

DKS Group Ethics Policy

Guided by our Company Credo, “Contributing to the nation and society through industry,” the DKS Group upholds high ethical standards and integrity in all business activities and is committed to engaging in the following fair and highly transparent corporate activities.

1. Scope of Application

This Policy applies to all officers and employees of the DKS Group (all employees, including permanent employees, contract employees, and temporary employees). We also expect our business partners (business partners and other parties directly involved in our business, products, or services) involved in the DKS Group’s corporate activities to understand and support this Policy and encourage them to respect this Policy.

2. Key Issues for the DKS Group

As a company responsible for the development, manufacturing, and sale of industrial chemicals, the DKS Group is deeply aware of the impact our business activities have on the trust of society.

To ensure sincere and fair corporate activities, we have identified the following items as particularly important issues. Based on the Code of Corporate Ethics and the Declaration of Actions by Officers and Employees, which translates this code into guidelines for officers and employees, we strive for continuous compliance and the strengthening of governance.

(1) Fair and Sound Business Activities

- (i) We conduct business activities in compliance with laws, regulations, and social norms.
- (ii) We comply with domestic and international competition laws and do not engage in acts that impede fair and free competition.
- (iii) We do not cause disadvantage to business partners or others by abusing our superior bargaining position.
- (iv) We work to prevent corruption in all its forms (bribery, extortion, conflict of interest, fraud, money laundering, etc.).
- (v) We have no association with anti-social forces.
- (vi) We respect intellectual property rights and take measures to prevent unauthorized infringement.
- (vii) We establish whistleblowing contact points accessible from both inside and outside the company. We ensure the protection of whistleblowers and conduct fair investigations.

(2) Responsible Information Management

- (i) We strictly prevent the leakage of confidential information obtained through business activities.
- (ii) We appropriately manage and protect the personal information of all stakeholders,

including employees and business partners, in compliance with relevant laws and regulations.

(iii) We strive to strengthen cybersecurity and implement appropriate technical and organizational measures to ensure data safety.

3. Promotion System

The DKS Group promotes initiatives for thorough compliance and the improvement of corporate ethics based on this Policy under the supervision of the Board of Directors.

We have established the “Sustainability Committee” as the core organization for promoting sustainability. We formulate goals and plans regarding corporate ethics, promote activities, and verify progress. We regularly report the results to the “Sustainability Meeting,” which is composed of members of the Management Committee, to make decisions on important matters regarding corporate ethics. Furthermore, we report regularly to the Board of Directors and conduct continuous reviews of strategies, targets, and plans.

4. Communication

The DKS Group actively discloses information regarding corporate ethics and compliance, ensuring dialogue and transparency with all stakeholders, including customers and investors.

In addition, we make this Policy known to all officers and employees of the DKS Group and regularly conduct education and training aimed at ensuring behavior based on this Policy.

This Policy was approved by the Board of Directors in December 2025.

December 24, 2025

DKS Co. Ltd.

President & CEO YAMAJI Naoki