

Bribery Prevention Basic Policy

1. Basic Policy

The Nippon Chemi-Con Group declares within and outside the Group that its member companies will comply with applicable laws and regulations of countries and make thorough efforts to prevent bribery, in order to promote fair and free competition.

2. Activity Guidelines

(1) Prohibiting bribery to public officials, persons with a like position, etc.

The Nippon Chemi-Con Group will not offer, promise, or propose any profits and/or facilities, including illicit money (facilitation payment), gifts and/or entertainments, to public officials, persons with a like position, etc. (hereafter collectively referred to as "public officials and the like") in Japan and other countries regardless of whether such activity is made directly by the Nippon Chemi-Con Group or indirectly by a third party, except for the case where it is obvious and evident that such activity is acceptable in light of laws, regulations, and business practices in the country. In an exceptional event that the Nippon Chemi-Con Group is to offer facilities, including gifts and/or entertainments in a country, which is obviously and evidently acceptable in light of laws, regulations, and business practices in the country, prior approval shall be obtained in accordance with in-house regulations covering determination guidelines.

(2) Offering gifts and entertainment to business partners who are not public officials or the like

The Nippon Chemi-Con Group will not offer facilities including gifts and/or entertainments in Japan and other countries to business partners, their officers, employees, etc. who are not public officials or the like, except for the case where such activity complies with laws and regulations of the country and is socially acceptable in light of business practices. In addition, even if such activity is socially acceptable in a country, prior approval shall be obtained in accordance with in-house regulations covering determination guidelines.

(3) Gifts and entertainments from business partners

The Nippon Chemi-Con Group will not accept the gifts that are beyond social courtesy and excess entertainments, from business partners in Japan and other countries.

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Representative Director and President
Nippon Chemi-Con Corporation