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Corporate Governance

Our Basic Policy

ROHM constantly pursues the best corporate governance in order to realize its objectives and policies, such as the Company Mission and the Basic Management Policy. Based on the recognition that ROHM is supported by all stakeholders, we believe that corporate operations and actions must be rooted in fairness, soundness, and transparency.

Based on our basic policy of maximizing sustainable corporate growth and medium- to long-term corporate value based on an accurate understanding of our company's capital costs from the standpoint of our stakeholders, we are working to enhance corporate governance.

Basic Policy

- 1. To properly cooperate with all stakeholders, including shareholders, and appropriately consider and respond to issues in sustainability management, including ESG (Environmental, Social, and Governance) factors.
- 2. To respect the rights of shareholders, secure their equal treatment, and engage in constructive dialog with shareholders who share the mid-to-long term perspective.
- 3. To disclose corporate information in a timely and appropriate manner as a part of ensuring our transparency.
- 4. To make the roles and responsibilities of the Board of Directors clear, hold meetings of the Board of Directors in a timely and appropriate manner, facilitate decision-making processes, and ensure that outside officers proactively express their views from an independent and objective standpoint and that the Board of Directors oversees the execution of business.

Based on these views, We have established and published the Corporate Governance Policy and Corporate Governance Report.

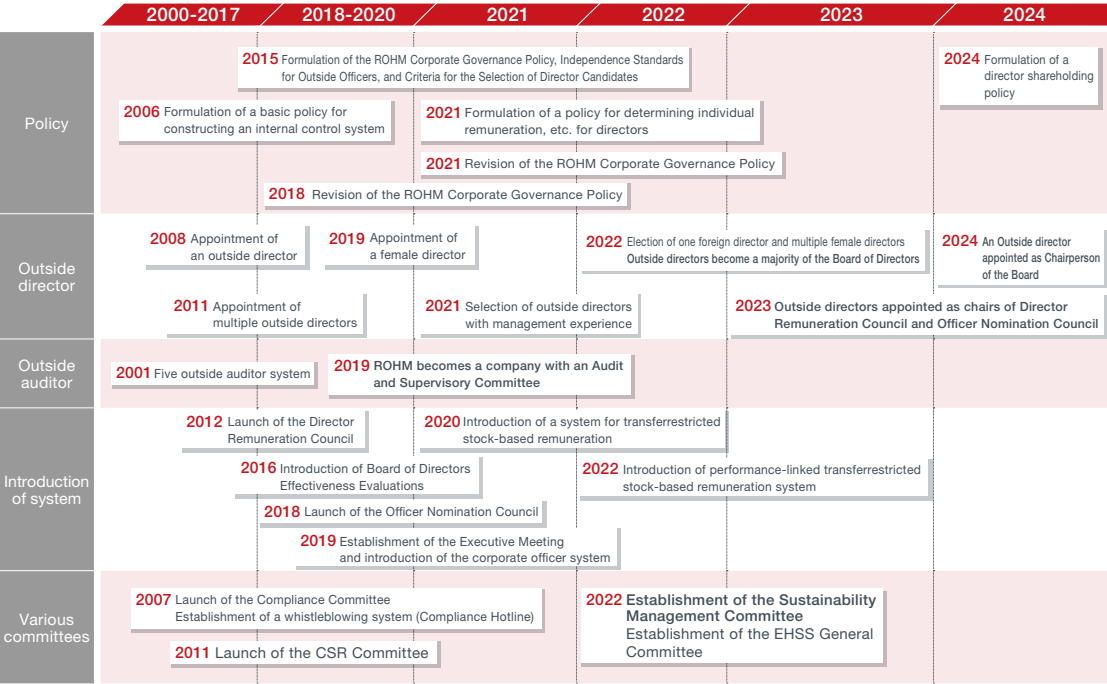
PDF ROHM Corporate Governance Policy

Corporate Governance Report

Reforming and Enhancing Governance

ROHM considers corporate governance to be one of the most important management issues and has been working to reform and strengthen it. We have strengthened our supervisory function by transitioning to a company with the Audit and Supervisory Committee system and introducing the Executive Officer System and created an organization that enables flexible decision-making. In addition, we have established the EHSS General Committee, which oversees the operations of eight management systems related to sustainability, and are building an executive governance system. Furthermore, to ensure objectivity and transparency while promoting diversity on the Board of Directors, we are striving to strengthen governance by electing more than half of the Board as independent outside directors.

Change Through Governance Reforms





Corporate Governance

Medium-term Targets and Achievements

Enhancing Corporate Governance

[Background and Challenges for Activities]
For corporate activities to comply with the rules of society and meet the expectations of diverse stakeholders, it is necessary to enhance corporate governance with the aim of strengthening competitiveness while ensuring management transparency. To this end, it is essential to clarify the roles and responsibilities of the Board of Directors and other bodies, to make swift decisions, and to promote the separation of management execution and supervision by utilizing outside directors from an independent and objective standpoint, thereby strengthening the monitoring and supervisory functions of the Board of Directors.
ROHM Group aims to strengthen corporate governance, achieve sustainable growth, and increase corporate and shareholder value.

Theme	Targets (Target Year: FY2025)	Targets for FY2025	FY2025 Results	Targets for FY2026
Secure diversity of the Board of Directors	Increase the female or foreign national officer ratio at Head Office to 10%	Maintain or increase the percentage of female and non-Japanese directors on the Board of Directors.	Total 20.0% ·Percentage of female directors: 10.0% ·Percentage of non-Japanese directors: 10.0%	Maintain and enhance the diversity of the Board of Directors.
Review of compensation system to improve medium-to long-term corporate value	①Increase the number of independent outside directors to a majority of the board of directors	Increase the number of independent outside directors to a majority.	Outside director ratio: 60.0%	Maintain a majority of independent outside directors on the Board.
	②Introduce a compensation system linked to the Medium-term management plan (financial and non-financial targets)	Review the effectiveness of the performance-linked remuneration system introduced for the next fiscal year at the Director Remuneration Council.	Operated a compensation system linked to the Mid-Term Management Plan, including both financial and non-financial performance targets.	Introduce a compensation system linked to the Second Mid-Term Management Plan.
Secure the effectiveness of management	Evaluate the effectiveness of the Board of Directors once every three years	Continue to utilize external organizations for support in evaluating effectiveness, and improve quality, including how to utilize external organizations in addressing issues.	Based on the analysis and assessment of third-party evaluations conducted with the support of an external organization, the Board of Directors received a report on its effectiveness.	Continue to utilize external organizations for support in evaluating effectiveness, and improve quality, including how to utilize external organizations in addressing issues.

*Unless otherwise specified, the figures presented in this report are based on information as of the end of the fiscal year (March 31). However, figures relating to the composition of the Board (including the ratios of outside directors, female directors/officers, and foreign directors/officers) are based on the latest information following appointments approved at the 68th Annual General Meeting of Shareholders, in order to reflect the most current Board composition.



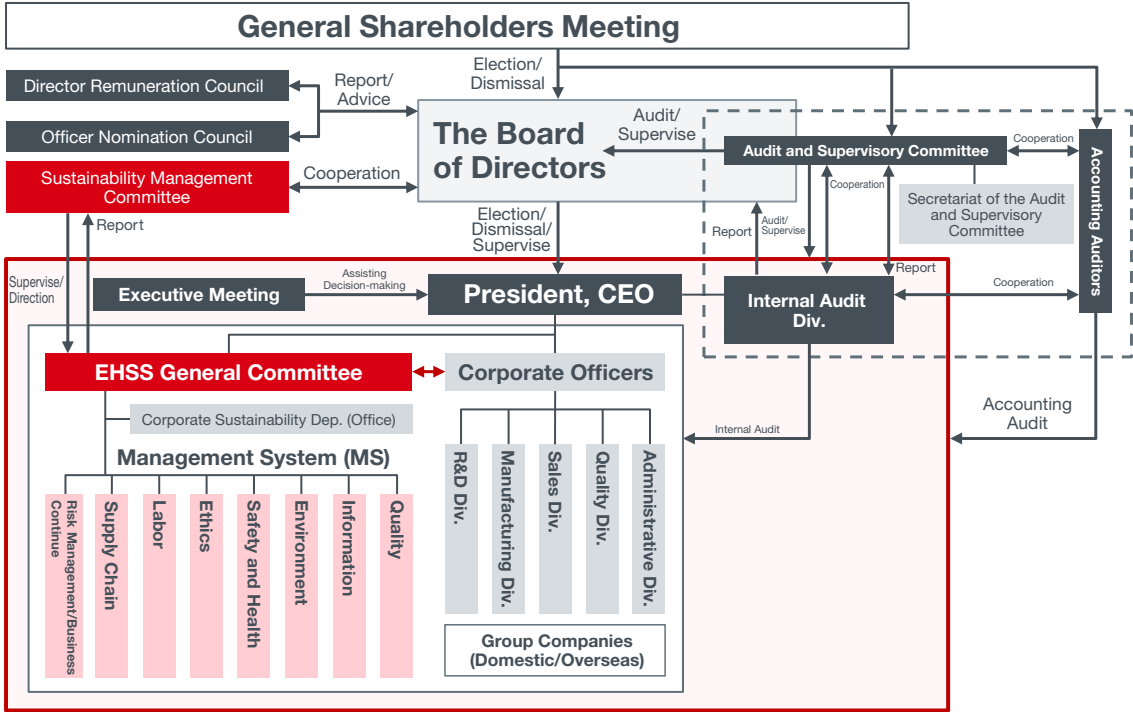
Corporate Governance

Corporate Governance System

ROHM has established an appropriate governance system based on the ROHM Corporate Governance Policy to ensure fairness and transparency in management.

From April 2024, the Board of Directors is chaired by an outside director, in order to promote the separation of supervision and execution by the Board of Directors and to ensure the effectiveness of supervision over management.

We are also continuously strengthening governance by establishing the Officer Nomination Council and the Director Remuneration Council as advisory bodies to the Board of Directors, and by strengthening the executive side through the Executive Meeting which serves as a supporting body for the President's decision-making.



Members and Number of Meetings Held for Individual Organizations (as of June 25, 2026) Internal directors Outside directors Corporate officers

Organization	① Board of Directors		② Audit and Supervisory Committee		③ Committee Executive Meeting	
Structure	 10 directors (of which 6 are outside directors)		 3 Audit and Supervisory Committee members (of which 3 are outside directors)		 15 corporate officers (of which 4 are directors)	
Number of times held in FY2025	15 times		16 times		18 times	

Organization	④ Director Remuneration Council		⑤ Officer Nomination Council		⑥ Sustainability Management Committee	
Structure	 3 directors (of which 2 are outside directors)		 3 directors (of which 2 are outside directors)		 5 directors (of which 1 outside director)	
Number of times held in FY2025	7 times		5 times		4 times	

① Board of Directors

The Board of Directors provides strategic corporate direction under a transparent and fair system in order to achieve sustainable growth for the company and improve its corporate value. It makes management decisions based on the diverse experience and expertise of its members, and also supervises business execution. It is chaired by an independent outside director.

② Audit and Supervisory Committee

The audit and supervisory committee establishes audit policies, standards and plans, and audits the legality and appropriateness of the execution of duties by the Board of Directors, while ensuring a reporting line that allows for direct reporting from the internal audit division, which is independent of the business execution division, in the event of any irregularities by directors. It also conducts audits of the entire group in cooperation with the internal audit department.



Corporate Governance

Executive Meeting

The Executive Meeting, consisting of corporate officers, deliberates important matters related to the management of the ROHM Group, such as the execution of strategies related to the business portfolio and the allocation of management resources such as human capital management, promotion of focused businesses, and strengthening of the sales structure. In this way, the Executive Meeting assists the President and Representative Director in decision-making.

Director Remuneration Council

The Director Remuneration Council discusses the remuneration system for directors and the remuneration of each director based on this system, and reports the results of discussions to the Board of Directors and the Audit and Supervisory Committee. It is chaired by an independent outside director.

Officer Nomination Council

The Officer Nomination Council discusses the appointment and dismissal of the Company's President and any director or corporate officer with titles, as well as the nomination of director candidates, and reports the results of discussions to the Board of Directors. It is chaired by an independent outside director.

Sustainability Management Committee

The Sustainability Management Committee decides on sustainability policies, aims, and long-term targets, applies these in the EHSS General Committee, and builds a framework for their implementation. It also deliberates important matters related to the sustainability management issues of the ROHM Group and coordinates with the Board of Directors to ensure appropriate decision-making.

Initiatives to Enhance the Board of Directors

We believe it is important for the Board of Directors to fully fulfill its functions and strengthen governance in order to sustainably increase ROHM's corporate value.

Since 2016, when we introduced the Evaluation of the Board of Directors' Effectiveness, we have conducted an annual survey of all directors on the effectiveness of the Board of Directors. The results of the survey are used by the Board of Directors to analyze and evaluate the effectiveness of the Board of Directors.

In FY2022, we introduced the analysis and evaluation of third-party assessments utilizing an external organization in order to ensure both objectivity and effectiveness of the evaluation, and from FY 2023, in addition to analysis and evaluation of questionnaire results, we will expand support to include setting and reviewing questionnaire items and using and tabulating web systems to further ensure objectivity.

Based on the results of these analyses and evaluations, we are striving to improve the effectiveness of the Board of Directors by discussing issues and future initiatives to improve the effectiveness of the Board of Directors.

Effectiveness Evaluation Process





Corporate Governance

Evaluation Results for FY2025 and Action Policy for FY2026

FY2025 Evaluation Results	The supervisory function of the Board of Directors is maintained through the enhancement of the outside director structure, and active discussions take place with appropriate deliberation time at Board meetings, including pre-briefing sessions. Overall, based on evaluation questionnaire results as well as third-party analysis and evaluation, the effectiveness of the Board of Directors was assessed to be generally ensured.
Challenges for FY2026	We recognize that there is room for further improvement in the supervision of business strategies and management plans, as well as topics that require deeper discussion by the Board of Directors (e.g., medium- to long-term corporate value creation, capital efficiency, non-financial strategies, etc.).

Remuneration

Policy for Determining Remuneration

ROHM's basic policy is to make the remuneration of directors a system that shares value with shareholders, and to set the remuneration of individual directors at an appropriate level based on their respective responsibilities, in order to clarify their management responsibility and fully function as a sound incentive for the company's sustainable growth and enhancement of corporate value over the medium to long term. ROHM's basic policy is to set the remuneration of individual directors at an appropriate level based on their respective responsibilities.

Specifically, the compensation for executive directors consists of a fixed monetary compensation, performance-linked remuneration, and stock-based remuneration as non-monetary remuneration. The remuneration for independent outside directors and non-executive directors is fixed remuneration only, from the perspective of assuming a supervisory function independent from the execution of business.

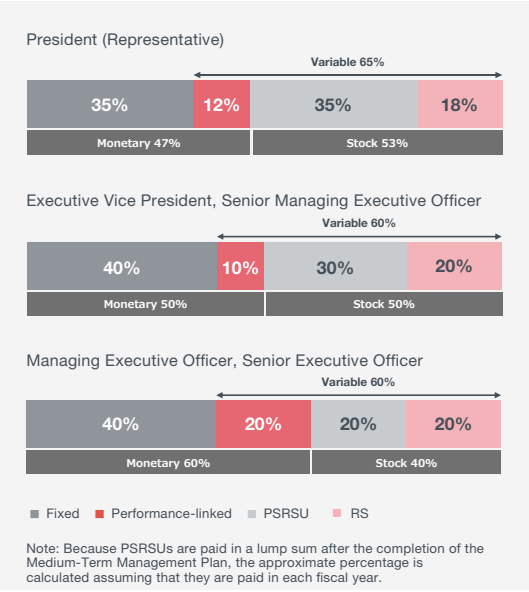
In addition, we have established a policy regarding the ownership of our own shares from the perspective of further increasing our willingness to contribute to the sustainable enhancement of corporate value and strengthening the sharing of value with our shareholders and other stakeholders.

Executive Director			
Monetary	Fixed remuneration	Paid in cash monthly according to position and responsibilities	Paid in cash monthly
	Performance-linked remuneration	Calculated according to the level of achievement of the company's consolidated net sales and operating profit targets for the immediately preceding period	-
Non-monetary remuneration (stock remuneration)		Consists of Restricted Stock (RS) granted upfront based on standard amounts by executive position, and Performance Share Restricted Stock Units (PSRSU) delivered post-evaluation based on performance targets. The PSRSU portion varies according to the degree of achievement against target metrics linked to the Medium-Term Management Plan	-

(Reference) Performance Cycle and Indicators for PSRSUs

Performance evaluation cycle	FY2026 to FY2028 (3 years)	
Performance indicators	Financial	ROE
		ROIC Spread (ROIC-WACC)
	Nonfinancial	GHG Emissions
		Dow Jones Best-in-Class Indices

Estimated Ratio of Remuneration (If Targets Are 100% Achieved)



Directors' Stock Ownership Policy

The company recommends that executive directors hold the company's shares as follows.

President and Representative Director

The President and Representative Director shall hold a number of shares equivalent to 3.0 times the monetary remuneration (fixed remuneration) by either the date on which two years have elapsed since the enactment of this section (June 27, 2026) or the date on which five years have elapsed since their assumption of the position, whichever is later.



Corporate Governance

Other Executive Directors

Other executive directors shall hold a number of shares equal to 1.0 times the amount of stock remuneration (fixed remuneration) by either the date on which two years have elapsed since the enactment of this section (June 27, 2026) or the date on which five years have elapsed since their assumption of the position, whichever is later.

Total Amount of Remuneration for Directors in FY2025

Category	Total Remuneration (Million JPY)	Total Remuneration by Type (Million JPY)			Number of Directors (Target)
		Fixed Remuneration	Performance- linked Remuneration	Non-monetary Remuneration	
Director (excluding Audit and Supervisory Committee Members and Outside Directors)	302	147	86	68	5
Directors who are Audit and Supervisory Committee Members (excluding Outside Directors)	30	30	-	-	2
Outside Directors	99	99	-	-	8

* The amount of remuneration, etc. of Directors does not include the amount of employee salaries of Directors who concurrently serve as employees.

Total Amount of Remuneration for Individuals with Total Remuneration of more than 100 Million Yen

Category	Total Remuneration (Million JPY)	Total Remuneration by Type (Million JPY)		
		Fixed Remuneration	Performance- linked Remuneration	Non-monetary Remuneration
Katsumi Azuma	112	50	43	18



Member of the Board and Corporate Officer

Reasons for selecting directors and Meeting Attendance

Reasons for Selecting the Seven Directors Who Are Not Audit and Supervisory Committee Members and Meeting Attendance in FY2025

Name	Position	Reasons for selection	Number of shares held (as of Mar. 31, 2026)	Meeting attendance in FY2025			
				Board of Directors	Audit and Supervisory Committee	Officer Nomination Council	Director Remuneration Council
Katsumi Azuma	President (Representative Director), Chief Executive Officer Officer Nomination Council Member Director Remuneration Council Member	Katsumi Azuma has attained an abundant knowledge and experience in Business Unit, along with outstanding capabilities in strategic oversight and business promotion. As President (Representative Director) of a key subsidiary, he has a proven track record of contributing to integrated group management. Furthermore, he has superior ability to lead the ROHM Group's fundamental structural reforms and drive the growth of its core businesses, and was therefore deemed suitable as a Director.	38,607	15/15	-	5/5	7/7
Kazuhide Ino	Member of the Board, Managing Executive Officer, Business Operations	Kazuhide Ino has attained an abundant knowledge and experience through the duties in technology development sections of Power device and other products, as well as financial experience in corporate management. Based on this background, he has demonstrated a comprehensive management perspective and has superior ability to strategically promote the business of the ROHM Group, and was therefore deemed suitable as a Director.	23,661	15/15	-	-	-
Tetsuo Tateishi	Member of the Board, Senior Executive Officer, Technology and Innovation	Tetsuo Tateishi has attained highly specialized expertise and abundant experience as LSIs developer, and he is familiar with a broad range of Semiconductor Technologies and he has superior ability to further promote the ROHM Group's technological innovation and to lead the development and execution of its IT strategy, and was therefore deemed suitable as a Director.	15,006	15/15	-	-	-



Member of the Board and Corporate Officer

Reasons for selecting directors and Meeting Attendance

Name	Position	Reasons for selection	Number of shares held (as of Mar. 31, 2026)	Meeting attendance in FY2025			
				Board of Directors	Audit and Supervisory Committee	Officer Nomination Council	Director Remuneration Council
Peter Kenevan	Member of the Board, Senior Executive Officer, Chief Financial Officer and Sustainability	Peter Kenevan has extensive knowledge and abundant experience in corporate finance, mergers and acquisitions (M&As), among other fields, nurtured over the years through working for a consulting firm. He also has a proven track record serving as the Japan Country Manager of a company that operates globally. He is expected to contribute to the development and promotion of the ROHM Group's financial strategy, as well as to enhancing corporate value through improved capital efficiency, and was therefore deemed suitable as a Director.	24,283	15/15	-	-	-
Tadanobu Nagumo	Outside Director, Member of the Board, Chairperson of the Board Officer Nomination Council Member Director Remuneration Council Member	Tadanobu Nagumo has attained an abundant knowledge and experience acquired as a top executive of a listed company that operates globally and he has a proven track record of aggressively promoting global strategies. Additionally, as an engineer he has a high level of insight in the field of manufacturing. He is expected to contribute to further strengthening oversight of the ROHM's execution of business from an independent standpoint, to provide advice on the management of the ROHM's business on a wide range of issues from an international and practical perspective, and to manage appropriately the Board of Directors as the Chairperson, and was therefore deemed suitable as a Director.	8,300	15/15	-	5/5	7/7
Aiko Kozaki *2	Outside Director, Member of the Board Officer Nomination Council Member Director Remuneration Council Member	Aiko Kozaki has the practical experience with a Japanese leading asset management company and private think tank and a wide range of knowledge and insight about resolution of social issues improved through study experience in the U.S. In addition, she is an expert of sustainable finance who has abundant experiences various projects and business creation initiatives. She is expected to contribute to further strengthening oversight of the ROHM's execution of business from an independent standpoint, and to provide advice on the sustainability-focused management, which is the ROHM Group's primary focus, and was therefore deemed suitable as an Outside Director.	900	15/15	-	2/2 *1	4/4 *1



Member of the Board and Corporate Officer

Name	Position	Reasons for selection	Number of shares held (as of Mar. 31, 2026)	Meeting attendance in FY2025			
				Board of Directors	Audit and Supervisory Committee	Officer Nomination Council	Director Remuneration Council
Akira Minamikawa *2	Outside Director, Member of the Board	Akira Minamikawa has long been engaged in research and analysis of the semiconductor industry at a leading global technology research firm as well as a foreign securities company and has acquired a high level of expertise and extensive international insight. The Company has determined that he is well suited to contribute to strengthening the supervision of business execution from an independent standpoint, as well as to provide strategic advice based on technology trends, and was therefore deemed suitable as an Outside Director.	0	-	-	-	-

* Tadanobu Nagumo, Aiko Kozaki, Akira Minamikawa, Keita Nakagawa, Tomoyuki Ono and Takaaki Oda are Members of the Board (Outside), and the Company has designated them as Independent Directors pursuant to the rules of the Tokyo Stock Exchange.

*1 Due to being appointed as a member of the Officer Nomination Council and Director Remuneration Council Director in December 2025, the number of meetings available for their attendance differs from other Members.

*2 Due to being elected as a Director at the 68th General Shareholders Meeting held on June 24, 2026, the number of board of directors meetings attended differs from that of other Directors.



Member of the Board and Corporate Officer

Reasons for Selecting the Three Directors Who Are Audit and Supervisory Committee Members and Meeting Attendance in FY2025

Name	Position	Reasons for selection	Number of shares held (as of Mar. 31, 2026)	Meeting attendance in FY2025			
				Board of Directors	Audit and Supervisory Committee	Officer Nomination Council	Director Remuneration Council
Keita Nakagawa	Outside Director, Member of the Board, Audit and Supervisory Committee Member (Full-time)	Keita Nakagawa will be expected to be able to utilize knowledge and insight through long-time experience at a financial institution as well as a global perspective nurtured through overseas assignments and abundant experience as the responsible for an internal audit division and the Director in charge of Compliance to coordinate with the Internal Audit Department and to strengthen audit and supervisory functions of management from an independent perspective, and is therefore deemed suitable as an outside director who is an Audit and Supervisory Committee Member.	1,500	15/15	16/16	1/1 *3	1/1 *3
Tomoyuki Ono	Outside Director, Member of the Board, Audit and Supervisory Committee Member	Tomoyuki Ono will be expected to be able to utilize professional knowledge and experience, wide insight as a certified public accountant and practical experience at business companies, etc. to ensure transparency and integrity for decision-making of the Board of Directors and to strengthen audit and supervisory functions of management from an independent perspective. Though never having previously engaged in company management in any way other than serving as an outside director, he was deemed suitable as an outside director who is an Audit and Supervisory Committee Member for these reasons.	700	15/15	16/16	-	-
Takaaki Oda	Outside Director, Member of the Board, Audit and Supervisory Committee Member	Takaaki Oda is be expected to be able to utilize professional knowledge and experience, wide insight as an attorney at law to ensure transparency and integrity for decision-making of the Board of Directors and to strengthen audit and supervisory functions of management from an independent perspective. Though never having previously engaged in company management in any way other than serving as an outside director/ corporate auditor, he was deemed suitable as an outside director who is an Audit and Supervisory Committee Member for these reasns.	200	13/13 *4	13/13 *4	-	-

*3 Due to being elected as a Director at the 67th General Shareholders Meeting held on June 25, 2025, the number of board of directors meetings attended differs from that of other Directors.



Member of the Board and Corporate Officer

Director Skill Matrix

We have identified the skill sets (such as knowledge, experience, and ability) that the Board of Directors needs to achieve sustainable growth for the ROHM and to enhance the Group’s corporate value over the medium- to long-term. The skill matrix for the Board members is as follows.

Name		Fields							
		Corporate Management	ESG/ Sustainability	Global	Innovation/ Technology	HR Development	Legal/ Compliance	Finance/ Accounting	Industry Expertise
Katsumi Azuma		●	●			●			●
Kazuhide Ino		●		●	●				●
Tetsuo Tateishi				●	●		●		●
Peter Kenevan			●	●				●	●
Tadanobu Nagumo	■ ■	●	●	●		●			
Aiko Kozaki	■ ■		●					●	
Akira Minamikawa	■ ■				●				●
Keita Nakagawa	■ ■ ■		●				●	●	
Tomoyuki Ono	■ ■ ■		●					●	
Takaaki Oda	■ ■ ■		●				●		

■ Audit and Supervisory Committee Member ■ Outside ■ Independent

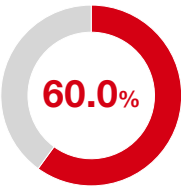
Fields	Definition
Corporate Management	Strive to further enhance corporate value by foreseeing changes in the environment surrounding the Company’s business, developing strategies from mid-to long-term perspectives and making decisions and running an organization effectively.
ESG/Sustainability	Contribute to the sustainable development and prosperity of the world, society and companies through conducting business activities with integrity, fairness and transparency, working towards the achievement of the United Nations’ Sustainable Development Goals (SDGs) and establishing and maintaining a good relationship with stakeholders.
Global	Given the rapidly changing international situation, gain increased confidence from international markets by developing strategies and conducting business from global perspectives.
Innovation/ Technology	Promote the creation, establishment and expansion of businesses by capturing the needs of society and customers and focusing time and resources on the development of new technologies and products that are essential for the sustainable growth of the company.
HR Development	Discover human resources who can be the next generation of managers, and conduct human resources development and human resources i nvestment of medium and long term that are linked to the Company’s management strategy.
Legal/Compliance	Perform appropriate risk management by understanding all applicable laws and regulations related to the Company’s business and by recognizing and understanding risks that may materially affect the Company’s business management, always from the standpoint of ensuring legal and other compliances.
Finance/Accounting	Appropriately identify the Company’s business management issues based on the full understanding of accounting, taxation and finance, and develop and monitor the progress of financial strategies and measures that are linked to the Company’s management strategy.
Industry Expertise	Possess insight on semiconductors and a wide network of personal connections in the semiconductor industry, and look to optimize the company’s business portfolio by appropriately monitoring competitive and market trends.



Member of the Board and Corporate Officer

Outside Directors

Percentage of outside directors
on the Board of Directors



Outside directors currently account for 60.0% of the Board of Directors.

Percentage of outside directors
that are independent officers



ROHM has formulated Independence Standards for Outside Officers to supervise and advise management from an independent perspective. Currently, all six of our outside directors meet these standards.

Percentage of female directors
on the Board of Directors



Women currently account for 10.0% of the Board of Directors.

[Independence Standards for Outside Officers](#)

Corporate Officer

In order to complement functions of the Board of Directors and establish a more flexible management structure which can appropriately and swiftly respond to the rapidly, ROHM have introduced corporate officer system since Sep. 2019. The Corporate Officers other than those who also serve as Board members are as follows.

Name	Position
Koji Yamamoto	Senior Executive Officer, Special Assignment
Masaki Sakai	Senior Executive Officer, Sales
Tetsuo Aoki	Senior Executive Officer, Director of Japanese Sales Headquarters
Motohiro Ando	Executive Officer, Director of Corporate Strategy Headquarters
Sumihiro Takashima	Executive Officer, Director of Marketing Headquarters
Yasushi Hamazawa	Executive Officer, Director of LSIs Development Headquarters and LSIs Production Headquarters
Masanori Tanimura	Executive Officer, Director of SiC Power Devices Business Headquarters
Tetsuhiro Tanabe	Executive Officer, Director of Si Power Devices Business Headquarters
Syoji Higashida	Executive Officer, Director of WP Headquarters, and Vice President of ROHM Device Manufacturing Co., Ltd.
Satoshi Fujitani	Executive Officer, Director of AP Headquarters, and Vice President of ROHM Assembly Manufacturing Co., Ltd.
Takashi Miki	Executive Officer, SCM and Director of Corporate Quality Headquarters



Tax Policy

Our Basic Policy

ROHM Group always pursuits the best corporate governance with a vision of achieving the purposes and policies including Company Mission and Basic Management Policy, with the aim for sustainable corporate growth and maximizing the corporate value over the mid- to long-term. ROHM Group established ROHM Group Business Conduct Guidelines to serve as a code of ethics for all directors, officers and employees, and engages in the global business activities.

>ROHM Group has established a management structure which appropriately understands the tax-related issues relating to its business activities and makes its tax payments in compliance with the relevant tax laws and regulations of each country/region. ROHM Group responds appropriately to any tax reforms in Japan and overseas, including the BEPS (Base Erosion and Profit Shifting) Project published by the OECD (Organization of Economic Co-operation and Development), and will continue to fulfill its corporate social responsibility (CSR) on an even higher level.

ROHM Group Tax Policy

(1) Tax Governance

ROHM Group appointed the Corporate Officer in charge of Finance as the Chief Executive and implemented a structure under which the HQ Tax Division cooperates with the group companies and related divisions in order to supervise any tax-related issues. ROHM Group further seeks to secure and train human resources with significant tax knowledge and experience, with the aim of building a strong structure that is capable of handling increasingly complicated tax operations.

(2) Tax Compliance

ROHM Group engages in the filing of appropriate tax returns and payment of appropriate taxes by understanding the latest laws and tax regulations of each country/region. ROHM Group has also introduced level-specific trainings designed to enhance tax knowledge and to penetrate the awareness of tax compliance.

(3) Tax Risk Management

For the early identification and minimizing of any tax risks, the HQ Tax Division of ROHM Group gathers information on a timely basis through coordination with the group companies and related divisions. Upon identifying any tax risks, ROHM Group takes immediate actions to solve such risks and requests advice from external professionals as needed.

(4) Tax Planning

ROHM Group understands that actions for tax avoidance will damage the trust of its stakeholders and will lead to a decline in its corporate value. Therefore, ROHM Group does not perform any tax planning that deviates from the purpose of the law and does not use tax havens for the main purpose of tax avoidance. However, in order to maximize its cash flow, ROHM Group utilizes tax incentives and tax treaties as defined in the tax-related regulations of each country/region, and optimizes its tax payments.

(5) Transfer Pricing

ROHM Group seeks to conduct its internal transactions appropriately. In accordance with the Transfer Pricing Guidelines published by the OECD and enacted by each country/region, ROHM Group determines the arm's length price by allocating profits to the overseas group companies based on their functions performed, risks assumed and assets owned.

(6) Relations with the Tax Authorities

ROHM Group endeavors to establish and maintain good relationships with the tax authorities in each country/region. Information requested by the tax authorities in each country/region will be provided in a timely-manner based on the relevant tax laws and regulations. In addition, ROHM Group strives to have constructive communications with the tax authorities during tax audits. With respect to any issues identified, ROHM Group will take measures to prevent the recurrence through coordination with the group companies and related divisions.

* The Policy has been approved by the Board of Directors at ROHM Co., Ltd.



Tax Policy

ROHM Group Tax Data by Country and Region for FY2025

(Unit: million JPY)

Tax Jurisdiction	Revenues	Profit (Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year
Japan	641,109	-154,987	-776	1,440
Thailand	155,062	586	-82	174
Hong Kong	95,136	4,626	506	733
Philippines	99,680	780	526	455
China	83,013	3,736	979	397
Germany	52,352	-11,712	735	143
South Korea	45,679	2,108	293	353
Singapore	39,307	4,980	997	855
United States of America	28,336	1,426	31	39
Taiwan	34,266	832	106	170

Tax Jurisdiction	Revenues	Profit (Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year
Malaysia	33,734	301	622	1,111
Subtotal	1,307,672	-147,325	3,937	5,870
Others	7,145	261	90	78
Total	1,314,817	-147,065	4,027	5,949

* Country data is disclosed so that the subtotal of each column exceeds 90%.
* The above amounts are based on "Country-by-Country Report" submitted to Japanese tax authorities, and not directly related to the consolidated financial statements.



Communications with Shareholders and Investors

IR Structure and Activities

ROHM has established the Public & Investor Relations Division to oversee the investor relations activities. In order to meet the diverse needs of our broad range of shareholders and investors, we hold various IR events and engage in communication with shareholders and investors throughout the year, including regular IR interviews, financial results briefings, factory tours, and company information sessions for individual investors.In FY2025, we engaged with investors through a combination of in-person and online channels, including direct visits to overseas institutional investors, and conducted more than 600 IR meetings. Our senior management actively participates in IR activities, including investor conferences and international IR roadshows. Furthermore, amid the growing interest in ESG, we conduct dedicated briefings in close collaboration with relevant departments.

Main topics of discussion and areas of interest

Theme	Issues of interest	
Business Environment and Overall Business Performance	•Forecast for EV production volume and impact on business •Trends in each market and future outlook •Future capital expenditures and depreciation •Inventory policy, future inventory levels, and operating status	•Product price trends •Alliance with Toshiba and synergies •Business expansion progress in the AI server market •Impact of surging gold prices
Medium-Term Management Plan	•Progress of structural reforms aimed at improving profitability	•Policy on returns to shareholders and cash allocation •Approach to investments for growth and M&A
Business-related	•SiC business targets, investment plans, and competitive environment •Improving profitability in the LSI business	
Financial-related	•Financial Strategies under the New CFO	
ESG-related	•Progress in reducing GHG emissions •Human capital strategy linked to management strategy	•Initiatives to increase the percentage of female managers •Corporate governance (nomination and remuneration of directors, etc.)

Reflecting the feedback from dialogue in management and IR activities

The evaluations and opinions obtained through dialogue with shareholders and investors are reported to the Board of Directors once every quarter, discussed by the management, and used to improve management and IR activities. We are focusing on internal IR activities, such as sharing information on business performance and market evaluations with employees every quarter. We also consider evaluations of our integrated reports to be an important feedback for management, and we report and discuss it with the Board of Directors and relevant departments to ensure the entire company works together to enhance corporate value.

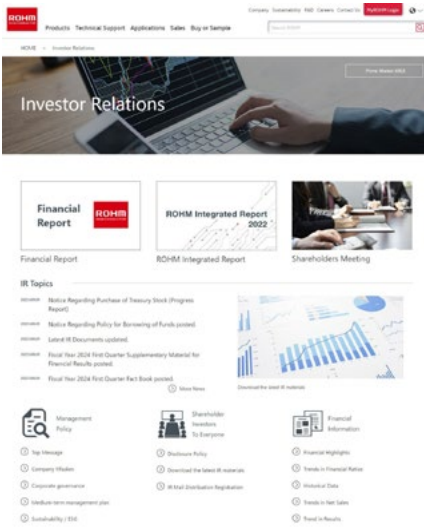
Theme	Improvements
Video streaming of financial results briefings	Since 2023, videos of financial results briefings and transcripts of Q&A sessions will be posted on the website. In addition, a section titled "Frequently Asked Questions (FAQ)" will be added to the Materials for the Financial Results Briefing.
Definition of corporate value	In response to requests to clearly state ROHM's corporate value, a financial logic tree was included in the financial strategy section of the 2023 Integrated Report. In 2024, the logic tree was further improved to include non-financial KPIs.
Factory tours	Tour of the new SiC building at ROHM Apollo Co., Ltd. and the ROHM Hamamatsu Co., Ltd. factory for securities analysts and institutional investors
Disclosure of tax payments by country	Since 2024, we have disclosed the amount of taxes paid in each country on our website and in our integrated reports.
Chair of the Board of Directors	In response to requests that the chair of the board of directors should be an outside director rather than the president, we changed the chair to an outside director in 2024.
Election of a director responsible for finance	In response to requeststhat an expert in finance should be appointed to the Board of Directors as the Director in charge of finance, Mr. Kenevan was elected as a Director at the General Shareholders Meeting held in June 2025.
Incentive compensation for directors	To provide long-term incentives for Executive Directors and promote shared value with shareholders, we established a Stock Ownership Policy for Directors in 2024 and increased the proportion of equity-based compensation within our overall remuneration framework
Hosting of Quarterly Financial Results Briefings	Previously held on a semi-annual basis, earnings briefings featuring the President are to be conducted on a quarterly basis.



Communications with Shareholders and Investors

Disclosing Information on the Website

ROHM has created a page for shareholders and investors on our website in order to provide timely updates of the information investors need. In order to meet the information needs of a wide range of investors in a timely manner, we have established a page for shareholders and investors on our website. In addition to disclosure documents such as financial statements and securities reports, the website provides Materials for the Financial Results Briefing, Integrated Reports, and long-term financial data. There is also a section for individual investors, and a page on basic knowledge of semiconductors to help the investors to better understand our company.



[Investor Relations](#)

The Promotion of Appropriate Information Disclosure

ROHM's policies on information disclosure to stakeholders are outlined in the Disclosure Policy and in-house rules on information disclosure including the requirements for fairness and legal compliance.

[Disclosure Policy](#)

We provide information in an appropriate and timely manner, guided by Information Handling Officers and the Disclosure Review Board centered around information management officers who control insider information.

Vitalizing the Shareholders Meeting and Facilitation of the Exercise of Voting Rights

The Company is working to create an environment that facilitates the exercise of voting rights by preparing and posting the Notice of General Shareholders Meeting in English on its website and investor platform website, and accepting votes via the Internet. In addition, ROHM conducts IR activities based on shareholder identification surveys and initiatives to promote the exercise of voting rights. At the General Shareholders Meetings, in addition to the prescribed reports and resolutions, we strive to promote interactive communication by explaining business performance, market trends, and management policies via video, and by using screens to answer questions frequently asked by shareholders. Also, in order to make the meeting available to a wide range of stakeholders, a video of part of the General Shareholders Meeting was streamed on our website.



The 68th Ordinary General Shareholders Meeting Held in June 2026



Risk Management

Risk Management and Business Continuity Policy

The following is defined to implement the objectives and policies such as “ Company Mission” and “Basic Management Policy” and to promote risk management and business continuity management within ROHM Group.

Risk Management

- Promote group-wide global risk management.
- Identify and assess critical risks and take measures to minimize losses.
- Regularly review the status of evaluation and response to critical risks and share them with the management team.
- In the event of an incident, promptly gather and report information, and transition to a business continuity and recovery plan as appropriate.

Business Continuity

- Place the highest priority on ensuring the safety and confirming the safety of employees and related persons, and strive to prevent secondary disasters such as fire and environmental pollution.
- To maintain the supply chain, we will work for prompt restoration of production and business.
- Fulfill our social responsibilities as a company.
- The entire company will work together to promote business continuity management and recovery activities under the direction of the management team.
- Periodically review the business continuity plan in response to changes in the business environment and strive for continuous improvement of the business continuity management system.

Company-wide Risk Management Promotional System

In the course of our business activities, various risks may affect our financial position and business performance. The ROHM Group is working to strengthen its company-wide risk management (Enterprise Risk Management) to avoid or minimize the impact of such risks. Under the Board of directors and the EHSS General Committee*, which oversees the company-wide management system, the Risk Management and BCM Committee (meets four times a year) is organized. The committee identifies important risks that may occur in the Group, evaluates them on a risk map in terms of their frequency of occurrence and impact on the business, and manages and promotes countermeasures, The Group manages and promotes countermeasures. In addition, in conjunction with each management system, the status of company-wide risk management activities and risk assessment/management indicators are reported to the EHSS General Committee once a half year, and important risks to be disclosed outside the company are reported to and approved by the board of directors.

The Risk Management and BCM Committee is chaired by the general manager of the Corporate Strategy Division, who is also a corporate officer, and the committee and its secretariat are independent of the business units.

* EHSS (Environment, Health and Safety, Sustainability) General Committee: This committee oversees the eight lower management systems (Risk Management BCP, Supply Chain, Labor, Ethics, Occupational Health and Safety, Environment, Information, Quality) and ensures that the PDCA cycle for each is properly implemented. The committee is chaired by an internal director or executive officer. The committee is chaired by an internal Board member or corporate officer.



Risk Management

Internal and External Audits

The Risk Management/BCM Committee conducts annual internal checks within the PDCA cycle of the management system to confirm its effectiveness.

In addition, the Internal Audit Department, an independent organization under the direct control of the President, conducts internal audits of business and compliance risks in the Group, and summarizes key details in an assurance map, which is shared and coordinated with each management system through the Risk Management/BCM Committee. In addition, an Audit and Supervisory Committee has been established as a body with an audit and supervisory function at the board of directors level, with outside directors also participating as members.

The quarterly meetings of the Risk Management/BCM Committee are attended not only by representative members of each management system, but also by Board members, including outside directors, full-time audit and supervisory committee members, and the head of the internal audit department, to monitor and supervise whether risk management is working effectively. The outside directors have experience in risk management and internal control at financial companies and provide advice and supervise ROHM's risk management based on their professional expertise.

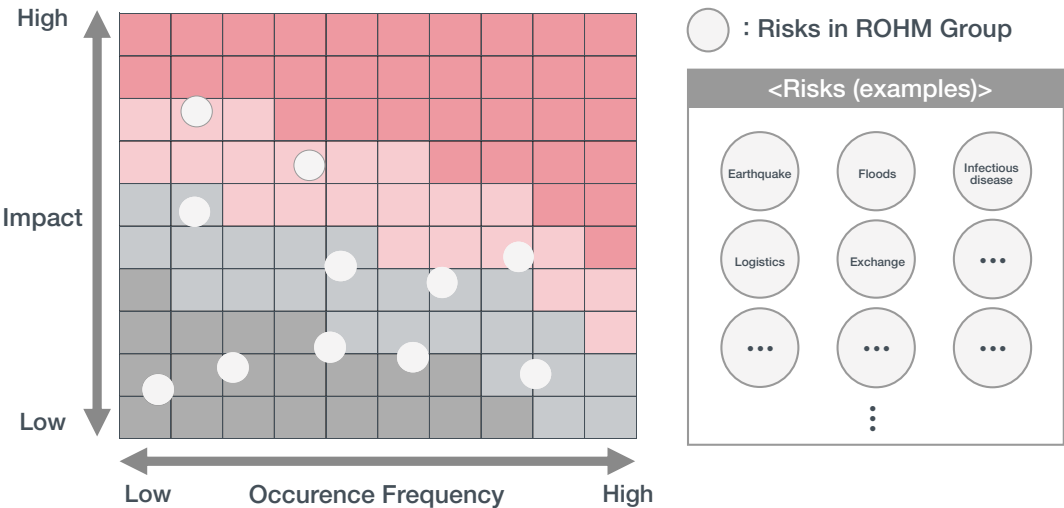
Each management system is subject to periodic external audits, including the RBA Validated Audit Process and ISO audits, to confirm the effectiveness of the management structure, including risk management, from an external perspective.

Risk Management Indicators and Reporting Structure

The Risk Management and BCM Committee analyzes and evaluates the impact and frequency of key risks in management, business, compliance, sustainability, and other areas, and compiles them into a risk map. In addition, in order to effectively monitor company-wide risk management, we have established Key Risk Indicators for all financial and non-financial risks, which measure the signs of potential risks and the progress of countermeasures. By establishing quantitative indicators as much as possible through sensitivity analysis and other means, we can visualize the signs of risk occurrence, its impact, and the status of response, and promptly reflect them in management.

In the event of a risk event, we have established and are promoting a culture and structure to promptly notify the appropriate parties and management (Board members) within the company, and to respond to the event through an internal emergency reporting system and communication tools prepared in advance, regardless of the country or location. In the event of an incident, the system is designed to ensure that it is reported through the internal emergency reporting system communication tool prepared in advance, regardless of the country or location.

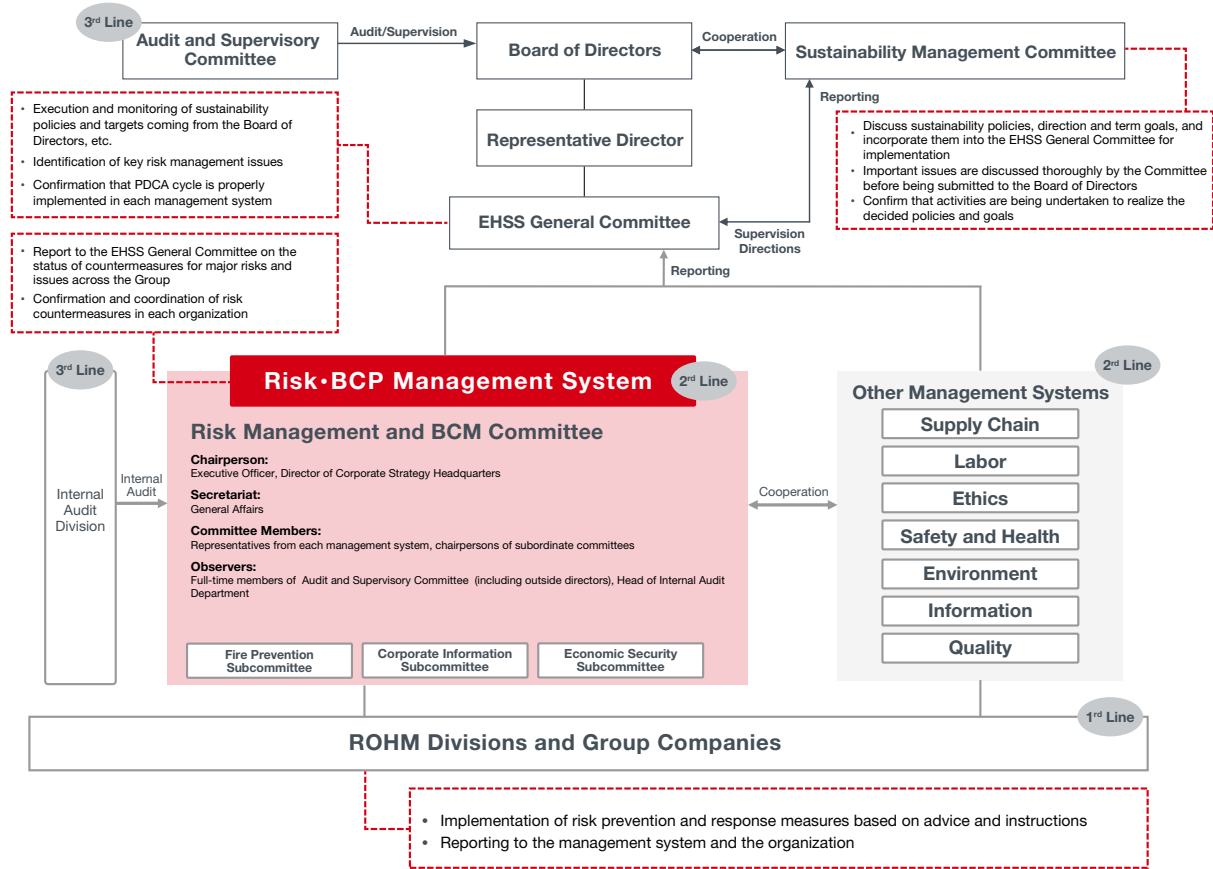
For compliance risks, we have established a supplier hotline for employees and an internal hotline for quality risks.





Risk Management

Risk Management System



Activity Cycle for Risk Management

Identification of Critical Risks

- The "Risk Management/BCM Committee" assumes a variety of risks surrounding the company.
- The "Risk Management/BCM Committee" assumes a variety of risks surrounding the company, and identifies important risks in the group through each management system and department.

Determination of Lead Management System and Department

- Clarify the management system and department that will be in charge of risk prevention and in case of occurrence.

Correction of Risk Management System

- If there is a high likelihood of risk occurrence, corrective action is taken as necessary under the direction of the lead management system/department.

Awareness-raising

- Provide risk information, etc., to ROHM Group.

Review

- Report to EHSS General Committee.



Risk Response

- Management system/department in charge analyzes and evaluates risks and decides on a response policy.
- Response based on the response policy.

Confirmation and Evaluation of Risk Management Systems

- The "Risk Management/BCM Committee" confirms and evaluates the status of the risk management system of the lead management system and departments.



Risk Management

Medium-Term Targets and Achievements

ROHM has identified "Risk Management" as a key priority for achieving its Phase 2 Medium-Term Management Plan and has established target goals for FY2026. We will continue to advance these initiatives, aiming for the sustainable growth of both society and ROHM.

Risk Management

【Background and Challenges for Activities】

Amid the diversification of risks surrounding companies in conjunction with economic globalization and changes in society, appropriately managing various internal and external uncertainties related to business is indispensable for the execution of management strategies and business objectives. Even if we suffer damage from a large-scale natural disaster, accident, infectious disease, or other epidemic, etc., it is an important responsibility as a company to ensure that critical operations are not interrupted, and that recovery and resumption of operations are carried out in the shortest possible time in the unlikely event of interruption. ROHM Group considers “risk management” to be an important management issue for the business foundation, and considers events that may interfere with operations and business performance as “risks” and minimizes the occurrence of such events, and takes measures to ensure business continuity and recovery smoothly even when events occur.

Theme	Targets (Target Year: FY2025)	Targets for FY2025	FY2025 Results	Targets for FY2026
Strengthening risk management and BCM systems	Strengthen BCM structure through company-wide risk management	·Continue activities implemented in FY2024 ·Formulate a master policy for the Group's BCM ·Reorganize company fire-fighting teams and strengthen evacuation guidance, rescue, and information gathering functions through simultaneous evacuation drills based on earthquake scenarios ·Conduct BCP drills at domestic group companies in the event of a temporary announcement of a Nankai Trough earthquake ·Conduct risk assessments at domestic group companies covering all factory buildings and warehouse areas, compile risk assessment tools in the first half (April to September) and second half (October to March), and identify fire risks	·Continued activities implemented in FY2024 ·Prepared a draft of the Group-wide BCM Master Policy. ·Reorganized the in-house fire brigade structure and strengthened evacuation guidance, rescue, and information-gathering functions through company-wide earthquake evacuation drills. ·Conducted BCP drills at domestic Group companies based on the issuance of a Nankai Trough Earthquake Advisory. In addition, headquarters conducted a blind exercise without prior notification to assess initial emergency response capabilities. ·Conducted fire risk assessments covering all factory and warehouse areas at domestic Group companies.	·Roll out the Group-wide BCM Master Policy across the organization and develop accompanying BCM guidelines. ·Continue strengthening evacuation guidance, rescue, and information-gathering capabilities through the reorganization of the in-house fire brigade structure and company-wide earthquake evacuation drills. ·Conduct BCP drills simulating cyberattacks to strengthen initial response capabilities and recovery frameworks in the event of information system disruptions. ·Conduct practical evacuation drills based on established damage scenario levels and aim to enhance disaster response capabilities and practical evacuation readiness across the entire organization, including both domestic and overseas Group companies. ·Conduct fire risk assessments covering all factory and warehouse areas at domestic Group companies.

【Related Activities】



Risk Management

Business Risks

The following are the major risks that we recognize as having the potential to significantly impact the financial position, operating results, and cash flow of the ROHM Group. For each risk, we evaluate the impact and frequency of occurrence on a scale of “large”, “moderate”, or “small”. The impact is evaluated based on internal indicators from the perspective of finance, business interruption, reputation/image, or safety/lives. However, the following is not an exhaustive list of all risks, and there is a possibility that the Group may be affected by risks other than those listed in the future.Matters in the text regarding the future are based on the ROHM Group’s judgments as of the end of June 2026.

* The following is not an exhaustive list of all risks, and ROHM Group may be affected in the future by risks other than those listed.

1. Risks Related to Business Strategy and Market Fluctuations	Frequency of Occurrence: Moderate	Impact: High
Contents	ROHM Group focuses on high-growth markets and fields where it can leverage its strengths, establishing "Automotive," "Industrial Equipment/Consumer," and "Overseas Markets" as key focus areas, and "Power" and "Analog" as key focus product categories. In these priority areas, global competition may intensify further in the future, potentially dragging the Group into severe price competition that exceeds the limits of cost reduction, as well as fierce development races. Furthermore, market growth may slow or contract due to various changes in societal needs, as well as policies and regulations in each country. For example, a slowdown in the electric vehicle (EV) market growth poses a risk to the ROHM Group, which manufactures power devices increasingly adopted in such vehicles. These market trends and changes in the competitive environment carry the risk of adversely affecting the ROHM Group’s financial position, operating results, and cash flows.	
Key Measures Implemented	In response to these risks, ROHM Group has reorganized the Marketing Headquarters from a function-based structure to a market-based organization in order to respond more agilely to changes in market trends and the competitive environment, while achieving an optimal balance within its market portfolio. Specifically, the Marketing Headquarters has been restructured into three market-focused organizations: the AI Server Market, Industrial and Consumer Market, and Automotive Market. Each organization incorporates System Marketing, Product Marketing, and Field Application Engineer (FAE) functions. This structure enables the integrated promotion of activities ranging from strategic planning and product development to technical support, tailored to the characteristics and customer needs of each market. Furthermore, through organizational optimization, we are strengthening customer engagement and enhancing our solution proposal capabilities and support quality, with the aim of further improving customer success. In particular, we are reinforcing our capabilities to address the rapidly expanding AI server market. At the same time, for the automotive market, which is characterized by significant environmental changes and susceptibility to demand fluctuations, our market-based organizational structure enhances our ability to respond flexibly and effectively to associated risks. In addition, as part of company-wide structural reforms, we are working to lower our break-even point by reducing fixed costs and optimizing our manufacturing footprint. From a corporate governance perspective, we have also nominated external director candidates with extensive expertise in the semiconductor industry, leveraging their professional insights to strengthen management decision-making and improve our responsiveness to market changes. Through these initiatives, we will achieve appropriate resource allocation based on the growth potential and volatility risks of each market, thereby ensuring the soundness of our business portfolio and enhancing earnings stability.	



Risk Management

2.M&A Risks	Frequency of Occurrence: Moderate	Impact: High
Contents	ROHM Group believes it is necessary to consider and execute M&A activities worldwide from a long-term business perspective to enhance corporate value. These activities aim to expand existing businesses, enter new fields based on core technologies, acquire new technologies, and secure promising talent. On the other hand, if pre-acquisition due diligence fails to sufficiently verify governance/management structures, operational frameworks, or synergy hypotheses, the acquisition price may exceed the actual value, resulting in financial losses. Even post-acquisition, if Post-Merger Integration (PMI) is not properly executed, unexpected circumstances or drastic shifts in market trends could prevent the acquired business from achieving its intended goals, potentially resulting in losses.	
Key Measures Implemented	Prior to pursuing any M&A transaction, ROHM identifies and evaluates potential acquisition targets that are aligned with its business strategy. During the execution phase, a dedicated internal project team is established and supported by external advisors to incorporate independent third-party perspectives. Comprehensive due diligence and thorough evaluations are conducted, and the appropriateness of the decision-making process is ensured through a multi-stage review and approval framework. In addition, to ensure the effectiveness of post-merger integration (PMI), PMI considerations are incorporated from the acquisition planning stage onward. Plans are formulated and executed with an integration perspective in mind, while the performance of the acquired business is continuously monitored against its objectives. The Company also responds in a timely manner to changes in the business environment by reviewing and adjusting strategies as necessary.	

3. Exchange Risks	Frequency of Occurrence: Moderate	Impact: High
Contents	ROHM Group operates development, manufacturing, and sales sites worldwide, generating revenues, expenses, assets, and liabilities in multiple currencies. The translation of local currency financial statements into functional currencies and the translation into Japanese Yen for consolidated financial statements fluctuate based on exchange rates, impacting operating results and financial position. Furthermore, the ROHM Group conducts production activities in Japan, Asia, and Europe, while engaging in sales activities globally. Consequently, transaction currencies differ between production and sales sites, exposing operations to ongoing exchange rate fluctuations. Generally speaking, a stronger Yen negatively impacts business performance, while a weaker Yen has a positive effect.	
Key Measures Implemented	To mitigate the risks associated with foreign exchange fluctuations, we enter into foreign exchange forward contracts for a certain portion of our foreign currency-denominated receivables and payables.	



Risk Management

4. Tax Risks	Frequency of Occurrence: Moderate	Impact: Moderate
Contents	As the ROHM Group operates development, manufacturing, and sales bases globally, it faces risks such as additional tax assessments by tax authorities in various countries, double taxation under transfer pricing regulations, and the accompanying damage to corporate reputation.	
Key Measures Implemented	ROHM Group has established the ROHM Group Tax Policy and, through close collaboration among its headquarters, group companies, and related departments, is committed to complying with tax laws and regulations in each country and region and to paying taxes appropriately. When tax risks are identified, we seek advice from external specialists as necessary, while striving to build trust and maintain constructive relationships with tax authorities in the countries and regions where we operate. With respect to transfer pricing taxation, we determine arm's length prices based on profit allocations that appropriately reflect the functions performed, risks assumed, and assets employed by each group company, and we endeavor to ensure that international transactions are conducted appropriately and in compliance with applicable regulations.	

5. Financial Market Fluctuation Risk	Frequency of Occurrence: Moderate	Impact: Moderate
Contents	ROHM Group is exposed to potential reductions in financial assets and increases in fundraising costs resulting from various financial market fluctuations.	
Key Measures Implemented	Cash and cash equivalents, which constitute our principal financial assets, are, in principle, deposited with highly rated financial institutions. In addition, we hold highly secure financial instruments, including bonds and other fixed-income securities. In raising funds, we take into consideration factors such as the purpose and duration of financing and strive to minimize funding costs through a variety of means, including bank borrowings and bond issuances. Going forward, we will continue to improve capital efficiency and cash generation capabilities, effectively utilize available cash resources, and employ financing methods that are appropriate to financial market conditions and interest rate trends.	



Risk Management

6. Natural Disasters Risks	Frequency of Occurrence: Low	Impact: High
Contents	ROHM Group operates development, manufacturing, and sales activities not only in Japan but worldwide. Natural disasters such as earthquakes and floods could damage local production and sales bases, leading to reduced operating rates. Furthermore, if these risks occur simultaneously across multiple regions, it could severely impact not only the ROHM Group but the entire supply chain, including customers and suppliers.	
Key Measures Implemented	To mitigate risks, the ROHM Group has implemented measures such as distributing production lines across multiple sites around the world to diversify operational risk. In addition, under its Risk Management and Business Continuity Policy, the Group conducts risk management activities at each site. In particular, major domestic and overseas manufacturing sites work in cooperation with external specialist organizations to conduct risk assessments from the perspectives of natural disasters, infectious diseases, safety, operational, economic, and political risks. Based on these assessments, each factory identifies, analyzes, and evaluates its most significant risks. Furthermore, the Group establishes committees and other bodies to formulate business continuity plans (BCPs) and conduct related training and exercises, while implementing a variety of preparedness measures to ensure readiness in the event of an emergency. To maintain a stable supply to customers, the Group has also implemented measures to address potential reductions or temporary suspensions in operations. These include transferring production of certain products to other ROHM Group sites and outsourced semiconductor assembly and test (OSAT) providers, as well as developing flexible production lines and labor-saving manufacturing lines. Through these and other initiatives, the Group is taking a long-term approach to reducing potential risks and strengthening supply resilience. * OSAT(Outsourced Semiconductor Assembly and Test) Manufacturer that undertakes assembly and testing, which are back-end processes in the semiconductor manufacturing.	

7. Climate Change Risks	Frequency of Occurrence: Moderate	Impact: High
Contents	Climate change risks include transition risks such as stricter environmental regulations, fluctuating energy and carbon prices, and growing customer demands for decarbonization. These factors could lead to increased capital expenditure and procurement costs, revisions to business plans, and impacts on order-taking opportunities. In addition to these transition risks, physical risks exist where severe weather events driven by climate change could impact ROHM Group business activities through operational shutdowns and supply chain disruptions.	
Key Measures Implemented	Under its Environmental Vision 2050 and Mid-Term Environmental Targets for 2030, the ROHM Group has established governance, strategies, risk management processes, and metrics and targets related to climate change, and is advancing various initiatives accordingly. However, due to changes in the external environment and uncertainties associated with future projections, there is a possibility that costs may increase beyond expectations and that business operations may be affected to a greater extent than anticipated. Accordingly, while maintaining its commitment to achieving its net-zero target by 2050, the ROHM Group is reviewing its transition plans in light of changes in the external environment and is implementing phased measures to address emerging challenges and opportunities.	



Risk Management

8. Geopolitical Risks	Frequency of Occurrence: High	Impact: High
Contents	International relations and trade environments across countries and regions face escalating uncertainty—including the worsening Middle East situation, US tariff policies, US-China bilateral relations, conditions in the Taiwan Strait and South China Sea, and the prolonged Russia-Ukraine conflict. Long-term and normalized geopolitical tensions are progressing alongside the potential for rapid changes triggered by sudden events. For the globally operating ROHM Group, geopolitical risks not only impact direct manufacturing and sales activities (such as business withdrawal or plant shutdowns) but also threaten the entire supply chain, including material procurement and customer transactions. In particular, physical impacts such as shipping route restrictions due to heightened tensions, unstable energy supplies, shortages of petroleum-derived products, and surging logistics costs—combined with institutional factors such as import/export restrictions and tariff measures—pose risks to the ROHM Group's business operations. In addition, as semiconductors are used in products across all industries, countries and regions are implementing protectionist policies and expanding trade restrictions regarding semiconductors as critical economic security assets. These regulations and their enforcement can change on short notice. Failure to respond appropriately could result not only in a loss of business competitiveness, but also in administrative penalties and legal sanctions, severely impacting ROHM Group operations and performance.	
Key Measures Implemented	To address economic security risks, the ROHM Group has established the Economic Security Office, a specialized department dedicated to economic security matters. Working in close coordination with company-wide management systems, related departments, and regional business sites, ROHM Group conducts ongoing information gathering, monitoring, and risk mitigation activities to minimize the potential impact of geopolitical risks on its business operations. Risks identified through these activities are promptly shared with management and relevant departments and, as necessary, are reflected in business operations, investment decisions, and other management actions. In particular, regarding issues such as ensuring employee safety and maintaining business continuity in the event of worsening geopolitical conditions in countries and regions where the ROHM Group operates, response policies are determined by the Economic Security Committee, which comprises representatives from relevant departments across the Group, and appropriate training programs are conducted accordingly. With respect to the frequently changing U.S. tariff policies, the Group continuously monitors the latest developments and, in coordination with its U.S. business locations and relevant headquarters functions, considers and implements timely and appropriate response measures. In addition, regarding export controls on semiconductor-related products, the Export Control Committee, consisting of representatives from relevant departments throughout the Group, works in collaboration with legal counsel to ensure appropriate security export control management. The Group also periodically reviews and updates its organizational framework and operational procedures to respond effectively to changes in regulatory requirements and their implementation.	



Risk Management

9. Compliance Risks	Frequency of Occurrence: Low	Impact: High
Contents	As ROHM Group conducts development, manufacturing, and sales globally, it must comply with applicable local laws and regulations, including competition laws and anti-corruption frameworks. Violating these laws and regulations could result in financial penalties, operational suspension, and brand damage, significantly harming the ROHM Group's business and financial performance. Furthermore, the ROHM Group utilizes public research funds and subsidies for R&D activities and operations. Should any unauthorized use occur, refund obligations, administrative sanctions, and brand damage could impair corporate value.	
Key Measures Implemented	At ROHM Group, the Compliance Committee, operating under the EHSS Executive Committee, plays a central role in establishing and managing ROHM Group's ethics management system. Through this framework, ROHM Group manages and seeks to prevent the risk of compliance violations. Key initiatives include the following: 1. Development and Operation of Internal Regulations To ensure compliance with applicable laws and regulations, the ROHM Group has established a comprehensive set of internal rules and procedures. Responsibility for overseeing compliance in specific legal areas is assigned to designated departments, which regularly monitor and assess new and revised legislation to ensure that internal regulations are reviewed and updated in a timely and appropriate manner. In addition, ROHM Group has implemented the ROHM Group Code of Conduct across the organization. This code sets out the fundamental ethical standards and behavioral principles that employees are expected to follow in their daily business activities, thereby helping to prevent not only legal violations but also conduct that may be inconsistent with ethical standards. 2. Compliance Education and Awareness Activities To promote and strengthen compliance awareness throughout ROHM Group, the ROHM Group provides annual compliance training for all employees, as well as role-based compliance training tailored to different employee levels and responsibilities. In addition, specialized training programs covering specific laws and regulations are conducted as necessary. 3. Establishment and Operation of Whistleblowing Systems To ensure the effectiveness of its compliance framework, the ROHM Group has established whistleblowing systems through which employees can report or seek advice regarding potential compliance violations. For domestic group companies in Japan, a Compliance Hotline operated by an external law firm serves as the reporting channel and is available to all employees. For overseas group companies, in addition to local compliance hotline arrangements, ROHM Group has established a Global Compliance Hotline, which enables the reporting of actual or suspected misconduct involving officers of group companies directly to ROHM. Furthermore, to promote fair and transparent business practices with suppliers, ROHM Group has established a Compliance Hotline for Business Partners (Suppliers). In addition, with respect to the management of public research grants and funding, ROHM Group has established the Fair Research and Development Committee and the Public Funding Management Committee under the Compliance Committee. These bodies oversee appropriate management and auditing systems, while also supporting compliance through internal and external consultation and reporting channels, as well as employee education and awareness activities.	



Risk Management

10. Intellectual Property Risks	Frequency of Occurrence: Moderate	Impact: Moderate
Contents	To manufacture differentiated products, the ROHM Group develops various new technologies and know-how, manufacturing and selling products worldwide. If disputes arise regarding third-party intellectual property (IP) infringement related to these products, it could lead to product injunctions, damage compensation, or settlement payments, adversely affecting ROHM's business operations.	
Key Measures Implemented	To prevent the risk of new technologies and know-how used by the ROHM Group infringing upon the intellectual property rights of other companies, ROHM Group provides intellectual property training to employees at least once a year, thereby fostering a proper understanding of the importance of respecting third-party intellectual property rights. In addition, ROHM Group has incorporated intellectual property-related requirements into its internal regulations and development procedures referenced during product and technology development. This ensures that intellectual property reviews are conducted as a mandatory part of the process when developing new products and technologies.	

11. Environmental Regulatory Risks	Frequency of Occurrence: Moderate	Impact: Moderate
Contents	ROHM Group complies with all laws and regulations governing emissions, wastewater, hazardous substance usage and handling, chemical substance management in products, waste disposal, soil/groundwater contamination testing, and environmental, health, and safety standards across all operational regions. However, should unexpected liabilities arise from unforeseen events, business performance could be impacted.	
Key Measures Implemented	ROHM Group has established and operates a Group-wide environmental management system in accordance with ISO 14001, the international standard for environmental management systems. Through this framework, ROHM Group promotes continuous environmental improvement initiatives aimed at environmental conservation, including the reduction of environmental impacts. These efforts are led by the Environmental Conservation Committee established within ROHM, which is responsible for managing environmental impacts arising from manufacturing operations and activities and services at each site in compliance with applicable laws, regulations, and other requirements. In addition, findings and improvement opportunities identified through internal audits conducted at individual sites are shared and deployed across Group companies to facilitate continuous improvement and the dissemination of best practices throughout the organization.	



Risk Management

12. Risks Related to Securing Human Capital	Frequency of occurrence: Moderate	Impact: High
Contents	ROHM Group has expanded its business by building expertise in design, manufacturing, quality assurance, and solution proposals. Securing human resources to support these operational activities has become increasingly critical. In Japan, shifts in employment conditions and a shrinking working-age population driven by low birthrates and an aging demographic raise concerns that acquiring highly specialized talent will become increasingly difficult. Furthermore, changing recruitment landscapes and diversifying career values mean traditional employment and training models are increasingly insufficient. Internally, challenges such as bridging intergenerational skill/awareness gaps, passing on specialized knowledge, and systematically nurturing next-generation talent are coming to the fore. To sustainably secure and leverage human resources, we must enhance organizational flexibility, adaptability, and make long-term continuous investments in human capital. Strategic talent management is essential to addressing these challenges.	
Key Measures Implemented	In response to evolving employment conditions and increasingly diverse career aspirations, the ROHM Group has established a Specialist Career Track that directly supports employees' motivation to pursue advanced professional expertise. This initiative enables each employee to leverage their individual strengths and capabilities and build a long-term career within ROHM Group. In addition, we are promoting the development of compensation systems designed to attract, retain, and further motivate high-performing talent. Strengthening support systems to improve retention among younger employees who will lead the future of the organization, as well as promoting the continued contribution of senior employees with extensive knowledge and experience, are also important initiatives for the sustainable utilization of human resources. Furthermore, to respond flexibly to technological innovation and changes in the business environment, we are enhancing programs that support employee reskilling and continuous learning. Through these initiatives that encourage individual growth and success, we aim to strengthen organizational capabilities and ensure their long-term sustainability. In this context, succession planning has been identified as a key management priority. By continuously fostering a virtuous cycle of growth for both our people and our organization, we seek to enhance employee engagement and improve talent retention.	



Risk Management

13. Information Security Risks	Frequency of Occurrence: Moderate	Impact: High
Contents	In our business activities, ROHM Group handles confidential and personal information belonging to both the Group and its stakeholders. Furthermore, in recent years, ROHM Group has actively introduced DX tools, including generative AI, to improve operational efficiency, boost productivity, and drive innovation. On the other hand, information security risks—such as targeted cyberattacks, unauthorized removal/use of confidential information by departing employees, and overseas technology leaks—are rising daily. Moreover, global changes in privacy protection and economic security laws, data protection regulations, and security clearance frameworks demand increasingly sophisticated data governance capabilities from corporations. Information is the lifeblood of corporate management. To maintain stakeholder trust and achieve sustainable growth, the Group urgently needs to improve employee information literacy while executing comprehensive, multi-layered technical and physical security measures. Inadequate countermeasures could lead to severe incidents, including data leaks, unauthorized data usage, system downtime, and regulatory non-compliance. Such incidents could damage brand equity, erode public trust, create civil/criminal liabilities, and incur significant financial burdens or business injunctions, severely impacting operating results and financial standing.	
Key Measures Implemented	ROHM Group has established a company-wide Information Management System (a PDCA cycle for information management) to protect the confidential information and personal data of the Group and its stakeholders that are handled in the course of business operations. The system is overseen by the Information Management Committee, which regularly monitors its effectiveness, identifies information security risks, and promotes continuous improvement activities. In accordance with the objectives and policies established by the Committee, ROHM Group implements comprehensive information security measures from four perspectives: organizational, human, technical, and physical. As part of ourorganizational initiatives, ROHM Group has established company-wide policies and internal regulations governing information management, including the Information Management Policy, Cybersecurity Management Regulations, Confidential Information Management Regulations, Privacy Policy, and Personal Information Protection Regulations. In accordance with these rules, each Group company appoints information management officers and establishes specific information management procedures. Their effectiveness is regularly assessed through internal audits, promoting the standardization and continuous enhancement of information management practices across ROHM Group. In addition, the Group continues to obtain and expand certifications for internationally recognized information security standards, including ISO/IEC 27001, as well as TISAX (Trusted Information Security Assessment Exchange), an information security assessment framework established by the German automotive industry, particularly at headquarters and other strategically important domestic and overseas sites. As for the human measures, To strengthen the information security awareness and capabilities of directors and employees, ROHM Group conducts regular initiatives such as annual training programs, role- and level-based education, and phishing email simulation exercises, thereby maintaining and enhancing information literacy throughout the organization. As fir the technical measures, ROHM Group has established a robust framework for the early detection and response to potential information leaks resulting from cyberattacks or internal misconduct. Key measures include 24/7 monitoring of information devices and collection of access logs by external cybersecurity specialists, vulnerability assessments and remediation activities, ransomware countermeasures, and incident response training based on simulated scenarios. As for the physical measures, to prevent the unauthorized removal, disclosure, commingling, or misuse of confidential information and personal data, ROHM Group implements multiple layers of physical security controls. These include access management to ROHM premises and restricted areas through ID cards, surveillance cameras, and security gates; facility zoning; and stringent access controls over media containing confidential or personal information. These measures are designed to prevent access not only by external third parties but also by employees who do not have a legitimate business need to know such information.	



Risk Management

14. Human Rights Risks	Frequency of Occurrence: Low	Impact: High
Contents	Driven by rising global expectations for human rights, ROHM Group is required to respect human rights across its entire supply chain—from procurement to customers—as well as within its own operations. Specifically, if human rights violations such as forced labor, child labor, low wages, or inadequate safety/health provisions occur or surface in developing countries, it could lead to reduced brand equity, supply chain disruptions, customer boycotts, and legal liabilities, significantly impacting ROHM Group operations. Furthermore, governments and international organizations are strengthening human rights regulations and guidelines. Failure to properly identify and address supply chain human rights risks could impair our ability to maintain global business continuity.	
Key Measures Implemented	In light of changes in the business environment and evolving societal expectations, the ROHM Group is advancing initiatives aimed at reducing human rights risks and mitigating their potential impacts. Within the ROHM Group and across its supplier network, we strive to identify and address human rights risks through assessment and monitoring frameworks based on internationally recognized standards and codes of conduct. However, due to the multi-layered nature of supply chains and changes in the external environment, there remains a possibility that impacts may exceed expectations.	



Risk Management

15. R&D Activity Risks	Frequency of Occurrence: Low	Impact: High
Contents	R&D in the electronics sector is subject to intense global competition. Delays in new product development directly erode competitiveness and risk losing market opportunities. Factors contributing to R&D delays include talent turnover or shortages of specialized talent, narrowed perspectives due to lack of diversity, technology obsolescence, and operational halts resulting from regulatory non-compliance. Any of these factors could adversely affect future financial performance.	
Key Measures Implemented	At ROHM, we seek not only to prioritize the allocation of resources over a medium-term horizon of approximately five years, but also to ensure strategic investment in new fields based on our long-term vision, thereby realizing research and development activities that support seamless and sustainable growth. By enhancing engagement through evidence-based approaches, expanding empowerment through organic collaboration and cooperation both within and outside the Company, and continuously reviewing research themes, we promote proactive R&D that anticipates future trends and evolving market needs. In addition, by maintaining a lawful and fair research and development framework, we strive to prevent and mitigate incident risks before they arise and to sustain responsible R&D activities. Looking further ahead—10 years and beyond—we are strengthening collaboration with external partners through initiatives such as joint research with numerous universities in Japan and overseas. Furthermore, as part of our open innovation efforts, we operate a Corporate Venture Capital (CVC) program to foster innovation and explore emerging technologies and business opportunities.	

16. Product Defect Risks	Frequency of Occurrence: Moderate	Impact: Moderate
Contents	Guided by our Company Mission —“Quality is Our Top Priority at All Times”— ROHM Group manufactures products under stringent quality controls. However, there is no guarantee that all products are completely free of defects or that future product liability claims will not arise. In the event of a significant liability claim, business performance could be affected.	
Key Measures Implemented	Within ROHM Group, the Development Headquarters and the quality organizations within each business division are responsible for ensuring quality throughout the product lifecycle, from design quality through built-in manufacturing quality. The Corporate Quality Headquarters oversees the establishment of company-wide quality assurance systems that extend across the Development Headquarters and individual business divisions. It is also responsible for deploying quality-related information throughout ROHM Group and monitoring quality management activities. In addition, to mitigate the risk of quality compliance violations, which have become increasingly prevalent across industries, the Quality Assurance Division has taken the lead in establishing dedicated committees at headquarters and manufacturing sites, where compliance initiatives are actively promoted. In the development of new products within the Development Headquarters and each business division, evaluations are conducted at every stage—including development planning, design reviews, pilot production, and mass production—to ensure the timely delivery of safe and reliable products that meet customer requirements. Lessons learned and improvement information are fed back to upstream development processes and incorporated into future product designs. For the assembly and processing equipment developed in-house by the Manufacturing System Development Division, the guiding principle is to “build quality into equipment and create equipment capable of preventing defects.” To achieve this, various mechanisms, including self-diagnostic functions, are incorporated into the equipment to prevent defective products from being produced. In the unlikely event that a product-related defect occurs, ROHM products are fully traceable through production information, including manufacturing dates and lot information. Using lot data, the Group can verify the 4M information (man, machine, material, and method) across all manufacturing processes, enabling rapid investigation of production conditions and quality performance, while limiting the scope of any potential impact. Furthermore, ROHM Group is developing and maintaining a defect-prevention management framework based on the following internationally recognized quality management standards: ISO 9001: Quality Management System IATF 16949: Quality Management System Standard for the Automotive Industry ISO 26262: International Standard for Functional Safety of Automotive Electrical and Electronic Systems	



Risk Management

17. Production and Procurement Activities Risks	Frequency of Occurrence: Moderate	Impact: Moderate
Contents	ROHM Group operates a vertically integrated business model, which requires various raw materials, including rare metals, for electronic component manufacturing. Consequently, procurement disruptions from specific suppliers could adversely affect production operations and cost structures.	
Key Measures Implemented	Within the business divisions, ROHM Group promotes multi-sourcing of materials and other procurement items, while implementing appropriate inventory management practices based on factors such as suppliers' business continuity planning (BCP) readiness. Within the procurement function, ROHM Group has investigated and compiled into a database information on the manufacturers and manufacturing locations of procured materials to enable the rapid confirmation of suppliers' operational status, business continuity, and the safety and impact situation of affected sites in the event of an emergency. In addition, the scope of these investigations has been expanded to include second-tier suppliers, allowing ROHM Group to gain a more comprehensive understanding of business continuity preparedness across the supply chain and strengthen supply chain resilience.	

Business Continuity Management

We have stated that part of our company mission is “to contribute to the advancement and progress of culture through a consistent supply, under all circumstances, of high quality products in large volumes to both the domestic and global markets”. As ROHM Group is conducting development, manufacturing and sales activities in various locations around the world, we believe that one key issue for the management of the company is to establish Business Continuity Management (BCM). We have therefore formulated ROHM Group fire and disaster prevention policy for the implementation of activities. A part of this is the implementation of various measures to prepare for emergencies at our production sites in both Japan and overseas. For example, we identify the risks such as disasters and form countermeasure committees to handle them. We also propose Business Continuity Plans (BCP) and conduct training based on them.

Fire and Disaster Prevention Policy

“The policy shall be to prevent and be prepared for disasters by promoting the fire and disaster prevention based on the respect for the international norm, etc., and observance of laws and regulations.”
ROHM Group shall provide the safe and secure work environment and be prepared for emergencies, such as a fire, and also seek to prevent any disasters that possibly affect the business continuity through the continuous approach to the fire and disaster prevention.



Risk Management

Main Activity Topics

[Action for Earthquake Risks]

1. Introduction of “Building Safety Judgment Support System” to Prepare for a Domestic Earthquake Risk

In fiscal 2020, ROHM installed the “Building Safety Judgment Support System” at major domestic sites in order to protect the safety of employees in the event of an earthquake and to respond appropriately to business continuity risks. Earthquake risk is one of the highest risks when doing business in Japan. This system analyzes the shaking of the building immediately after the earthquake and judges the safety of the building structure in three stages. By utilizing this system, we can judge the safety of buildings in a timely, professional and objective manner, and can proceed with efforts to reduce and prevent earthquake damage.

2. Conducting Earthquake Drills

ROHM Domestic bases have established a BCM countermeasure headquarters to ensure the safety of employees and others in the event of an emergency, and to ensure the continuity and early recovery of core businesses, and conducts periodic assumed drills and video-based training.

In FY2024, triggered by the government's issuance of the Nankai Trough Earthquake Extra Information in Japan, we conducted a simulation to clarify the necessary actions the ROHM Head Office must take under such circumstances. This initiative has prepared us for a potential mega-earthquake by defining how to act not only after a disaster occurs but also prior to its onset.

Furthermore, in FY2025, we carried out a blind drill for the members of our BCM (Business Continuity Management) Response Team to test their initial response capabilities without providing prior information. This exercise simulated a scenario in which electricity, water, and communications were cut off due to a major earthquake, allowing us to verify our practical response capabilities under realistic conditions.



BCM Emergency Response Head Office Drill

3. Production Building Resistant to Disasters such as Earthquakes

At ROHM Device Manufacturing Hamamatsu Factory, a seismic isolation structure has been adopted for the production building in anticipation of a Nankai megathrust earthquake or other disasters.

In addition, the SiC building at ROHM Device Manufacturing Co., Ltd. Chikugo Factory is equipped with a seismic isolation structure that includes the ancillary area, as well as flood prevention measures, gas fire extinguishing equipment, and emergency generators, making it a factory that is prepared for various disasters.



Adoption of Seismic Isolation Structure Including Ancillary Areas (ROHM Apollo Chikugo Plant)

[Action for Water Risks]

1. Identification of Water Risks by Using the World Resources Institute's Aqueduct

ROHM Group has used the WRI Aqueduct, a global assessment tool, to identify water risks. The semiconductor industry uses large amounts of water, so securing water is very important for semiconductor manufacturing. In addition, all factories in Japan have the function of the pre-process (wafer process) of semiconductor manufacturing. Therefore, we have set long-term water intake securing and water consumption reduction targets with “drought risk” as a priority issue. In addition, we have been proceeding with a water intake plan that is linked to production plans and environmental targets.

At overseas factories that have post-process functions for assembly and inspection, flood risks are identified as an issue. The 2011 flood in Thailand caused the group's factories to shut down. In addition, the loss of facilities and equipment and the economic loss due to the suspension of production had a great impact both inside and outside the company. To prevent such problems from occurring again, we use WRI Aqueduct as a flood risk assessment tool for each factory. Then, the risk assessment and analysis extracted by the Risk Management and BCM Committee will be conducted. From the perspective of BCP, we are working to reduce the risk of production suspension due to floods by formulating and managing a BCP inventory design that reflects the expected number of suspension days.



Risk Management

2. Conducting Drills Based on Lessons Learned from the Flooding in Thailand

At our manufacturing sites in Thailand, we hold annual BCM countermeasure headquarters training sessions to prepare for the possibility of flooding. Based on the action plan we created based on the experience of the 2011 floods, the participants check the items to be implemented in each phase of the flood scenario, such as in the event of flooding in the upper reaches and in the event of flooding equivalent to 2011, when the flood barriers in the industrial park did not function. We also regularly conduct training on assembling flood barriers, starting up drainage pumps, and operating boats, as well as checking the items we will use in the event of a flood and training on the skills we will need.



Watertight Wall Assembly Training

3. Flood-proof Production Building

In the production building at the ROHM Group's Malaysia plant, the floor height on the first floor was set at an average of +5.1m above mean sea level, based on lessons learned from the flooding that occurred in 2014. In addition, a structure has been established to prevent long-term shutdowns by securing backup through dual power transmission. The new building, which was completed in 2023, also has various BCM measures in place that meet the same standards.



[Action for Fires and Other Risks]

1. Response to Fire Risk in ROHM Group

ROHM Group regards fire risk as one of the top risks and is working to reduce it. In the fire-specific risk survey that started in 2021, we conducted hearings, using also online tools, on the status and activities of fire prevention measures at each group factory and held discussions based on fire cases at other companies to confirm our efforts regarding fire prevention. In particular, for clean rooms, we have created Fire Prevention Guidelines that describe fire prevention measures for production equipment and ancillary equipment as well as measures to prevent the spread of fire. We are also rolling out risk assessments aimed at preventing fires across the ROHM Group. We will continue fire prevention measures for the entire group and strengthen awareness of employee safety and business continuity.

2. Formation of Self-defense Fire-fighting Teams, and Fire and Disaster Prevention Drill at ROHM Head Office

ROHM has organized a self-defense fire brigade organization in preparation for disasters, and deploys small power pumps, chemical protective clothing, and rescue equipment and other materials according to the situation of each company. We also conduct practical evacuation drills for fires and earthquakes, drills in clean rooms where hazardous materials are handled, and drills for large-scale earthquake scenario to ensure that we can act quickly and appropriately in the event of a disaster. In FY2024, we conducted a company-wide earthquake drill based on the assumption of a magnitude 7.7 earthquake, with a total of 2,000 employees participating. We also conduct nighttime evacuation drills every shift, assuming nighttime holidays. From the perspective of BCP, it is stipulated that the self-defense fire brigade will be dispatched and firefighting equipment will be provided in the event of a surrounding fire.





Risk Management

Fostering a Risk Culture

ROHM Group is continuously implementing training and various measures aimed at raising risk awareness and promoting countermeasures throughout the entire company, from Board members and directors to employees, in order to further strengthen risk management and the BCM structure. In particular, in light of the recent increase in risks related to economic security and geopolitics, ROHM provides education and enlightenment through lectures for corporate officers by outside instructors and monthly reports for directors and corporate officers, including those from outside the company.ROHM also conducts e-learning programs for employees to raise their awareness of fire prevention, disaster prevention, and business continuity at ordinary times.In addition, ROHM Group locations are also conducting video-based fire and disaster prevention education and e-learning programs to raise employees' awareness of how to respond to disasters even during normal times.

The ROHM Group actively encourages employees to make improvements and suggestions in order to identify and improve not only apparent risks but also potential risks. For example, at manufacturing sites, we solicit ideas for improvements in various areas such as production, quality, safety, and the environment, and award bonuses based on the content of the ideas. In addition, we present the President's Award to recognize particularly outstanding activities within the Group.

Major Education and Training Achievements

Education and Training	Purpose and Contents	Target	Number of Participants	Attendance Rate
Fire and Disaster Prevention E-Learning 2025	E-learning for employees on fire prevention and disaster control to raise awareness of fire prevention within the company and further enhance the fire prevention system	ROHM	-	-
Fire and Disaster Prevention E-Learning 2024	E-learning for employees on fire prevention and disaster control to raise awareness of fire prevention within the company and further enhance the fire prevention system	ROHM	3,814	99%
Fire and Disaster Prevention E-Learning 2023	E-learning for employees to raise awareness of fire prevention within the company and further enhance the fire prevention system	ROHM	3,755	99%

* In FY2025, as participation was voluntary, the number of participants and the participation rate are excluded from calculations.



Compliance

Our Basic Policy

ROHM Group has conducted our business observing the laws, business ethics and in-house rules in order to continue to gain the trust of various stakeholders as a company in compliance with the laws.

ROHM Group has the awareness and responsibility that “the company is a public institution of society” and establishes a system for compliance in accordance with “ROHM Group Basic Ethics Policy” and “ROHM Group Business Conduct Guidelines” to prevent the risk of legal and corporate ethics violations. We are committed to thorough management.

ROHM Group Basic Ethics Policy

“Respect for International Standards, and Compliance with Laws, Business Ethics, and in-house rules”

ROHM Group will conduct its business observing the laws, business ethics, and in-house rules in order to continue to gain the trust of various stakeholders as a company in compliance with the laws. The Group will also, in line with the globalization of business activities, respect international standards of conduct.

1. Conduct guidelines:

ROHM Group shall act as specified below in accordance with the basic policy.

1.1 Fair action:

ROHM Group recognizes that a corporation is a public entity of society and responsible for acting honestly and fairly at all times based on social common sense and the awareness that each individual employee represents the Company.

1.2 Compliance with laws and regulations, and business ethics:

ROHM Group shall always conduct business activities in good faith and with a law-abiding spirit and solid understanding of ethics. The Group shall strive to constantly collect the related laws and regulations of each country and other information needed for business activities, and to gain a better understanding thereof. In addition, the Group shall establish in-house rules corresponding to the related laws and regulations, and strive to ensure the full awareness of and compliance with those in-house rules.

1.3 Prohibition of Personal Conflicts of Interest:

We prohibit any conduct that creates or may create a conflict of interest between the Company and any individual.

1.4 Compliance hotline and whistle-blower protection:

ROHM Group shall, by following the provisions of in-house rules, establish a contact point (e.g. compliance hotline) to which Group employees may report business activities that they suspect may be in violation of related laws and regulations or business ethics. Furthermore, in the event of any violation or suspected of any conflict-of-interest transactions, ROHM Group shall immediately implement corrective action to prevent the occurrence or recurrence of the foregoing act, and shall strictly deal with the violation. In addition, the Group shall not subject persons or groups who deny any violations and who report violations or suspected violations to disadvantageous treatment, on the grounds of such reporting.

1.5 Prevention of bribery and corruption:

ROHM Group shall, by following the provisions of in-house rules and agreeing with the spirit of corruption prevention required by international standards of conduct, commit no act for the purpose of or that may be suspected of not bribing governmental agencies or officers or employees thereof, or politicians of any country, in order to continue transparent and honest business activities. Any corruption, extortion and embezzlement are also strictly prohibited.



Compliance

1.6 Prohibition of excessive business entertainment:

ROHM Group shall observe the provisions of in-house rules by not giving any gifts or providing any food, drink, or other economic benefits that are socially unacceptable. Furthermore, the Group shall be most cautious with any offers of entertainment and/or gifts from suppliers, and shall not accept any personal benefits, based on the clearly established policies and monitoring procedures of each country and region.

1.7 Disclosure of information:

ROHM Group shall disclose to stakeholders not only information in accordance with related laws and regulations, but also information on social connections of the Group, including company missions and policies, business activities, and social contribution activities in a positive, fair, appropriate, and timely manner.

1.8 Intellectual property rights:

ROHM Group shall strive to enhance its corporate value by upgrading technologies unique to each individual division and appropriately acquiring and using the rights to the Group's own intellectual properties. In addition, the Group shall respect and shall not use the intellectual property rights of third parties without permission, nor abuse the Group's own rights.

1.9 Implementation of fair business activities:

In expanding business on a global scale, ROHM Group shall observe the provisions of in-house rules and respect free market competition as a part of conducting fair business activities. The Group shall comply with related laws and regulations, social ethics, and contract provisions, and shall not pursue an increase in sales or income by means contrary thereto. The Group shall not conduct any transactions that violate related laws and regulations, social ethics, and/or contract provisions, including agreements that restrict competition with other companies in the same trade (i.e., cartelling), bid rigging, fictitious transactions, and selling price restrictions. Furthermore, the Group shall comply with import/export-related laws and regulations for the peace and safety of the international community.

1.10 Fair and appropriate expression:

ROHM Group shall use fair and appropriate expressions in public relations and advertising activities in compliance with related laws and regulations and based on the facts at all times. In addition, the Group shall observe public order and morality, and shall not use any unjust expressions that constitute false information, slander, social discrimination, or infringement of human rights.

1.11 Non-use of conflict minerals:

In the interesting of protecting human rights, ROHM Group shall not use in products any conflict minerals that have helped to finance armed groups that have conducted inhumane acts in conflict regions.

1.12 Confidential and personal information management:

ROHM Group shall strive to thoroughly manage the Group's confidential information obtained in the course of business activities, any third parties' confidential information acquired through business partnerships, information related to the privacy of concerned persons, and personal information, in accordance with the provisions of in-house rules.

1.13 Fair accounting and disclosure:

ROHM Group shall appropriately record and report information based on fair accounting practices and facts, and shall properly make tax payments in accordance with related laws and regulations. The Group shall take into account the interests of all stakeholders and respect the positions thereof, in order to build and enhance relations of mutual trust through the disclosure of information.



Compliance

2. Management System:

ROHM Group shall build a management system to observe this Ethics Policy and work on the continual improvement of this Policy. The management system shall be designed to ensure compliance with applicable international standards of conduct and related laws and regulations, and the identification and mitigation of operational risks related to this Policy.

2.1 Responsibility:

ROHM Group shall operate the management system in accordance with the Labor Policy approved by top management as provided for in-house rules.

2.2 Identification of representative:

ROHM Group shall identify an internal representative responsible for ensuring implementation of the management system and related items, and the top management shall carry out periodic reviews of the status of the management system.

2.3 Statutory and customer requirements:

ROHM Group shall define the procedures for identifying, monitoring, and understanding international standards of conduct, related laws and regulations, and customer requirements.

2.4 Risk assessment and management:

ROHM Group shall define the procedures for identifying risks involved in the Group's business activities, determining the relative significance of each risk, managing the identified risks, and complying with related laws and regulations.

2.5 Improvement objectives:

ROHM Group shall define improvement objectives and implementation plans, and periodically assess and review the achievement of those objectives, in order to fulfill its social responsibilities.

2.6 Training:

ROHM Group shall provide training to employees to implement the improvement objectives in accordance with the Ethics Policy, and to meet requirements of international standards of conduct and related laws and regulations, as well as customer requirements.

2.7 Communication:

ROHM Group shall define the procedures for communicating this Ethics Policy, improvement objectives, and the assessment of the achievement thereof to employees, suppliers, and customers in an accurate and understandable way.

2.8 Feedback and participation of employees:

ROHM Group shall define the procedures for assessing employee comprehension of matters provided for in this Ethics Policy, obtaining employees feedback effectively, and making sustained improvements to this Policy based on those assessment results.

2.9 Audit and assessment:

ROHM Group shall conduct periodic self-assessments to ensure conformity to international standards of conduct, related laws and regulations, and customer requirements.

2.10 Corrective and preventive actions:

ROHM Group shall define procedures for correcting and preventing within an appropriate period of time the recurrence of defects/ inadequacies detected in the course of internal or external audits.

2.11 Documentation and records:

ROHM Group shall create and retain records related to the management system in accordance with the provisions of in-house rules and related regulations.

2.12 Supplier responsibility:

ROHM Group shall define procedures for communicating requirements provided for in this Ethics Policy to suppliers and monitoring the compliance of the suppliers with this Policy.

* The Policy has been approved by the EHSS General Committee.

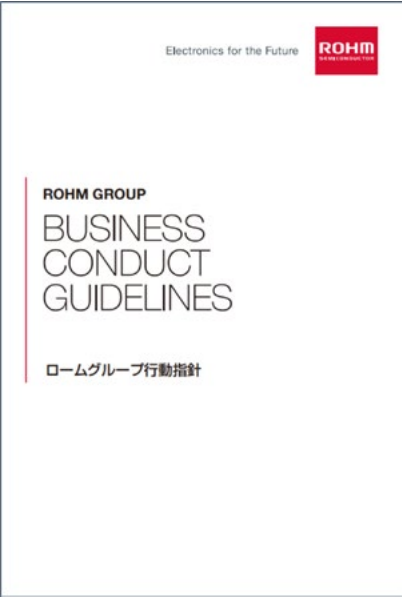


Compliance

ROHM Group Business Conduct Guidelines

ROHM Group translates its Business Conduct Guidelines, which clarify basic ethical rules that must be observed in daily business activities, into seven languages and promotes their use at all group companies. In addition, opportunities for employee education at the company, such as workshops and legal e-learning, along with awareness-raising activities are offered to increase and ensure compliance.

[ROHM Group Business Conduct Guidelines](#)



Promotional System

ROHM Group monitors the status of newly enacted or revised laws and regulations as appropriate. This enables the Group to appropriately respond to and develop new items that need to be complied with, thereby preventing the risk of legal violations. s. Beyond strict legal compliance, we have established and operate an Ethics Management System to actively promote corporate ethics.

Chaired by the Director in Charge of Sustainability, the EHSS General Committee* oversees eight management systems—including the Ethics Management System—and holds overall responsibility for properly managing risks related to legal and corporate ethics violations.

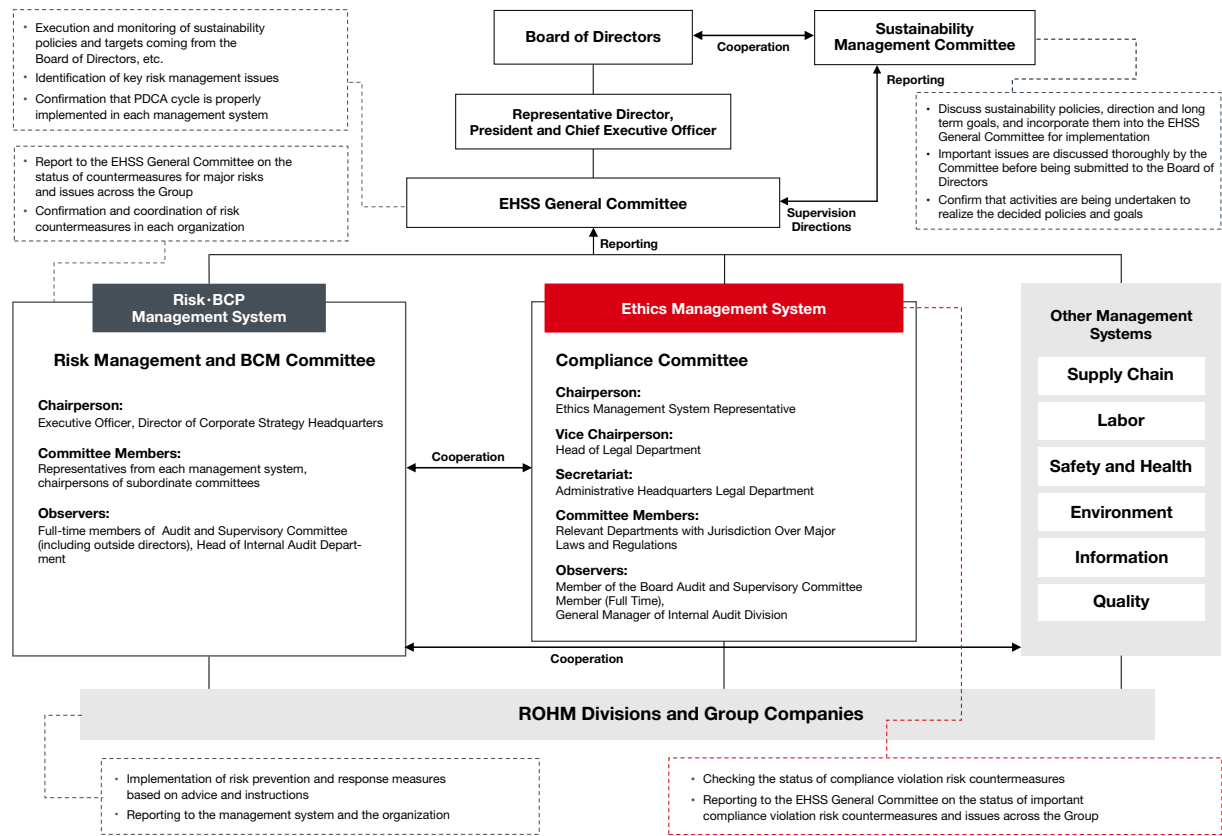
The Ethics Management System is chaired by the Head of the Business Division, with its sub-body, the Compliance Committee, serving as the primary driving body. Focused on building sound corporate ethics across the entire ROHM Group, the Compliance Committee sets goals, executes initiatives, and evaluates progress, while managing legal and ethics violation risks in close coordination with the Legal Department acting as its secretariat.

The EHSS General Committee also evaluates and confirms that the PDCA cycle of the Ethics Management System is properly implemented, and reports and consults with the Sustainability Management Committee as necessary, and checks that a system is in place to maintain and improve the accuracy of the management system. The Board of Directors works in conjunction with the Sustainability Management Committee to discuss sustainability-related policies, directions, and long-term targets, and incorporates the decisions made into the EHSS General Committee and supervises whether activities are being carried out to achieve these targets. Under this system, we identify serious issues related to laws, regulations, and corporate ethics, and promote and strengthen compliance through appropriate measures, internal and external audits, and continuous improvement.

* EHSS General Committee : A committee composed of the executive officers of management that oversees the eight lower management systems (Risk Management BCP, Supply Chain, Labor, Ethics, Occupational Health and Safety, Environment, Information, Quality) and ensures that the PDCA cycle for each is properly implemented.



Compliance



Management and Audit of Public Research Funds and Prevention of Misconduct in Research Activities

ROHM will properly manage and administer public research funds under the following responsibility system to prevent misconduct in research activities.

Responsibility System at ROHM

	Top Management	Chief Management	A Person in Charge of Compliance
A person in charge	President	Director in charge of Research & Development	Reader of research and development division using Public Research funds
Role	Person who take the final responsibility for conducting and managing of Public Research funds	Person who support a person is in charge of top management and have the responsibility and authority. for managing all of research institutes	In research division, person who has a practical responsibility and authority for conducting and managing the Public Research funds



Compliance

Hotline for Consultation and Reporting Regarding Management and Administration of Public Research Funds and Prevention of Misconduct in Research Activities (Internal and external)

[External Reporting Contact]

Postal Address:

ROHM Co., Ltd.

Reporting Desk for Research Fairness, Legal Department, Administrative Headquarters

21 Saiin Mizosaki-cho, Ukyo-ku, Kyoto 615-8585, Japan

(Reports accepted by postal mail)

[Internal Reporting Contact]

Compliance Hotline (Contact by telephone)

- * •The above external reporting contact service is available solely for reporting misuse of public research funds and misconduct in research activities.
- In accordance with national guidelines, the names of those who report incidents are generally disclosed, but anonymous consultations and reports are also possible.
- The privacy and personal information of the reporting person will be kept confidential and managed under strict control.
- Reports that are malicious, false, baseless, or constitute slander or defamation of others will not be accepted.
- We will verify the facts of the reported matter and take appropriate action.
- Except in cases where a report is found to have been made with malicious intent, no disadvantageous treatment will be imposed on the person who reported the matter as a result of making such a report.

Purpose of Use and Handling of Personal Information

- The personal information provided will be used for the following purposes:
- To investigate and rectify the matters reported
- To contact the reporting person, if necessary
- Personal information will be handled in accordance with the separately posted Privacy Policy. Please read and agree to the [Privacy Policy](#) before contacting us.v

Education and Training

In order to comply with and thoroughly enforce business ethics, it is important to raise the level of compliance literacy of each employee. ROHM Group have conducted regular training sessions on themes related to compliance and internal education and enlightenment activities such as legal e-learning in order to spread and raise awareness of compliance.

Also we have been providing training for management (directors), department heads, leader classes, and new employees at each level according to their level of compliance. Our aim is for employees at each level to gain an understanding and knowledge of the rules to be followed.

General Education (FY2025 Result)

Education or Training	Theme and Objective	Subject	Number of Participants	Participation Rate (%)
E-learning on Compliance (Labor and Ethics)	Acquire knowledge of compliance (competition law compliance, anti-bribery, compliance hotline, privacy protection, etc.)	ROHM All employees	4,371	90.6
Compliance training by level and role	Understand the importance of compliannce	Employees promoted to a higher grade	402	100.0
Compliance Education	Mastering the concept of compliance and matters to be complied with	All ROHM Group employees	22,680	98.0



Compliance

General Education (FY2025 Result)

* Education required for specific departments

Education or Training	Theme and Objective	Subject	Method of Execution	Number of Participants・ Participation Rate
E-learning on precautions for exchanging information with competitors	information with competitors Preventing violations and reducing the risk of suspected violations through a better understanding of what information should not be exchanged with competitors	All department heads and all employees of sales departments	Video viewing and response to post-course questionnaire	739/739 (100%)

In addition to the above education and training, ROHM creates and distributes to its employees the “LEGAL Guide Book,” which explains legal knowledge and procedures in an easy-to-understand manner in order to prevent unlawful violation of laws and regulations.

This guidebook focuses on laws related to business activities, ssuch as insider trading, management of confidential information, and bribery, as well as the latest topics such as the use of generative AI and freelance laws, and you can always check the items related to your business. It is also an effective tool that can be used when employees face legal issues or during compliance training within departments.



Comprehensive Anti-Corruption (Bribery Prevention) Measures

ROHM Group established Regulation on Prevention of Bribery, Donations and Advertising Sponsorship Regulations and Regulations on Procedures for Client Dinners, and aims to eliminate corruption in all affiliated companies in Japan and overseas. In addition to conducting bribery prevention briefings in level-based training courses and e-learning for all employees at ROHM Head Office.

Whistleblowing System

ROHM has established a Compliance Hotline, which is operated by an external law firm, to receive reports and consultations* from all employees, including non-regular employees, regarding compliance violations in the ROHM Group in Japan. In addition to the compliance hotlines established at each overseas affiliate, ROHM has also established a global compliance hotline for reporting to the head office any misconduct or potential misconduct by officers.

In order to properly operate this system, ROHM Group has established internal regulations to ensure that whistleblowers and information obtained through investigations are kept strictly confidential, and that those who report or consult with us are not subjected to any disadvantageous treatment because of their reporting. In addition, internal training is periodically provided to employees who are engaged in handling the compliance hotline. In addition, by distributing “ROHM Compliance Card” and raising awareness of the reception desk through bulletin boards and in-house training, we are working to promptly grasp risk information such as violations and respond swiftly and appropriately.

The compliance hotline reception and response flow is shown in the diagram below. After the report is received by the law office, it is reported and actions are taken as appropriate.

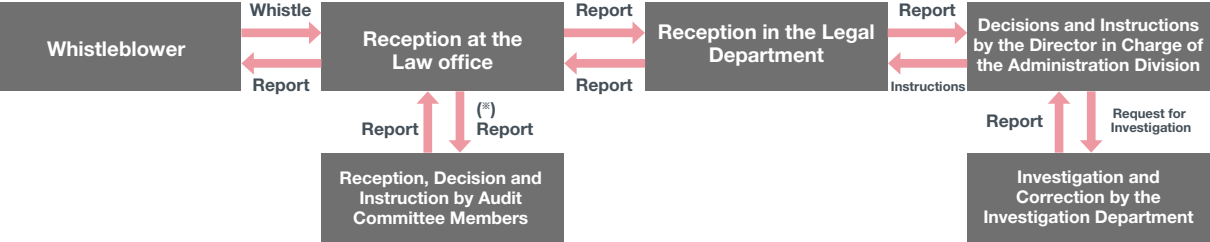
* In FY2025 (April 1, 2025 to March 31, 2026), we received 71 reports.

* Anonymous reports are also accepted.



Compliance

Compliance Hotline Reception and Response Flow



* In the event of a report concerning a ROHM director or a member of Legal Department, the law firm will report the matter to Audit and Supervisory Committee Member, who will take appropriate action.

ROHM Compliance Card

We distribute the following ROHM Compliance Card to ROHM employees, which describes the items of compliance that each ROHM employee must comply with. In addition, this card also contains information on the law firm, which is the contact point for reporting, so that all employees can consult and report on compliance at any time.



- ①We shall conduct fair business transactions.
- ②We shall not trade with antisocial forces.
- ③We shall keep corporate confidentiality and protect personal information.
- ④We do not offer price cartels or bribes.
- ⑤We shall respect intellectual property rights.
- ⑥We shall not conduct insider trading.
- ⑦We shall conduct development, production, and sales activities with quality as our first priority.
- ⑧We shall comply with other laws and regulations.

In addition to the internal hotline described above, we have also established a compliance hotline for our business partners.

[🔗 Compliance Hotline for Business Partners \(Suppliers\)](#)



Human Rights

ROHM Group Human Rights Policy

Our Basic Policy

ROHM Group recognize “Human rights are the fundamental right, freedom, and standard for treatment that individuals around the world possess”. This policy is a superordinate policy of all documents and norms regarding the efforts to respect human rights in the ROHM Group’s business activities and is applied to all activities carried out by the ROHM Group around the world.

As a company with a globally growing business, ROHM Group views respect for human rights as one of the most basic conditions for its business activities. We recognize that it is important to build a sustainable society in which human rights are respected. In particular, we support and respect the following global standards.

And where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will seek ways to respect internationally recognized human rights to the greatest extent possible.

Global Principles and Rules

- Ten Principles of the United Nations Global Compact (UNGC)
- Universal Declaration of Human Rights
- The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- SO26000
- RBA(Responsible Business Alliance) Code of Conduct

Scope of Application of This Policy

This policy applies to all officers and employees, which consists of ROHM Group and its consolidated subsidiaries. In addition, based on this policy, we will ask our business partners and other parties connected to ROHM Group’s business, to respect human rights and not to violate them.

Initiatives to Respect Human Rights

- ROHM Group will prohibit any form of discrimination based on race, ethnicity, nationality, social status, lineage, gender, disability, health conditions, ideology, faith, gender identity, sexual orientation, occupation or occupational status and harassment.
- ROHM Group will commit to responsible labor practices including the provision of a safe and healthy environment in the workplace as well as ensuring adequate working hours and minimum wage. We also commit ourselves to respecting freedom of association and the right to collective bargaining.
- ROHM Group will never allow or complicit in slave labor, forced labor, or child labor, including human trafficking.
- ROHM Group will acknowledge and seek to uphold our responsibility to the communities, including indigenous groups, affected by our operations.

Practice of Respect for Human Rights

- In accordance with principles and norms which we support, ROHM Group will exercise human rights due diligence to identify, prevent and mitigate adverse human rights impacts related to our business activities. We will also endeavor to take appropriate and effective remedies when it becomes clear our activities, products and services by our business relationships have caused or contribute to adverse human rights impacts.
- ROHM Group will establish a hotline for human rights violations, and continue to establish an effective reporting response system.
- ROHM Group will provide the training necessary for our board member and employees to have the knowledge and capacity to implement this policy.
- ROHM Group will strengthen its efforts to respect human rights through the professional advice of external stakeholders about this policy and efforts based on this policy.
- ROHM Group will regularly and properly communicate our progress on our efforts to address adverse human rights impacts including through our CSR website and/or integrated report.

October 28, 2021



Human Rights

Promotional Structure

In 2011, the UN Human Rights Council endorsed the UN Guiding Principles on Business and Human Rights, calling on companies to do more to address human rights issues. In response, ROHM Group signed the UN Global Compact in October 2011.

At ROHM Group, the EHSS General Committee, chaired by the Director in charge of Sustainability, oversees eight management systems: Risk Management and Business Continuity, Supply Chain, Labor, Ethics, Safety and Health, Environment, Information, and Quality.

Within each management system, we continuously verify that appropriate PDCA cycles are functioning effectively to address the specific risks identified in each area. Furthermore, we have established the Sustainability Management Committee as a forum to discuss key sustainability-related themes in coordination with the Board of Directors. The EHSS General Committee reports to and consults with the Sustainability Management Committee regarding the appropriateness of its initiatives. Based on these discussions, the framework is structured to receive ultimate oversight and directives from the Board of Directors.

- ④ Sustainability Management System
- ④ Human Capital Management Promotional Structure

* We have acquired ISO14001 and ISO45001 certification for the environment and health and safety.
In the field of labor ethics, we manage human rights issues and risks in labor ethics by building and operating a labor ethics management system that complies with the RBA Code of Conduct.

Human Rights Assessment in the Supply Chain

ROHM Group is conducting activities in compliance with RBA Code of Conduct with the aim of building a sustainable society in which human rights are respected. Furthermore, efforts are being made to ensure human rights are respected throughout the entire supply chain by respecting the human rights of our business partners and asking them to also act in accordance with RBA Code of Conduct.

We respect the human rights of our suppliers and ask our suppliers to follow the RBA Code of Conduct in our efforts to respect human rights throughout the supply chain.

Specifically, our business partners are asked to perform self-evaluations on labor, health and safety, environment, ethics, management systems and procurement BCP indicated in RBA Code of Conduct. Based on the results of their responses and CSR procurement audits, our business partners are asked to make improvements on items with poor evaluations including those related to human rights. Moreover, during audits and meetings, efforts are made to raise awareness of the need to perform CSR procurement throughout the entire supply chain, including the importance of human rights.

④ Working Together with Suppliers



Human Rights

Human Rights Assessment at ROHM Group

To address human rights issues and risks, the ROHM Group has established management systems covering areas such as labor, ethics, and the environment under the umbrella of the EHSS General Committee. This structure enables us to comprehensively manage internal human rights risks based on international norms. Within each management system, we identify human rights risks specific to that respective field and continuously operate a PDCA cycle—spanning policy and target setting, implementation of measures, monitoring, and corrective improvement. Through these ongoing efforts, we strive to strengthen a management foundation across the entire ROHM Group that respects fundamental human rights.

As part of ongoing monitoring, we conduct annual SAQ surveys and third-party audits or internal audits in accordance with the RBA Code of Conduct at all production sites within the ROHM Group. In FY2025, we conducted third-party audits at seven production sites. Across six of these locations, we identified a total of 17 non-conformities. These included issues related to evacuation route safety, working hours at on-site contractors, and contracts not fully aligning with local laws. While no critical human rights risks were identified, we implemented corrective actions at these sites, such as improving evacuation route conditions and instructing on-site contractors to revise their labor contracts and employment regulations. All corrective measures have now been completed. Concurrently, to prevent the recurrence of these non-conformities, we are advancing measures such as updating internal rules and revising our verification processes.

- 🔍 Human Capital Management Promotion System
- 🔍 Compliance Promotion System



Human Rights

Identified Human Rights Risks

	Human Rights Issues (Based on the RBA Code of Conduct)		Subject	Due Diligence	Grievance Mechanism
Labor	•Freedom of Employment •Forced labor, Human Trafficking •Working Time •Wages and Benefits •Elimination of Discrimination •Harassment Prevention	•Occupational Health and Safety •Young Workers •Privacy Protection •Freedom of Association, Right to Collective Bargaining	•All employees, including contract and immigrant workers •On-site contractor employees •Women •Children	Internal Audit SAQ based on RBA RBA VAP Audits	Internal Hotline External Whistleblowing System
Ethics	•Elimination of Discrimination	•Harassment Prevention	•All employees, including contract and immigrant workers •On-site contractor employees •Women		
Health and Safety	•Occupational Health and Safety	•Emergency Preparedness	•All employees, including contract and immigrant workers •On-site contractor employees		
Environment	•Water •Noise	•Air Emissions	•Surrounding environment •Local communities and indigenous peoples •All other relevant stakeholders		
Supply Chain	•Labor Issues •Ethical Issues •Health and Safety Issues	•Environmental Issues •Responsible Mineral Procurement	•Suppliers		
Information	•Privacy Protection		•All employees, including contract and immigrant workers •Customers •Suppliers		



Human Rights

Human Rights Training

ROHM Group respects and embraces a variety of cultural backgrounds, religions, customs, and opinions from each country and each region. We conduct rank-specific human rights training programs for new employees, mid-career recruits, new senior managers, directors, and executive officers.

Also, ROHM conducts Labor and Ethics e-Learning for all employees as a part of employee education to ensure that they understand ROHM's approach to international norms and customer requirements, including the RBA Code of Conduct.

[Labor and Ethics e-Learning]

	FY2021	FY2022	FY2023	FY2024	FY2025
Number of Participants	3,350	3,832	3,941	4,511	4,371
Participation Rate (%)	83.6	99.7	98.5	95.6	90.6

Prevention of Child Labor and Forced Labor

ROHM Group prohibits forced labor and child labor. In its supply chains as well, ROHM Group Supply Chain Management Guidelines clearly specify that forced labor and child labor are strictly prohibited, and all suppliers are responsible to follow the human rights guidelines. In fiscal year of 2017, ROHM issued “ROHM Group Statement Regarding UK Modern Slavery Act”, clearly stating its determination to further strengthen its commitment to preventing child labor and forced labor. The effectiveness of and compliance with the initiative are verified annually through internal audits, as well as through external audits such as customer audits and RBA audits.

Working Together with Suppliers

ROHM Group Supply Chain Management Guidelines Rev.12

ROHM Group Statement Regarding UK Modern Slavery Act

Elimination of Discrimination

The entire ROHM Group is committed to showing respect for the human rights of all employees. We respect individuality, human rights, and the privacy of all our employees. We seek to eliminate discrimination of all kinds, whether based on race, nationality, gender, gender identity/sexual orientation, religion, beliefs, or disability, to eliminate child labor and forced labor and we endeavor to create a safe and healthy workplace environment as we have stated in the “ROHM Group Code of Conduct” to help our employees better understand.

As part of our efforts to promote compliance, we have established a whistleblower hotline for employees and business partners (suppliers) to deal with human rights violations

- ROHM Group Business Conduct Guidelines
- Whistleblowing System
- Compliance Hotline for Business Partners (Suppliers)

Harassment Prevention

ROHM has established a consultation center with advisors who are available to listen to employees' troubles and provide counseling services. Counseling services via telephone, email, or face-to-face consultation are available issues such as harassment or interpersonal relationships at workplace. By making female advisors available, and ensure all counselors hold license in employment counseling, ROHM works to create an environment in which employees can consult with advisors and receive reliable and professional advices. Furthermore, efforts are being made to raise awareness among employees by continuously conducting training for managers on the prevention of harassment.

Approach to Harassment Prevention



Human Rights

Privacy Protection

Appropriate management of personal information of employees, customers, business partners, and other parties involved in the ROHM Group's business activities is essential for providing better products and services to society and for conducting reliable corporate management. ROHM Group regards the protection of privacy as one of the fundamental human rights, and has established a privacy policy and is committed to specifying the purpose of use of personal information, acquiring it appropriately, and managing it safely and strictly. The privacy policy complies with the Act on the Protection of Personal Information and Ministry of Economy, Trade and Industry Guidelines on the Protection of Personal Information, the GDPR (EU General Data Protection Regulation), and the California Consumer Privacy Act (USA).

In addition, through e-learning and level-specific training, we make our employees aware of the risks of personal information and corporate information leaks and improve their security literacy. In the unlikely event of an incident, we will immediately investigate the cause and promptly take appropriate measures to prevent recurrence.

🔗 [ROHM Group Privacy Policy](#)

🔍 [Information Security](#)



Information Security

Policies on Information Protection

ROHM Group has established an information security policy and confidential information management policy to ensure thorough management of confidential information and personal information of ROHM Group and stakeholders obtained in the course of business activities.

ROHM Group Information Security Policy

1.Compliance

ROHM Group complies with domestic and international laws, regulations, norms, and contractual obligations related to information security. In addition, ROHM Group shall establish internal regulations related to information security that comply with and conform to such laws, regulations, and contractual obligations, and shall ensure thorough compliance with such regulations.

2.Information Security Management System

ROHM Group recognizes that information security is one of the most important issues in management and business, and under the direction of top management, has established an information security management system to maintain and continually improve organizational, personnel, physical, and technical information security.

3.Protection of Information Assets

ROHM Group shall appropriately protect information assets from threats to the confidentiality, integrity, and availability of the information assets handled by ROHM Group, and shall take appropriate control measures.

4.Prevention of Accidents and Response when They Occur

ROHM Group shall strive to prevent information security incidents, and in the event of an incident, minimize the impact by promptly implementing appropriate initial responses, and investigate the cause of the incident to prevent recurrence.

5.Education and Training

ROHM Group will continuously educate and train its top management and employees on information security in order to raise their awareness of information security.

6.Ensure Information Security throughout the Supply Chain

ROHM Group will maintain and improve information security throughout the entire supply chain, including suppliers and contractors.



Information Security

ROHM Group Confidential Information Management Policy

ROHM Group (referred to as “We” or “ROHM Group”) recognizes that our information assets and the information assets entrusted to us by our stakeholders (collectively referred to as “Confidential Information”) are the important foundation for conducting our global business activities. We have the social responsibility to rigorously maintain and protect such Confidential Information as confidential.

We affirm that we will establish a management policy as follows and will appropriately manage and protect the Confidential Information.

1. When using and maintaining the Confidential Information, ROHM Group will comply with various laws, regulations, standards, contracts, and other ethical standards, applicable to our business activities.
2. ROHM Group has established its own confidential information management system (referred to as “ROHM Group CIMS”) for the purpose of appropriately managing Confidential Information under the leadership of top management. ROHM Group will operate ROHM Group CIMS proactively and continuously.
3. To protect all Confidential Information, ROHM Group will implement appropriate management measures for the protection and proper control of Confidential Information. “Management measures” means organizational, human, technological and physical measures that are strictly enforced according to the confidentiality level of the applicable Confidential Information.
4. To increase the awareness of appropriate management, ROHM Group will provide continuous education and training programs for all (executives, employees, contract employees, partner company employees, etc.) who can access the Confidential Information.
5. ROHM Group will make best efforts to prevent the leakage of Confidential Information and any other incidents. If any incident should happen, we will immediately investigate the causes of the incident and take proper countermeasures to prevent its recurrence.
6. ROHM Group will conduct regular risk assessments and internal audits in order to examine the operation of ROHM Group CIMS and explore its continuous improvement.

Information Management System

ROHM Group has identified the establishment of an information security system that enhances business continuity and the development, provision, and utilization of IT tools that support the medium-term management plan as key issues in Information Security Governance, Cyber Security, and IT Governance, and the Information Management Committee takes the lead in the operation of the information management system.

This committee is established as a subordinate organization of the EHSS General Committee*1, in which directors with executive authority and divisional managers participate, and is responsible for the appropriate management of information security risks, cyber security risks, and IT governance risks in ROHM Group.

Information Management Committee is chaired by the head of IT Headquarters, and its subordinate organizations are the Confidential Information Management Subcommittee, the ISMS*2 Subcommittee, and Cyber Security Subcommittee. Each subcommittee formulates goals, implements measures, and conducts evaluations for each theme, and reports progress and results to the Information Management Committee on a regular basis. The EHSS General Committee also evaluates and confirms that the PDCA cycle of the Information Management Committee is properly implemented, and reports and consults with the Sustainability Management Committee as necessary, and checks that a system is in place to maintain and improve the accuracy of the management system. The Board of Directors works in conjunction with the Sustainability Management Committee to discuss sustainability-related policies, directions, and long-term targets, and incorporates the decisions made into the EHSS General Committee and supervises whether activities are being carried out to achieve these targets.

ROHM Co., Ltd., ROHM Device Manufacturing (Hamamatsu, Kasaoka, and Chikugo Factories), ROHM Assembly Manufacturing (Kasaoka Factory), and LAPIS Semiconductor Co., Ltd. have obtained ISO/IEC 27001 certification, the international standard for Information Security Management Systems (ISMS). The scope of certification encompasses the planning, development, maintenance, and operation of internal information systems across ROHM Group, as well as the development, manufacturing, and sales of semiconductors and electronic components. In addition to ISO/IEC 27001 certification, ROHM Co., Ltd., LAPIS Semiconductor Co., Ltd. and ROHM Semiconductor GmbH have obtained TISAX*3 certification, an information security assessment by the German Association of the Automotive Industry because of the growing importance of information security in the automotive industry (For the details of TISAX certification, please check [ENX Portal](#)).



Information Security

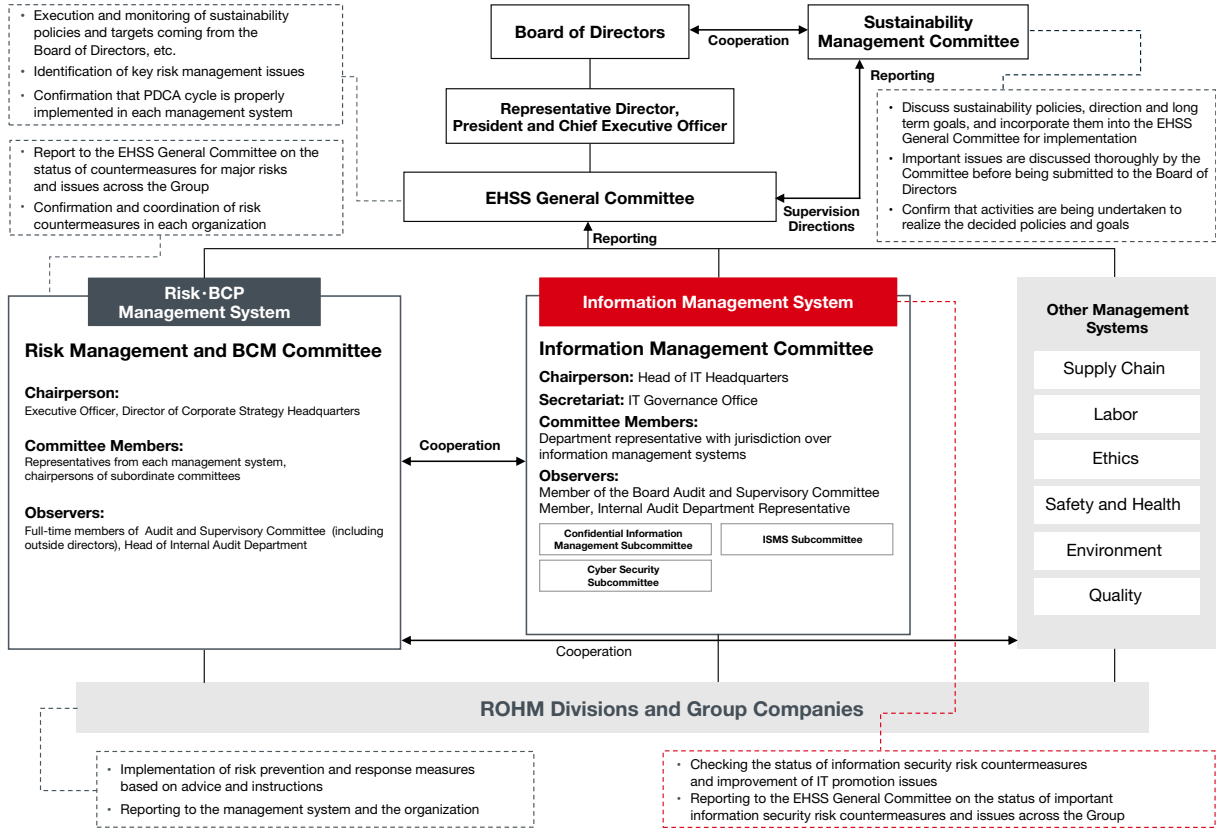
By continuously expanding the scope of operation and certification in addition to conventional internal and external audits and assessment, ROHM is promoting appropriate information management to prevent the leakage of important confidential business information and to eliminate unauthorized use of such information.

*1 EHSS General Committee: A committee composed of the executive officers of management that oversees the eight management systems (Risk management BCP, Supply Chain, Labor, Ethics, Health and Safety, Environment, Information, Quality) and ensures that the PDCA cycle for each is properly implemented.

*2 ISMS (Information Security Management System): A system or framework for managing information security in an organization, the standard of which is defined as "ISO/IEC 27001.

*3 TISAX (Trusted Information Security Assessment Exchange): A mechanism for suppliers to undergo information security audits by an external audit organization at the request of German automobile manufacturers and others in order to assess the appropriate level of information security within the entire automobile supply chain.

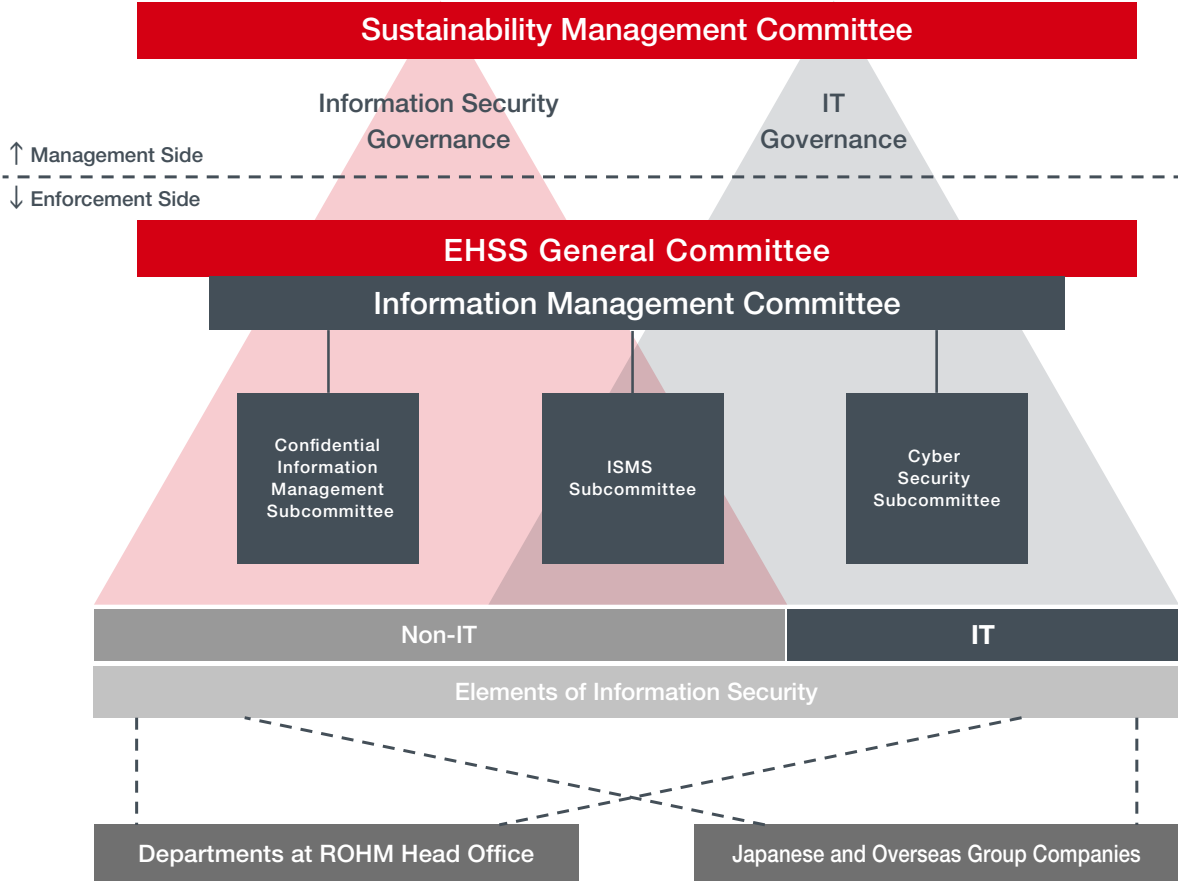
Overall Governance Structure





Information Security

Information Management System Promotion Structure





Information Security

Key Issue	Committee	Priority Implementation Items for FY2025	Targets for FY2025	FY2025 Results	Priority Implementation Items for FY2025	Targets for FY2025
Establishment of an information security system to enhance business continuity	Confidential Information Management Subcommittee	Strengthen the confidential information management structure of entire ROHM Group (ongoing)	•Introduce and establish a confidential information management system based on headquarters operations for 10 companies in five countries (Germany, Austria, Belgium, the Philippines, and India) •Strengthen measures against confidential information leaks and contamination through the establishment of company-wide data access permission policies and the introduction of technology leakage prevention tools	•Completed the establishment of a confidential information management system based on head office standards for 10 group companies across 5 countries (Germany, Singapore, Malaysia, the Philippines, and India) •Established data access privilege policies for ROHM's core business systems •Integrated the comprehensive information security monitoring framework with the incident reporting and response system	•Strengthen technical safeguards to prevent the leakage of core technologies •Enhance supply chain security to prevent confidential information leaks through contractors and external partners	•Enhance technical safeguards and review workflows to prevent and promptly detect core technology leaks caused by intentional acts or human error •Establish confidentiality management standards based on guidelines from government agencies (such as METI) and external organizations, while strengthening capability assessment frameworks for contractors and third parties
	ISMS Subcommittee	•Strengthen the information security structure of entire ROHM Group (ongoing) •Strengthened information security in the supply chain.	•Achievement of zero major information security incidents (ongoing) •Reduce the number of information security incidents by half compared to the previous year (ongoing) •Improve the ISMS management level of each department where ISMS activities have been implemented, and strengthened security in other departments and the supply chain.	•Achieved zero major information security incidents •Number of information security incidents remained flat compared to the previous fiscal year •REPI obtained ISO 27001 certification in January 2026 •RIST obtained TISAX certification in September 2025 •ROHM Apollo obtained TISAX certification in March 2026	•Strengthen the information security structure of entire ROHM Group (ongoing) •Strengthened information security in the supply chain	•Achievement of zero major information security incidents (ongoing) •Reduce the number of information security incidents by half compared to the previous year (ongoing) •Aiming to improve the ISMS level across the entire ROHM Group
	Cyber Security Promotion Subcommittee	Raise the level of cyber security measures for the entire Group and reduce the occurrence of major incidents to zero (ongoing)	•Conduct internal audits of affiliated companies on the status of cyber security measures and establish a PDCA cycle (ongoing) •Enhance vulnerability management and improve the cyber attack resistance of the entire group	•Conducted inventories of critical systems and verified backup procedures •Released the Information Security Guidebook for system administrators •Conducted a plant risk assessment at the Chikugo Plant utilizing the IPA (Information-technology Promotion Agency, Japan) framework	•Elevate cybersecurity measures across the entire Group and ensure zero major incidents (ongoing) •Establish a backup framework for critical systems	•Establish a mechanism to prevent internal misconduct/insider threats •Strengthen vulnerability management and assess current system capabilities through simulated attacks



Information Security

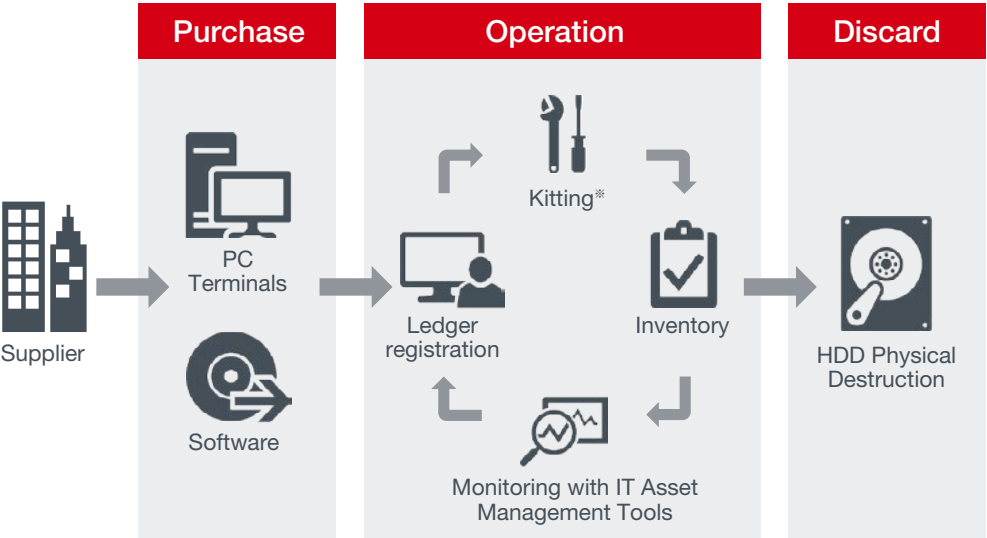
Information Security Activities

Proper management of information about stakeholders, as well as information held by ROHM Group, is essential for providing better products and services to society and for reliable corporate management.

ROHM Group is promoting information security measures through the following continuous efforts. In the unlikely event of an accident, we will immediately investigate the cause and take appropriate measures including recurrence prevention measures.

IT Assets Management

ROHM strictly manages its IT assets by centralizing the purchase and disposal of IT assets (PC terminals, software, USB memories and other storage media, and internal communication devices), monitoring usage with an IT asset management tool, and taking monthly inventories. Through these efforts, we prevent and manage compliance and security risks such as illegal use of IT assets, cyber attacks, and security breaches.

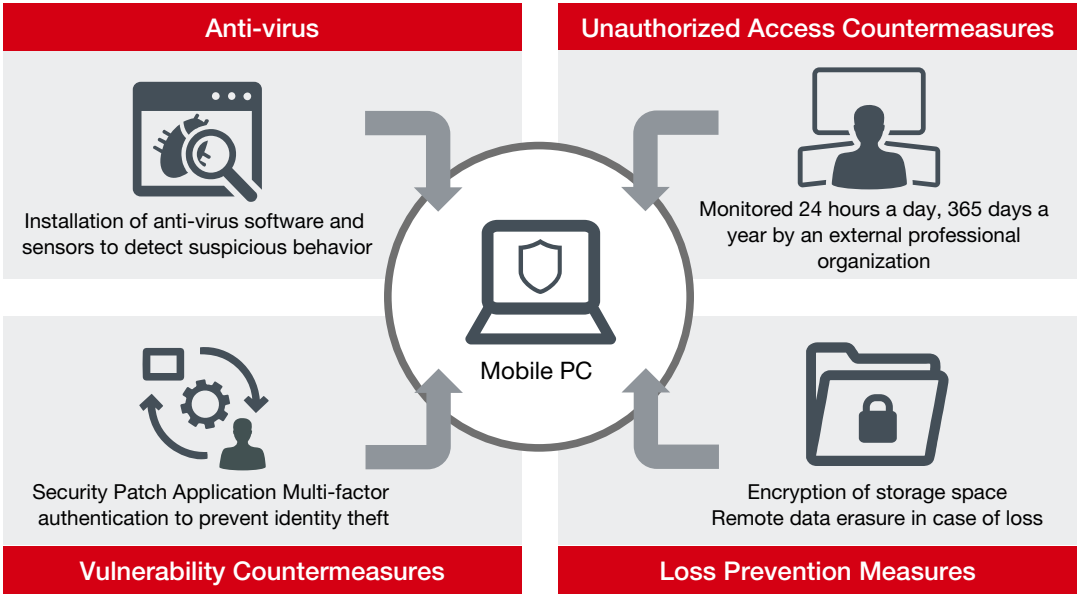


* Kitting : Setting up PCs and installing software to make them usable for business

Security Measures for Information Devices

We have implemented anti-virus and Windows vulnerability countermeasures for PCs and other information devices used by employees. Furthermore, we have constructed and been maintaining an environment where information leakage does not occur by introducing multi-factor authentication and mechanisms to remotely perform a factory reset of a computer in case of loss.

In response to the recent increase in the risk of cyber attacks, ROHM has established a system in which computers used by employees are monitored 24 hours a day, 365 days a year by an external specialized organization for signs of cyber attacks, to detect and respond to threats as early as possible.





Information Security

Number of Information Security Incidents

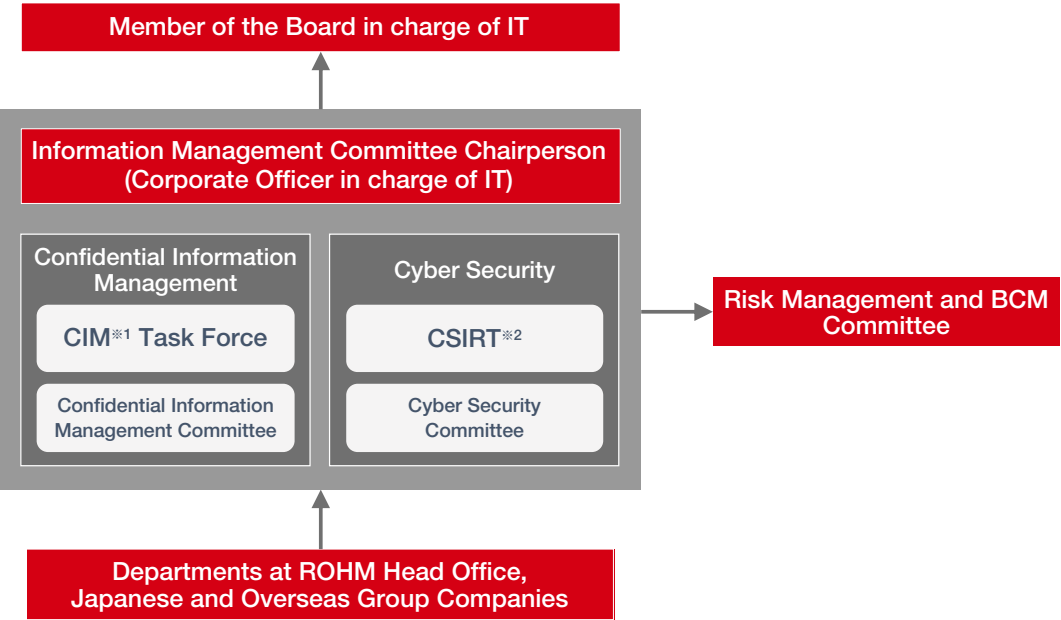
No serious information security incidents occurred in FY2024 and FY2025.

Emergency response procedures and measures

ROHM Group strives to prevent information security incidents through a variety of management measures, including thorough implementation of information security rules.

We have established an escalation process when an information security incident or suspicious event is detected, so that if an incident should occur, we can promptly take appropriate initial actions to minimize damage and losses.

* Emergency response procedures and measures are tested once a year.



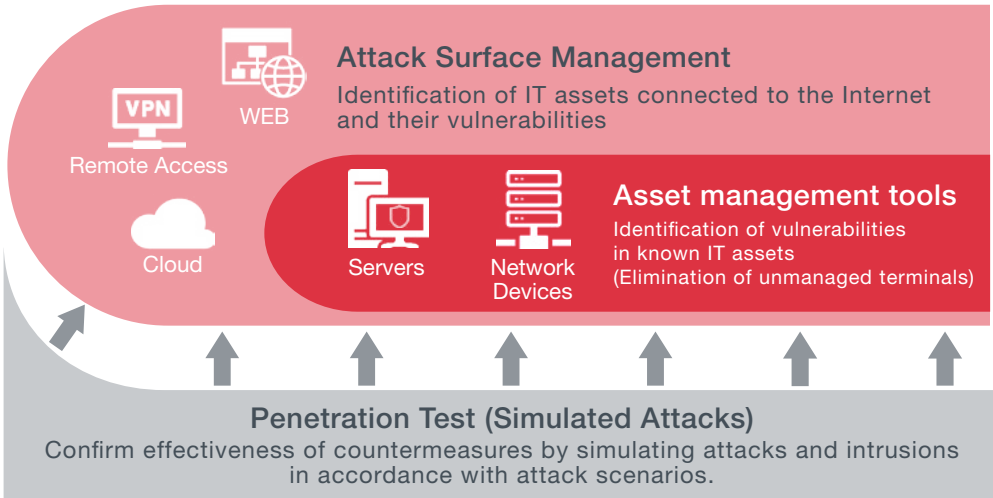
*1 CIM: Confidential Information Management

*2 CSIRT: Computer Security Incident Response Team

Vulnerability Status

Changes in work styles, such as the shift to cloud computing and the normalization of remote work, have expanded the IT environment for business. In addition, the risk of cyber-attacks targeting Japanese and overseas affiliates, business partners, and outsourcing companies is increasing year by year, and security risk management in the supply chain is becoming increasingly important.

Against this backdrop, ROHM Group is strengthening its cyber attack resistance by combining external attack surface management (attack target area management) service with a penetration testing (simulated attacks) in addition to vulnerability management using conventional asset management tools.



Education and Training

Many of the causes of information leakage are mishandling, mismanagement of devices and information, and lack of awareness of information security, all of which correspond to human error.

In order to prevent and reduce security risks caused by humans, ROHM requires employees to sign an information security-related pledge when they join the company to make their responsibilities for information clear, and also continuously provides them with training and education to improve their security literacy.



Information Security

[Education and Training Achievements]

Education/Training	Theme/Purpose	Year	Target	Number of People Trained	Attendance Rate (%)
Cyber Security Education E-learning	Ensure that all employees are aware of internal regulations revised to ensure cybersecurity	FY2023	ROHM Group	12,455	98%
ISMS Education	To acquire basic knowledge of “ISO/IEC27001” and promote understanding of information security management in order to expand the scope of ISMS certification		ROHM Group (Japan)	866	100%
Confidential Information Management Education E-learning	Ensure that all employees are aware of internal regulations revised to strengthen confidential information management		ROHM Group (Japan)	7,607	100%
Information Security Education	Explain points to keep in mind for ensuring information security using illustrations and easy-to-understand language by distributing the Information Security Guidebook	FY2024	ROHM Group	23,536	100%
4 rd Targeted Email Attack Training	Conduct training that simulates phishing emails designed to steal account information to raise employees' awareness and ensure that initial responses are properly established		ROHM Group (Japan)	7,872	100%
ISMS Education	To acquire basic knowledge of “ISO/IEC27001” and promote understanding of information security management in order to expand the scope of ISMS certification		ROHM Group (Japan)	2,057	100%
Information Security Education	Explain points to keep in mind for ensuring information security using illustrations and easy-to-understand language by distributing the Information Security Guidebook	FY2025	ROHM Group	23,171	100%
3 rd Targeted Email Attack Training	Conduct training that simulates phishing emails designed to steal account information to raise employees' awareness and ensure that initial responses are properly established		ROHM Group (Overseas)	2,869	100%
ISMS Education	To acquire basic knowledge of “ISO/IEC27001” and promote understanding of information security management in order to expand the scope of ISMS certification		ROHM Group (Japan)	1,961	100%



Information Security

Privacy Information Protection Management Efforts

ROHM Group recognizes the protection of personal information as an important management issue and complies with the “Act on the Protection of Personal Information” and other national guidelines and implements the following measures for the purpose of safe and appropriate management of personal information of customers, business partners, shareholders, investors, and others.

Formulation and Disclosure of Privacy Policy

ROHM Group clarifies the purpose of use of personal information, contact point for inquiries, safety control measures, etc.

[Privacy Policy](#)

Privacy Information Protection Regulations

ROHM Group has established basic rules for the proper handling, management, operation, and protection of personal information held by ROHM Group, and has made these rules available to all employees. The Rules specifies that the head of the department that handles personal information shall be assigned responsible for the matter. In addition, the rules specify a reporting system in the event of a leakage or threat of leakage of personal information in order to quickly identify the situation and prevent the spread of damage.

Employees who violate the personal information protection rules may be subject to disciplinary actions.

Provide Training for Employees

All employees are provided with training on the handling of personal information to improve their understanding of such matters. Through this education, we are working to spread our privacy policy and personal information protection rules throughout the Group.

[Education and Training]

Education and Training	Purpose and Contents	Year	Target	Number of People Trained	Attendance Rate(%)
Labor and Ethics e-learning	Acquire knowledge of compliance (competition law compliance, anti-bribery, compliance hotline, privacy protection)	FY2024	ROHM Group (Japan)	4,511	95.6%
Compliance Education	Acquiring an understanding of compliance (including personal information protection) and compliance requirements	FY2024	ROHM Group	23,403	98.9%



Information Security

Information Security Certification

ISO27001:2022 (ISMS) Certification

Organization		Certificate	(Registration Date) Last Renewal Date/ Last Revision Date	Certificate Number	Scope of Registration
ROHM Co.,Ltd. [Scope of Registration]			(2013/07/19) 2025/7/19 /2028/7/18	JQA-IM1197	Development, Maintenance and Operation for Internal Information Systems of ROHM Group Companies and Development, Manufacturing and Sales of Semiconductor and electronic components, etc.
	ROHM Co.,Ltd. Headquarters				Development, Maintenance and Operation for Internal Information Systems of ROHM Group Companies and Development and Sales of SiC
	ROHM Co.,Ltd. Yokohama Technology Center				Development, Maintenance and Operation for Internal Information Systems of ROHM Group Companies
	ROHM Co.,Ltd. Kyoto Business Center				Sales of SiC and Other Products by the ROHM Group
	LAPIS Semiconductor Co.,Ltd.				Development, Maintenance and Operation for Internal Information Systems of LAPIS Semiconductor
	LAPIS Semiconductor Co.,Ltd. Miyazaki Plant				Maintenance and Operation for Internal Information Systems of LAPIS Semiconductor and Manufacturing of SiC
	LAPIS Semiconductor Co.,Ltd. Miyagi Plant				Maintenance and Operation for Internal Information Systems of LAPIS Semiconductor
	ROHM Device Manufacturing Co., Ltd. Hamamatsu Factory				Development, Maintenance and Operation of Internal Information Systems at the RDM Hamamatsu Factory and Manufacturing of Semiconductor Devices and Semiconductor integrated Circuit Wafers
	ROHM Device Manufacturing Co., Ltd. Kasaoka Factory				Development, Maintenance and Operation for Internal Information Systems at the RDM Kasaoka Factory and Manufacturing of Diode Devices and LSI Power Devices
	ROHM Device Manufacturing Co., Ltd. Chikugo Factory				Development, Maintenance and Operation for Internal Information Systems at the RDM Chikugo Factory and Manufacturing of Discrete Devices (SiC)
	ROHM Assembly Manufacturing Co., Ltd. Kasaoka Factory				Development, Maintenance and Operation for Internal Information Systems at the RAM Kasaoka Factory



Intellectual Property

Intellectual Property Policy

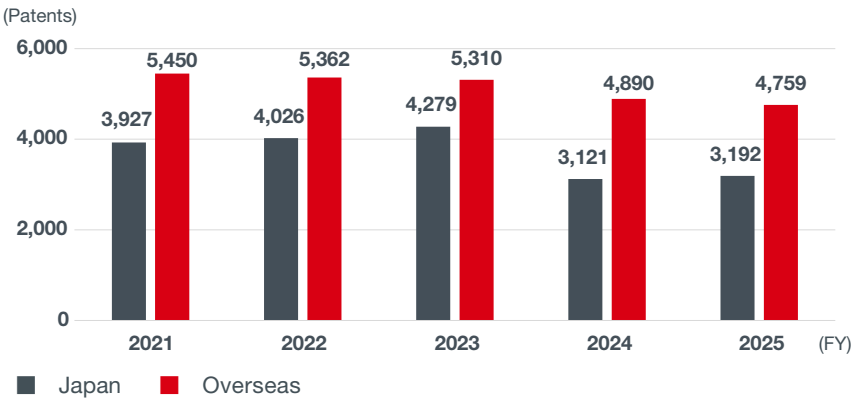
In order to fulfill our Company Mission of “Quality First” at ROHM Group, we strive to improve upon technologies held by each department by properly protecting and using our own intellectual property, we will improve our corporate value. Also, ROHM Group respects the intellectual property rights and strives to ensure that we do not infringe on the legitimate intellectual property rights of third parties.

Intellectual Property Activities and Strategy

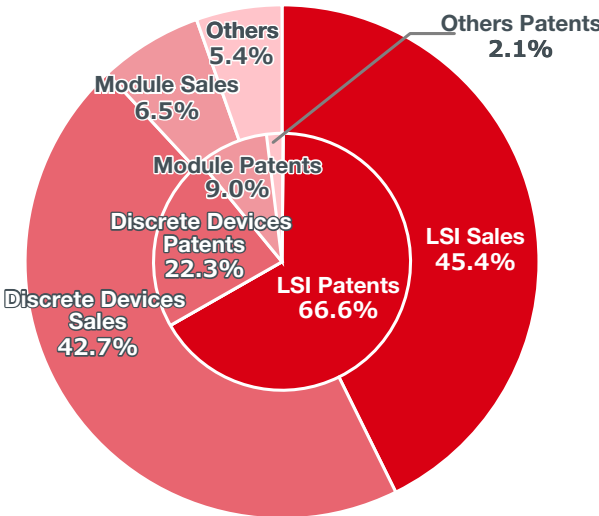
ROHM Group practices business activities that respect the intellectual property rights of others, ROHM Group is also continuously working to strengthen its world-leading technological and product development capabilities. As of the end of March 2026, ROHM Group holds approximately 8,000 patents worldwide, primarily in Japan, the United States, Europe and China (3,200 in Japan and 4,800 overseas).

With regard to trademarks, the Public & Investor Relations Division, Marketing Headquarters, and Intellectual Property Division work closely together to enhance corporate and product brand value by securing trademark rights in countries and regions where products are sold. In particular, ROHM Group focuses on power device-related technologies such as SiC, IGBT and GaN. By securing patents for technological inventions that realize high levels of value-add to these fields, the Group aims to ensure its competitive advantage.

Trends in the number of registered patents.



Patent portfolio and sales by segment.



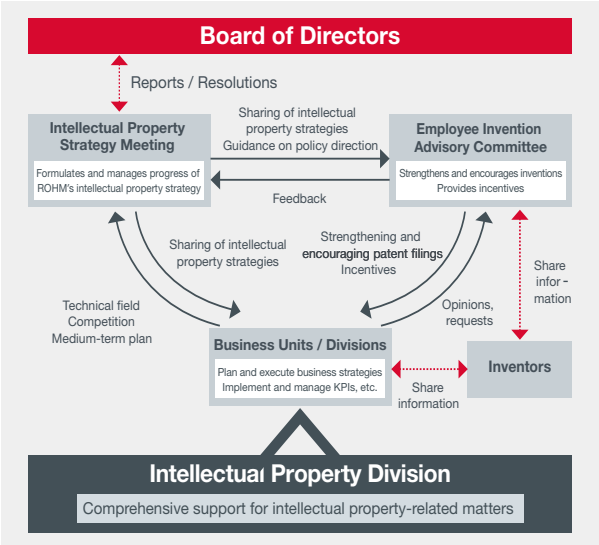


Intellectual Property

Intellectual Property Activity Promotion System

ROHM Group holds IP strategy meetings four times a year that are led by the head of the Intellectual Property Division and composed of executive officers and business division heads. At these meetings, company-wide IP strategies are discussed and formulated. The formulated IP strategy is reported to the Board of Directors once a year, enabling the directors to supervise the IP strategy.

Intellectual property activity promotion system



Developing Human Resources to Promote Intellectual Property Activities

ROHM Group systematically implements intellectual property education for employees of all grades, from new hires to managers, aiming to develop personnel who promote intellectual property activities. In addition, ROHM Group has established its own evaluation criteria to assess intellectual property activities and every year, we honor engineers who have met these criteria as recipients of the ROHM Invention Award. In particular, we promote the creation of intellectual property from inventions generated within ROHM Group through incentives, such as establishing a young innovator award for young rising talent.



ROHM Invention Award Ceremony



Intellectual Property

History of External Awards

ROHM Group has received numerous awards at regional invention awards sponsored by the Japan Institute of Invention and Innovation.

History of invention awards

Year	Award	Name of invention
2016	Invention Encouragement Award	Semiconductor light emitting device
	Invention Encouragement Award	Rotation control device
	Invention Encouragement Award	LED drive device
2017	Kyoto Institute of Invention and Innovation Chairman's Award	Coil load drive circuit
	Invention Encouragement Award	High voltage transistor with improved reverse recovery characteristics
	Invention Encouragement Award	Motor driver
	Invention Encouragement Award	Proximity/illumination sensor
2018	Kyoto Institute of Invention and Innovation Chairman's Award	Copper wire bonding technology ideal for semiconductors
	Invention Encouragement Award	Surge countermeasures for long-side electrode type resistors
2019	Commissioner of the Patent Office Award	SiC (silicon carbide) semiconductor device
	Invention Encouragement Award	Transformer element

Year	Award	Name of invention
2020	Invention Encouragement Award	Power supply equipment and monitoring method for USBPD
	Invention Encouragement Award	Overcurrent protection circuit and power supply device
2021	Commissioner of the Patent Office Award	CM noise malfunction prevention method for isolated GDIC
	Invention Encouragement Award	Technology to prevent atmospheric discharge on SiC wafers
2022	Invention Encouragement Award	Field plate shape of high voltage IC
	Invention Encouragement Award	Electric field relaxation structure of SiC trench MOSFET
2023	Invention Encouragement Award	Power control method that enables high reliability and low standby power consumption
	Kyoto Institute of Invention and Innovation Chairman's Award	Semiconductor design method that realizes rapid heat generation detection
2024	Invention Encouragement Award	Common electrode structure that improves print quality
	Kyoto Institute of Invention and Innovation Chairman's Award	Package insulation method for isolated gate drive IC (GDIC)
2025	Invention Encouragement Award	Method for Stabilizing Switching Frequency