularities.

2. Consulting and Reporting Desk

To recognize and correct illegal, improper, and unethical acts such as corruption and corrupt practices within the Group at an early stage, a reporting system shall be established in accordance with the “rules for internal reporting system operation.”

### 3. The ESG Promotion Committee

Earning further trust from society and local communities through anti-corruption and corrupt practices efforts is an important issue to be addressed with regard to sustainability.

Accordingly, the ESG Promotion Committee, which is composed of directors, shall oversee its promotion.

(Revision and Abolition of Policy)

#### Article 9

The revisions and abolition of this policy shall be resolved and implemented by the Board of Directors.

Date of enforcement: April 24, 2023