



Rigaku Europe SE

Code of Conduct for Business Partners

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I. Foreword

For our company, Rigaku Europe SE ("RESE"), and its employees ("employee", including temporary employees, fixed-term employees, part-time employees and contract employees), it is expected standard practice to adhere to the law in the performance of our duties. To reinforce this our parent company Rigaku Holdings Corporation has drawn up a Rigaku Group Code of Conduct applying to all Rigaku group companies employees around the world. The Rigaku Group Code of Conduct forms a binding guide for the conduct of all of us in our daily business. Our business partners contribute significantly to our success, and we see a common understanding of ethical and sustainable action as an essential basis for this. The "Rigaku Europe SE Code of Conduct for Business Partners" ("Code of Conduct") is based on the Rigaku Group Code of Conduct for employees and is founded on the principles of internationally recognized standards for responsible corporate management. For us, the requirements and principles of this Code of Conduct are an essential part of any relationship. We therefore expect our business partners to fully comply with applicable laws and directives and to recognize, support and comply with internationally recognized environmental, social and corporate governance standards.

II. Scope of application

Business partners are all third parties with whom RESE has a business relationship. These may be suppliers, customers, distributors, sales partners, consultants, brokers, subcontractors, commercial agents, freelancers and other providers of goods and services, etc.

III. Code of Conduct

1. Compliance with the law

Our business partners comply with applicable local, national and international laws. This includes the establishment of effective processes and internal controls for financial reporting and reporting systems. Relevant transactions and facts are recorded completely, transparently and traceably and presented accurately.

2. Responsibility

Our business partners guarantee the implementation of and compliance with our Code of Conduct in their contractual relationship with RESE.

Our business partners shall ensure that their own business partners who are employed for or on behalf of RESE are also aware of and comply with the requirements of our Code of Conduct.

3. Respecting human rights

Our business partners respect and support the observance of internationally recognized human rights and actively ensure that they are not complicit in human rights violations. RESE believes that employee diversity, equality and inclusion offer great potential and expects the same from its business partners.

4. Rejection of forced labour, slavery, trafficking in human beings and child labour

Our business partners take action against forced labour, such as modern slavery and human trafficking, and child labour. All forms of forced and child labour are prohibited at our business partners.

5. Fair labour conditions, Remuneration and Working Hours

Our business partners comply with the legal regulations for fair labour conditions. This includes, in particular, fair remuneration and social benefits that meet national legal standards, such as the statutory minimum wage for example. Our business partners comply with all applicable laws and regulations regarding the restriction of working hours and the granting of rest periods, breaks and vacations.

6. Freedom of association

Our business partners respect the right of their employees to freedom of association, to form organizations and to bargain collectively without fear of repression, intimidation or punishment.

7. Bullying and harassment in the workplace

Our business partners provide a working environment that is free from discrimination, violence and harassment. All business partners are expected to create and maintain an atmosphere of respectful cooperation, equality and inclusion. This applies in particular to the rights of women, minorities and indigenous peoples.

8. Environmental protection and sustainability

Our business partners comply with all applicable environmental laws and standards and use natural resources responsibly. This includes, in particular, reducing energy consumption, noise emission and greenhouse gas emissions, keeping the air clean and thus increasing air quality, managing natural resources, avoiding waste, and maintaining water quality. Where possible, business partners should rely on renewable energies, promote the decarbonisation of their own activities and support the responsible use of resources through reuse and recycling.

9. Conflict Minerals

Our business partners shall ensure that the products, materials, components, or services supplied to RESE do not directly or indirectly contribute to human rights abuses, armed conflict, or unethical practices associated with so-called Conflict Minerals, specifically tin (Sn), tantalum (Ta), tungsten (W), and gold (Au).

10. Donations and Sponsoring

Donations are made by our business partners only on a voluntary basis and without expectation of consideration. Sponsorship of individuals, groups or organizations is not used to gain unlawful business advantages.

11. Fair competition and compliance with competition and antitrust law

Our business partners behave fairly in competition and comply with applicable antitrust and competition law. Our business partners do not enter into discussions or agreements with competitors on pricing, market and customer allocation, bid rigging or other similar activities that could have anti-competitive effects.

12. Anti-Corruption, Anti-bribery and money laundering

Our business partners condemn all forms of corruption and bribery and must not participate directly or indirectly in any form of corruption, extortion, embezzlement or bribery nor tolerate them. Our business partners must fully comply with the requirements of the relevant national applicable bribery and anti-corruption laws.

Our business partners shall observe the relevant statutory provisions on money laundering prevention and comply with their reporting obligations hereunder.

13. Gifts and invitations

Our business partners only accept or issue invitations in connection with their activities if they are reasonable, are not made in anticipation of improper consideration or other preferential treatment and do not violate applicable law (in particular anti-corruption laws). The same applies to the acceptance or granting of gifts, other benefits or advantages of any kind.

14. Avoiding conflicts of interest

Our business partners make decisions on the basis of factual considerations and do not allow themselves to be guided in an inadmissible manner by personal interests.

15. Regulations covering foreign trade, export control and customs duties

Our business partners are obliged to comply with all applicable national and international regulations relating to foreign trade, export control and customs law. This includes, in particular, compliance with applicable economic and financial sanctions (including EU, UK, UN and US sanctions regulations, where applicable), embargoes and restrictive measures against specific countries, regions,

organisations or individuals, regulations to prevent the financing of terrorism, and prohibitions and licensing requirements for the export, import, transfer or brokering of goods, services, software and technologies. Business partners shall ensure that they implement appropriate measures and controls to prevent breaches of these regulations, in particular through suitable sanctions list checks and export control processes.

16. Occupational safety and health protection

Our business partners ensure health and safety in the workplace. Legal and internal measures are implemented to avoid accidents, injuries and work-related illnesses.

17. Product Safety

Our business partners shall ensure that all products, materials, and services supplied to RESE comply with all applicable product safety, quality, and regulatory requirements.

18. Confidential Information

Our business partners ensure that confidential information of RESE and its affiliates is kept secret and that intellectual property is protected. Each business partner shall ensure that RESE's and RESE's affiliates' intellectual property does not find its way into unauthorized third parties' hands or is not misused.

19. Insider Trading

Our business partners must comply with all applicable laws on insider trading and market abuse. They shall not use or disclose any material, non-public information obtained through its relationship with RESE for trading in securities or for any other improper purpose.

20. Data Protection

Our business partners observe the applicable laws and regulations. This applies in particular when personal data and information is collected, stored and processed.

21. Information security

Our business partners receive partly confidential information from RESE. This is to be used exclusively for the fulfilment of their tasks within the scope of the business relationship with RESE. Our business partners protect this information against internal and external misuse according to the state of the art. If such data and information is transferred, RESE must be contacted in advance and informed of the intended transfer.

22. Protection of property and ownership

Our business partners condemn all forms of fraud and other property damaging behaviour towards RESE and third parties. Corresponding rights are consistently respected, and the creation or use of plagiarized material is not tolerated.

IV. Implementation in the supply chain

RESE expects its business partners to comply with the principles of this Code of Conduct. Business partners are also expected to pass these on to their own business partners in the supply chain and to identify risks within the supply chains and take appropriate measures where necessary. If serious violations are identified in the supply chain of a business partner, RESE expects disclosure of the facts and information about the measures taken.

V. Whistleblower reporting system

RESE would like to be informed about any questionable or even illegal behaviour within its company in order to clarify and, if necessary, eliminate such behaviour. Information about possible violations of laws, guidelines or this Code of Conduct in a work-related context can be reported either to the Compliance department of RESE (LegalRigakuEuropeSE@rigaku.com) or anonymously via the whistleblower reporting system, which can be accessed via our website (<https://rigaku.com/EMEA/Compliance>). All reports will be treated confidentially. RESE furthermore expects its business partners to have also implemented a process for reporting misconduct in their company and to inform RESE in case of violations of the contents of this Code of Conduct

VI. Compliance with the Code of Conduct, violations and consequences

RESE reserves the right to check compliance with the standards and regulations listed in this Code of Conduct by means of a self-assessment questionnaire and audits.

In case of violations of laws, directives and the standards set forth herein, RESE reserves the right to take appropriate measures against business partners who do not meet these requirements, which may ultimately lead to the suspension or termination of a business relationship.

This Code of Conduct was adopted by the Executive Board and the Legal & Compliance Department on 13 March 2026.