

The UNITED ARROWS Group's Efforts to Prevent Bribery and Corrupt Practices

The UNITED ARROWS Group has formulated and disclosed the UNITED ARROWS Group's Code of Conduct, which describes how we should think and act to realize our corporate philosophy. In the Code of Conduct, we emphasize fair and equitable transactions, in addition to compliance with the laws and regulations of each country and region, and declare that we will never provide or receive personal benefits and will strive to prevent corrupt practices.

In addition, we have established compliance regulations to ensure social credibility by establishing a compliance system and securing the soundness of business operations and to contribute to the realization of our corporate philosophy, and in accordance with these regulations, we have prepared a compliance manual that applies to the entire Group.

Internal Structure

Based on internal compliance regulations, the UNITED ARROWS Group has established its Compliance Committee, with the Representative Director, President and CEO serving as the Chair, executive directors serving as members, and directors who are Audit and Supervisory Committee members serving as observers. The Committee reviews and approves compliance policies and action plans, develops systems, and promotes education planning and management. Our efforts to prevent bribery and corrupt practices are also reviewed by the Committee as appropriate. The Committee regularly reports to the Board of Directors on its activities.

Entertainment and Gifts

The Compliance Committee has established the Rules for Gifts and Meals, etc. for the purpose of establishing a mechanism to ensure transparency so that healthy relationships can be developed with business partners. Entertainment and gifts are managed and recorded in accordance with appropriate rules. In addition, we have a system in place whereby the Internal Audit Division audits the management status of entertainment and gifts.

Donations related to Political Activities

Our donation regulations prohibit donations related to specific political activities.

Whistle-blowing System

We have established a whistle-blowing system pursuant to our whistle-blowing regulations, whereby multiple internal and external contact points are available for anonymously reporting any conduct that is questionable in terms of compliance. In addition, the above regulations stipulate that whistleblowers shall not be subjected to disadvantageous treatment.

Compliance Education

Our compliance regulations state that one of the main roles of the Compliance Committee is to plan, manage and provide compliance education, and all officers and employees are provided with training (e-learning) on compliance, including the prevention of bribery and corrupt practices.

Requests to Business Partners for Compliance with the Guidelines

The Code of Conduct for Business Partners of UNITED ARROWS Group in Goods Procurement set forth provisions to prevent corrupt practices, and we require that our business partners comply with the provisions on prevention of bribery, unethical conduct, corruption, money laundering, and involvement with antisocial forces in their business activities and provide education on preventing corrupt practices. Regarding said Code of Conduct, we receive a consent form from our business partners. It stipulates that, in the event of non-compliance by business partners, we will take corrective action against them and that if they fail to correct their actions, it may result in the suspension of business transactions.

Responsibilities of Officers and Employees

Our compliance regulations stipulate responsibilities of officers and employees, which include the following: officers and employees must sincerely recognize the importance of compliance and perform their duties in a fair and equitable manner; they must not engage in any act of instructing, suggesting, or tacitly allowing others to commit compliance violations; and, if they become aware that another officer or employee has committed a compliance violation, they must promptly report to the Company in accordance with the reporting line or notify the Company in accordance with the whistle-blowing regulations.

Disciplinary Actions

Our rules of employment stipulate that any employee who has received or demanded an unreasonable amount of money or goods by taking advantage of his/her position will be subject to disciplinary action, including dismissal.

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