

<Supplement to the Epson Group Principles of Corporate Behavior >

Anti-Bribery, Anti-Corruption, and Competition Law (Antimonopoly Act) Guidelines for Business Partners

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1. Dear Business Partners,

Epson, a participant in the United Nations Global Compact since 2004, has pledged to uphold universal principles concerning human rights, labor, the environment, and anti-corruption. In 2019, Epson declared its support for the RBA Code of Conduct and joined the Responsible Business Alliance (RBA). We revised our Principles of Corporate Behavior and the Epson Global Code of Conduct to reflect recent changes in the social environment and to achieve social sustainability. All directors and personnel in the Epson Group are required to conduct themselves in adherence to these.

In Principles of Corporate Behavior and the Epson Global Code of Conduct, Epson declares its intent to eliminate any involvement in bribery, corruption, dishonest marketing, cartels, insider trading, and conflict of interest, as well as its commitment to doing business in accordance with the principles of fairness, transparency, and free competition. We strongly request that our business partners also eliminate any business practices that violate laws, regulations, and business ethics.

Compliance with anti-bribery, anti-corruption, and competition laws (in Japan, the Antimonopoly Act) has become increasingly important in recent years. These guidelines were created to help ensure that our business partners understand Epson's values with regard to compliance in these areas and to again ask our business partners to reject practices that violate these laws in all dealings with the Epson Group.

These guidelines are also in accord with Epson's Management Philosophy. Conducting business with honesty and integrity will help enable us to provide the best products and services to all of our customers and stakeholders. Let's ensure our mutual growth by observing these guidelines.

2. Epson's Mission

Epson will fulfill its social responsibility by aspiring to live up to the Principles of Corporate Behavior, which are based on "trust-based management," a concept that underlies Epson's Management Philosophy. We seek to create value that surprises and delights our customers and helps to make the world a better place. At the same time, we aim to be an indispensable company, a company that maintains the trust of stakeholders.

2.1 Management Philosophy

Epson aspires to be an indispensable company, trusted throughout the world for our commitment to openness, customer satisfaction and sustainability. We respect individuality while promoting teamwork, and are committed to delivering unique value through innovative and creative solutions.

2.2 Principles of Corporate Behavior

1. Pursuing customer satisfaction
 2. Preserving the natural environment
 3. Fostering diverse values and teamwork
 4. Creating a safe, healthy, and fair work environment in which human rights are respected
 5. Ensuring effective governance and compliance
 6. Ensuring the security of people, assets, and information
 7. Working with business partners for mutual benefit
 8. Prospering with the community
 9. Initiating honest dialogue with our stakeholders
- Closing. The spirit of "integrity and effort" and "creativity and challenge"

3. Ensuring Effective Governance and Compliance, and Working with Business Partners for Mutual Benefit

The content of the fifth principle in Principles of Corporate Behavior, "Ensuring effective governance and compliance," is as shown below.

- We institute effective corporate governance and internal controls, and we observe laws, regulations, and other rules and maintain the highest ethics in all activities.
- We will establish and maintain an effective system which governs our corporate entities and internal controls to ensure that management is transparent, fair, agile, and decisive.
 - We will implement systems of compliance to ensure that we observe and respect all applicable laws and regulations, internal rules, and business ethics, and will respond to the needs of society.
 - We will establish whistleblowing systems that can be used anonymously to report concerns of violations of laws and regulations, internal rules or of business ethics. We will not tolerate any retaliation against whistleblowers who report for justifiable reasons.
 - We will not tolerate any form of bribery, corruption, dishonest marketing, cartels, insider trading, or conflict of interest. We will conduct all transactions in accordance with these principles, promoting fair and open competition in the marketplace.
 - We will maintain a good, mutually cooperative relationship with governments and their administrative bodies.
 - We will not involve ourselves in or have contact with any anti-social movement or group that promotes activities that are illegal or threatening to public order and safety.
 - We will establish a system to investigate the source of minerals used in our products and supply chain and will take actions to responsibly source minerals to avoid using any minerals that could be involved in human rights abuses, conflicts or environmental degradation.
 - We will employ best practices in risk management to prevent risks from materializing and minimize impact in cases where they do materialize.

The content of the seventh principle in Principles of Corporate Behavior, "Working with business partners for mutual benefit," is as shown below.

- We seek to maintain mutually beneficial relationships with our suppliers, sales channels, collaborators, and other business partners, whom we ask to live up to the highest standards of ethical conduct while respecting their autonomy and independence.
- Acts of bribery and collusion with business partners are strictly forbidden. We will engage in sound business practices and demand that our business partners adhere to a zero-tolerance policy regarding illegal and unethical business practices.
 - We will hold our business partners to the same strict standards that Epson upholds, with regard to compliance with laws and maintenance of human rights, suitable labor conditions, the environment, ethics, quality, and information security. Epson will support improvements to any of these areas as needed.
 - We will develop and maintain open relationships with our business partners and work with them to increase the competitiveness of the entire supply chain, based on mutual trust and for our mutual benefit.

3.1 Anti-Bribery and Anti-Corruption

As stated above, Epson's policy is not to tolerate any form of bribery, corruption, dishonest marketing, cartels, insider trading, or conflict of interest and to conduct all transactions in accordance with these principles, promoting fair and open competition in the marketplace. We believe it is important to maintain wholesome relationships with political and governmental bodies, as well as business partners.

To eliminate all association with bribery, we ask our business partners to strictly refrain from engaging in conduct such as that described below for the purpose of securing transactions on behalf of the Epson Group or to gain or maintain a business.

- Offering, giving, or promising, either directly or indirectly, cash, gifts, or other favors or benefits* to a domestic or foreign government officials and/or persons other than government officials in order to gain an unfair business advantage
 - o Including but not limited to facilitation payments, excessive entertainment or hospitality, the receipt of kickbacks, discounts, rebates, and travel
- Please understand that all officers and employees of the Epson Group are strictly forbidden from engaging in bribery and collusion, and cannot accept illegal or unethical bribes or entertainment. We ask for your understanding and cooperation.

3.2 Competition Law (Antimonopoly Act)

Epson creates, produces, and sells products and services that emotionally engage customers worldwide. Our policy is to seek true customer value, not impair competition in the name of profit. To maintain compliance with competition laws (Antimonopoly Act), we ask our business partners to strictly refrain from engaging in conduct such as that described below.

- Perpetrating or being complicit in the following types of anti-competitive conduct that violates Japan's Competition Act (Antimonopoly Act) or the competition laws of other countries or regions is prohibited:
 - Colluding with competitors to fix prices, production quantities, etc.
 - Dividing and allocating markets or customers
 - Rigging bids
 - Obstructing trade
 - Using a position of advantage to interfere with or exclude the activities of another business operator
 - Restricting selling prices

4. Reporting (in the event of violations)

If you become aware of illegal conduct or conduct that violates or may violate these guidelines, please promptly notify an Epson Group company with whom you do business or report your concerns via one of the whistleblowing systems that have been set up.

If you would like to report or consult with someone regarding possible compliance issues, please refer to the information on the Epson website below.

Epson website : [Notes on Use of the Supplier Whistleblowing System | Sustainability | Epson \(corporate.epson\)](#)