

The ALCONIX Group Anti-Bribery Policy

Established on October 20, 2023

Representative Director, Chairman and CEO
Masato Takei

The ALCONIX Group pledges to conduct its business activities in compliance with all applicable anti-bribery laws, regulations, guidelines, etc. (hereinafter referred to as the "Anti-Bribery Laws and Regulations, etc."), whether in Japan or abroad, and requires its business partners (including customers, suppliers, contract manufacturers and subcontractors, etc., the same shall apply hereinafter) and agencies, representatives, agents, consultants, distributors, and others retained by the Group (hereinafter referred to as "Agents, etc.") to comply with this Policy.

1. Entertainment and Gifts to Public officials, etc.

The ALCONIX Group prohibits employees from improperly providing, offering, or promising money or other benefits to public officials and others (including deemed public officials, executives and employees of state-owned companies, etc.), whether in Japan or abroad. Even when giving gifts to public officials or others within the scope of social norms, employees must obtain approval from ALCONIX Head Office in accordance with internal rules and guidelines. Even in the event that the ALCONIX Group is requested by any public official, whether in Japan or abroad, to provide an improper monetary or other benefit, the Group will reject the request and report the situation to the relevant authorities as appropriate.

2. Entertainment and Gifts to Business Partners

The ALCONIX Group provides gifts and entertainment to executives and employees of business partners, whether in Japan or abroad, within the scope of socially accepted norms, and prohibits employees from providing excessive entertainment, or gifts and entertainment that exceed the scope of social norms. The ALCONIX Group also prohibits employees from providing, offering, or promising money or other benefits to officers or employees of business partners for the purpose of requesting them to perform improper acts, and employees from accepting offers of money or other benefits from other businesses made for the same purpose.

3. Appointment of Agents, etc.

Prior to appointing Agents, etc., whether in Japan or abroad, the ALCONIX Group takes necessary measures to ensure compliance with Anti-Bribery Laws and Regulations, etc., including requesting and obtaining appropriate written pledges from them to comply with Anti-Bribery Laws and Regulations, etc. The Group ensures that the services provided by Agents, etc., are specific and clear, and that the compensation for the services is reasonable and rational.

4. Compliance with Anti-Bribery Laws and Regulations, etc.

In the event of any violation or suspected violation of Anti-Bribery Laws and Regulations, etc., within the ALCONIX Group, the Group will promptly investigate the facts and take appropriate measures, such as suspending any conduct that violates or may violate Anti-Bribery Laws and Regulations, etc., and cooperating with investigations by the relevant authorities.

In addition, if any violation of Anti-Bribery Laws and Regulations, etc., is found to have been committed by an officer or employee of the ALCONIX Group, the Group will deal with such conduct in a strict manner in accordance with its employment and other regulations, and if any violation of Anti-Bribery Laws and Regulations, etc., is found to have been committed by a business partner or agent, the Group will take strict action in accordance with this Policy and the terms of the related agreement.

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