

Anti-Bribery Policy

Under the corporate philosophy of “creating new value,” the Leopalace21 Group strives to meet the expectations of customers and all other stakeholders, and works with them as a corporate citizen to help create a more sustainable society. To maintain and enhance the trust society places in it, the Leopalace21 Group has adopted this policy and will take steps to counter bribery in the countries and regions where the Leopalace21 Group engages in business activities.

1. Prohibition of Bribery to Public Officials, etc.

The Leopalace21 Group will not, directly or indirectly, conduct any acts of bribery, such as offering to give, promising to give, or providing money, gifts, entertainment, or any other type of advantage and benefit (hereinafter, “advantage, etc.”) to Japanese and foreign public officials and any other similar person (officers, employees, etc. of national governments, local governments, national enterprises, political parties, and international organizations; hereinafter, “public officials, etc.”).

In the case where public officials, etc. request for any advantages or benefits, the Leopalace21 Group will deny any requests, and inform any competent authorities if necessary.

2. Treatment of Individuals other than Public Officials, etc.

The Leopalace21 Group will not conduct any acts of bribery aimed at persons who are not public officials, etc. However, this shall exclude lawful cases within the bounds of general good business practice.

3. Accurate Records

The Leopalace21 Group will accurately record all of its transactions and properly store the corresponding ledgers.

4. Education and Reporting

The Leopalace21 Group will ensure that its officers and employees are aware of and comply with this policy through education and training, etc. The Group will also establish a reporting system for preventing and correcting acts in violation of this policy.

5. Revisions

The Leopalace21 Group will review the policy and revise it as appropriate and whenever necessary.

Established on August 1, 2016

Revised on January 18, 2017