

Sojitz Group Anti-Bribery Policy

As an international company, Sojitz Group recognizes that preventing bribery in connection with our business activities and operations is a critical and important issue, and Sojitz Group is committed to make concerted efforts to prevent any such acts of bribery.

1. Prohibition Against Bribery

All Sojitz Group personnel (including all Group employees, temporary and contract employees) shall not bribe any third party (including, but not limited to, government officials).

2. Compliance with Anti-Bribery Laws

In the course of Sojitz Group's business activities, Sojitz Group shall comply with all applicable anti-bribery laws, including Japan's Unfair Competition Prevention Law, the United States' Foreign Corrupt Practices Act, the United Kingdom's Bribery Act of 2010, and any other anti-bribery laws enacted by the countries and regions in which Sojitz Group operates.

3. Continuous Improvement of the Anti-Bribery Management System (ABMS)

In order to maximize our efforts to prevent bribery, we have established anti-bribery-related rules and procedures tailored to the business and operations we conduct, the products we handle, the services we provide, and the size and scale of all Sojitz Group organizations. We have also implemented an Anti-Bribery Management System (ABMS) in order to promote the efficacy of these rules and procedures. Sojitz Group shall regularly set and review anti-bribery targets pursuant to the ABMS and work to continuously improve it.

4. Independence of and Authority over the Anti-Bribery Processes and Procedures

The Chairman of Sojitz Corporation's Compliance Committee has the authority to lead the operation of ABMS. The other members of the Compliance Committee oversee the operation of ABMS and ensure it is implemented in an appropriate and effective manner.

5. Reporting System

In order to detect any suspected bribery at an early stage and implement appropriate responsive measures, Sojitz Group has established several internal processes whereby all Sojitz Group personnel may report any bribery-related issues and consult with compliance staff on any such issues. Sojitz Group encourages all employees to use these established internal processes to confer with compliance staff and report any bribery-related concerns. Sojitz Group prohibits any retaliation against any employee that uses any such system.

6. Protective Measures Against Bribery

Sojitz Group shall investigate any suspected bribery-related concerns as appropriate and necessary, the results of which shall be reviewed by the Chairman of Sojitz Corporation's Compliance

Committee and the other members of the Compliance Committee. Investigations may result in disciplinary actions and other fair and unbiased measures against any parties concerned as appropriate.

Dated March 1st, 2019