

## DVx Bribery Prevention Guidelines

### 1. Prohibition of bribery to public servants, etc.

We do not allow and will not be engaged in direct or indirect provision, offering or promising of money or any other benefits or facilities to public servants or people who are in a similar position (the “Public Servants, etc.”) regardless of whether they are in Japan and overseas.

In the event that the Public Servants, etc. demand the provision of illicit benefits, we shall firmly refuse such request, and contact and report the matter to the authorities concerned depending on the situation.

#### [Notes]

- Public Servants, etc. include the following people.  
Examples include, but are not limited to, the following:
  - Staff of the governments, ministries, local public agencies, etc. in Japan and overseas (examples: members of the Diet (parliament), military personnel, police officers, firefighters, tax inspectors, customs officers, etc.)
  - Officers and staff of government-affiliated companies and corporations in Japan and overseas (examples: state-owned or semi-governmental public utility companies such as those related to electricity, gas, railways, national universities, national hospitals, etc.)
  - Officers and employees of corporations who receive similar treatment to those for public servants due to the laws and regulations in Japan and overseas
  - Officers and staff of public international agencies (examples: United Nations (UN), World Trade Organization (WTO), etc.)
  - Officers and staff of political parties
  - Candidates for public office
  - People who perform official duties on behalf of the above (examples: government-appointed inspection body, designated testing institution, etc.)
  
- “Money or any other benefits or facilities” means anything of any name that

becomes beneficial to a recipient, and includes the following:

Examples include, but are not limited to, the following:

- Monies, cash vouchers, gift vouchers, unlisted stocks, loans, collateral, guarantees
- Gifts, treats, invitations (sports event and theater tickets, travel, etc.)
- Contributions, donations, sponsorship fees
- Honorarium, rebates, promotion expenses, discounts
- Employment opportunity for the person or his/her relatives (within two years since the time when the person lost the status as a public servant)
- Opportunities of education, medical care, etc. for the person or his/her relatives
- Others that become beneficial to a recipient

## **2. Prohibition of the provision of illicit benefits to third parties**

When we provide business partners that are not Public Servants, etc., their officers and employees, and other third parties with benefits including entertainment, gifts and facilities, we shall abide by the laws and regulations of Japan and the country where the business partner is located and do so within the range considered as reasonable based on the ideas generally accepted in society.

Therefore, we do not allow and will not be engaged in direct or indirect provision, offering or promising of money or any other benefits or facilities to third parties as consideration for the third party's wrongful conduct of duties intending to obtain or retain business or a business advantage for the Company, regardless of whether they are in or out of the country.

In the event that a third party demands the provision of illicit benefits including the case where it requests an act similar to the above, we shall firmly refuse such request, and contact and report the matter to the authorities concerned depending on the situation.

## **3. Prohibition of the receipt of illicit benefits**

We do not allow and will not be engaged in direct or indirect demand, receipt or

promise of receipt of money or any other benefits or facilities from third parties as consideration for our wrongful conduct of duties for the third party during our business operations, regardless of whether they are in or out of the country.

#### **4. Cooperation in investigations**

We have introduced an internal reporting system for the early detection and correction of compliance breaches such as bribery.

If an investigation is to be conducted by us or the authorities concerned, we will ask companies, organizations and individuals that have a business relationship with us to fully cooperate in the investigation by submitting to the Company information, documents, etc. that allow us to confirm the compliance status.

In addition, we will ask companies, organizations and individuals that have a business relationship with us to immediately report and consult with a department or person in charge of compliance in each company when there are any questions or doubts regarding bribery and accounting fraud, a lack of confidence about their actions, or when they are involved or are about to be involved in such act, etc.

When there is a suspicion of compliance breaches for the transactions that we made, we will fully cooperate with an investigation by a third party or the authorities concerned.