

Kubota Group Supplier Code of Conduct

Our requirements regarding sustainability in its relationship with suppliers

Established on 1 November 2024

Kubota Corporation

Revised on 1 October 2025

Introduction

The Kubota Group has stated "Food, water and the environment are indispensable for human beings. The Kubota Group continues to support the future of the earth and humanity by contributing products that help the abundant and stable production of food, help supply and restore reliable water, and help create a comfortable living environment through its superior products, technologies and services" as its mission. To achieve this, we are promoting management that enhances the value of the entire company while satisfying stakeholders in and around the company and balancing the three values of economic value, social value and environmental value. Among these initiatives, in addition to the quality, price and performance of the Kubota Group's products and services, appropriate consideration must be given to the entire business process (including the procurement of raw materials and parts) in which the products and services are produced, including how they are made. Accordingly, we have compiled the items that Kubota Group requires our suppliers to comply with in the "Supplier Code of Conduct" in order to have a common understanding with our suppliers who play an important role and to promote cooperative efforts. We require our suppliers to comply with the Supplier Code of Conduct.

Kubota Group Supplier Code of Conduct

Table of Contents

I. Kubota Group Mission	
II. Purpose of Kubota Group Supplier Code of Conduct	
III. Scope of Application	
IV. Implementation of the Supplier Code of Conduct	
V. Kubota Group Supplier Code of Conduct	
1. <u>Legal Compliance and Business Ethics</u>	4
(1) Fair Competition	
(2) Improper Payment	
(3) Intellectual Property	
(4) Confidential Information	
(5) Electronic Information	
(6) Appropriate and Timely Disclosure of Corporate Information	
(7) Ensuring Proper Quality	
(8) Elimination of Relationships with Antisocial Elements	
(9) Stable Supply of Products and Services	
2. <u>Labour and Human Rights</u>	5
(1) Child Labour	
(2) Forced Labour and Responsible Employment	
(3) Wage and Working Hours	
(4) Occupational Health and Safety	
(5) Harassment	
(6) Discrimination	
(7) Right to Organise and Collective Bargaining	
(8) Marginalised Populations/Groups	
3. <u>Global and Local/Regional Environment</u>	6
4. <u>Others</u>	7
(1) Human Rights Policy	
(2) Due diligence on Products, Parts and Raw Materials and Compliance with Environmental Laws and Regulations	
(3) Grievance Mechanisms	

I. Kubota Group Mission

[Food, water and the environment are indispensable for human beings. The KUBOTA Group continues to support the future of the earth and humanity by contributing products that help the abundant and stable production of food, help supply and restore reliable water, and help create a comfortable living environment through its superior products, technologies and services.]

II. Purpose of Kubota Group Supplier Code of Conduct

The purpose of this Supplier Code of Conduct is to promote management that increases the value of the entire company through cooperation between the Kubota Group and its suppliers by indicating the items that the Kubota Group requires suppliers to address and compliance with them.

III. Scope of Application

This Code of Conduct applies to all suppliers who provide products and services to Kubota Group. If the supplier uses its associated business partners in connection with a transaction with the Kubota Group, we expect the supplier to make a similar requirement to the associated business partners.

IV. Implementation of the Supplier Code of Conduct

The Kubota Group may require suppliers to explain or provide information through questionnaires, etc. about their compliance with the Supplier Code of Conduct. If a supplier or its associated business partners are found not to comply with the Supplier Code of Conduct, the supplier is required to promptly report to our Supplier hotline. At our Supplier hotline, we accept opinions and comments of all employees of our suppliers, including management, regular and temporary employees, part-timers and casual workers. For further information on our Supplier hotline, please refer to <https://www.kubota.com/sustainability/society/procure/index.html>

If a supplier or its associated business partners are found to have violated this Supplier Code of Conduct or violated human rights, the Kubota Group may require the supplier to take appropriate measures to prevent or minimize the scope of the violation, to verify the measures, and to provide corrective measures and remediation to the victims of the situation arising from the violation. For suppliers who fail to respond to our requirements, and Kubota Group believes that this will have a significant impact on Kubota's business, Kubota Group may review the business relationship with the supplier.

V. Kubota Group Supplier Code of Conduct

1. Legal Compliance and Business Ethics

All suppliers shall comply with the laws and regulations of the countries and regions in which they operate and conduct business in accordance with international rules.

(1) Fair Competition

All suppliers shall respect “fair and free competition”, comply with the provisions of Anti-Trust Laws and other related laws and regulations, and not engage in unfair transaction practices.

(2) Improper Payment

No suppliers shall make bribes, kickbacks or other illicit payments to political organizations, government officials, employees of the Company or other third parties in order to obtain an unfair advantage. Kubota Group suppliers and their employees, agents and representatives shall comply with Kubota Group's “Request for Understanding and Cooperation in Anti-Bribery Activities” and shall not accept, solicit, offer or pay bribes or provide anything of value, directly or indirectly, to Kubota Group employees or third parties. For further details, please refer to "Request for Understanding and Cooperation in Anti-Bribery Activities" at

https://www.kubota.com/sustainability/society/procure/data/requests_20251001_english.pdf.

(3) Intellectual Property

All suppliers shall respect the intellectual property rights of others, including patent rights, utility model rights, design rights, trademark rights, copyrights, and know-how, and shall not use such rights improperly.

(4) Confidential Information

All suppliers shall protect all confidential information of the Kubota Group, such as sales, technical, management and personal information (all business information not disclosed outside the Company), and shall permit access to such information in a legitimate manner if such access is permitted under applicable law.

(5) Electronic Information

All suppliers shall ensure thorough information security and appropriately manage electronic information to prevent leakage, theft or alteration of electronic information. For further details, please refer to "Information Security Measures Standards for Business Partners at

<https://www.kubota.com/sustainability/society/procure/index.html>.

(6) Appropriate and Timely Disclosure of Corporate Information

All suppliers shall disclose appropriate corporate information on their management and business activities in accordance with relevant laws and regulations at an appropriate time and in an

appropriate manner upon our request.

(7) Ensuring Proper Quality

All suppliers shall not only comply with laws, regulations, codes and standards, but also ensure that the responsible department is responsible for ensuring safety and excellent quality in each operational process, from development to production, sales and service. In the event that a possible safety problem is identified, our relevant department is to be informed promptly and accurately, and suppliers will work to resolve the problem and prevent its spread.

(8) Elimination of Relationships with Antisocial Groups

All suppliers shall take a resolute stance against antisocial groups that threaten the order and safety of civil society and cooperate with the police and other relevant organizations to ensure thorough elimination of any relationships of such groups. No suppliers shall accept unreasonable demands from antisocial groups under any circumstances.

(9) Stable Supply of Products and Services

All suppliers shall develop the necessary systems to ensure a stable supply of products and services by formulating a business continuity plan (BCP) in preparation of disasters or unforeseen events that may hinder the stable supply of products and services.

2. Labour and Human Rights

In accordance with the Universal Declaration of Human Rights, we require all suppliers to respect the dignity and rights of all people, refrain from human rights violations, respect privacy and protect personal information.

(*In order to respect and ensure human rights and freedoms, the Universal Declaration of Human Rights is a declaration of "a common standard of achievement for all peoples and all nations" and was adopted by the United Nations General Assembly in 1948.)

(1) Child Labour

No suppliers shall employ persons under 15 years of age or under the age of completion of compulsory education, whichever is higher, in their business activities and supply chains.

(2) Forced Labour and Responsible Employment

No suppliers shall engage in bonded labour, indentured servitude, forced labour, slave labour, labour by sentenced persons, labour resembling slavery, or labour through trafficking in persons. Forced labour includes violation of the rights of vulnerable groups, deception, restriction of movement, isolation, physical or sexual violence, threats and intimidation, withholding of identity documents, withholding of wages, debt bondage, inadequate work and living conditions, and forced or excessive overtime. All suppliers shall ensure that foreign workers do not pay recruitment and placement fees (in excess of the legal amount) in their placement and, suppliers or their recruitment agencies shall not deprive workers of their identity documents.

(3) Wages and Working Hours

All suppliers must ensure that all employees receive at least the legally prescribed minimum wage and benefits. If possible, provide a living wage. All suppliers must, at the very least, comply with the laws, standards and practices applicable in the country in which they operate in terms of working conditions and hours.

(4) Occupational Health and Safety

All suppliers shall provide workers with a safe and healthy working environment and shall appropriately manage the health and safety of workers. They shall also provide the necessary training on occupational health and safety in a language that workers understand.

(5) Harassment

No suppliers shall tolerate any form of harassment, including sexual harassment and power harassment, or any other violation of human rights, such as bullying.

(6) Discrimination

No suppliers shall discriminate against workers on the basis of race, sex, colour, nationality, religion, age, pregnancy, marital status, social or ethnic origin, sexual orientation, political beliefs, disability, union membership, or any other grounds.

(7) Right to Organise and Collective Bargaining

All suppliers shall allow workers to freely join and bargain collectively in accordance with local laws without interference, discrimination, retaliation or harassment. In addition, where the right to join or form a trade union is not fully protected by law, suppliers must facilitate and not impede parallel and alternative means of independent and free association and negotiation.

(8) Marginalised Populations/Groups

All suppliers shall respect the land and natural resources on which people of marginalised populations/groups live without depleting or depriving them.

3. Global and Local/Regional Environment

We require all suppliers to understand the basic ideas set forth in the "Kubota Group Green Procurement Guidelines" and comply with the standards required of suppliers, and the environmental considerations required for goods procured from suppliers. For further details, please refer to the "Kubota Group Green Procurement Guidelines" at <https://www.kubota.com/sustainability/environment/procure/index.html>.

4. Others

In Europe and the United States, laws and regulations requiring specific products, parts, and raw materials to undergo environmental and human rights due diligence are being developed. In order to comply with this requirement, Kubota may require suppliers that handle specific products, parts, or raw materials to confirm the usage status, provide information on the supply chain, purchase from specific suppliers, and conduct environmental and human rights due diligence. We also ask all suppliers to establish a mechanism for handling employee complaints.

(1) Human Rights Policy

All suppliers shall strive to develop human rights policies in accordance with the UN Guiding Principles on Business and Human Rights.

(2) Due Diligence on Products, Parts and Raw Materials and Compliance with Environmental Laws and Regulations

All suppliers are directly or indirectly responsible for the import and export of products (including their raw materials and parts) delivered to Kubota Group and must be aware of and comply with the laws and international rules applicable to international trade. This includes obtaining (or assisting in obtaining) the necessary licenses, approvals, certificates or other permits and making accurate customs declarations. It also includes cooperation in conducting due diligence and providing accurate information on the place of origin necessary for the Kubota Group to comply with regulations (examples include, but are not limited to, the Dodd-Frank Act on Conflict Minerals, the EU Battery Regulation, and the EU Deforestation Regulation) that require due diligence on raw materials and parts suspected of involvement in child labour, forced labour or environmental destruction. In the area of environmental legislation, this includes investigating and responding to environmental hazardous substance surveys, CBAM (European Carbon Border Adjustment Mechanism), etc.

(3) Grievance Mechanisms

All suppliers shall endeavour to establish a grievance mechanism that enables workers, both named and anonymous, to raise complaints and concerns to management and employee representatives without retaliation from the company, and to provide effective solutions to such complaints and concerns.

END