

## Fuji Electric E&C Group Anti-Bribery Policy

Engaging in the bribery of public officials, etc. not only constitutes a breach of the laws of Japan and of local laws overseas, but also may violate the laws of third-party countries given the globalization of corporate activities. Moreover, involvement in bribery may cause a loss of public credibility and undermine the foundation upon which the corporation's existence is based.

In the Fuji Electric E&C Group Code of Conduct that defines the basis for personnel's decision-making and proper behavior, the Fuji Electric E&C Group declares "*Compliance with Laws and Other Social Norms*", and indicates its full understanding of and compliance with laws, ordinances, customs and all other social norms, as well as the spirit thereof, in Japan and overseas with respect to its actions as a corporate group and the actions of its personnel. We hereby establish the Fuji Electric E&C Group Anti-Bribery Policy as follows in order to contribute to our compliance with the anti-bribery laws and regulations of all countries worldwide, to prevent corporate corruption, and to establish and maintain fair business practices.

### Article 1 (Prohibition of Bribery)

The Fuji Electric E&C Group will not, directly or indirectly by proxy, provide, offer, or promise money or any other benefits or advantages (including facilitation payments\*) to public officials (including persons equivalent to public officials and/or those associated with public officials, etc.), political organizations, private organizations, or their officers and employees for any fraudulent purposes, nor engage in any conduct that could be suspected as such, under the false pretenses of making donations or contributions, or under the guise of bearing expenses or making partial returns of payments (referred to as "kickbacks"), etc.

In addition, the entertainment and gifts, etc. we provide shall be limited to a socially acceptable and reasonable extent. In the event that we receive a request from a public official to engage in bribery, or in other acts that could constitute bribery, we shall firmly reject the said request.

(\*) Small payments intended to facilitate or expedite procedures for regular administrative services.

### Article 2 (Establishment and Operation of Anti-Bribery System)

In order to prevent bribery, the Fuji Electric E&C Group shall, in accordance with the "Fuji Electric E&C Group Compliance Program\*\*", endeavor to detect instances of bribery in their early stages by actively utilizing the Fuji Electric E&C Group's "E&C Help Line", as well as by defining and continuously monitoring matters requiring attention from personnel during daily business operations, conducting internal audits, and providing all personnel with regular trainings to ensure their familiarity with the rules.

The Compliance Committee will review and revise these initiatives semi-annually and issue reports to the Board of Directors and the Audit & Supervisory Board Member.

(\*\*) The Fuji Electric E&C Group Compliance Program:

A program covering the Company and its group companies that consolidates four aspects of all laws, regulations, and ordinances that pertain to business activities (1. Establishment and dissemination of in-house rules, 2. Daily monitoring of compliance with laws, regulations, ordinances, and in-house rules, 3. Auditing of compliance with 1 and 2 above, and 4. Compliance-related trainings).

Established on October 31, 2024

Revised on February 3, 2025