

RRA3 : Business Integrity

Our company is committed to preventing money laundering and terrorist financing. (Policy)

Regarding money laundering, risks are identified and assessed based on the "Policy on responsible sourcing of Copper, Nickel and Cobalt raw materials."

In operating the management system, we conduct due diligence and risk management, transaction monitoring, training, and record keeping.

We conducted risk assessments regarding bribery, competition law, and money laundering, and developed and managed action plans to prevent and mitigate those risks.

As a result, no serious violations or misconduct have been confirmed at this time.

	Action plan	KPI	deadline	in charge	Progress report
Preventing bribery and corruption	Annual anti-bribery training for all employees.	100% training attendance and 100% test pass rate	Every February	Administration Dept.	From December 2025 to January 2026, training (including comprehension tests) was conducted for all employees (including those at subcontractors) at the target factories, and all employees successfully completed the training.
	Prior approval will be required when providing benefits to public officials, etc.	100% approval rate	as needed	General Affairs Sect.	We continue to operate under the prior approval system. There were no cases requiring prior approval in fiscal year 2025.
	Regarding the provision of benefits to public officials, accurate accounting procedures and accurate records should be maintained.	100% accounting and record-keeping	as needed	General Affairs Sect.	We have established and are implementing rules regarding record-keeping and accounting procedures. In fiscal year 2025, there were no cases of providing benefits to public officials, etc.
	Establishment of a reporting hotline where anonymous reporting is permitted.				We operate internal and external reporting channels that allow for anonymous reporting, and we have clearly stated that retaliation is prohibited. There were zero reports received in fiscal year 2025.
	Bribery risk assessment for all raw material suppliers	Held once a year	Every April	Administration Dept.	We conducted our annual risk assessment in fiscal year 2025. As a result, we found no business partners that were classified as high-risk.
	Prevention of bribery and promotion of compliance with relevant laws and regulations (Legal Dept.)		as needed	Legal Dept.	We have established and are operating management procedures based on a risk management system to address bribery risks involving public officials and others.
Anti-money laundering (AML)	Develop an AML policy.				We have published our AML policy. (Website launch: September 2025)
	Annual AML training for all employees	100% training attendance and 100% test pass rate	Every February	Administration Dept.	From December 2025 to January 2026, in-person training (including comprehension tests) was conducted for all employees (including those at subcontractors) at the target factories, and all employees successfully completed the training.
	AML risk assessment for new raw material suppliers	100% implementation	as needed	Administration Dept.	We conduct risk assessments before initiating new business transactions. As a result of these assessments, no trading partners were found to be high-risk during the period in question.
	Annual AML risk assessment for all raw material suppliers	Held once a year	Every April	Administration Dept.	We conducted our annual risk assessment in fiscal year 2025. As a result, we found no business partners that were classified as high-risk.
	Strict enforcement of double approval for payments within the company (Accounting Regulations)	100% implementation	as needed	General Affairs Sect.	We maintain a double-authorization system for payments. (This is a continuing measure to control the risk of "fraudulent accounting.")
Competition Law	Annual competition law training for all employees	100% training attendance and 100% test pass rate	Every February	Administration Dept.	From December 2025 to January 2026, in-person training (including comprehension tests) was conducted for all employees (including those at subcontractors) at the target factories, and all employees successfully completed the training.
	When contacting competitors or other related parties, prior notification must be submitted (Notification under Article 8 of the Competition Law Compliance Regulations).	100% implementation	as needed	Departments related to the Toyo Plant	We continue to implement a system requiring prior notification regarding contact with competitors. (Implementation started: 2023)
	When contacting a competitor, keep a record.	100% implementation	as needed	Departments related to the Toyo Plant	We continue to maintain records of contact incidents. (Implementation started: 2023)
	Establishment of a reporting hotline where anonymous reporting is permitted.				We operate internal and external reporting channels that allow for anonymous reporting, and we have clearly stated that retaliation is prohibited. There were zero reports received in fiscal year 2025.