NSK
Supplier CSR Guidelines

October 2026

NSK Ltd.

Introduction

The social environment surrounding companies is undergoing significant changes. Driven by factors such as climate change initiatives, growing calls for respect for human rights, and the strengthening of laws and regulations in various countries and regions, companies are expected to do their part to build a sustainable world, not only within their own operations but across the supply chain.

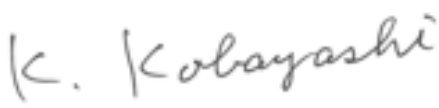
NSK conducts its business activities according to the core values of safety, quality, environment, and compliance. Under the NSK Human Rights Policy, NSK is committed to helping to build a sustainable world by ensuring respect for human rights, practicing environmental conservation, and using fair business practices. Furthermore, NSK believes it is essential to share and practice these values throughout the supply chain that supports its business activities.

In 2010, NSK published the NSK Supplier CSR Guidelines and has worked alongside its business partners to promote CSR initiatives. In recent years, however, the scope of responsibilities expected of companies has expanded to include responding to human rights due diligence, addressing climate change, and strengthening information security. Moreover, there is a strong demand for initiatives addressing these challenges to be implemented not only within a company itself, but also across the supply chain.

In response to these social expectations, we have revised the NSK Supplier CSR Guidelines. We hope that these guidelines will serve as a guiding framework for NSK and our business partners to share common values and work together to build a sustainable, resilient supply chain.

We kindly ask our business partners to understand the objectives of these guidelines and to continue to extend your cooperation.

Kenji Kobayashi,
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NSK Ltd.



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1 Matters that Suppliers Should Address

NSK and its suppliers should share a common recognition concerning, and comply with, the following matters in order to meet the expectations of society and the requirements of customers.

(Underlines indicate revisions made since the previous edition.)

1.1 Compliance

1.1.1 Creation of a structure for complying with laws and corporate ethics

Make a policy declaration to your corporate group from the management team, draw up and disseminate action guidelines and manuals to ensure they all thoroughly comply with corporate ethics and the laws in countries and regions related to your business.

Put in place a whistleblower system that enables employees to seek advice or report compliance issues with peace of mind without suffering prejudicial treatment or other retaliation, and provide education and training for officers and employees.

Conduct investigations into reported matters and, if compliance violations are identified, promptly implement necessary corrective actions and measures to prevent recurrence.

1.1.2 Compliance with competition laws

Comply with competition laws (antitrust laws) in countries and regions related to your business. Do not engage in such practices as private monopolies, improper restraint of trade (cartels, bid rigging, etc.), or unfair business practices (abuse of a dominant position, etc.).

1.1.3 Prohibition of corrupt practices such as bribery, extortion, and embezzlement

Prohibit bribery, extortion, embezzlement, and all other forms of corruption. Strive to forge transparent and fair relations with the government/administration and public institutions and, if making political contributions and donations, do so in accordance with the laws of countries and regions related to your business.

1.1.4 Preventing the giving or acceptance of improper benefits

Do not accept from customers, suppliers or other business partners any entertainment, gifts or money whose aim is to gain or retain improper benefits or inappropriate preferential treatment. Do not provide improper benefits to powers or groups that negatively affect social order or sound corporate activities.

1.1.5 Compliance with export-related laws and regulations

Confirm whether parts, products, technologies, equipment, software or other exports are subject to regulations under international law or the laws of countries and regions related to your business, prepare and provide documentation of such confirmation, and otherwise thoroughly implement export controls.

1.1.6 Protection of intellectual property

Take sufficient care to prevent infringement by others of all intellectual property rights owned by or belonging to your company. Do not improperly obtain or use the intellectual property of third parties or make illegal copies of software or publications.

1.1.7 Protection of confidential and personal information

Put in place and operate a management structure for the proper handling of confidential and personal information and for ensuring that information is not acquired by persons who do not have access privileges, nor misused, falsified, disclosed, or leaked.

Strictly manage your company's confidential information and use such information in an appropriate manner. Obtain confidential information concerning other companies only from authorized personnel by legitimate means. Verify the permissible scope of use and other conditions concerning such confidential information and use it within the scope allowed, while maintaining its confidentiality and not infringing upon the rights of the other companies.

Obtain personal information about employees, customers, suppliers, and other business partners by legitimate means. Manage and protect such information in a secure manner, and use the information only within the scope allowed.

Furthermore, implement appropriate information security measures to prevent damage caused by unauthorized access, malware, and other cyber threats.

1.1.8 Provision of safe, quality products and services

Provide only products and services that meet safety standards specified by laws in relevant countries and regions and that fulfill customer quality criteria. Establish and operate a quality assurance system, such as ensuring traceability, in order to guarantee the quality of all products and services and to maintain and improve quality continuously.

Comply with relevant laws, regulations, and applicable standards and criteria when ensuring the safety and quality of products and services.

Strive to develop and improve products and services, paying consideration to matters such as safety, quality, price, delivery time, and the environment in order to meet social expectations and the needs of customers and consumers.

1.2 Human Rights and Labor

Understand, support and implement the NSK Human Rights Policy.

NSK Human Rights Policy

https://www.nsk.com/sustainability/human_rights/pdf/NSK_HumanRightsPolicy_en_221020.pdf

In accordance with the United Nations Guiding Principles on Business and Human Rights, respect international norms related to human rights, and human rights of the stakeholders involved in our business activities.

- Identify adverse impacts on human rights and implement measures to prevent or mitigate them.
- Periodically evaluate and review the progress of human rights initiatives, and strive to disclose the status of progress to the public.
- Handle any grievances through a point of contact in each region, and cooperate in solving problems or implementing remedies.

1.2.1 Non-discrimination

Do not discriminate on the basis of personal characteristics (race, physical characteristics, principles, sex, social status, lineage, ethnicity, nationality, age, marital status, sexual orientation, gender identity, disabilities, etc.) protected by the laws of countries and regions related to your business in any aspect of employment or treatment (including recruitment, hiring, promotion, compensation, access to training, job assignment, wages, benefits, discipline, termination and/or retirement, etc.). In addition, promote diversity and inclusion initiatives.

1.2.2 Respect for human rights

Do not allow inhumane treatment in the workplace, including sexual harassment, power harassment (harassment through verbal abuse or coercive conduct committed by persons in positions of superiority), maltreatment, and corporal punishment, etc.

1.2.3 Prohibition of child labor

Verify at the time of hiring that workers have reached the legal age for employment and take other steps to exclude child labor, so as never to deprive children of educational opportunities and hinder their development by forcing them to work from an early age, in all types of work. Do not allow young workers under the age of 18 to engage in dangerous or hazardous work that could impair their sound development.

The minimum age for employment shall be 15 years of age, the legal minimum age for employment, or the age for completing compulsory education, whichever is greatest under the laws of the country or region where business is conducted. However, employment of persons under this age shall be allowed in bona fide job training or apprenticeship programs within the scope permitted by law.

1.2.4 Prohibition of forced labor

Employees must be employed legally in accordance with the laws and regulations of the country or region where business is conducted.

Compulsory labor, bonded labor, prison labor, slavery, and labor via human trafficking are prohibited. Ensure that all labor is voluntary and guarantee that employees are free to leave their jobs or end their employment following reasonable procedures. Do not require the surrender of passports, government-issued identification, work permits, and applications for immigration as a condition of employment. Do not permit actions that would be considered unfair under international norms, such as a worker himself/herself paying a recruitment fee.

1.2.5 Management of working hours

Employees' working hours (including overtime) must not exceed the limit established by the laws of the country or region where business is conducted. Allow workers to take at least one day off every seven days, and grant the right to days off established by law and paid annual vacation time.

1.2.6 Appropriate wages and benefits

Pay wages in compliance with the laws relating to minimum wages, overtime, wage deductions, performance-based pay, and other remuneration in the country or region where business is conducted. Provide benefits required by law.

1.2.7 Development of human resources

Offer educational and training programs to provide staff with the knowledge, skills, and abilities required to perform their duties, as well as those required by applicable laws.

1.2.8 Creation of safe and healthy workplaces

Place the highest priority on ensuring the safety and health of workers, establish a system to promote occupational safety and health activities, and strive to prevent accidents and occupational injuries so that each employee can work without anxiety. Identify and assess occupational safety and health risks in the workplace, such as machinery/electrical equipment, chemical substances, and fire, implement measures to mitigate them, strive to establish safe work procedures, conduct occupational safety and health education and regular training for employees, and provide appropriate personal protective equipment as necessary.

In addition, secure a hygienic work environment and clean sanitary facilities (safe drinking water, hygienic dining facilities, clean restrooms and rest areas, dormitories designed with

safety, sanitation, and habitability in mind, etc.), and strive to maintain a safe and healthy workplace environment.

Support efforts to improve the health of employees through health maintenance and promotion activities, guidance for preventing illness, and other means.

1.2.9 Respect for freedom of association and the right to collective bargaining

Engage in good-faith consultation and dialogue with employees and their representatives. Recognize and respect employees' rights to freely associate, choose representatives, and participate in collective employee representation activities, or choose not to do so, in accordance with applicable laws and regulations.

1.2.10 Open communication with employees

Promote two-way communication with employees, appropriately share information regarding the business environment, management status, workplace environment, and working conditions, and strive to take employees' opinions and suggestions seriously and to apply them toward continuous improvement.

1.3 Environment

1.3.1 Establishment and operation of an environmental management system

Put in place a system for undertaking a wide range of environmental conservation activities. Set your own goals, carry out activities toward the achievement of those goals, and strive for continuous improvement.

1.3.2 Compliance with environment-related laws and fulfillment of administrative procedures

Comply with the environment-related laws and regulations of each country and region related to your company's activities, identify community and customer requirements, and make necessary responses. Always obtain the latest information and respond appropriately. Obtain necessary permits and licenses, submit notifications and reports, appoint persons of responsibility and contact persons, fulfill all other administrative procedures, maintain the validity of them, and carry out reporting.

1.3.3 Prevention of environmental pollution

Comply with and appropriately implement relevant laws and regulations, including labeling and providing information on product handling, recycling, and disposal.

Identify chemical substances handled in processes that affect or could affect human health or ecosystems, manage them in a safe manner, and reduce the use of these chemical substances.

Furthermore, regarding chemical substances contained in products and raw materials, comply with applicable laws and regulations, and properly track and manage regulated substances and substances of very high concern.

Identify events that could cause environmental pollution accidents, and strive to prevent them. Assume situations in which accidents have occurred and make the necessary preparations to mitigate the effects.

Regularly monitor and properly manage emissions of air and water pollutants and other environmentally hazardous substances, and strive to reduce their emissions.

Strive to prevent water pollution and soil contamination through the appropriate management of chemical substances and waste. In addition, safely manage and dispose of waste via proper means in accordance with laws and regulations, and strive to conserve living and natural environments by promoting waste reduction, reuse, and recycling.

1.3.4 Advancement of measures to reduce greenhouse gas emissions

Aiming to help build a decarbonized society, strive to create and promote products and services that contribute to the reduction of greenhouse gas emissions throughout their lifecycle, from raw material procurement to manufacturing, distribution, use, and disposal/recycling.

Monitor greenhouse gas emissions throughout all business activities, including development, procurement, manufacturing, distribution, and administrative tasks to identify issues. Set targets and concrete measures to reduce greenhouse gas emissions for your company and across the entire supply chain, and continuously manage their progress. Furthermore, promote energy conservation, improvement of energy efficiency, and the expanded use of renewable energy.

1.3.5 Advancement of resource saving measures

Ascertain the usage status of water, energy, and other natural resources consumed in all business activities, including development, manufacturing, distribution, and administrative tasks, and strive to utilize them efficiently and reduce consumption. Strive to reduce the use of resources for which possible depletion is a concern, especially rare metals, by making effective use of them or substituting other resources.

Strive to develop and disseminate products and services that contribute to resource savings and recycling, including products that are more compact and lighter and have longer service life and simplified packaging and containers, etc.

Implement a 3R (reduce, reuse, and recycle) policy for wastes.

1.3.6 Preservation of biodiversity

Recognizing the importance of biodiversity, ascertain the dependence and impact on biodiversity of your company's business activities, provision of products and services to customers, and procurement of parts, raw materials, and services from suppliers, and take preservation steps.

In addition to these guidelines, we may also ask that your company practice management based on the NSK Group Green Procurement Standards (by requesting your written agreement to do so).

1.4 Local Communities

1.4.1 Responsible procurement

When procuring mineral resources, natural resources, and raw materials (tantalum, tin, tungsten, gold, cobalt, etc.), ensure that there is no direct or indirect involvement with organizations that exert a serious, adverse influence on local societies, including regional conflicts, human rights violations, and destruction of the environment. If involvement with such organizations has been identified, implement measures to avoid the situation.

In particular, minerals (conflict minerals[1]) that fund or profit destructive armed forces responsible for human rights violations in the vicinity of the Democratic Republic of the Congo (DRC) must not be used in products. If an investigation[2] raises concerns that conflict minerals are being used, employ measures to avoid using the parts or raw materials in question.

Furthermore, respect rights concerning the use of land, forests, and water resources, strive to prevent adverse impacts on local communities and indigenous peoples, and take care not to be involved in actions that significantly damage people's livelihoods or the environment.

1 Minerals originating from the DRC and neighboring countries that have directly or indirectly contributed to the financing of armed groups.

2 NSK Group offices may request an investigation of the status of conflict mineral usage as well as the results and pertinent information.

1.4.2 Social contribution

Ascertain the social challenges facing the local communities where your company does business, and strive to conduct business activities and social contribution activities that help to resolve these challenges, working together with community members to promote community development.

1.5 Risk

1.5.1 Risk reduction

Assess risks that could have an effect on your company's business activities, such as earthquakes, wind storms, flooding, fire, occupational or other accidents, the occurrence of legal violations in products or business activities, leakage of confidential information, and cyberattacks, and strive to implement measures to reduce those risks.

Also, ascertain the risks your suppliers face and take the necessary steps to ameliorate the potential impact of those risks on your business.

1.5.2 Business Continuity Plan (BCP) formulation and improvement

Formulate a BCP and make the necessary preparations to avoid the interruption of important business activities in the event of emergencies such as a disaster or, if they are unavoidably interrupted, to resume business operations as quickly as possible. Also, reexamine the BCP by conducting periodic drills.

If an envisioned interruption could last a long time in the event of a disaster, secure alternative production sites and/or inventory in advance. Also, develop a contact system, secure means of contact, and decide on contact procedures to enable the extent of damage to be ascertained and communicated.

1.6 Information Disclosure

Ensure reliable, timely, and appropriate disclosure to stakeholders of information related to management and financial affairs, information related to social and environmental activities, and information related to products and services, including the handling of products, safety, quality, and chemical substances.

1.7 Application of These Guidelines to Your Company's Suppliers

Request your company's own suppliers to undertake the same initiatives indicated in these guidelines and perform corrective actions as necessary in order to help drive progress in these efforts throughout the entire supply chain.

2 Confirming the Status of Initiatives and Responses to Issues

NSK may request your company to provide information in order to confirm the status of your initiatives and use of conflict minerals. Your company may also be asked to allow NSK personnel to visit your business site(s) to verify the situation on-site.

If your company is subject to penalties for legal violations or orders from administrative authorities, or if any issues of non-compliance with these guidelines arise through internal

or external evaluations, investigations, or audits, report them promptly and take steps to remedy the situation.

3 Handling of Information

NSK will not provide, without your company's permission, any corporate or personal information NSK may obtain about your company to persons outside the NSK Group. However, we may provide the NSK Group's customers with general information relating to the use of conflict minerals.

4. Guideline Revision and Publication Information

This guideline will be revised as necessary in response to changes in laws and regulations, customer requirements, social expectations, and other factors.

Current Version
Version: 5th
Publication Date: October 2026

For detailed revision history, please check the NSK website or contact Procurement Division Headquarters.

NSK website: https://www.nsk.com/company/sustainability/suppliers/csr-guidelines/

5. Inquiries

Please contact the NSK office that distributed these guidelines or the following department if anything is unclear or you have any questions.

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