

Meiji Group Anti-Corruption Policy

We, Meiji Group, engage in anti-corruption initiatives to remain a transparent, wholesome corporate group trusted by society, as defined in our Management Attitude.

1. Compliance With Laws and Regulations, etc.

We comply with the laws and regulations of each country and region in which we operate, as well as with group internal rules, to prevent corrupt practices. We also note the extraterritorial application of laws and regulations in countries and regions outside of Japan.

2. Prohibition Against Bribery, etc.

We prohibit, whether through direct or indirect means, the granting, proposing, or promising of bribes to government officials or equivalent persons, holding improper relationships with business partners or others, or engaging in relationships with antisocial forces.

We prohibit the offering or receiving of inappropriate money, gifts, entertainment, or other property benefits exceeding a scope deemed proper according to social convention.

3. Cooperation With Audits and Investigations

We provide full cooperation and appropriate responses to financial-related audits, etc. conducted by external financial statement auditors and group internal audit departments, as well as investigations conducted by relevant government authorities, etc.

4. Improvement of System

To prevent or detect corrupt practices as quickly as possible, we strive to improve a system for officers and employees to seek consultation or to submit notice of acts in violation of this policy or acts which may be in violation of this policy. We do not punish person seeking consultation or submitting notice in connection with its action.

5. Education and Training for Anti-Corruption

We provide appropriate education and training related to this policy and anti-bribery rules, etc. to officers, employees and business partners or others, striving to prevent corrupt practices.

6. Disciplinary Action, etc.

We take strict disciplinary action against officers or employees who violate this policy, in accordance with employment rules and other group internal rules. We also take appropriate measures against business partners or others who violate this policy.

Established in March 2019

Amended in February 2020