

# Morinaga Group Bribery Prevention Policy

In order to contribute to the promotion of compliance in its management, the Morinaga Group has established a policy to prevent bribery and thereby endeavors to prevent bribery.

This policy applies to the Morinaga Group (Morinaga & Co., Ltd. and subsidiaries and affiliates in which Morinaga & Co., Ltd. directly or indirectly invests) and its officers and employees (directors, statutory auditors, executive officers, and employees of the Morinaga Group (including temporary, contract, and dispatched employees)).

## **1. Compliance with Laws and Ordinances, etc.**

In order to prevent bribery, we will comply with laws and ordinances related to prohibiting bribery in Japan and other countries and regions where we do business and with various internal regulations, including the Morinaga Group Code of Conduct and Standards of Behavior as well as employment regulations.

## **2. Prohibition of Bribery**

We will not directly or indirectly give, offer, or promise to any person, nor will we accept, any improper money, gifts, entertainment, or other economic benefits (economic benefits, etc.).

We will also not provide or receive economic benefits, etc. that are beyond the scope deemed appropriate by social customs.

## **3. Establishment of a System**

In order to prevent bribery and to detect it as early as possible, we will develop a system to receive consultation and reports from officers and employees concerning acts that violate or may violate this policy. In addition, we will not engage in any disadvantageous treatment of anyone due to consulting or reporting on such acts.

## **4. Appropriate Accounting and Recording**

We accurately maintain records in our accounting books based on facts and properly store the related documents in accordance with the internal regulations and the like of the companies of the Morinaga Group.

## **5. Punishment**

Any officer or employee who violates this policy will be strictly punished in accordance with the internal regulations of the relevant company of the Morinaga Group.

Established: April, 2021