

Meiden Group **Anti-Bribery Policy**

June, 2020

MEIDENSHA CORPORATION

Compliance Committee

Foreword

We, Meidensha Corporation, established the Meiden Group Corporate Code of Conduct and are proactively engaged to ensure its regulatory compliance. Within the Meiden Group Corporate Code of Conduct, we display our attitude towards the prohibition of Bribery by establishing a strict code with regard to gift-giving and business entertainment, and by demanding compliance with all applicable laws and regulations, as well as, other social rules.

To ensure compliance with the Anti-Bribery Laws and Regulations and to promote appropriate business activities, this Policy (hereinafter referred to as “this Policy”), establishes a more specific code based upon the prohibition of Bribery stipulated within the Meiden Group Corporate Code of Conduct.

Each company within the Meiden Group and all their members shall take the appropriate measures to comply with this Policy and the Anti-Bribery Laws and Regulations related to our business activities.

Compliance with this Policy also requires keeping our promise to society, which earns and builds trust with our clients and society. Please ensure you fully comprehend this Policy and continue to conduct business activities in the appropriate manner, while realizing the successful development of the Meiden Group.

June, 2020

Takeshi Miida

President

Meidensha Corporation

[Meiden Group Anti-Bribery Policy]

1 Prohibition of Bribery

- (1) All members of the Meiden Group shall not engage in any act of Bribery towards “Public Officials” ※¹ of a country or region where the Meiden Group conducts business or towards a Meiden Group client (either a private business entity or individual) for the purpose of obtaining or retaining improper advantages in business activities.
- (2) In this Policy, “Bribery” means taking an action (or providing an inappropriate benefit), to an entity or an individual, which is illegal, unethical, or a breach of trust, or requesting an entity or an individual to take such action (or to provide an inappropriate benefit), in return for, directly or indirectly ※², offering, providing, promising, requesting, or accepting money, gifts, business entertainment, donations, services, employment, and/or any other advantage (including anything of value, regardless of whether it is tangible or intangible) to/from such entity or individual, with dishonest intent or purpose.

※ 1 The term “Public Officials” generally refers to a business entity or individual exemplified below from ① through ④ . Provided, however, that each individual and specific case should be judged in accordance with the provisions of the applicable Anti-Bribery Laws and Regulations.

- ① A person who is in a legislative, administrative, or judicial position
- ② An administrative agency (an organization established based on laws and ordinances in order to conduct business relating to the public interest) and its staff members
- ③ A public corporation and its staff members
- ④ A staff member of a public international organization or an entity or an individual who is delegated a work assignment by a public international organization

※ 2 “Bribery” includes any action taken via a third party, including a business partner.

2 Compliance with Laws and Regulations

All members of the Meiden Group shall comply with all laws, ordinances, and regulations, established or stipulated to prevent Bribery, that are applicable within the countries and regions where the Meiden Group conducts business (hereinafter referred to as “Anti-Bribery Laws and Regulations”).

3 Record Management

The Meiden Group properly processes, prepares, and retains accounting books and records with respect to all transactions, expenditures, and dispositions of assets, in compliance with internal rules and procedures.

4 Whistleblower System

- (1) The Meiden Group establishes and maintains a contact desk for consultation or to report any activity that violates or appears to violate the applicable Anti-Bribery Laws and Regulations or this Policy (hereinafter referred to as “Violation”).
- (2) In the event a Meiden Group member witnesses or learns of a Violation, the member shall immediately report such Violation to their boss, the contact desk, or another appropriate channel.
- (3) The Meiden Group prohibits any act of retaliation against any whistleblower that sincerely utilizes this reporting system by reporting a Violation to a compliance officer or the contact desk.
- (4) In the event the Meiden Group discovers a Violation, the Meiden Group shall conduct a proper investigation and take appropriate action to correct such Violation.

5 Punishment

Any Meiden Group member who violates the applicable Anti-Bribery Laws and Regulations or this Policy shall be subject to disciplinary action imposed in compliance with the disciplinary provisions of the company that employs the member.

6 Efforts of Meiden Group Company

Each company within the Meiden Group, based on this Policy, shall establish and maintain the necessary preventive provisions, systems, and procedures in order to prevent Bribery. Furthermore, in order to ensure continued compliance with the Anti-Bribery Laws and Regulations and this Policy, each company within the Meiden Group shall take necessary and appropriate measures, such as conducting ongoing educational training for its members.

(end)