

## The Anti-bribery Policy of Nikke Group

### I. Policy

The Nikke Group (hereafter referred as “the Group”) will meet every challenge with passion and pride as a corporate group that is gentle and warm toward people and the planet. Companies under the Group are constantly striving to create a charismatic career that is consistent with the concept ---- “a company that creates future life”.

The Group insists that the continuous growth and development of the company cannot be separated from the trust of the customers, partners, employees, society, shareholders and so on. The cornerstone of this kind of trust is the “integrity management” for interested parties and the “Corporate ethical behavior” that goes further than compliance with the law.

The group has established the "Corporate Code of Conduct" as the basic concept of the Group's staff to consistently abide by the laws and social norms. According to the "Corporate Code of Conduct", a specific behavioral standard - "Corporate Behavior Standards" was formulated. Moreover, as a supplement to the above two norms, the “The anti-bribery policy of Nikke Group” (hereinafter referred to as “the policy”) is now formulated and promulgated, and the Group will be as one and endeavor to fight against bribery.

### II. Promise

The Group stated that we will completely fight against bribery based on the following basic concepts.

① Not committing violations of Japanese criminal law, Japanese Anti-Unfair Competition Law, Japanese National Civil Service Ethics Law and National Civil Service Ethics Regulations, other relevant ethical rules formulated by special legal persons and local public bodies similar to the aforementioned laws and regulations of Japan, and other laws and regulations related to the ethics of civil servants ,etc of other countries ;

Compliance with the US Foreign Corrupt Practices Act, Bribery Act 2010, Law of the PRC against Unfair Competition and other laws and regulations that impose penalties on bribery, etc.

② If there is a need to exchange gifts or receptions with partners and other related parties, it shall be based on the principle of obtaining approval from superiors, and it is forbidden to provide or accept money and services that violate public order and good customs, and go beyond the general concept of society or the common sense of society.

③ Not providing any improper gift, reception, convenience or any other financial benefit to the personnel of domestic and foreign government departments and similar public organizations.

④ In the event of a violation of this policy, the Group will promptly implement improvement measures and appropriately punish the participating personnel in accordance with various regulations.

### III. Specific Behavior Guideline

#### 1. Prohibition of bribery

The Nikke Group will put an end to the following acts:

① Bribery of civil servants, etc.

Agree that the expenses will be borne by the Group, or the personnel of the Group take the initiative to bear the expenses, at home or abroad, to propose, promise, provide money and other benefits to civil servants, etc, directly or indirectly, or agree to conduct the foregoing actions by employees, partners, and related parties in an attempt to influence the performance of civil servants, etc and other duties.

② Bribery of persons other than civil servants, etc

For the purpose of obtaining or maintaining business convenience, agree that the expenses will be borne by the Group, or the personnel of the Group take the initiative to bear the expenses, at home or abroad, to propose, promise, provide money and other benefits to other parties (regardless of legal or natural persons) directly or indirectly, , or agree to conduct the foregoing actions by employees, partners, and related parties in an attempt to cause other parties (regardless of legal or natural persons) to commit illegal acts or improper duties.

③ Bribery

Requiring and promising to accept money and other benefits from other parties or civil servants, etc or accepting money and other benefits provided by other parties or civil servants, etc, at home or abroad, as compensation for providing business convenience or achieving and maintaining transactions.

④ Participate in assistance, introduction or conspiracy to offer or accept bribes

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⑤ In order to enable civil servants, etc to successfully handle the usual administrative services related procedures, they pay a certain fee (“facilitation payments”), including those that are not prohibited by the laws and regulations of the country or region.

#### 2. Record

The companies under the Nikke Group will accurately and appropriately record all expenditures towards any third-party to ensure that no bribery is committed.

### IV. To partners, related parties

Partners and related parties, please convey this policy to your staff., and ensure that they know and implement this policy.

If you find any violation or suspected violation of this policy and related laws and regulations, please immediately contact the companies under the Group who have any relationship with you.

In addition, we are kindly ask you to assist the companies under the group or relevant authorities in conducting investigations into violations or suspected violations.

V. Definitions

• “Civil Servants, etc.” refers to the following persons.

- ① Personnel engaged in government official duties or public affairs of local public bodies.
- ② Personnel engaged in government affairs.
- ③ Official company officers and employees.
- ④ Personnel engaged in official duties of international institutions;
- ⑤ Personnel authorized by the government, local public bodies, and international agencies.
- ⑥ Party personnel
- ⑦ Candidate for public officials
- ⑧ Personnel equivalent to ①~⑦

• “Business Convenience” refers to the tangible and intangible economic value and other usual benefits that can be obtained by completing a business.

• “Money and other interests” refer not only to the interests of the property, but also to the satisfaction of the needs and expectations of the people.

• “facilitation payments” refer to small sums of money paid to civil servants, etc for the purpose of smoothing or expediting daily administrative services.