

Risk Management / Compliance

Basic Approach

The OKI Group recognizes that gaining the trust of all stakeholders is the foundation for improving corporate value. We aim to contribute to the realization of comfortable and prosperous lives for people worldwide through the development of sound and sincere corporate activities rooted in social decency while adhering to all relevant laws and regulations. In the Medium-Term Business Plan 2025, we have identified “thoroughly manage risks and ensure compliance” as a key initiative under the material issue theme of “strengthening management foundation to support sustainable growth,” and are actively working to enhance Group-wide controls.

Initiatives for Material Issues and Results

Material Issue	Key Initiative Theme	Initiatives for FY2023 to FY2025	FY2024 Results
Strengthening management foundation to support sustainable growth	Thoroughly manage risks and ensure compliance	<ul style="list-style-type: none"> Enhance the risk management structure Enhance the compliance promotion structure 	100% participation rate in compliance manager training Please refer to the main text for additional information.

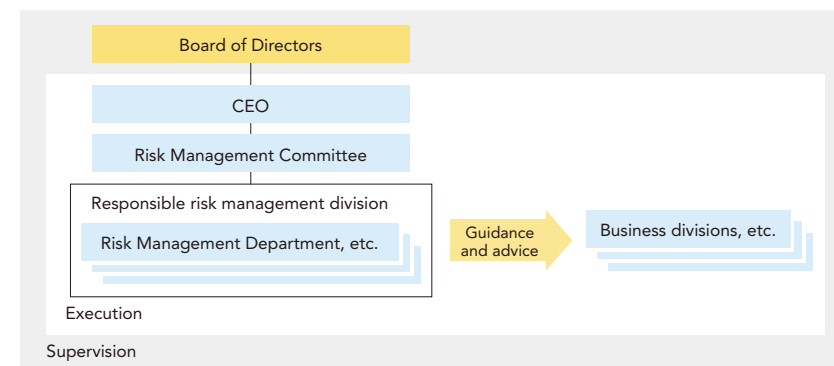
Structure

OKI has established the Risk Management Committee to discuss basic policies and key measures related to Group-wide risk management and compliance along with the policy for addressing realized risks. We are working to build and implement an effective risk management structure. The structure allows the CEO, who serves as the chair of the Risk Management Committee, to quickly identify both apparent and latent risks that could impact corporate management for timely and appropriate instruction and management decisions.

In the OKI Group, each division identifies, analyzes, and assesses its own risks, controlling them within its business activities, including operations and sales. For Group-wide risks, a responsible risk management division is selected primarily from among the corporate divisions, and the division identifies these risks, formulates control measures, and monitors them. This division also provides guidance and advice on risk management to OKI and consolidated subsidiaries.

Additionally, the Internal Auditing Division reviews the OKI Group’s risk management and compliance promotion structures and their implementation status and offers advice, suggestions, and corrective recommendations to management when necessary.

Risk Management/Compliance Promotion Structures

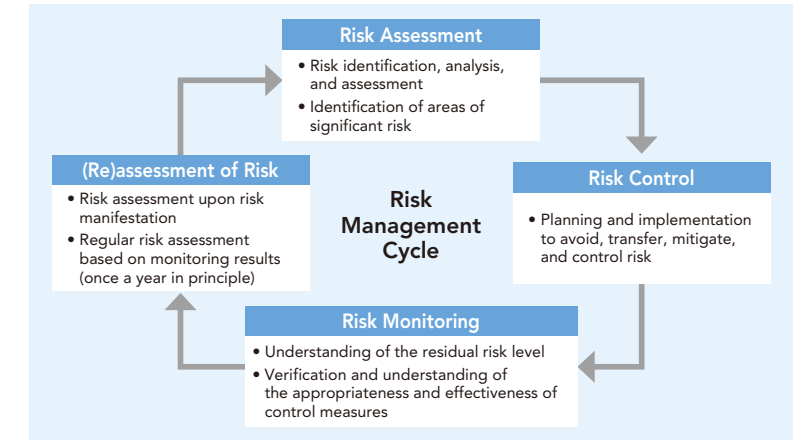


Risk Management Initiatives

Group-wide risks are identified, analyzed, and assessed by the division responsible for the relevant risk. This process helps pinpoint the location, characteristics, and magnitude of risks along with areas where significant risks reside and it is necessary to develop a structure.

The identified risks are managed by the responsible division, which develops specific control measures to avoid, transfer, mitigate, or control the risks. The division also continuously monitors the appropriateness and effectiveness of the measures. The results of monitoring and any newly emerging risks are assessed by the responsible division and incorporated into the periodic review of risk management measures (conducted once a year in principle).

We have also established the OKI Group Critical Incidents Reporting System for reporting to the Risk Management Committee when risks emerge or when there is concern that they may arise. This system enables early identification of potential issues and ensures quick risk mitigation and resolution.



Major Risks That Could Have a Significant Impact on the OKI Group’s Business or Finances

① Risks related to global political and economic trends	⑧ Risks related to major IP-related contracts and technological support contracts
② Risks related to country risk	⑨ Risks related to quality
③ Risks related to exchange rates	⑩ Risks related to mergers and acquisitions (M&As) and alliances
④ Risks related to fluctuations in financial markets and interest rates	⑪ Risks related to environmental protection
⑤ Risks related to laws and regulations	⑫ Risks related to information security
⑥ Risks related to market trends, products, and services	⑬ Risks related to human resources
⑦ Risks related to procurement	⑭ Risks related to human rights

 Please refer to the website below for details.
<https://www.oki.com/global/ir/corporate/risk.html>

Emergency and Disaster Response

The OKI Group has established Safety Countermeasure Committees at its sites and subsidiaries in order to “protect people’s lives,” “prevent secondary accidents,” “contribute to local communities and foster good relationships with them,” and to ensure the “continuity of business operations” in the event of disasters. We have established the Business Continuity Management (BCM) Development Guidelines and conduct regular reviews of the BCM/BCP in each division to ensure the continuity of business operations in preparation for unforeseen events.

Risk Management / Compliance

Initiatives to Promote Compliance

The OKI Group has adopted the OKI Compliance Commitment at its Board of Directors' meeting and established the OKI Group Charter of Corporate Conduct and the OKI Group Code of Conduct to ensure compliance. Officers and employees of OKI and consolidated subsidiaries are working to raise awareness of compliance and ensure strict adherence.

In addition, to ensure the early detection of legal violations and improper activities and the effectiveness of their rectification, we have established whistleblowing and consultation contact points (including in-house, Group-wide, and external contact points) across all Group companies. The whistleblowing system is operated based on whistleblowing regulations, which stipulate provisions such as anonymous reporting, protection of whistleblowers, and confidentiality obligations. In fiscal year 2024, 33 reports and consultations were received at OKI and domestic consolidated subsidiaries.



Please refer to the websites below for details.
OKI Compliance Commitment
<https://www.oki.com/global/sustainability/mng/cpcommit.html>
OKI Group Charter of Corporate Conduct / OKI Group Code of Conduct
<https://www.oki.com/global/sustainability/mng/code.html>

Ongoing Compliance Training

In Japan, the OKI Group holds regular training sessions for compliance managers and promoters at each division and subsidiary, provides training specific to various job levels, and conducts compliance-related e-learning for all Group employees.

We also have tools in place to foster and raise awareness, including regular reporting of compliance case studies via our intranet and internal newsletters as well as compliance awareness surveys.

Furthermore, we provide a unified e-learning compliance training program for employees of overseas Group companies.

Main Compliance Training Programs (OKI and Domestic Consolidated Subsidiaries) in FY2024

Training Overview	Subject Employees	Attendance Rate
Compliance manager training • Compliance lessons learned from critical incidents • Information security (Video distribution: December 2024 to March 2025)	Managers and promoters of OKI and domestic consolidated subsidiaries	100% (approx. 350 persons)
Anti-Monopoly Act training (Video distribution: December 2024 to March 2025)	Employees of related divisions at OKI and domestic consolidated subsidiaries	98.7% (approx. 4,700 persons)
Personal information protection and information security e-learning (regularly or as needed) (Simultaneous training: August to November 2024)	All employees of OKI and domestic consolidated subsidiaries	100% (approx. 16,700 persons)
Workplace compliance e-learning (regularly or as needed) (Simultaneous training: January to March 2025)	All employees of OKI and domestic consolidated subsidiaries	99.9% (approx. 16,200 persons)

Ensuring Fair Business Transactions

The OKI Group is committed to complying with laws and regulations and engaging in fair and open competition in all business activities and relationships across the regions where it operates.

■ Approaches to Anti-Corruption

The OKI Group has established the OKI Group Anti-Corruption and Anti-Bribery Policy to prevent the risks of offering or receiving bribes and other forms of corruption, both domestically and internationally. Furthermore, in line with the 10th principle of the UNGC on anti-corruption, we have established management rules for recording gifts and entertainment under the policy and are promoting activities to enhance the effectiveness of anti-corruption initiatives through regular monitoring of management performance in an effort to improve both social and corporate sustainability and transparency. In fiscal year 2024, there were no violations of anti-corruption laws in any country or region within the OKI Group.

■ Ensuring Thorough Compliance with Anti-Monopoly Laws

The OKI Group has established basic rules for compliance with competition laws, outlining the fundamental principles for conducting business properly and in accordance with the competition laws and regulations in each country and region where OKI and consolidated subsidiaries operate. In addition, we have introduced and are operating a system to record interactions with competitors, and conduct annual Anti-Monopoly Act training sessions, primarily for the Sales & Promotion divisions. In fiscal year 2024, there were no violations of anti-monopoly laws within the OKI Group.



Please refer to the website below for details.
<https://www.oki.com/global/sustainability/governance/compl/index.html>