

Preventive Guidelines for Bribery

The subjects of these Guidelines are those persons who engage in the business operations of the Company, such as the officers and employees, loaned employees, contract employees, dispatched employees, etc., of the Company, its subsidiary companies and affiliated companies.

1. Behavioral criteria (Matters to be observed as an individual)

1-1. Prohibition of bribery

Such actions shall be prohibited as to give money or other benefits to or receive the same from a public servant and/or a person with a similar capacity (hereinafter referred to as a “public servant, etc.”) or promise or offer the same to a public servant, etc., with a view to receiving unfair favors.

1-2. Prohibition of bribery through a third party

Such actions that fall under the actions of bribery of the preceding article shall be prohibited even through an agency, consultant, customer, business partner, family member, friend or any other third party.

1-3. Facilitation payment

In some countries or regions, there are cases where a small amount of payment that has no legal grounds (hereinafter referred to as a “facilitation payment”) is demanded by a public servant, etc., to expedite or facilitate normal administrative procedures. However, in principle, such a facilitation payment shall be prohibited.

1-4. Measures to be taken in case of violation

In the case of a violation of these Guidelines or the laws and regulations concerning bribery of each country, a penalty may be applied based on the internal rules or the relevant regulations. In addition, when having actually identified a violation or recognized an act suspected of a violation, a prompt report shall be made to the division in charge of legal affairs or compliance of the relevant company of the Company Group.

2. Matters to be addressed by the Company

2-1. Records management

To ensure compliance with the laws and regulations on bribery and these Guidelines, each company of the Company Group shall record all payments and receipts in terms of its transactions and endeavor to establish and maintain a system for the appropriate preservation thereof.

2-2. Enlightenment activities

Each company of the Company Group shall provide education and training for protection against bribery as may be necessary to improve the understanding of the laws and regulations on bribery and these Guidelines.

2-3. Protective measures against bribery through a third party

To prevent an unintended act of bribery by a third party, each company of the Company Group shall, as may be necessary, implement an appropriate screening when employing a third party and take such measures as to impose on said party the obligation not to engage in bribery by means of a contract, a written pledge, etc.

3. Other

3-1. Relationship between these Guidelines and the Regional Guidelines

The guidelines specifically established by a region or each company may not conflict with these Guidelines and in the event of any inconsistency with the content of these Guidelines, these Guidelines shall prevail.

3-2. Revision of these Guidelines

Revisions of these guidelines shall be drafted by the General Manager of the General Affairs Department of the Company, and after approval by the Compliance Officer of the Company, such revisions shall be enacted through a decision by the Risk Management Officer of the Company.

Established on March 25, 2016