

Supplier Code of Conduct

Introduction

MANI Group (hereinafter, "MANI") is a company that "contributes to the world welfare through development, production and distribution of its products beneficial to patients and doctors." By developing and providing high-value-added, world-class products, we aim to contribute to resolving various social issues, including medical issues faced by patients, healthcare professionals, and other consumers.

Based on this corporate philosophy, MANI has adopted Integrity, Passion, and Communication (I.P.C.) as its employee code of conduct. We strive to build relationships of mutual understanding and trust regardless of race, religion, nationality, age, gender, origin, or disability, and we respect individuals and their human rights without engaging in unfair discrimination or harassment on these grounds. As a provider of medical equipment, MANI is always mindful of the importance of life and the environment and aims to create a safe and efficient workplace and reduce environmental impact. To this end, we have established an Environmental and Occupational Safety Policy to ensure that all employees participate enthusiastically and tenaciously in our efforts. We comply with labor-related laws and regulations and strive to maintain and improve a safe and comfortable working environment for everyone involved in our business activities.

We have therefore established the Supplier Code of Conduct to describe the behavior, procedures, and processes that MANI expects from its suppliers.

This code sets out our approach to fair and sensible business activities, reflecting all relevant legal requirements to the extent possible at this time.

When providing materials or services to MANI, all suppliers are required to comply with this Code of Conduct in addition to all applicable laws and regulations. Furthermore, MANI is required to provide any information reasonably requested by MANI that is necessary to demonstrate compliance with this Code.

Governance

Ethical behavior is an essential element of everything MANI does. The application of strict standards to avoid bribery and corruption-related risks, as well as compliance with our high ethical standards, is essential to our continued success.

MANI's suppliers are required to conduct business with their customers, suppliers, and other companies fairly and impartially in their daily business dealings, without committing fraud or dishonesty.

MANI expects our suppliers to:

Article	What we expect from suppliers
Risk management	<ul style="list-style-type: none">• Demonstrate a responsible attitude towards risk and for them, in turn, to expect the same from their own suppliers• Develop and implement procedures to regularly assess and evaluate all risks in their operations and supply chains• Implement and execute action plans, where risk is identified• Inform Mani Group of any issues or developments that significantly increase the level of risk in the supply chain to Mani Group• Ensure resilience and be prepared for disruptions to its business as a result of emergencies, such as natural disasters, terrorism, civil unrest, and pandemics. This should include implementing the appropriate contingency plans and regularly reviewing exposure in the supply chain
Competition Compliance	<ul style="list-style-type: none">• Prohibit any actions that falsify or distort free competition or market access or infringe the applicable legal rules concerning competition law
Anti-Bribery & Corruption	<ul style="list-style-type: none">• Accept personal responsibility for behaving professionally ethically, fairly and with integrity• Prevent the offering, promising or giving of a bribe and the requesting, agreeing to receive or accepting of a bribe by any person associated with them• Operate and maintain an employee code of conduct
Conflicts of Interest	<ul style="list-style-type: none">• Notify Mani Group immediately if they become aware that any of the supplier's directors, officers or employees have a relationship with any Mani Group employee that could result in a conflict of interest
Intellectual Property and Cyber Security	<ul style="list-style-type: none">• Respect and protect intellectual property rights• Implement and maintain robust cyber security process within their systems• Ensure that all uses and storage of personal data are in compliance with applicable laws and regulations.

If a business partner becomes aware of a conflict of interest with MANI, we ask that they contact our whistleblowing hotline.

(Whistleblowing | Company Information | MANI, INC.

<https://www.mani.co.jp/company/policy4.html>

Email address: tsuho@mani.inc or mani.bengoshi@ilo.gr.jp)

Social

As a major international business, MANI has significant relationships across the world with our employees, the communities in which we operate, and our many other stakeholders. MANI takes corporate social responsibilities seriously and acknowledges internationally proclaimed human rights.

All suppliers must conform to the relevant International Labor Organization Labor Standards as a minimum requirement.

This means suppliers must strive to apply employment standards that promote the application of human rights. There should be no intentional discrimination for recruitment, promotions, job transfer, dismissal and other employment related activities based on race, color, creed, nationality, age, marriage or civil partnership, pregnancy and maternity, gender, gender reassignment, sexual orientation, religion or belief, ethnic or national origins, disability, union membership, political affiliation or other status protected by law. Local laws on age discrimination must be observed. Abuse, harassment, or intimidation will not be tolerated under any circumstances, nor will the act of pressurizing or retaliating against the individual who reports such harassment.

MANI is committed to sourcing parts and materials from companies that share our values around human rights, ethics, and environmental responsibility. In this light, MANI is committed to responsibly sourcing minerals in a manner that does not directly or indirectly finance, or benefit armed groups or cause human rights abuses.

MANI is committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business.

MANI expects our suppliers to:

Article	What we expect from suppliers
Conflict Minerals	<ul style="list-style-type: none"> • Ensure that products supplied to Mani group do not contain metals derived from minerals or their derivatives that finance or benefit armed groups or cause human rights abuses. • Carry out due diligence with respect to the sourcing of conflict minerals and other minerals from high-risk areas and support Mani group and our customers in complying with conflict minerals reporting obligations.
Anti-Slavery & Child Labour	<ul style="list-style-type: none"> • We expect all our suppliers to respect national employment law on working hours. Mani group will not engage with suppliers who apply or support forced labour. Young people under the age of 15, or older if defined by law, must not be employed. • Comply with legislation regarding slavery and human trafficking. • Undertake appropriate due diligence and ongoing management where recruitment agencies or brokers are used, in order to mitigate the risks of worker exploitation such as debt bondage and unsafe housing. • Ensure that at a minimum, the legal minimum wage standard is adhered to across the workforce (including employees employed through recruitment agencies or brokers) and that unfair deductions are not made.
Health & Safety	<ul style="list-style-type: none"> • Provide a safe and healthy working environment by minimising, as far as is reasonably practical, the causes of hazards inherent in the working environment. • Minimise the risk of exposure to harmful materials, machinery or operations. • Operate and maintain an effective safety policy, including ensuring employees and visitors are sufficiently protected in the event of an infectious disease outbreak.
Human Rights & Employment Standards	<ul style="list-style-type: none"> • Respect national employment law on working hours. • Conform to the relevant International Labour Organisation Labour Standards as a minimum requirement. This means suppliers must strive to apply employment standards which promote the application of human rights. Abuse, harassment or intimidation will not be tolerated under any circumstances nor will the act of pressuring or retaliating against the individual who reports such harassment.
Inclusion & Diversity	<ul style="list-style-type: none"> • Promote inclusivity and diversity within their business and supply chain. • There should be no international discrimination for recruitments, promotions, job transfer, dismissal and other employment related activities on the basis of race, colour, creed, nationality, age, marriage or civil partnership, pregnancy and maternity, gender, gender reassignment, sexual orientation, religion or belief, ethnic or national origins, disability, union membership, potential affiliation or other status protected by law.

Environment

MANI is fully committed to environmental sustainability. We will constructively communicate and collaborate with our suppliers, and where necessary, with governments, regulatory authorities, scientific organizations, and other relevant stakeholders, to develop and encourage business and community practices that make progress towards the common aim of sustainable development.

We expect our suppliers to play their part in creating a prosperous and sustainable future by continually seeking to achieve best practice in environmental protection and minimizing any detrimental effects from their operations on the environment as far as is reasonably practicable.

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Hazardous Materials	<ul style="list-style-type: none">• Manage hazardous material through compliance with applicable laws, regulations and standards as well as internal rules and procedures.• Suppliers must seek to take every possible measure in order to prevent release of hazardous material, fire , explosion and other major accidents that may cause severe damage to their own employees, premises, surrounding communities and environment
Sustainable Development	<ul style="list-style-type: none">• Play their part in creating a prosperous and sustainable future by continually seeking to achieve best practice in environmental protection and minimising any detrimental effects from their operations on the environment as far as is reasonably practicable
Environmental responsibility	<ul style="list-style-type: none">• Comply with all applicable environmental legislation• Have an environmental policy that is proportionate to the environmental risk of their business• Follow procedures that ensure existing plant and equipment are operated in ways which minimise any impact on the environment.• Train employees and provide the necessary resources to make them aware of their personal environmental responsibilities in protecting the environment
Water Consumption and Resource Management	<ul style="list-style-type: none">• Make practical efforts to minimise the use of energy and materials.• make practical efforts to maximise the efficient use of water and ensure that wastewater is controlled within acceptance quality limits.
Waste Management and Emissions	<ul style="list-style-type: none">• Make practical efforts to minimise the generation of waste, including making efforts to reuse and recycle waste where possible.• Take action to manage pollutant air emissions within acceptable levels

Disclosed: October 22, 2025

MANI, INC.

Masaya Watanabe, President & Representative Executive Officer