

Fuji Electric E&C Group Anti-Corruption Policy

The Fuji Electric E&C Group declares in the Fuji Electric E&C Group Code of Conduct to comply with laws, regulations and other social norms, and thereby conduct fair business transactions. In addition, we agree to the United Nations Global Compact and adhere to its 10 principles, including those in the area of anti-corruption.

Involving in corruption is an act that is not only subject to punishment such as fines and imprisonment, but also causes a loss of public trust and may undermine the foundation of a company's existence.

Aiming to advance anti-corruption efforts, the Fuji Electric E&C Group has established the Fuji Electric E&C Group Anti-Corruption Policy (hereinafter referred to as "this Policy") for all of its personnel. We will endeavor to prevent corruption.

Article 1 (Purpose)

The purpose of this Policy is to ensure that the policy prevents all personnel of the Fuji Electric E&C Group (including employees, contract workers, part-timers, and temporary workers dispatched to the Fuji Electric E&C Group and other personnel working under the direction and orders of the Fuji Electric E&C Group; the same applies hereinafter) from engaging in corruption and acts complicit in corruption, whether in Japan or overseas.

Article 2 (Compliance with Laws and Regulations)

The Fuji Electric E&C Group complies with anti-corruption laws and regulations applicable to each country or region in which businesses conducted.

Article 3 (Prohibition of Corruption)

The Fuji Electric E&C Group prohibits its personnel from directly or indirectly engaging in corruption (*) in violation of laws and regulations, whether in Japan or overseas. We also endeavor to promote fair business practices more broadly and contribute to the realization of a peaceful, fair, and sustainable society. Specific standards of conduct are as follows:

(*) Corruption is defined as acts of abuse of power to gain an unfair benefit, including bribery, fraud, embezzlement, illegal political contributions, unfair competition, insider trading, money laundering, and conflict-of-interest transactions.

1. Prohibition of bribery

Bribery means the act of giving money or goods, receiving an undue reward, or promising to perform such acts to or from a public official or a third party, including a business partner, for the purpose of obtaining favorable treatment for oneself.

In accordance with the Fuji Electric E&C Group Anti-Bribery Policy, the giving or receiving of entertainment, money, or goods that are inappropriate under laws, regulations or socially accepted norms are prohibited.

2. Prohibition of fraud

Fraud means the act of deceiving another person by misrepresenting facts.

The Fuji Electric E&C Group prohibits fraudulent acts against its counterparty in conducting business. We also endeavor to refrain from statements and actions that could be misinterpreted as fraud but provide true and correct information to conduct fair transactions.

3. Prohibition of embezzlement

Embezzlement means the act of consuming another person's property with which one has been entrusted as one's own.

The Fuji Electric E&C Group prohibits any act of embezzlement or any other illegal infringement on the property of others.

4. Prohibition of improper political contributions

The Fuji Electric E&C Group prohibits making improper political contributions and refrains from any actions that may cause the misunderstanding that we have a collusive relationship with political power. When making political contributions, shall comply with all relevant laws and regulations and endeavor to build a proper and transparent relationship.

5. Maintenance of fair and free competition

The Fuji Electric E&C Group complies with laws and regulations such as Act on Prohibition of Private Monopolization and Maintenance of Fair Trade, as well as related government ordinances, guidelines, etc. We will not engage in any acts that would cause disadvantages to our business partners, such as abusing a dominant position to conduct unfair transactions or unfairly modifying transaction terms, or acts that impede fair trade and competition, including bid-rigging.

6. Prohibition of insider trading

The Fuji Electric E&C Group prohibits insider trading in which undisclosed information obtained in the course of business used for personal gain.

The Fuji Electric E&C Group complies with the internal rules to prevent insider trading by its personnel.

7. Prohibition of money laundering

The Fuji Electric E&C Group prohibits any involvement in money laundering, including involvement in transactions related to proceeds from criminal activities, transactions that provide funds to terrorists, and transactions with prohibited persons identified by national governments and other authorities.

8. Prohibition of conflict-of-interest transactions

The Fuji Electric E&C Group prohibits conflict-of-interest transactions and other abuses of authority, which refer to transactions directly or indirectly for the benefit of oneself or a third party at the expense of the interests of the Company, in principle.

In the case when concerned to be a transaction constitute conflict-of-interest, necessary steps such as obtaining the approval of the Board of Directors in accordance with laws, regulations and internal rules shall be taken.

Article 4 (Establishment and Operation of Anti-Corruption System)

In order to prevent corruption, the Fuji Electric E&C Group, in accordance with the Fuji Electric E&C Group Compliance Program(**) , endeavors to detect corruption at an early stage by actively utilizing the Fuji Electric E&C Group's "E&C Help Line", as well as by prescribing matters to note in daily business operations of each personnel, always practicing such matters, conducting internal audit, and providing education to all personnel to ensure that they are familiar with the rules. The Fuji Electric E&C Group personnel shall promptly report to the Company any corruption or suspected corruption in violation of this Policy.

The compliance committee reviews and revises these efforts semi-annually and 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).

Article 5 (Accounting Records)

The Fuji Electric E&C Group will maintain and keep accurate and reasonably detailed records of transactions, income, expenditures and other dispositions of assets in accordance with applicable accounting rules.

Article 6 (Scope of Application)

This Policy applies to all personnel of the Fuji Electric E&C Group. We also require all business contacts involved in the business activities of the Fuji Electric E&C Group to understand and cooperate with this Policy.

Established on October 31, 2024

Revised on February 3, 2025