

# Basic Policy on Prevention of Bribery and Corruption

Japan Energy Capital G.K. ("JEC") hereby declares its Basic Policy on Prevention of Bribery and Corruption as follows in order to ensure compliance with anti-bribery and anti-corruption laws and regulations.

1. JEC will establish a Code of Ethical Conduct and prohibit the provision of entertainment, seasonal gifts, occasion-based gifts, and significantly advantageous terms and conditions for transactions to its clients and other relevant parties who are:
  - public servants;
  - deemed public servants; or
  - groups qualifying as subjects of bribery under the Financial Instruments and Exchange Act, laws under which they were established, or any other applicable laws and regulations.
2. JEC will require its officers and employees to pay due attention to compliance, as well as exercise care to avoid being overly extravagant or excessive in terms of social standards, also when providing entertainment or gifts to clients and other relevant parties not covered by Paragraph 1 above.
3. JEC will prohibit its officers and employees from engaging in conduct that constitutes a violation of any law, ordinance, or regulation applicable to clients and other relevant parties, which pertains to remunerations, entertainment and the like.
4. JEC will prohibit its officers and employees from accepting entertainment or gifts deemed inappropriate by social standards and will require them to consult appropriate party(ies) in the event of difficulty determining the acceptability of any entertainment or gift.
5. JEC will observe all relevant laws, internal rules, and any other applicable regulations. At the same time, JEC will endeavor to establish and maintain fair and sound relationships with its clients and other relevant parties.

## Japan Energy Capital G.K.

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