

UACJ Group Policy on Prevention of Bribery

The UACJ Group established this Fundamental Policy as set forth below to ensure compliance with the Japanese Penal Code, Unfair Competition Prevention Act, National Public Service Ethics Act, National Public Service Ethics Code, the United States Foreign Corrupt Practices Act of 1977, the United Kingdom Bribery Act 2010, and the bribery prevention laws and regulations of other countries (hereinafter referred to as “Bribery Prevention-Related Laws and Regulations”) in accordance with the UACJ Group Management Philosophy. All Officers and Employees of UACJ Group Companies (hereinafter referred to as “Officers and Employees”) must comply with these policies.

1. UACJ Group shall establish Group Rules on Prevention of Bribery s and their Guidelines (hereinafter referred to as “Rules and Guidelines”), and Officers and Employees shall know, observe and comply with the Rules and Guidelines.
2. Each Group Company and Officers and Employees shall comply with domestic and foreign Bribery Prevention-Related Laws and Regulations applicable to business activities for which they are responsible and shall not engage in bribery as well as conduct that may give rise to suspicions of bribery.
3. Prohibited conduct in violation of this Policy or the Rules and Guidelines and conduct that may give rise to suspicions of violation of this Policy or the Rules and Guidelines relating to Officers and Employees includes the conduct set forth in the following items.
 - (1) Bribing by Officers and Employees in relation to their duties in the form of payment of expenses by the company;
 - (2) Bribing by Officers and Employees in relation to their duties in the form of personally paying expenses;
 - (3) Engaging indirectly, through an Agent etc., in Bribing as referred to in items (1) or (2);
 - (4) Officers and Employees Accepting Bribes in relation to their duties;
 - (5) Engaging indirectly, through an Agent etc., in Accepting Bribes as referred to in item (4);
 - (6) Engaging in conduct by Officers and Employees that may give rise to suspicions of Bribery from the objective circumstances of provision of the cash or other benefit, such as the time, method, amount, frequency, and position of the parties, even in cases where it is not intended to obtain an improper benefit for business purposes;
or
 - (7) Engaging in fraudulent accounting practices for the purpose of Bribery or in a manner that gives rise to suspicions that the purpose is for Bribery.
4. Officers and Employees shall report any violations, or suspected or potential violations, of Bribery Prevention-Related Laws and Regulations, this Policy, or the Rules and Guidelines to the division responsible for legal affairs and compliance of UACJ Corporation or the UACJ Corporate Ethics Consultation System.

5. Officers and Employees shall consult with the division responsible for legal affairs and compliance of respective companies or UACJ Corporation if they have any questions concerning Bribery Prevention-Related Laws and Regulations, this Policy, or the Rules and Guidelines.

Established: December 17, 2018