

Basic Policy for Anti-Bribery and Corruption

Pacific Industrial Co., Ltd.

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Shinya Ogawa

President and Member of the Board

1. Scope of Application

This Policy requires the Company and its subsidiaries in Japan and overseas (hereinafter “Group Companies”) to comply with this Policy and legislation concerning anti-bribery regulations.

2. Prohibition on Giving Bribes to Public Officials

Group Companies shall not provide improper entertainment, gifts, or benefits to public officials or persons equivalent to public officials (hereinafter “Public Officials”) either in Japan or overseas.

3. Payments to Business Agents

To prevent portions of payments made to agents or consultants (hereinafter “Business Agents”) to whom Group companies have commissioned work from being diverted to the provision of improper benefit to Public Officials, etc., when appointing Business Agents, Group Companies shall conduct due diligence regarding their eligibility and the appropriateness of remuneration.

If a Group Company becomes aware that a portion of payments made to a Business Agent will or may become diverted for the provision of improper benefit to Public Officials, etc., it shall not make payment to that Business Agent.

4. Entertainment and Gifts to Transaction Partners Other than Public Officials

Provision of entertainment, gifts, or benefits to suppliers or their officers, etc. who do not fall under the category of Public Officials shall be conducted in compliance with the laws and regulations of the relevant countries and only within the scope of social rituals.

5. Receipt of Entertainment and Gifts

Group Companies shall not accept excessive entertainment or gifts that go beyond the scope of social rituals from business partners or suppliers.

6. Keeping of Payment Records

Factual and accurate accounting ledgers shall be kept pursuant to appropriate accounting standards and proper records of payments shall be kept.

7. Understanding of and Compliance with Anti-bribery Regulations

In-house education regarding this Policy and anti-bribery regulations will be conducted on an ongoing basis.

8. Reports

Breaches of compliance, including bribery, shall be reported immediately on discovery and appropriate measures shall be taken at the appropriate time.

9. Regular Review and Improvement

This Policy shall be reviewed regularly and amendments and improvements made as necessary.