

BIPROGY Group Anti-Corruption Policy

The BIPROGY Group has established the Group Code of Conduct as the basic rule for compliance with laws and regulations. This BIPROGY Group Anti-Corruption Policy(hereinafter “this Policy”) clarifies the approach on prevention of corruption defined in the Group Code of Conduct.

1. Scope

This Policy applies to all officers and employees of the BIPROGY Group. The Group also strives to foster relationships of trust with suppliers and business partners to encourage their cooperation in implementing this Policy and to promote sustainable mutual development.

2. Prohibition of Bribery and Corruption

The BIPROGY Group does not provide money, goods or other benefits (entertainment, gifts, political contributions, donations, sponsorships, employment assistance, kickbacks, etc.) to government officials, public officials or business partners either in Japan or overseas for the purpose of obtaining improper benefits. Furthermore, in countries or regions where laws and regulations restrict the provision of benefits to officers and employees of private companies, we act appropriately to avoid violating such laws and regulations.

3. Compliance with Laws and Regulations

We comply with the Unfair Competition Prevention Act (in Japan), the Foreign Corrupt Practices Act (in the United States), the Bribery Act 2010 (in the United Kingdom), and other anti-bribery laws and regulations of each country.

4. System and Initiatives

The BIPROGY Group has established the necessary promotion system to prevent corruption in line with this Policy. Furthermore, activities under this system are regularly reported to the Executive Council and Board of Directors of BIPROGY Inc.

- Establishment and operation of an internal reporting hotline

To prevent corruption, we have established departments with responsibility for compliance and internal reporting hotlines and strive to operate them in a fair and equitable manner. When corruption is exposed, we respond promptly and appropriately by taking strict disciplinary action against violators, as well as analyzing the root causes and taking measures to prevent recurrence. We have established and operate an internal reporting system in line with the requirements of laws and regulations to protect whistleblowers by ensuring that they do not suffer any disadvantages for reporting corrupt practices.

- Education and training

The BIPROGY Group works to raise awareness of this Policy and the Group Code of Conduct among its officers and employees

5. Prohibition of Conflict of Interest

The BIPROGY Group, as a general rule, prohibits actions that conflict with the interests of the BIRPOGY

Group (conflict of interest). When there are concerns about conflict of interest, we take the necessary action, such as obtaining approval of the Board of Directors, in accordance with laws and regulations.

6. Disclosure of Information

The BIPROGY Group regularly discloses information on its anti-corruption initiatives via various channels, including internal and external websites and a variety of other media.

Noboru Saito
Representative Director, President & CEO
BIPROGY Inc.
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