

Anti-Bribery Policy

This policy is formulated for the purpose of the companies, officers and employees of the G-TEKT Group respecting and complying with the legal system of bribery regulation such as Japan's Unfair Competition Prevention Act, the US Foreign Corrupt Practices Act (FCPA), UK Bribery Act (UKBA).

We declare here not to accept any bribes prohibited by this policy.

Article 1 (Applicable target)

- (1) This policy is applied to all companies, which include subsidiaries and affiliates (hereinafter referred to as "each company"), officers and employees belonging to the G-TEKT Group (hereinafter referred to as "each officer and employee").
- (2) Each company, officer and employee must carefully confirm the laws concerning bribery (hereinafter referred to as "related laws and regulations") and pay attention not to violate the laws.

Article 2 (Prohibition of giving bribes)

- (1) Each company, officer and employee shall not grant money or other benefit, or make an offer or promise to grant to persons closely related to civil servants or who substantially equivalent to them (hereinafter referred to as "civil servants, etc.") to obtain profits of fraud in business.
- (2) Each company, officer and employee clearly reject these requests and report to authorities according to situation, in cases these acts are requested from "civil servants, etc."
- (3) Each company, officer and employee shall not grant money or other benefit, or make an offer or promise to grant to persons other than "civil servants, etc." beyond the scope of lawful and common business practices.
- (4) Each company, officer and employee located or working in areas where small payment for facilitation of ordinary administrative services (referred to as "Facilitation Payment"), collaborate with authorities (Ministry of Foreign Affairs, Embassy, Consulate, JETRO, JICA, etc.) and consider efforts to settle it.

Article 3 (Prohibition of accepting bribes)

Each company, officer and employee shall not receive money or other benefit from outside parties such as business partners beyond the scope of lawful and common business practices.

Article 4 (Obligation of recording)

In order to prevent transactions such as off-balance sheet transactions, fictitious transactions and other false transactions or transactions that give misunderstandings to them, each company prepare and store accounting records for all transactions and dispositions of assets in a timely and accurate manner.

Article 5 (Organizational Structure)

- (1) The Compliance Officer, appointed from G-TEKT (headquarters in Japan)'s Officers (hereinafter referred to as "the Compliance Officer"), supervises the G-TEKT Group's compliance. The Compliance Officer constantly monitors for this policy to be properly operated, and reports to the G-TEKT Board of Directors, in case of discovering problems.
- (2) Compliance managers are appointed from the management team at each company. Each company establishes a committee to deal with compliance including bribery prevention.
- (3) Each company establishes an internal reporting desk that can be reported anonymously. Each company's committee to deal with compliance actively conducts educational activities of its existence.
- (4) In cases a bribe is requested by "civil servants, etc." or when it is discovered that a bribe may have been paid to "civil servants, etc.", each company's committee to deal with compliance promptly reports the situation to the Compliance Officer and cooperates to investigate or deal with the problem.

Article 6 (Formulation of internal regulations)

- (1) Each company consults with lawyers or other experts as necessary to formulate internal regulations that embody this policy, considering related laws and regulations and the actual circumstances of the company. The internal regulations must be approved by the Compliance Officer.
- (2) Regardless of the position, officers and employees who committed inappropriate conduct in light of related laws and regulations, this policy or internal regulations shall be strictly punished in accordance with internal regulations.

Article 7 (Education)

- (1) Education of Bribery prevention is to be carried out continuously through training etc.

- (2) The contents of the education are practical contents including concrete examples of bribery, based on the understanding of related laws and regulations, this policies and internal regulations of each company.

Article 8 (Cooperation request to suppliers)

- (1) Each company requests cooperation from suppliers so as not to commit inappropriate conduct in light of related laws and regulations, this policy and internal regulations.
- (2) In case violations of related laws and regulations, this policy or internal regulations by suppliers are discovered, each company promptly requests correction and if correction can't be expected, considering measures including elimination of business relations.

Article 9 (Audit)

- (1) The Compliance Officer audits the company's compliance with this policy and internal regulations on a regular basis, and reports the results to the G-TEKT Board of Directors.
- (2) Each company strives to make audit results widely shared among officers and employees.

December.1.2017

G-TEKT CORPORATION
PRESIDENT
NAOHIRO TAKAO