

The DNP Group has established the "DNP Group's Code of Conduct" to define the behavior expected of us and for us to put into practice while conducting all corporate activities in fulfilling our corporate philosophy, "The DNP Group connects people and society, and provides new value".

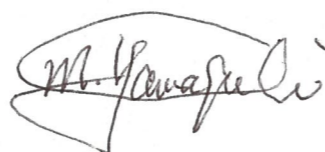
The Code of Conduct requires the compliance with laws and social ethics as one of the ten behaviors expected of us. With this, we recognize that we are able to earn the trust of society by having each and every one of us, while conducting our corporate activities, to not only comply with the laws but also, to contribute to the maintenance and development of markets that are free, orderly and competitive through higher ethical standards and a consistently fair and impartial behavior.

In recent years, with companies around the world expanding their footprints beyond regions and countries, governments are tightening anti-bribery regulations to ensure fair, free and competitive markets, and, as defined as a target of the SDGs, substantially reducing corruption and bribery in all forms is becoming a social agenda. With the DNP Group's increasing expansion of activities beyond regions and countries, the Group must not pursue profits through bribery or other types of fraud so as to continue winning the trust of the society.

The management of each company in DNP Group will further develop anti-bribery initiatives by actively promoting the "DNP Group Anti-Bribery Policy".

October 2021  
Corporate Ethics Committee

Chairperson



\*1: The "DNP Group" refers to Dai Nippon Printing Co., Ltd. and its subsidiaries.

\*2: "We", "our" or "us" refer to the directors, statutory auditors, corporate officers and advisors of the companies in DNP Group, those in an employment relationship with the companies and temporary staff assigned to perform work or services for the companies under temporary staffing contracts.

For the purpose of promoting the anti-bribery framework, the DNP Group has established this DNP Group Anti-Bribery Policy, in accordance with the DNP Group's Code of Conduct.

#### 1. Prohibition of Bribery

DNP Group requires us to observe the following rules:

- (1) We shall not directly or indirectly commit any bribery involving any government officials, private organizations or other persons/entities or perform any conduct which may lead to suspicion of bribery, including providing, promising or offering meals, entertainment, gifts, travel, donations or anything of value that is beyond convention, in relation to our duties.
- (2) We shall recognize that each country/region has its own specific laws and regulations (such as not only the prohibition of the offering of a bribe to government officials, but also the prohibition of the offering of a bribe to or accepting the same from private organizations), and shall comply with all and any applicable anti-bribery laws and regulations when performing our duties.
- (3) We shall not make any facilitation payments to any government officials or to any other persons/entities to expedite or secure the performance of governmental actions, regardless of the amount of such payments and under any circumstances.
- (4) We shall recognize that bribery committed by agents may be deemed as bribery committed by DNP Group; therefore, we shall not instruct agents to commit any bribery. Furthermore, we shall require agents to follow this DNP-Group Anti-Bribery Policy, and shall not give implicit approval if we are aware of any acts or evidence of bribery committed by agents.

#### 2. Anti-bribery framework in DNP Group

DNP Group shall establish internal anti-bribery regulations and promote the following anti-bribery framework:

- (1) DNP Group shall, taking into consideration conditions or risks specific to each country/region, establish an appropriate anti-bribery management system in each group company and regularly perform monitoring, inspection and assessment on whether such anti-bribery management system is being operated properly.
- (2) DNP Group shall regularly evaluate the bribery risks within DNP Group, and continue to improve the anti-bribery management system as need arises.
- (3) DNP Group shall provide training sessions relating to the anti-bribery management system to all of us.
- (4) DNP Group shall accurately record all transactions in its accounting books, and keep the relevant documentation. To this end, DNP Group shall establish, maintain and properly operate necessary internal control systems .
- (5) DNP Group shall establish and appropriately operate the consulting/reporting channels in order to detect any acts of bribery in a timely manner.
- (6) DNP Group shall take strict disciplinary actions against officers and employees who violate anti-bribery laws and regulations and/or this DNP Group Anti-Bribery Policy, in accordance with the internal rules and regulations of each group company.

Established: March 2018

Amended: October 2021