

KITZ Group Global Anti-Bribery Policy

1. Basic Policy

The KITZ Group, in its Compliance Code of Conduct, declares to prohibit bribery and receipt of unfair benefits in all of its interactions with public officials (※1), customers and business partners of any country. In order to promote activities toward anti-bribery program, the KITZ Group has established this “KITZ Group Global Anti-Bribery Policy” (hereinafter “this Policy”) and, by practicing this Policy, the KITZ Group will perform fair and sound business activities, thereby becoming a global company that contributes to sustainable growth of society.

2. Scope of Application

This Policy applies to each KITZ Group company, and Executive(s) and Employee(s) (※2).

3. Compliance with Applicable Laws and Regulations

The KITZ Group complies with this Policy and any and all applicable anti-bribery laws and regulations in any and all countries and regions.

4. Prohibition of Bribery

The KITZ Group will not, directly or indirectly, give, offer or promise to give money or any other profit (※3) to any public officials or any executive and employee of any private enterprise both in and out of the country in order to gain unfair business benefits.

5. Prohibition of Acceptance of a Bribe

The KITZ Group will not, directly or indirectly, demand, receive or promise to receive money or any other profit from any public officials or any executive and employee of any private enterprise in exchange for the provision of unfair business benefits both in and out of the country.

6. Prohibition of Facilitation Payments

The KITZ Group will not make the Facilitation Payments (※4) in principle, provided, however, the Facilitation Payments of a minimum amount may be allowed, only if and when such Facilitation Payments are forced to be made in order to avoid the unjustifiable invasion of human life, physical well-being or personal property, including but not limited to the case where there is a potential threat of physical violence unless such Facilitation Payments are made.

7. Business Entertainment and Gifts

When providing or receiving the entertainment or gifts to/from the business partners, the KITZ Group will do the same based on the relevant laws and regulations as well as the company's regulations and rules, and to the extent it is socially accepted.

8. Accounting Records

The KITZ Group records all trades in the accounting books accurately and keep the accounting books and other relevant documents properly.

9. Education and Training

The KITZ Group will provide the Executives and Employees with education and training related to the bribery prevention to ensure that the Executives and Employees are fully aware of, and comply with, the anti-bribery system.

10. Whistle-Blowing System

In the case that any violation of this Policy is detected or expected, the Executives and Employees will report the situation to the company in accordance with the company's regulations and rules. The KITZ Group will take an appropriate investigation based on such report.

11. Audit

The KITZ Group will conduct the periodic audits to verify the compliance with, and operation of, this Policy and any applicable regulation and rule relevant to this Policy.

12. Action for the Violation

If any Executive and Employee violates this Policy, the KITZ Group will immediately investigate the relevant facts and take a disciplinary action or any other strict measure, against such Executive and Employee in accordance with the relevant company's regulations and rules.

(※1) "public officials" means as follows (for example):

domestic public officials, foreign public officials, any person engaged in the public service of international organizations and the executives and employees, etc. of the companies which are substantially controlled by the domestic or foreign state or national or local governments.

(※2) "Executive(s) and Employee(s)" means as follows:

directors, audit and supervisory board members, officers, employees, loaned employees, advisors, contracted employees, and dispatched employees of the KITZ Group.

(※3) "money or any other profit" means as follows:

economic benefits such as money, gifts, entertainment or wining and dining, loans or collateral, etc. and non-economic benefits such as offer of occupational positions and provision or mediation of an employment opportunity, etc. and any other tangible or intangible benefits.

(※4) "Facilitation Payments" means as follows:

small payments made to the public officials for the purpose of facilitating and accelerating the routine administrative procedures.

Established in July 2022