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Compliance

Basic Policy and Action Guidelines

In order to realize sustainable contributions to society over the long run through the delivery of our one-and-only technologies and number one products, which are found in our Group's mission, we believe that it is essential to have the trust of society and all stakeholders, including clients, business partners, development partners, employees, and shareholders, regarding compliance with laws and other rules. This is indicated in the Charter of Corporate Behavior: "Asahi Intecc shall comply with all laws and regulations, international rules, and the spirit of these rules, regardless of their origin, whether domestic or international, and shall act in a socially sensible manner."

Promotional Structure

Under the supervision of the director and general manager of the Administration Division, the Legal, General Affairs, and Human Resource Divisions are responsible for understanding the information contained in laws and regulations, considering the impact that these could have on business operations, reflecting this upon internal regulations, disclosure items, and

企業行動憲章 企 業 理 念

 朝日インテック株式会社

企業行動憲章

朝日インテック株式会社は、以下の10原則に基づき、国内外を問わず、全ての法律、国際ルール及びその精神を遵守することともし、社会的意識をもって行動する。私たちは、公正な競争を通じて利潤を追求するという経営全体である同時に、広く社会にとって利用が存在できるよう努める。

- 製品安全の確保、環境保全及び個人情報・顧客情報の保護に対する配慮しつつ、社会的に有用な商品・サービスを販売・開拓し、顧客などの満足と信頼を得る。そして市民生活の向上により社会の発展に貢献する。
- 環境問題への取り組み、人権の尊重の観点であり、企業の社会的責任であることを認識し、地域貢献、社会的貢献、資源のリサイクルなどの観点で、持続可能な社会の実現に取り組む。また、社会的・環境的・経済的のトライアルを行なう。
- 株主を中心とした、社会に貢献する企業としての役割を果たす。

4. 従業員のゆとりと豊かさを実現し、安全で働きやすい環境を確保するとともに、従業員の多様性、人権性を尊重する。

5. 良き企業市として、積極的に地域社会活動などを実践する。

6. 市民社会の秩序と安全に貢献できる反社会的勢力による活動とは断固として対決する。

7. 國際的な事務活動にあたっては、国際ルール及び規則の遵守並びにそれらの精神を尊重すると共に、その国の文化や慣習を尊重し、規範の実践に貢献する。

8. 政府・行政との健全かつ正常な関係を保つ。

9. 開拓行為を規制し適度化し、社会的規範にとることのない、誠実な企業活動を遂行し、公正、透明、自由な競争に貢献する。

10. 企業の行動規範としての行動規範の充実ため、本憲章に対する理解が得られたときに、本憲章に対する理解が得られたときは、自ら開拓規範にあり、進歩かつ的確な情報公開を行い、再発防止に努め、適正な努力を行う。

operational procedures, and implementing company-wide awareness and education.

Internal Reporting System

Our group has established the ASAHI Intecc Group Compliance Hotline for the early detection of violations of laws and regulations, the Articles of Incorporation, the Charter of Corporate Conduct, and internal rules, as well as inappropriate acts such as harassment, in order to correct them and prevent their recurrence. This system covers the entire global region where our group operates, and we are working to create an environment where all employees can use the system with peace of mind.

In addition to the existing internal contact points, we have established an external contact point staffed by lawyers to ensure independence and neutrality. Reports and consultations can be made from either contact point. The name of whistleblowers or information that could identify them is not disclosed unless their consent is given or there is a justifiable reason, and we strive to thoroughly protect whistleblowers so that they are not disadvantaged.

Based on internal reporting regulations, the Compliance Committee, which consists of several members, including the general manager of the Administration Division, the general manager of the Human Resources Division, the General manager of the Legal Department, and the general manager of the Internal Audit Office, takes the lead in investigating and responding to reports. When conducting an investigation, the committee will conduct a fair and prompt fact-finding process, taking the utmost care to ensure that whistleblowers and related parties are not adversely affected. If a violation is found from the investigation, corrective measures and measures to prevent recurrence are appropriately considered and implemented.

For cases involving directors or executive officers, the company will take actions with the involvement of outside directors and directors who are members of the Audit and Supervisory Committee to ensure the transparency of the decision-making process.

The whistleblowing information received through this system is reported to directors who are Audit and Supervisory Committee members of the company, depending on the importance of the content, and important matters are reported to directors as necessary to strengthen supervision and governance at the management level.

We have also set up consultation and reporting hotlines at our subsidiaries and branches, including overseas bases, and we are working to ensure a globally unified level of compliance by adhering to the laws and regulations of each country and region. In addition, directors who are also Audit and Supervisory Committee members continuously monitor the Internal Reporting System to improve its effectiveness.

Compliance Training

We provide training to new graduates and mid-career hires that are joining the Company to ensure compliance with regulations on personal information, corporate secrets, and insider trading. We also provide training to business personnel on specific topics such as the basics of contracts, subcontracting laws, laws and regulations concerning sales, debt collection, and confidentiality agreements. In addition, we provide group training to those involved in operations regarding specific topics that require special attention, such as EU competition laws and compensation rules for health care professionals. Furthermore, for all employees, we distribute e-learning content in which explanations are provided on basic knowledge of contracts, procedures until conclusion of a contract, and compliance and control

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with regulations on insider trading. In FYE June 2025, we provided employees of the company and its domestic subsidiaries with e-learning training on business and human rights.

Appropriate Relations with Healthcare Professionals

We have established internal rules on payments to medical institutions, etc. that clarify standards in accordance with relevant laws and regulations, such as the Fair Competition Code Concerning Restriction on Premium Offers in the Medical Devices Industry and the National Public Service Ethics Code, and the Legal Division ensures compliance with these internal rules prior to all payments to healthcare professionals, etc.

In addition, in accordance with the Japan Federation of Medical Devices Associations' Transparency Guidelines for the Medical Device Industry and Its Relationships with Medical Institutions and Other Organizations, we publicly disclose payments to healthcare professionals. In Europe, the company, as a member of the MedTech Europe Code, conducts marketing activities in compliance with the ethical standards thereof and discloses information on the payment of educational grants to healthcare organizations. With regards to overseas payments to medical professionals, etc., we follow industry rules such as the Mecomed Code of Ethical Business Practice, Apac-Med Code of Ethical Conduct for Interactions with Health Care Professionals, and the AdvaMed Code of Ethics on Interactions with Health Care Professionals, and disclose the payment information in accordance with the United States' Physician Payments Sunshine Act and France's Bertrand Law.

Monitoring of Domestic and Overseas Related Companies

Asahi Intecc's Directors or employees are dispatched to subsidiaries as Directors to ensure compliance with laws, regulations, and other rules, and each subsidiary's Director reports monthly to Asahi Intecc's Director and General Manager of the Administration Division concerning the existence and details of any violations of laws, regulations, or the Articles of Incorporation, or any other important matters concerning compliance, and the existence of disputes or administrative dispositions. In addition, planned visiting audits to subsidiaries by Directors who are Audit and Supervisory Committee members and visiting audits by the Internal Audit Office are conducted systematically.

Respect for Human Rights (1) Harassment/ Discrimination Prevention

Our Group advocates in the Charter of Corporate Behavior that "We shall achieve the feeling in our employees of being free of pressure and affluence, secure safe and comfortable environments for them, and respect the diversity, personalities, and individual characters of employees," and we respect the human rights of each employee and prevent discrimination and harassment.

As harassment and discrimination are socially impermissible acts of unjustly harming an individual's dignity, we are working to prevent them. Regarding harassment, our Directors and managers have received harassment training from external experts, all participants have submitted written pledges, and when discovered, it will be dealt with in accordance with the rules for disciplinary action. In addition,

since June 1, 2022, the contact point established in the Human Resources Division has been integrated in the ASAHI Intecc Group Compliance Hotline that is an internal reporting contact point, in order to create a contact point system that makes it easier for users to understand as a contact point for all forms of harassment.

Respect for Human Rights (2) Prevention of Forced Labor and Child Labor

Our Charter of Corporate Behavior states that "In our international business activities, we shall comply with international rules, local laws, and their spirit, respect the culture and customs of the country, and contribute to the development of the local community," and we are committed to business activities that take human rights into consideration, including the prevention of forced labor and child labor.

From FYE June 2022, our Group has added items related to compliance with laws and social norms to its questionnaires that have been conventionally implemented for suppliers. As such, we, through our entire corporate activities, are taking measures that take human rights into consideration, such as the prevention of forced labor and child labor.

Respect for Human Rights (3) Formulation of Human Rights Policy.

Our Group formulated the Asahi Intecc Group Human Rights Policy in May 2023 with the approval of the Board of Directors. This policy was formulated in order for the Asahi Intecc Group to respect human rights in its business activities and fulfill its responsibilities in society.

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As a company concerned with human life and safety, we support and respect the United Nations Guiding Principles on Business and Human Rights and strive to investigate and prevent important human rights issues that need to be addressed, such as the prohibition of modern slavery, prevention of discrimination and harassment, appropriate management of employee working conditions, occupational health and safety, compliance with laws and regulations concerning environmentally controlled substances and hazardous substances, and protection of the rights of human subjects in clinical trials. In FYE June 2025, we have published our requests to our suppliers, including those related to human rights, the environment, and anti-corruption measures, and asked our business partners to respect human rights. In accordance with the Human Rights Policy, we have also begun conducting human rights due diligence (efforts to identify, prevent and mitigate negative impacts on human rights) on the above issues.

For details of Asahi Intecc Group Human Rights Policy and Requests to Our Suppliers, see our website.

Asahi Intecc Group Human Rights Policy/
Request to Our Suppliers [\[link\]](#)

Dealing with Antisocial Forces

Our group's Charter of Corporate Behavior clearly states that compliance with laws and regulations is fundamental to our activities. In accordance with this Charter, Asahi Intecc's basic policy is not to have any relationship with antisocial forces that pose a threat to social order and safety, and all directors and employees are thoroughly informed of this. As part of this policy, as a basic rule, all contracts with new business partners in Japan include an article regarding

the elimination of antisocial forces, and memorandums of understanding on the elimination of antisocial forces are concluded with long-standing business partners. In addition, the legal division oversees the collection of information concerning measures against antisocial forces and takes appropriate measures in a resolute manner by consulting with experts such as attorneys and the police as needed in cooperation with the general affairs division.

Corruption Prevention

Our Group formulated the Asahi Intecc Group Anti-Bribery Policy in May 2024 with the approval of the Board of Directors. This policy was formulated to comply with the laws and regulations of each country and to conduct fair, transparent, and free trade and competition while corporate

activities are conducted worldwide. In order to implement this policy, while bribery is obviously prohibited, we also examine and confirm that this is the case to ensure that inappropriate payments are not made, such as payments to public or quasi-public servants based upon requests or contracts to obtain permission. In addition, we have also obtained anti- bribery pledges from its overseas distributors.

See our websites for details of the Asahi Intecc Group Anti-Bribery Policy.

Asahi Intecc Group Anti-Bribery Policy [\[link\]](#)

