

Group Basic Anti-Bribery and Corruption Policy

The Fuji Seal Group (hereinafter referred to as "FSG") upholds the credo "Each day with renewed commitment, we create new value through packaging." In FSG Code of Ethics, we are committed to complying with laws and regulations and conducting business activities in good faith and ethically (compliance). Based on FSG Code of Ethics, FSG establishes this policy to promote our efforts to prevent bribery and corruption.

1. Scope of Application

This policy applies to all FSG officers and employees of FSG (including temporary employees; hereinafter referred to as "FSG officers and employees").

2. Compliance items

(1) Prohibition of Bribery

FSG officers and employees shall not give, offer, promise, or receive any bribe directly or indirectly to any person.

(2) Prohibition of Entertainment and Gifts to Public Officials, etc.

FSG officers and employees shall not engage in bribery activities (including so-called "facilitation payments" (small payments made to facilitate and expedite routine administrative procedures) to such as public officials and persons equivalent to public officials, etc.¹ in order to obtain illegal benefits, etc.

(3) Prohibition of bribery by Third Parties such as consultants

FSG officers and employees shall not instruct bribery through third parties such as consultants and agents. In addition, we will not tolerate the facts and signs of bribery by the third party.

(4) Compliance with related laws and regulations

FSG officers and employees will comply with this policy and the laws and regulations related to the prohibition of bribery in the countries or regions concerned ² (hereinafter referred to as "related laws and regulations").

1. Persons in legislative, administrative, or judicial positions in foreign countries (including foreign local governments)

- Officials, etc. of a foreign public organization (an organization established by special laws and regulations to perform specific affairs concerning the public interest) who perform official duties for a foreign country.
- Officials of a public enterprise, etc. who perform official duties for a foreign state
- Officials or Administrators of Public International Organizations

2. Japan: Unfair Competition Prevention Law, etc.

3. Operation

(1) Construction and operation of anti-bribery management systems at Group companies and regular monitoring, inspection, evaluation, and other FSG shall establish and operate appropriate anti-bribery management systems at each Group company in accordance with the characteristics and risks of the country and region in relation to anti-bribery, and regularly monitor, inspect, and evaluate whether they are being operated properly to continuously improve the anti-bribery management system.

(2) Thorough recording and management of accounting books, etc.

FSG shall accurately record the information in the accounting books and manage the related documents in accordance with the local rules of each group company in order to explain the compliance with this policy and related laws and regulations.

(3) Duty to Report in Cases of Suspected Violation

FSG officers and employees must promptly report any suspected violation of this policy, related laws, and local rules of each group company to the Compliance Department of each group company in order to take appropriate measures in a timely manner.

4. Penalties (in case of violation)

If FSG discovers an act that violates or may violate this policy or related laws and regulations, it will conduct a rigorous internal investigation and fully cooperate with the investigation by the relevant authorities.

FSG will take strict measures against FSG officers and employees who have violated this policy or other local rules in accordance with the local rules of each group company in addition to legal responsibilities as individuals.

Established: 26th January 2022

United States: Foreign Corrupt Practices Act (Foreign Corrupt Practices Act, "FCPA")

United Kingdom: Bribery Act 2010 (Bribery Act 2010)

Other similar laws under or related to the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.