

Anti-Bribery and Anti-Corruption Policy

The Direct Marketing MiX Group (meaning both Group companies as a whole and specific Group companies; “the Company”) prohibits all forms of corruption in the DmMiX Group Code of Conduct based on the recognition that strengthening the anti-corruption compliance system is one of the most important management issues. Furthermore, this Anti-Bribery and Anti-Corruption Policy (this “Policy”) specifies the framework of anti-corruption compliance systems applicable to the entire Group and is intended to concretely state the prohibitions specified in the DmMiX Group Code of Conduct by clarifying fundamental rules for preventing all forms of corruption.

1. Fundamental Approach

The Company does not permit any conduct contrary to the interests of the Company (conflicts of interest) or corruption of any type and engages in fair business. To ensure the soundness of business activities and fulfill the expectations of our stakeholders, the Company will thoroughly take measures to prevent bribery and corruption in accordance with this Policy.

2. Scope of Application

This policy applies to all executives and employees of the DmMiX Group and suppliers. In addition to regular employees, this includes temporary and part-time workers.

3. Compliance with Laws and Regulations

The executives and employees shall comply with Japanese and foreign laws and regulations relating to the prevention of corruption and bribery including the Penal Code, Unfair Competition Prevention Act, National Public Service Ethics Act, National Public Service Ethics Code, ethics codes established by local governments, etc., the United States ‘Foreign Corrupt Practices Act’, the United Kingdom ‘Bribery Act 2010’, and other laws and regulations on the prevention or punishment of bribery of other countries and regions.

4. Implementation Systems

The Risk and Compliance Committee shall meet every month and take action pertaining to the prevention of corruption. Matters investigated and deliberated on by the Committee shall be reported to the Board of Directors, and the Board regularly supervises this process and issues instructions as necessary. Furthermore, guidelines on the prevention of corruption including bribery, insider trading, and misappropriation of company assets have been established in the Code of Conduct that is established, amended, and abolished by the Board and is available in Japanese and English on the company intranet, and measures are taken to inform all employees regarding, and ensure strict

compliance with, those guidelines by all employees.

5. Supervising Bodies

The Risk and Compliance Committee shall be supervised by the Board of Directors and chaired by the President and CEO, Representative Executive Officer.

6. Prohibition of Bribery and Corruption

(1) Prohibition of bribery

We will not engage in acts that might be suspected of constituting bribery to customers, suppliers, other business partners, and civil servants or the equivalent (including civil servants of countries other than Japan). We will stipulate in-house rules based on important legislation and ordinances, thoroughly disseminate this education, comply with outside business and in-house regulations, and strive, through process management, to prevent bribery.

(2) Prohibition of political contributions

We do not make any contributions to political parties, political funding organizations, or individual politicians.

(3) Prevention of third-party corruption

If we conduct business through a third party, such as a consultant, consignee, broker, or sales agent, we will make efforts so that they comply with anticorruption rules in the same way as our own executives and employees. We conduct appropriate due diligence and will not engage in business with any third party unless a written contract has been concluded.

(4) The internal whistleblowing system

We established and operate an internal whistleblowing system to quickly identify circumstances that are or may be corrupt conduct, prevent compliance violations, and quickly rectify any violations that occur. In cases where consultations or reports are made, information is provided to the Risk Compliance Committee, which takes appropriate action. The internal whistleblowing system protects anonymity and confidentiality, and individuals who make reports are not subject to any retaliation.

(5) Notification of employees

We conduct training for all employees that includes content on preventing corruption. Through this training, we strive to strengthen understanding of the details of internal regulations on anticorruption, including bribery and other forms of corruptions, transactions that may be suspected of corruption, and consultation and reporting methods so that we can prevent corruption from occurring.

Attachment: Definitions of terms

“Bribery” includes the following:

The act of providing, promising, offering, or approving 'benefits such as money and goods, food and drink entertainment, honor, status, and inspection trips'* for the purpose of gaining unjust benefit in transactions

*Money, cash vouchers, gift cards, unlisted shares, financing, collateral, guarantees, gifts, hospitality, invitations (such as sporting events, theater, and travel, etc.), donations, charitable giving, sponsorship fees, rewards, rebates, sales promotion expenses, discounts, employment, education, opportunities for medical treatment, sexual favors, etc.

Facilitation payments (payment of small amounts of money for the purpose of facilitating procedures relating to normal administrative services by public servants)

Payment of disproportionate fees for services provided, etc.

“Corruption” includes the following:

All forms of corrupt practices including money laundering, embezzlement, and obstruction of justice
Gifts and entertainment that lead to suspicion or mistrust in society or provision of money or other benefits in order to gain unjust benefits

Provision of entertainment and gift-giving with business partners and others that deviate from sound business practices and social norms

Making requests to receive private benefits from business partners and so on by using the Company's status or authority etc.