

## **Daio Group Anti-Bribery Policy**

The Daio Group has established the Daio Group Code of Conduct as a guideline for the conduct of each and every officer and employee in order to continue to be a "good corporate citizen" trusted by the international community toward the realization of our management philosophy "Shaping an abundant and affable future for the world," and has declared that the Group will not tolerate bribery that impedes the stability of social systems and fair competition.

The Daio Group strives to prevent bribery in accordance with this policy and the "Daio Group Anti-Bribery Rules" and other related internal rules, and is committed to conduct our business with high ethics and integrity.

### **1. Compliance with Laws and Regulations**

Each Daio Group company and its officers and employees comply with all applicable anti-bribery laws and regulations in the countries and regions in which they operate, and each of them acts with high ethical standards and in accordance with sound business practices.

### **2. Prohibition of Bribery, etc.**

- (1) Each Daio Group company and its officers and employees do not, whether directly or indirectly through a third party, provide, offer or promise to provide any money, goods or other benefits to any public official, etc. for the purpose of obtaining any undue advantage, or engage in any conduct that could be misunderstood as such.
  
- (2) Each Daio Group company and its officers and employees do not provide gifts, entertainment, or other benefits to other private businesses that exceed socially accepted norms or common sense, and do not accept or seek any such benefits.

### **3. Third Party Management and Record Keeping**

When the Daio Group engages business partners or provides gifts, entertainment, or donations, it will follow approval procedures pursuant to this policy, the "Daio Group Anti-Bribery Rules," and other relevant internal rules, and will handle such matters pursuant to appropriate accounting rules. In addition, the Daio Group will properly keep records related to these procedures and handling.

### **4. Implementation of Education**

Each Daio Group company regularly educates its officers and employees to ensure compliance with all applicable anti-bribery laws and regulations, this policy, and other relevant internal rules.

## **5. Internal Consultation and Whistle-blowing System**

Each Daio Group company and its officers and employees establish a system to promptly consult with and report to the department responsible for risk and compliance, or the Daio Group's Corporate Ethics Hotline, in the event that they are involved in or discover an act that violates or is suspected of violating this policy.

## **6. Anti-Bribery System and Continuous Improvement**

- (1) The Daio Group establishes and maintains an anti-bribery system within the Group based on this policy under direction of a director responsible for risk and compliance.
  
- (2) The Daio Group periodically monitors the status of its compliance with all applicable anti-bribery laws and regulations, this policy, and relevant internal rules, evaluates the adequacy and effectiveness of this policy and relevant internal rules, and its anti-bribery system, and continuously reviews the system for improvement.

## **7. Response to Violations**

If any officer or employee of the Daio Group violates this policy or relevant internal rules, the Daio Group will take strict measures, including disciplinary action, in accordance with employment rules, etc., and will take necessary measures to prevent recurrence.

Established: January 2024