

## **NX Group Anti-Bribery Policy**

Established: January 1, 2026

The NX Group strives to contribute to society through logistics and fulfill the company's social responsibilities based on the "NX Group Corporate Philosophy" and "NX Group Charter of Conduct." Regarding the prevention of bribery, the NX Group has established the "NX Group Anti-Bribery Policy" as a basic policy of the NX Group, which was resolved and enacted by the Board of Directors of Nippon Express Holdings, Inc.

The NX Group management demonstrates its firm commitment to compliance with this Policy, and officers and employees of the NX Group must comply with this Policy. In addition to the matters stipulated in this Policy, the NX Group must comply with all applicable laws and regulations relating to anti-bribery in the country or region in which the NX Group company is located (hereinafter referred to as "Local Laws").

### **1. Purpose**

This Policy sets forth the NX Group's initiatives to prevent bribery involving public officials or persons in equivalent positions (hereinafter referred to as "Public Officials") as well as officers and employees of private businesses. It also stipulates the basic policy, matters to be complied with in relation to the basic policy, and the compliance system, etc., to never permit any acts in violation of the laws and regulations related to anti-bribery and the prevention of corrupt practices in Japan and overseas, and to endeavor to prevent all forms of bribery through the action guidelines provided in this Policy.

### **2. Scope of Application**

This Policy applies to each NX Group company and all officers and employees of each NX Group company.

### **3. Matters to Be Observed**

The NX Group must comply with the following:

#### **(1) Prohibition on offering of bribes**

Providing bribes or other unjust interests, or applying for, or making a promise to provide, directly or indirectly, to Public Officials or officers or employees of private business operators, for the purpose of obtaining or maintaining a business contract or other interest in a business, whether in Japan or overseas, will not be allowed.

#### **(2) Prohibition of acceptance of bribes**

The acceptance of an offer, promise or provision of bribes or other unjust interest, directly or

indirectly, from Public Officials or officers and employees of private business operators, for the purpose of obtaining or maintaining a business contract or other interest in a business, whether in Japan or overseas, will not be allowed.

(3) **Prohibition of assistance and arrangement**

A person must not assist in, or request an arrangement of, a bribery, and must not be involved in, or take part in, the process of offering and accepting bribes or other unjust interests in relation to Public Officials or officers and employees of private business operators, whether on one's own behalf or on behalf of third parties, whether in Japan or overseas.

(4) **Compliance with anti-bribery laws**

In addition to the preceding Items, a person must not conduct any acts that violate or conflict with the Local Laws and overseas laws which are applied extraterritorially (including, but not limited to, the Unfair Competition Prevention Act of Japan, the Foreign Corrupt Practices Act of 1977 of the United States, and the Bribery Act 2010 of the United Kingdom, etc.; hereinafter collectively referred to as "Anti-Bribery Laws").

(5) **Ensuring proper business relationships**

With customers or concerned parties outside the company, an individual must not offer or accept entertainment or gifts that are beyond the range of business customs and unacceptable generally in society, and the individual must not have any financial interests that could be misunderstood as bribery.

(6) **Implementation of appropriate acts of entertainment, gifts, donations, sponsorships, and political contributions**

Even if an offer of entertainment or gifts is within a reasonable range in accordance with societal norms, the NX Group company will establish standards or internal rules for prior applications and authorizations of certain acts in accordance with the Local Laws, and apply them appropriately. In addition, when performing acts of sponsorships and donation, including charitable donations and political contributions, an individual must comply with the Local Laws and must not engage in acts that are suspected of constituting the offering of bribes.

#### 4. Establishment of a System to Prevent Bribery

(1) **Retention of records**

The NX Group must retain accurate reports and records for all its transactions.

(2) **Internal reporting**

The NX Group has established an internal reporting hotline to enable consultation or reporting in the event that any act in violation of, or potentially in violation of, this Policy is discovered. When a consultation or report is received from officers or employees, the NX Group will promptly investigate and establish a system to implement appropriate measures.

The NX Group strictly prohibits any form of retaliation against officers or employees who consult or report such matters.

(3) Training

The NX Group will provide its officers and employees with periodic education and training relating to anti-bribery to ensure awareness of, and compliance with, the regulations relating to anti-bribery under the Anti-Bribery Laws and this Policy.

(4) Audit

The NX Group will conduct periodic audits relating to compliance with and the operation of this Policy and related regulations, etc.

(5) Disciplinary action

If an officer or employee violates this Policy or related regulations, etc., each NX Group company will appropriately dispose of the officer or employee in accordance with the regulations related to disciplinary actions, such as the rules of employment, etc.

## 5. Request for Understanding and Cooperation from Business Partners

All business partners involved in the NX Group's business activities are kindly requested to ensure that their officers and employees are fully aware of the contents of the Anti-Bribery Laws and this Policy, and that no business partners are engaged in any conduct that violates or may be suspected of violating Anti-Bribery Laws or this Policy with respect to their counterparties when conducting business or transactions related to the NX Group.

In the event that you become aware of any of the aforementioned violations or suspected violations when conducting the NX Group's business operations or transactions, you are requested to promptly notify one of the NX Group companies thereof and to cooperate fully with any subsequent investigation by the NX Group or by the relevant authorities.