



Tokyo Principles for Strengthening Anti-Corruption Initiatives

A Company agreeing to the Tokyo Principles (“Company”) will promote the anti-corruption initiatives pursuant to the UN Global Compact Principle 10. Furthermore, as part of efforts to increase social and corporate sustainability and transparency, the Company will aim to implement the following basic principles for strengthening anti-corruption initiatives. At the same time, the Company will proactively disclose the status of their anti-corruption initiatives as much as possible by using, for example, the Anti-Bribery Assessment Tool, and will strive to have constructive engagement and dialogues with stakeholders, including investors.

1. Commitment and actions by top management

The Company, including the top management, should take specific actions to take the lead in sending out a clear message that the corporate group should never resort to improper practices in the pursuit of profits or sales.

2. Adopting risk-based approach

The Company should first accurately identify and assess the status of corruption and bribery risks facing itself, and then adopt a risk-based approach focusing on addressing business activities that involve a high level of bribery risks.

3. Establishment of fundamental policy and internal rules

The Company should establish a clearly defined fundamental policy that sets out its basic position on anti-bribery matters and internal rules providing for internal procedures, etc. that give effect to it.

4. Establishment of organizational structure

In order to prevent bribery and manage crisis situations, the Company should, according to the scale of business and bribery risks, establish an effective organizational structure and route for communicating information at both head office and local establishments.

5. Managing third parties

In order to prevent bribery carried out through agent and other third parties, the Company should appropriately assess third party bribery risk, and use the assessment findings to manage business relationships with third parties.

6. Training

By providing anti-corruption training programs to the top management, management and employees, the Company should increase their understanding of the fundamental policy and internal rules and share approaches to deal with unreasonable demands for bribes on the ground.

7. Monitoring and continual improvement

The Company should monitor on a periodic basis the status of implementing the fundamental policy and internal rules, and use the findings to continuously improve their anti-corruption initiatives by also taking collective action with external organizations.