

This is an excerpt translation of the Japanese original for convenience only. In the event of any discrepancy between this translated document and the Japanese original, the original shall prevail.

Basic Policy on Bribery Prevention

1. Prohibition of bribery

The directors, officers, and employees of JAFECO Group Co., Ltd. and its group companies (hereinafter “the Company Group”) shall not engage in any act of offering or accepting bribes prohibited by laws and regulations of each country, either directly or indirectly, with public officials, their equivalents and persons of interest (hereinafter “Public Officials, Etc.”) to acquire illicit gains in business or offer benefits to third parties.

2. Establishment and operation of a bribery prevention framework

The Company Group shall establish internal rules related to bribery prevention in light of laws and regulations of each country, while building a framework to prevent bribery through establishment of a continuous monitoring system and an internal whistleblowing system.

3. Education and training

The Company Group shall provide periodic training to prevent its directors, officers and employees from offering or accepting bribes and ensure the effectiveness of the bribery prevention system.

4. Retention of payment records

The Company Group shall accurately record payments made to Public Officials, Etc. and retain the records properly under the appropriate internal control systems.

5. Internal audit

The Company Group shall conduct periodic internal audits on the operational status of the bribery prevention framework.

6. Disciplinary action

The Company Group shall take strict disciplinary actions based on the Rules of Employment in the event that a director, officer, or employee violates this Policy or internal rules related to bribery prevention.

Enacted as of September 8, 2021