



## Our Policy on Prevention of Bribery and Corruption

SNBL establishes its code of ethics and declares that it will, with a high sense of ethics, not condone any act of bribery, corruption or other violations of the code. The company also requires its officers, employees and outsources to stay away from any act of bribery or corruption and to secure free, fair competition.

1. For every country and region where it operates, SNBL prohibits the offering, promising, giving, requesting and receiving of a bribe (monetary or economic benefits) for the purpose of directly or indirectly exerting inappropriate influence on public affairs and/or an official decision in an attempt to receive an order or gain business advantage.
2. As evidence of the absence of bribery and corruption, we keep a record of all expenditure including payments to third parties on our accounting book or equivalent accurately and appropriately and archive related documents.
3. Whenever we make a political donation or a donation to different organizations, we clarify the reason we do it and take legitimate procedures in compliance with the Public Offices Election Act, Political Funds Control Act and other related laws.
4. We will not give gifts or entertainment to employees of a government office or equivalent public organization (including civil servants based in Japan and overseas) in violation of the National Public Service Ethics Act defined by government offices and other codes of ethical conduct. If we are requested by a civil servant or similar to give such an illegal gift/entertainment, we would resolutely decline it.
5. Even if we give entertainment or a gift to a business partner, it will be limited to an extent that is not excessive and is deemed appropriate in light of conventional wisdom. This will also involve gaining approval in accordance with our internal regulations, accurately keeping a record of all payments concerning the entertainment and/or gift and archiving related documents.
6. If we are to receive entertainment or a gift from a client, business partner or suchlike, we will make sure that it is within an extent acceptable in light of conventional practice.
7. If an officer or employee of SNBL has violated this policy, strict sanctions will be applied in accordance with our work regulations or equivalent.

Established in October 2021