

Nabtesco Group Export Controls and Economic Sanctions Policy

I. General Provisions

1. Nabtesco Corporation and its group companies (collectively, the “Nabtesco Group”) are committed to maintaining peace and security in the international community. To that end, the Nabtesco Group maintains a robust management framework and implements appropriate export controls so that its products, technologies, and services that could be diverted to military use do not fall into the hands of states or terrorists involved in the development of weapons of mass destruction or the excessive accumulation of conventional weapons. The Nabtesco Group also complies with applicable economic sanctions laws and regulations adopted by relevant countries and regions in response to violations of international law or other acts that threaten peace and security in the international community.

II. Export Controls

2. Compliance with Export Control Laws and Regulations

Each company within the Nabtesco Group complies with the export control laws and regulations applicable to it in the countries and regions where it operates or intends to operate, including, without limitation, the Foreign Exchange and Foreign Trade Act of Japan, the U.S. Export Administration Regulations, and Regulation (EU) 2021/821 (collectively, “Export Control Laws and Regulations”), as well as all applicable internal rules and regulations, including the Nabtesco Group Code of Ethics.

3. Prohibition of Transactions Violating Export Control Laws and Regulations

With respect to goods and technologies (including software) regulated by Export Control Laws and Regulations, the Nabtesco Group does not, directly or indirectly, engage in exports or reexports of goods, provision or reprovision of technologies (including deemed exports and deemed reexports), brokerage or other intermediary transactions involving goods or technologies (collectively, “Export-Related Transactions”) to restricted countries or regions or for restricted end uses or end users in violation of such laws and regulations. Nor does the Nabtesco Group engage in acts intended to circumvent or evade Export Control Laws and Regulations.

4. Framework for Compliance with Export Control Laws and Regulations

The Nabtesco Group implements export controls in accordance with the following principles.

(1) Robust Export Controls

Where a group company continuously engages in Export-Related Transactions involving goods or technologies regulated by Export Control Laws and Regulations, it establishes internal export control rules appropriate to the nature of its business and the level of risk involved, and implements robust export controls under a framework in which a senior executive of the company has ultimate responsibility for export controls.

(2) Recordkeeping

The Nabtesco Group appropriately retains records of measures taken to comply with Export Control Laws and Regulations in accordance with applicable Export Control Laws and Regulations and internal rules and regulations.

III. Economic Sanctions

5. Compliance with Economic Sanctions Laws and Regulations

Each company within the Nabtesco Group complies with all economic sanctions laws and regulations applicable to it in the countries and regions where it operates or intends to operate (collectively, “Economic Sanctions Laws and Regulations”), as well as relevant internal rules and regulations.

6. Prohibition of Transactions Violating Economic Sanctions Laws and Regulations

The Nabtesco Group takes a risk-based approach to sanctions compliance. To avoid involvement in transactions with sanctioned countries or regions and sanctioned parties (including the receipt or processing of payments), as well as in any circumvention or evasion of economic sanctions, the Nabtesco Group appropriately assesses sanctions risks, including by confirming whether transaction-related parties (including individuals, entities, vessels, and aircraft) are subject to sanctions in relevant jurisdictions. Where concerns are identified, the Nabtesco Group seeks, to the fullest extent possible, to avoid the relevant transaction.

IV. Miscellaneous

7. Audits

The Nabtesco Group conducts audits, taking into account the nature of relevant transactions and the level of risk involved, in order to confirm that this Policy is being

properly observed.

8. Education

The Nabtesco Group provides planned education and training to promote understanding of Export Control Laws and Regulations, Economic Sanctions Laws and Regulations, and the importance of compliance with this Policy, and to support their effective implementation.

9. Consultation

Officers and employees who have questions regarding the application of Export Control Laws and Regulations or Economic Sanctions Laws and Regulations should consult with the Legal & Compliance Department of Nabtesco Corporation or the department responsible for compliance at the relevant Nabtesco Group company. In addition, if they become aware of facts constituting, or potentially constituting, a violation of such laws and regulations, they are required to report the matter immediately in accordance with applicable internal rules and regulations.