

Sustainability Policy



Table of Contents

1. INTRODUCTION AND SCOPE	7
2. REGULATORY COMPLIANCE AND STANDARDS	8
3. POLICY ACCESSIBILITY AND STAKEHOLDER ENGAGEMENT	9
4. DOUBLE MATERIALITY ASSESSMENT	10
5. TARGETS AND MONITORING.....	11
6. ENVIRONMENTAL COMMITMENTS.....	12
6.1. CLIMATE CHANGE	12
6.1.1. Climate Change Mitigation.....	12
6.1.2. Climate Change Adaptation	12
6.1.3. Energy Efficiency.....	12
6.1.4. Renewable Energy Deployment.....	13
6.2. POLLUTION PREVENTION AND CONTROL	13
6.2.1. Air, Water, and Soil Pollution.....	13
6.2.2. Hazardous Substances Management.....	14
6.3. WATER AND MARINE RESOURCES	14
6.4. BIODIVERSITY AND ECOSYSTEM	15
6.5. RESOURCE USE AND CIRCULAR ECONOMY	15
6.5.1. Circular Economy	15
6.5.2. Conflict Minerals	16
7. SOCIAL COMMITMENTS.....	17
7.1. OWN AND VALUE CHAIN WORKERS.....	17
7.1.1. Safety and wellbeing	17
7.1.2. Human Rights and Labor Rights	17
7.1.3. Modern Slavery and Child Labor.....	18
7.1.4. Engagement and Remediation.....	18
7.1.5. Equal opportunities	19

7.2.	AFFECTED COMMUNITIES	19
7.2.1.	Community Rights and Engagement	19
7.3.	CONSUMERS AND END USERS	20
7.3.1.	Product Safety and Quality	20
7.3.2.	Customer Privacy and Data Protection	20
7.3.3.	Responsible Marketing and Communication	21
8.	GOVERNANCE.....	22
8.1.	BUSINESS ETHICS AND COMPLIANCE.....	22
8.1.1.	Code of Conduct.....	22
8.1.2.	Whistleblowing and Grievance Mechanisms.....	22
8.2.	GOVERNANCE STRUCTURE	23
8.2.1.	Board Oversight.....	23
8.2.2.	Management Systems.....	23
8.3.	TRANSPARENCY AND REPORTING	23
8.4.	SUPPLY CHAIN ENGAGEMENT.....	24
9.	POLICY AND REVISION.....	25

Nidec Conversion's approach to Sustainability

Nidec Conversion, part of Nidec Corporation Japan, has developed a forward-thinking sustainability strategy that extends across its entire global operation, including its subsidiaries. This comprehensive approach encompasses everything from design and manufacturing to marketing, addressing the full value chain from raw material sourcing to end-of-life product management.

This policy should be read and implemented in conjunction with Nidec Conversion's People Management Policy and Sustainable Procurement Policy, and the relevant corporate policies, guidelines, and directives issued by Nidec Corporation Japan. These policies form an integrated framework that supports Nidec Conversion's sustainability strategy, ensuring a consistent approach to environmental, social and governance commitments across our operations, workforce management, and supply chain activities.

At the heart of Nidec Conversion's **Environmental** commitments is an ambitious climate action plan. The company aims to drastically reduce its carbon footprint with specific targets including a 42% reduction in Scope 1 and 2 emissions by 2030 compared to FY2022, 25% reduction in Scope 3 emissions by 2030 compared to FY2022 and achieve net-zero by 2040 in Scope 1 and Scope 2 and by 2050 along the entire value chain (Scope 3 included).

This transition will be powered by a rapid shift to renewable energy, with plans to achieve 50% renewable electricity by 2030.

The company is equally focused on resource conservation. By implementing advanced recycling systems and efficiency technologies, Nidec Conversion plans to cut water consumption by a third by 2028. Similarly, their pollution prevention strategies include keeping air pollutants under control.

Nidec Conversion pledges to raise awareness among stakeholders, exclude those with unmitigated biodiversity impacts, and implement protective measures in their operations.

Their approach includes controlling exposure to harmful practices, engaging stakeholders, supporting regulations, integrating biodiversity in processes, and monitoring project impacts.

Nidec Conversion commits to managing resource use and circular economy principles, aiming to reduce product lifecycle impacts and to increase durability of

our products. Strategies include addressing negative product factors in design and setting waste reduction targets.

Nidec Conversion commits to preventing the use of conflict minerals that finance armed groups, ensuring all sourced minerals are Conflict Free, enforcing due diligence and transparency in the supply chain.

Nidec Conversion's **Social** responsibility starts with its workforce and the workforce in the value chain. The company prioritizes safety with a goal of zero work-related fatalities and serious injuries, while fostering a proactive safety culture through employee engagement. Their commitment extends to upholding human and labor rights throughout their value chain, with particular emphasis on preventing modern slavery and child labor through rigorous supplier verification and monitoring.

Community engagement represents another pillar of Nidec Conversion's social approach. The company pledges to respect community rights and contribute meaningfully to local development priorities. Their community investment focuses specifically on education, skills development, and environmental protection in the regions where they operate.

For consumers and end users, Nidec Conversion commits to product safety, data protection, and responsible marketing. This includes rigorous testing beyond regulatory requirements and transparent communication about product attributes. Nidec Conversion is also committed to providing equal opportunity in all aspects of employment, business operations, and service delivery. We prohibit discrimination and harassment based on race, color, religion, gender, gender identity, age, national origin, disability, sexual orientation or any other characteristic protected by applicable law.

Governance at Nidec Conversion is structured to ensure accountability for sustainability performance. The company operates according to a comprehensive Code of Conduct that establishes ethical standards across all business activities, supported by robust whistleblowing mechanisms accessible to all stakeholders.

This integrated approach to sustainability is monitored through comprehensive systems tracking key performance indicators, with regular internal reviews and annual third-party verification.

By embedding sustainability throughout its operations and governance structures, Nidec Conversion demonstrates its commitment to responsible business practices that benefit all stakeholders while contributing to global sustainability goals.

Nidec Conversion Sustainability Policy Summary

Overview

Nidec Conversion, part of Nidec Corporation Japan, has established a comprehensive sustainability policy covering all operations, production sites, including its subsidiaries and value chain activities worldwide. The policy aligns with major international standards and sets specific targets across environmental, social, and governance dimensions.

Key Commitments

Environmental

- Climate Change:
 - o 42% reduction in Scope 1 and 2 emissions by 2030 compared to FY2022;
 - o 25% reduction in Scope 3 emissions by 2030 compared to FY2022;
 - o Net-zero by 2040 in Scope 1 and Scope 2 and by 2050 along the entire value chain (Scope 3 included).
- Renewable Energy: 50% renewable electricity by 2030.
- Pollution Control: 30% reduction in air pollutants by 2028.
- Water Management:
 - o 30% reduction in water consumption by 2028;
 - o Implementation of recycling systems.
- Biodiversity and ecosystem: 100% main Tier 1 suppliers and customers made aware on biodiversity management.
- Resource use and circular economy: full circular economy principles across all product lines to extend the durability of our products.
- Conflict minerals: 100% suppliers mapped as Conflict Free.

5

Social

- Worker Safety: zero fatalities and serious injuries.
- Human Rights:
 - o Implementation of due diligence processes aligned with UN principles;
 - o Zero tolerance for modern slavery and child labor.
- Equal opportunity:
 - o Discrimination prohibition;

- Fostering an inclusive environment.
- Community Engagement:
 - Respect for community rights;
 - Focus on education, skills development, and environmental protection.
- Consumer Protection:
 - Stringent product safety standards;
 - Robust data protection and privacy measures.

Governance

- Ethics: comprehensive Code of Conduct prohibiting corruption and establishing ethical standards.
- Oversight: Global HSE & ESG Steering Committee with monthly meetings.
- Transparency: annual sustainability reporting aligned with ESRS Standards and CSRD requirements.

Implementation

- Baseline period: April 1, 2023 - March 31, 2024;
- Quarterly internal reviews;
- Comprehensive monitoring system tracking specific KPIs;
- Regular stakeholder engagement through surveys, feedback channels, and consultation sessions.

6

The policy will be reviewed annually, with the next review scheduled for March 31, 2027.

Sustainability Policy

1. INTRODUCTION AND SCOPE

Nidec Conversion is committed to sustainable development in all aspects of our operations.

This Sustainability Policy applies to all Nidec Conversion and its subsidiaries activities, including the design, manufacturing, and marketing of our products.

This policy encompasses:

- All Nidec Conversion production sites worldwide;
- Our entire value chain, from raw material sourcing to end-of-life product management;
- All geographical areas where we operate or have business partnerships;
- All stakeholder groups including employees, suppliers, customers, local communities, and shareholders.

2. REGULATORY COMPLIANCE AND STANDARDS

Nidec Conversion commits to comply with:

- All applicable local, national, and international environmental, social, and governance laws and regulations;
- European Union Corporate Sustainability Reporting Directive (CSRD);
- ISO 9001 Quality Management System standard;
- ISO 14001 Environmental Management System standard;
- ISO 45001 Occupation Health & Safety Management System standard;
- ISO 50001 Energy Management System standard;
- ISO 26000 Social Responsibility guideline;
- ISO 37001 Anti-bribery Management System standard;
- ISO/IEC 27001 Information Security Management System standard;
- SA 8000 Social Accountability Management System standard;
- UN Global Compact principles;
- ILO (International Labor Organization) Fundamental Conventions;
- UN Guiding Principles on Business and Human Rights;
- Science-Based Targets initiative (SBTi) for climate action;
- Task Force on Climate-related Financial Disclosures (TCFD) reporting framework;
- OECD Guidance on conflict minerals supply chain traceability.

3. POLICY ACCESSIBILITY AND STAKEHOLDER ENGAGEMENT

Nidec Conversion ensures this policy is:

- Published on our corporate website in all relevant languages;
- Included in the annual sustainability report;
- Distributed to all employees during onboarding and through regular training;
- Communicated to suppliers and business partners as part of contractual agreements;
- Presented in community engagement forums;
- Reviewed during periodic meetings;
- Made available upon request to regulatory authorities and certification bodies.

We actively solicit feedback on our sustainability performance through:

- Annual stakeholder engagement surveys;
- Dedicated sustainability feedback channels via our website;
- Regular supplier assessment meetings;
- Community consultation sessions in operational locations, where applicable;
- Employee sustainability committees at each production site.

4. DOUBLE MATERIALITY ASSESSMENT

Nidec Conversion adopts a double materiality approach to sustainability management. Sustainability matters are assessed considering both the impacts generated by the Company on people and the environment, and the sustainability-related risks and opportunities that may affect the Company's financial performance, business model and long-term value creation.

Nidec Conversion commits to:

- Periodically perform a Double Materiality Assessment across its operations and value chain;
- Identify, assess and prioritize sustainability-related impacts, risks and opportunities;
- Consider the perspectives and expectations of relevant stakeholders;
- Use the results of the assessment to support sustainability strategy, target setting, risk management activities and reporting processes;
- Review and update the assessment to reflect changes in business activities, stakeholder expectations and regulatory developments.

Implementation strategies include:

- Engagement of internal and external stakeholders;
- Evaluation of actual and potential impacts across the value chain;
- Assessment of sustainability-related risks and opportunities;
- Integration of the assessment outcomes into decision-making processes;
- Periodic review of material topics and related action plans.

10

5. TARGETS AND MONITORING

Nidec Conversion employs a comprehensive monitoring system to track progress against our sustainability targets.

Baseline Period: April 1, 2023 - March 31, 2024

Main Key Performance Indicators (KPIs):

- GHG emissions reduction (Scope 1, 2, and 3)
- Energy efficiency improvements
- Renewable energy adoption
- Water usage reduction
- Waste reduction and recycling rates
- Supplier ESG compliance
- Employee health and safety metrics
- Community engagement hours
- Customer satisfaction on sustainable products
- Diversity and inclusion metrics

We conduct quarterly internal reviews and we're going to organize annual third-party verification of our performance against these targets, with results published in our annual sustainability report.

6. ENVIRONMENTAL COMMITMENTS

6.1. CLIMATE CHANGE

6.1.1. Climate Change Mitigation

Nidec Conversion commits to:

- Reduce absolute Scope 1 and 2 GHG emissions by 42% by 2030 from the FY 2022 baseline;
- Reduce Scope 3 emissions by 25% by 2030 from the FY 2022 baseline;
- Achieve net-zero emissions across all operations by 2040 in Scope 1 and 2 and by 2050 along the entire value chain (Scope 3);
- Start the transition of company vehicles to electric;
- Design products with lower carbon footprints through life cycle assessments;
- Partner with suppliers to reduce upstream emissions.

Implementation strategies include:

- Energy efficiency improvements across all facilities;
- On-site renewable energy generation where feasible;
- Power Purchase Agreements (PPAs) for renewable electricity;
- Sustainable product design and material selection;
- Employee engagement in carbon reduction initiatives.

12

6.1.2. Climate Change Adaptation

Nidec Conversion commits to:

- Develop site-specific climate adaptation plans;
- Incorporate climate resilience in new facility designs;
- Develop business continuity plans addressing climate-related risks.

Implementation strategies include:

- Implementation of physical adaptation measures at high-risk sites;
- Water conservation and flood protection measures;
- Heat stress management protocols;

6.1.3. Energy Efficiency

Nidec Conversion commits to:

- Improve energy efficiency across all operations;
- Implement ISO 50001 Energy Management Systems at main sites;

- Optimize manufacturing processes for energy conservation;
- Integrate energy efficiency into product design;
- Conduct regular energy audits and implement findings.

Implementation strategies include:

- Energy performance contracts with guaranteed savings;
- Real-time energy monitoring systems;
- Employee awareness and training programs.

6.1.4. Renewable Energy Deployment

Nidec Conversion commits to:

- Achieve 50% renewable electricity by 2030;
- Support the development of new renewable energy projects through long-term contracts;
- Collaborate with utilities and energy providers on grid decarbonization.

Implementation strategies include:

- Solar PV installations at appropriate facilities;
- Renewable energy procurement through PPAs;
- Participation in renewable energy certificate programs;
- Collaboration with suppliers on renewable energy adoption.

6.2. POLLUTION PREVENTION AND CONTROL

6.2.1. Air, Water, and Soil Pollution

Nidec Conversion commits to:

- Keep / Implement ISO 14001 Energy Management Systems at main sites;
- Keep air pollutant emissions under control;
- Push suppliers to keep under control all potential sources of soil contamination;
- Implement advanced wastewater treatment technologies;
- Prevent accidental spills through rigorous management systems.

Implementation strategies include:

- Installation of best-available air pollution control technologies;
- Water recycling and closed-loop systems;

- Proper chemical storage and handling procedures;
- Spill prevention and containment systems;
- Regular environmental monitoring and reporting;
- Employee training on pollution prevention.

6.2.2. Hazardous Substances Management

Nidec Conversion commits to:

- Continue to manage their sites to ensure the absence of substances of very high concern (SVHCs);
- Reduce use of substance of concern by 30% by 2028 from the 2023 baseline;
- Ensure safe handling, storage, and disposal of necessary hazardous substances;
- Provide comprehensive training on hazardous materials management.

Implementation strategies include:

- Chemical substitution programs;
- Supplier requirements for hazardous substance disclosure;
- Rigorous chemical management systems;
- Regular audits of hazardous substance use and management.

14

6.3. WATER AND MARINE RESOURCES

Nidec Conversion commits to:

- Reduce water consumption by 30% by 2028 from the 2023 baseline;
- Implement water recycling systems at manufacturing sites by 2028;
- Conduct water risk assessments across all operations and Tier 1 key suppliers.

Implementation strategies include:

- Water efficiency technologies and practices;
- Advanced wastewater treatment and recycling;
- Supplier engagement on water stewardship;
- Support for marine ecosystem conservation projects.

6.4. BIODIVERSITY AND ECOSYSTEM

Nidec Conversion commits to:

- Raise awareness and support Clients and Suppliers with a high impact or dependence on biodiversity;
- Exclude stakeholders with a significant impact on biodiversity without a remediation plan in place;
- Apply actions in our own operations that are favorable to the protection of biodiversity;
- Lower the pressure exerted on biodiversity of Clients', Suppliers' and its own local communities due to changing use of land and oceans and soil artificialization, overexploiting biological resources, climate change, pollution, proliferation of invasive species.

Implementation strategies include:

- Controlling our exposure to companies that have a serious impact on biodiversity and do not implement remediation measures;
- Stakeholder engagement to encourage Clients and Suppliers to control their impacts on biodiversity;
- support for regulatory initiatives aimed at strengthening actions of companies in favour of biodiversity preservation;
- Systematically integrating biodiversity into our analysis and design processes.

15

6.5. RESOURCE USE AND CIRCULAR ECONOMY

6.5.1. Circular Economy

Nidec Conversion commits to:

- Require ourselves and our suppliers to demonstrate that they deal with resource use and circular economy principles, they have systems and processes in place to manage and control the storage, recycling, reuse, or disposal of waste;
- Extend durability of our products;
- Set ourselves the target of reducing the negative impact of products throughout their entire life cycle.

Implementation strategies include:

- Consider the dealing with negative product-related factors on designing our

products;

- Implement dedicated revamping strategies for our products;
- Set and achieve waste targets and promote circular solutions.

6.5.2. Conflict Minerals

Nidec Conversion commits to:

- Fully support the goals and objectives of any initiative which aims to prevent the use of “Conflict Minerals” that directly or indirectly finance or benefit armed groups;
- Do not supply any products or other materials that directly or indirectly finance or benefit armed groups;
- Enforce procedures, due diligence processes and management systems that are designed to prevent products or minerals that are not Conflict Free.

Implementation strategies include:

- A due-diligence framework to conform in all material respects to the requirements provided by The Organization for Economic Co-operation and Development (OECD)
- An ongoing evaluation of its supply chain, including the smelter, refiner and/or mine from which Conflict Minerals originate.

16

7. SOCIAL COMMITMENTS

7.1. OWN AND VALUE CHAIN WORKERS

7.1.1. Safety and wellbeing

Nidec Conversion commits to:

- Achieve zero work-related fatalities and serious injuries for our employees;
- Keep / Implement ISO 45001 Occupational Health and Safety Management Systems at main sites;
- Provide comprehensive health and safety training to all employees;
- Foster a proactive safety culture through employee engagement and leadership commitment; - Address both physical and psychological safety in the workplace;
- Ensure fair labor practices and benefits.

Implementation strategies include:

- Hazard identification and risk assessment processes at all facilities;
- Near-miss reporting and investigation programs;
- Safety observation programs with employee participation;
- Regular safety audits and inspections;
- Ergonomic assessments and improvements;
- Regular safety committee meetings with worker representation;
- Emergency preparedness and response training;
- Health monitoring programs for at-risk workers;
- Continuous improvement through lessons learned and best practice sharing;
- Safety performance linked to management evaluation.

17

7.1.2. Human Rights and Labor Rights

Nidec Conversion commits to:

- Respect and uphold the human and labor rights of all workers in our value chain;
- Implement human rights due diligence processes aligned with UN Guiding Principles;
- Ensure fair wages, working hours, and conditions throughout the supply chain;
- Respect freedom of association and collective bargaining rights;
- Require safe and healthy working environments for all workers;
- Prohibit all forms of discrimination, harassment, and violence.

Implementation strategies include:

- Regular human rights impact assessments;
- Supplier Code of Conduct aligned with internal and international standards;
- Supplier auditing and capacity building programs;
- Collaboration with industry initiatives on labor rights.

7.1.3. Modern Slavery and Child Labor

Nidec Conversion commits to:

- Zero tolerance for human trafficking, forced labor, and child labor;
- Conduct thorough risk assessments for modern slavery in all parts of our value chain;
- Implement robust supplier verification and monitoring processes;
- Provide remediation for any identified cases of forced or child labor;
- Establish effective grievance mechanisms accessible to all value chain workers;
- Report transparently on modern slavery risks and mitigation actions.

Implementation strategies include:

- Supply chain mapping and transparency initiatives;
- Supplier certification requirements;
- Regular audits in high-risk areas;
- Worker voice mechanisms and anonymous reporting channels.

18

7.1.4. Engagement and Remediation

Nidec Conversion commits to:

- Establish effective grievance mechanisms accessible to all value chain workers;
- Engage regularly with worker representatives and labor organizations;
- Provide and enable remediation for any adverse human rights impacts;
- Support capacity building for suppliers on worker rights and welfare;
- Monitor and publicly report on grievance resolution;
- Participate in industry initiatives for collective action on labor rights.

Implementation strategies include:

- Multiple accessible channels for grievance reporting;
- Fair and transparent investigation processes;
- Appropriate remediation based on the nature of impacts;

- Non-retaliation policies for workers raising concerns;
- Regular stakeholder engagement with labor representatives;
- Public disclosure of grievance statistics and resolution outcomes.

7.1.5. Equal opportunities

Nidec Conversion commits to:

- Foster an inclusive environment where diversity is valued, and all individuals are treated with dignity and respect;
- Implement fair and transparent recruitment practices;
- Provide equal access to training, mentoring, and promotional opportunities based on performance and potential;
- Ensure equitable compensation practices;
- Make reasonable accommodations for qualified individuals with disabilities.

Implementation strategies include:

- Provide regular unconscious bias and diversity training for all employees;
- Review employment practices for adverse impact;
- Maintain clear and accessible reporting procedures.

19

7.2. AFFECTED COMMUNITIES

7.2.1. Community Rights and Engagement

Nidec Conversion commits to:

- Respect the rights of communities where we operate;
- Assess and mitigate community impacts of our operations;
- Engage meaningfully with communities in decision-making processes;
- Contribute positively to local development priorities;

Implementation strategies include:

- Community impact assessments prior to significant operational changes;
- Transparent communication about operational impacts.

7.2.2. Community Development and Investment

Nidec Conversion commits to:

- Focus on education, skills development, and environmental protection of the

Communities where we operate;

- Support local economic development and supplier diversity;
- Develop community investment strategies in partnership with local stakeholders;
- Encourage employee volunteering in community initiatives.

Implementation strategies include:

- Partnerships with local organizations;
- Skills transfer and capacity building programs;
- Support for STEM education in local schools;
- Environmental restoration projects; - Local supplier development initiatives.

7.3. CONSUMERS AND END USERS

7.3.1. Product Safety and Quality

Nidec Conversion commits to:

- Design and manufacture products that meet the highest safety standards;
- Conduct rigorous product testing beyond regulatory requirements;
- Provide clear safety information and user instructions;
- Implement prompt and effective product recall procedures when necessary;
- Continuously improve product safety through customer feedback;
- Take a precautionary approach to new technologies.

20

Implementation strategies include:

- Comprehensive product risk assessments;
- Rigorous quality management systems;
- Post-market surveillance programs;
- Extend Product Labelling to disclose and include all sustainability information;
- Advanced testing facilities at all manufacturing sites.

7.3.2. Customer Privacy and Data Protection

Nidec Conversion commits to:

- Respect and protect customer privacy, personal data and intellectual property;
- Be transparent about data collection, use, and sharing practices;
- Provide customer with control over their personal data;

- Comply with all relevant data protection regulations globally.

Implementation strategies include:

- Privacy impact assessments for all data-collecting products;
- Clear and accessible privacy policies;
- Secure data storage and transmission protocols;
- Regular security testing and updates;
- Implement robust cybersecurity measures to protect customer data and intellectual property (ISO 27001);
- Employee training on data protection.

7.3.3. Responsible Marketing and Communication

Nidec Conversion commits to:

- Provide accurate, clear, and non-misleading product information;
- Make evidence-based environmental and social claims;
- Avoid exploitative marketing techniques;
- Ensure accessibility of marketing materials to diverse audiences;
- Obtain appropriate consent for marketing communications;
- Respond promptly to consumer complaints and inquiries.

21

Implementation strategies include:

- Marketing compliance review processes;
- Third-party verification of environmental claims;
- Inclusive and accessible communication guidelines;
- Customer feedback mechanisms;
- Regular training for marketing and sales teams;
- Monitoring of marketing effectiveness and impact.

8. GOVERNANCE

8.1. BUSINESS ETHICS AND COMPLIANCE

8.1.1. Code of Conduct

Nidec Conversion operates according to a comprehensive Code of Conduct that:

- Establishes ethical standards for all business activities;
- Prohibits corruption, bribery, and anti-competitive practices;
- Outlines expectations for financial integrity and tax responsibility;
- Addresses conflicts of interest and related party transactions;
- Guides political involvement and lobbying activities;
- Sets standards for transparent communication with stakeholders.

The Code is reviewed periodically, translated into all languages of operation, and all employees receive regular training.

8.1.2. Whistleblowing and Grievance Mechanisms

Nidec Conversion has established robust mechanisms for reporting concerns:

- Multiple reporting channels including hotline, web portal, and in-person options;
- Anonymous reporting option available to all stakeholders;
- Accessible to internal and external stakeholders including employees, contractors, suppliers, customers, and community members;
- Protection against retaliation for good-faith reporting; -
- Transparent investigation procedures and timelines;
- Regular reporting on case statistics and resolution outcomes;

22

Implementation strategies include:

- Third-party managed whistleblowing system;
- Clear investigation protocols and responsibilities;
- Training for all employees on reporting mechanisms;
- Regular awareness campaigns on speaking up;
- Case management system for tracking and analysis;
- Executive oversight of significant cases.

8.2. GOVERNANCE STRUCTURE

8.2.1. Board Oversight

Nidec Conversion's sustainability governance includes:

- Global HSE & ESG Steering Committee with monthly meetings;
- ESG performance linked to all workers (including executives) performance evaluation;
- Regular board training on sustainability issues and trends;
- Integration of sustainability risks into enterprise risk management;
- Annual board review of sustainability strategy and performance;
- Independent expertise through external advisors.

8.2.2. Management Systems

Implementation is supported by:

- ESG Director;
- Cross-functional ESG Sustainability Steering Committee;
- Site-level sustainability coordinators at each facility;
- Management systems for environment, health, safety, and quality;
- Clear roles and responsibilities for sustainability actions;
- Regular performance reviews and continuous improvement processes.

23

8.3. TRANSPARENCY AND REPORTING

Nidec Conversion commits to:

- Annual sustainability reporting in accordance with ESRS Standards and CSRD requirements;
- Participation in relevant ESG ratings and benchmarks;
- Transparent disclosure of material sustainability risks and opportunities;
- Regular stakeholder engagement on sustainability reporting content;
- Public disclosure of progress against targets.

8.4. SUPPLY CHAIN ENGAGEMENT

Nidec Conversion commits to:

- Apply the same rigorous ESG standards applied to itself to the rest of the Supply Chain;
- Assist the Suppliers asking for, to achieve and maintain the highest levels of sustainability.

Implementation strategies include:

- Requiring 100% of the Supply Chain to accept and respect our Supplier Code of Conduct;
- Qualify with an ESG due-diligence the 100% Tier 1 Supplier.

9. POLICY AND REVISION

This policy will be reviewed annually and revised as necessary to reflect changes in our business, stakeholder expectations, regulatory requirements, and sustainability best practices.

The ESG Director is responsible for initiating the review process, with final approval by the Global HSE & ESG Steering Committee.

Last updated: April 1, 2026

Next review date: March 31, 2027

Milan, April 01, 2026

Approved by:

Dominique Llonch

President Motion & Energy BU

Nidec

