

Anti-corruption Policy

Recognizing that corrupt practices interfere with healthy economic growth and have an adverse effect on a sustainable society, the Okamura Group (the “Group”) hereby covenants to abide by the laws, regulations, and the like of the countries and regions where the Group conducts its businesses and to carry out fair and transparent transactions (hereinafter, this “Policy”).

This Policy applies to all officers and employees of Okamura Corporation and the Okamura Group. Employees include employees on temporary assignments, part-time and full-time employees, and dispatched employees.

1. Prohibition of Provision or Receipt of Benefits

There shall be no provision, offer, receipt, request, or promise made for any cash, gifts, client entertainment, or any other benefits between the Group and civil servants (including quasi-civil servants) nor between the Group and its business partners.

2. Compliance with Relevant Laws and Regulations

Taking note of the legal restrictions unique to each country and region and fully understanding the spirit of the relevant laws and regulations as well as the guidelines concerning the prevention of all manners of bribery and corruption that are applicable to the Group’s businesses, the Group shall abide by such laws, regulations, and guidelines.

3. Appropriate Relationships with Administrative Organs

The Group shall abide by the relevant domestic and international laws, regulations, and the like in its relationship with politicians and political groups and shall maintain healthy and normal relationships with them.

4. Appropriate Client Entertainment and Gift-giving

The provision or receipt of entertainment, gifts, travel expenses, donations, support, or any other benefits between the Group and its business partners shall be carried out only if there is a legitimate business purpose and in conformity with all laws, regulations, and the like as well as internal rules.

5. Prohibition of Corrupt Practices by Agents

The Group shall not give instructions to engage in bribery through a distributor, consultant, subcontractor, or any other third party or permit these third parties to engage in corrupt practices.

6. Request to Business Partners

The Group requires its business partners, who are involved in business with the Okamura Group, to demonstrate their understanding of the purport of this Policy and demands their cooperation in not engaging in bribery or corrupt practices for the benefit of the Okamura Group.

7. System Development and Support

- 1) The Group shall appropriately manage a whistle-blower system as the point of contact for all matters relating to compliance, including corrupt practices.
- 2) The Group shall regularly evaluate the risk of corrupt practices occurring and shall continue to improve its system to prevent corrupt practices.
- 3) The Group shall record all transactions accurately in accounting books and shall store all relevant documents appropriately.
- 4) The Compliance Committee and the Group Compliance Committee shall build and design any necessary internal controls and operate them appropriately.

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5) The Group shall ensure, through communication and education, that this Policy is fully understood by all parties involved.

6) Breach of this Policy shall be subject to strict punishment pursuant to internal rules.

Enacted on May 1, 2022