

Policy for Bribery Prevention

1. Prevention of bribery

JSR will not seek to gain profit or benefit, directly or indirectly, from any person who is subject to the regulations of anti-corruption laws, including commercial bribery regulations, by wrongfully influencing said person's professional conduct, nor provide benefit or promise to provide benefit¹ to said person, either in Japan or abroad.

2. Anti-bribery system

JSR will ensure that all officers, employees, etc., comply with this policy.

If an act by an officer, employee, etc., that violates, or may violate, this policy is discovered, JSR will have the discovering person report the act using the internal reporting system or another channel and will not engage in retribution against said reporting person.

3. Audits and system reviews

JSR will conduct periodic internal audits and also evaluate and review its anti-bribery system to maintain a continuous and effective bribery and corruption prevention system.

4. Education

JSR will conduct appropriate education to officers, employees, etc., to ensure their compliance with this policy.

5. Recording and retaining transaction details

JSR will accurately and appropriately prepare accounting records concerning all transactions and disposals of assets and retain those records.

6. Punishment

If an officer, employee, etc., violates this policy, JSR will strictly punish the violating officer, employee, etc., based on the employment regulations and other regulations.

Definition of terminology

- 1) Provide benefit or promise to provide benefit refers to the provision or promise to provide money or goods as well as any other tangible or intangible benefit (such as invitation to an eating or drinking establishment, provision of entertainment, coverage of travel expenses, donation, and participation in an outside organization) and includes the provision of said benefit done directly or indirectly through a third party, such as an agent.

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