

The Nisshin Seifun Group

Anti-Bribery & Anti-Corruption Policy

The basic stance of the Nisshin Seifun Group (the "Group") is to comply with laws, corporate ethics and social norms, to maintain social order, and to promote fair and ethical business practices in accordance with the "*Corporate Code of Conduct and Employee Action Guidelines*".

Our Group has established this policy to prevent corruption in all forms such as bribery and comply with related laws and regulations.

1. Scope

This policy applies to the officers and employees of Nisshin Seifun Group Inc. and its subsidiaries.

2. Prevention of Corruption

Our Group prohibits and strives to prevent corruption by persons abusing their job authority or position for the benefit of individuals or organizations, including through bribery, embezzlement, breach of trust, obstruction of justice, money laundering and insider trading.

3. Prohibition on Bribery

Our Group prohibits any form of bribery such as providing, receiving, subscribing to, or promising illegal payoffs in order to solicit or cause inappropriate conduct that violates laws, ethics, or integrity through the abuse of the person's authority or position.

(1) Prohibition of Bribery to Public Officials, etc.

Our Group does not allow the provision of improper entertainment, gifts, benefits, etc., or other economic advantages, offers, or commitments to public officials or equivalent (hereinafter, "Public Officials, etc.") in Japan or overseas.

(2) Payments to Agents, etc.

Our Group will not make payments to outside business consignees, agents or consultants, etc., if we believe that part of the payment will be, or likely will be, used in illegal activities involving Public Officials, etc..

(3) Entertainment and Gifts to Business Partners other than Public Officials, etc.

Any provision of entertainment, gifts, benefits, or other economic advantages to officers and employees of business partners whom are not Public Officials, etc. shall only be made if in compliance with the laws of each country and within the scope of social norms.

(4) Donations

Donations, including charitable and political contributions, must comply with relevant laws and regulations and must be above any suspicion of bribery. We will also ensure the appropriateness of donations.

(5) Entertainment and Gifts

We do not accept excessive entertainment or gifts from business partners that go beyond the scope of social courtesy.

(6) Records Management

Accounting records are prepared and maintained in a timely and accurate manner for all transactions and asset disposals.

4. Dissemination and Implementation

To ensure implementation of the Policy, we will appropriately educate our employees and make them aware of the policy herein.

Effective Date:
March 26, 2019