

Principles for Prevention of Bribery and Corruption

In performing our respective duties, all officers and employees of the Mitsubishi HC Capital Group (“Group”) shall comply with laws and regulations for preventing bribery and corruption, applicable in countries and regions where the Group performs businesses (“Anti-Corruption Laws”) according to the principles below. The Anti-Corruption Laws include the Penal Code, the National Public Service Ethics Act, and the Unfair Competition Prevention Act (all in Japan), the Foreign Corrupt Practices Act (the U.S.), the Bribery Act (the U.K.), and the Bribery & Corruption Laws and Regulations (China). The Group prohibits all officers and employees from offering and receiving any bribe because those acts cause suspicions or distrust from society.

1. No one shall conduct corrupt practices in any form, including embezzlement and obstruction of justice.
2. Each officer and employee shall fully understand the laws and regulations related to public officials or equivalent persons in Japan and foreign countries. No one shall offer any entertainment or gift that may cause suspicions and distrust from society, nor any money or other benefits to profit illegally.
3. Whether inside or outside the country, no one shall receive any entertainment or gift beyond common sense and sound commercial custom from a supplier or business partner.
4. No one shall demand any supplier or business partner to offer private profit by exploiting its position or abusing its authority in the company.
5. Each company of the Group (“Company”) shall establish the necessary internal structure to comply with Anti-Corruption Laws inside and outside the country by setting auditing process, providing training, and stipulating relevant rules and procedures.

In addition, to eliminate any bribery and corrupt practices and ensure fair execution in the Group’s businesses, the Company shall ask the cooperation from its suppliers and business partners involved in the Group’s businesses to comply with Anti-Corruption Laws and understand the Group’s principles.

Established: April 1, 2021