

Kagome Group Anti-Bribery Policy

1. Purpose

The Kagome Group Anti-Bribery Policy (hereinafter, “the Policy”) defines prohibition of bribery activities and other matters requiring compliance when dealing with government organizations, public officials, etc., in Japan and overseas. The Policy aims to ensure that Kagome Group officers, employees, and temporary employees (hereinafter, “Employees, etc.”) will act with high ethical standards in accordance with their own good conscience and the Kagome Code of Conduct.

2. Legal Compliance

Employees, etc., shall comply with the laws and regulations prohibiting bribery in the related countries and regions. Specific procedures for complying with the Policy shall be separately specified.

3. Prohibition of Bribery

- (1) Employees, etc., must not offer, promise, or issue a bribe, and must not request, promise, or receive a bribe, neither directly nor indirectly.
- (2) In principle, Employees, etc., must not provide entertainment or give gifts to public officials, etc.
- (3) Employees, etc., must stay within the bounds of common sense when providing entertainment and giving gifts so as to prevent suspicions of collusion.

4. Appropriate Accounting Records

Employees, etc., shall create and maintain accounting records that accurately and fairly reflect in reasonable detail all transactions and disposal of assets related to the Policy.

5. Third Party Management Procedures

Employees, etc., shall take appropriate measures to prevent bribery and actions suspected of bribery of public officials, etc., by a third party such as a consultant, etc.

6. Reporting Obligation

Employees, etc., shall promptly report any suspected violation of anti-bribery laws/regulations or violation of the Policy so that appropriate measures can be taken in a timely manner.

7. Strict Compliance with Code of Conduct

Management at each Kagome Group company shall ensure that its Employees, etc., comply with the Policy by strictly complying with the Kagome Code of Conduct.

8. Auditing

The Kagome Group shall periodically audit the compliance and operation of the Policy. Audit targets and audit procedures shall be decided by considering the characteristics of the country, region, company, and business, as well as the degree of risk.

9. Disciplinary Measures

If any Employee, etc., violates the Policy, that Employee, etc., shall be disciplined in accordance with internal rules such as the Rules of Employment, individual contracts, and related laws, regulations, etc.