



IINO Group Anti-Corruption Policy

The IINO Group, as a global company, recognizes that it is our social responsibility as a corporation to conduct fair corporate activities by ensuring that all officers and employees of IINO Kaiun Kaisha, Ltd. (IINO) and its subsidiaries comply with laws, regulations, and internal rules and by encouraging ethical conduct, and has established “The IINO Group Anti-Corruption Policy (the Policy)” based on the Corporate Philosophy. This policy also expresses our basic stance on anti-corruption as advocated in the "Ten Principles of the United Nations Global Compact," and in order to be a company that continues to meet the expectations of our stakeholders, The Group hereby announces this policy and will further enforce it to realize our ideal state.

1. Scope of Application

This policy is intended to demonstrate the IINO Group's responsibility to prevent corrupt practices, etc., and applies to all officers and employees of IINO and its subsidiaries. We will also seek the understanding of all our business partners, including suppliers, to support this policy. In addition, if necessary, we may request them to make agreements to prevent corrupt practices, etc., in contracts and other documents.

2. Laws and Regulations to be Observed

The IINO Group complies with the anti-corruption laws of each country and region where we conduct business activities.

3. Anti-Corruption Initiatives

Section 1. Prohibition of Bribery

"Bribery" refers to any act of giving a bribe such as money or goods, or receiving or promising to receive an improper reward, to obtain favorable treatment. The IINO Group prohibits the giving and receiving of entertainment or gifts of money or goods that are inappropriate under laws and regulations or socially accepted norms.

Section 2: Prohibition of Facilitation Payments

The IINO Group prohibits facilitation payments, which are illegal small monetary payments, etc. to public officials to facilitate administrative services.

Section 3: Prohibition of Illegal Political Contributions

The IINO Group complies with all applicable laws and regulations when making political

donations, refrains from any behavior that could be misinterpreted as collusion with politics, and strives to build sound and transparent relationships.

Section 4: Prohibition of Money Laundering

The IINO Group prohibits money laundering to conceal the source of proceeds obtained by illicit means using remittance, etc.,

Section 5: Prohibition of Insider Trading

The IINO Group prohibits insider trading to make personal profits by taking advantage of undisclosed information gained through business activities.

Section 6: Prohibition of Conflict of Interest Transactions

In principle, The IINO Group prohibits conflict of interest transactions, which are direct or indirect transactions for the benefit of oneself or a third party at the expense of the Company's profits by the "Compliance Regulations". In case where a conflict of interest is concerned, we shall follow the necessary procedures by laws and regulations, including approval by the Board of Directors.

Section 7: Prohibition of Wrongful Activities

"Wrongful Activities" refers to deliberate misrepresentation or concealment of important facts carried out with the intention of causing disadvantage to individuals or organizations. The IINO Group prohibits any form of wrongful activities, and all officers and employees are expected not to overlook such activities in their daily duties.

4. Compliance Structure

The IINO Group formulates and promotes compliance policies under the Chief Compliance Officer who is appointed by the President and Representative Director as chairperson of the Compliance Committee, deliberates on compliance issues regularly at the Compliance Committee, and reports to the Board of Directors.

In addition, corruption is clearly stated as a prohibited activity in the Group's "Compliance Rules" and in the "Code of Conduct" of the same rules. In the unlikely event that an officer or employee violates such prohibitions and infringes on domestic or foreign anti-bribery laws and regulations, we will punish them in strict accordance with the employment regulations.

Through compliance with the above-mentioned compliance system, we will thoroughly implement measures to prevent corrupt acts.

5. Establishment of a Reporting Desk

The IINO Group has established a whistleblower hotline so that we can promptly recognize and take appropriate corrective action in the event that an officer, employee or business partner has determined that an illegal act or an act that is in breach of corporate ethics has been, or may be, committed internally. In addition, we prohibit any disadvantageous treatment of whistleblowers for using this system and also established an operational system to maintain the confidentiality of whistleblowers.

6. Education and Training

The IINO Group will conduct educational activities for all officers and employees to ensure that they are aware of the prohibited acts stipulated in the "Compliance Rules" and compliance with domestic and foreign anti-corruption-related laws and regulations.

January 24, 2025
IINO Kaiun Kaisha, Ltd.