

Nextage Group Anti-Bribery and Corruption Policy

Basic policy

The Nextage group shall establish fair and transparent relationships with all stakeholders. Any form of corrupt behaviors, such as bribery, embezzlement, breach of trust, offering or accepting gifts beyond rationality, collusion with specific persons, and undue treatment to specific persons, shall not be conducted. In consistent with this policy, we prohibit corrupt acts and bribery for which we strive to establish a system for such prohibition.

Anti-Bribery corruption and corruption prohibition

Prohibition of Bribery

All directive officers and employees of the group (including non-regular employments) shall not offer, promise, give or even accept bribes.

Prohibition of corrupt acts

We will not engage in any corrupt acts that abuse our own or a third party's authority or position in the course of our duties, including bribery, embezzlement, insider trading, extortion of benefits, and improper bidding. This includes complicity.

Compliance with Laws and Regulations

We observe laws and regulations applied at where we develop our business.

Implementation of Fair and Equal Transactions and Deals

Maintaining sound and clear relationships with politics and government, etc.

We observe laws and regulations regulated by nationals or local government for the relationships with political and administrative organizations. Additionally, we do not engage in ant bribery of government employees or other similar personnels.

Fair and free competition

We will not engage in any acts that would invite suspicion as well as any acts that would impede the principle of free and fair competition, such as collusion.

Prohibition of deals and transactions with antisocial forces

We do not associate with antisocial forces positive to threatening social order. Furthermore, there shall be no engagement with any acts encouraging such activities.

Establishment of Anti-Corruption System

Embodying above, we have settled and been operating, for instance, internal "Anti-Social Force Countermeasure Regulations".

Charitable donations and sponsorships

When making a charitable donation or sponsorship, we will consider whether there is any possibility of corruption or political contributions before making the decision to do so.

Establishment of Reporting Desks

We have established an "Internal Reporting Desk" to realize early detection of violations of laws and regulations, internal rules, and socially unacceptable behavior. This shall lead us to prevention of misconduct as well as enhancement of the soundness of group management with necessary improvements.

Educations

We conduct educational activities for all employees as appropriate, including the development of methods for dealing with antisocial forces.