

Mitsubishi Electric Group Anti-Bribery Policy Preamble

In relation to dealing with public officials or any other persons in similar capacity in or outside the country, Mitsubishi Electric Group has previously established “Prohibition of Improper Payments” in “Mitsubishi Electric Group Conduct Guidelines” in an effort to strictly prohibit our group companies and their officers and employees from offering bribes, and taken various steps to prevent bribery, implementing employee education, self-inspection and conducting internal audit, etc. However, in the light of the current global situation where anti-bribery regulations are becoming increasingly tighter, we are now engaged in strengthening our anti-bribery measures even further to respond to the expansion of our business at a global level.

Our group has established “Mitsubishi Electric Group Anti-Bribery Policy” to reiterate, to people in and outside the group, our policy that our group companies, their officers and employees do not offer bribes, do not pursue profits if such profits can be realized only by offering bribes, and remain firm in rejecting any illegal demand. Based on this policy, our group companies are making efforts to establish and improve necessary and appropriate internal rules and to enhance educational and auditing activities to constantly prevent offering of bribes.

These efforts toward prevention of bribery will not bring results if made only by our group. To achieve this goal, cooperation of all of our business partners who are involved in the business of our group is essential. Your understanding of the objective of this policy and continuous support will be greatly appreciated.

July 28th, 2021

A handwritten signature in black ink, appearing to read 'Kei Uruma', with a long horizontal flourish extending to the right.

Kei Uruma

President & CEO

MITSUBISHI ELECTRIC CORPORATION

Mitsubishi Electric Group Anti-Bribery Policy

This Mitsubishi Electric Group Anti-Bribery Policy (hereinafter referred to as the "Policy") is provided for the purpose of prohibiting each Group company and its officers and employees from offering bribes to any public official or any person who holds a similar position in or outside the country (hereinafter referred to as a "Public Official") or any private individual or corporation, and thereby promoting compliance with anti-bribery laws and regulations in or outside the country and proper business activities of the Group.

1. Compliance with Law

Each Group company, its officers, and employees shall comply with all anti-bribery laws and regulations applicable to the Group company.

2. Prohibition of Bribery

Each Group company, its officers, and employees shall not engage in Bribery in any country or region in which the Group company carries out business. Furthermore, we do not pursue profits if such profits can be realized only by offering bribes.

If any demand for Bribery or any act which may constitute Bribery is made by a Public Official or a private individual or corporation, each Group company, its officers, and employees shall refuse such demand.

In this Policy, "Bribery" means provision of any gift, entertainment or any other benefit (regardless of whether such benefit is a tangible or intangible benefit, and including bearing expenses, giving any donation or aid or making facilitation payment^(*1)) or promise to provide or offer to provide such benefit to any person, whether directly or indirectly and whether such person is a Public Official or a private individual or corporation, with the expectation or appearance of improperly obtaining or maintaining business or other inappropriate benefit or having such person improperly perform any act or improperly refrain from performing any act related to that person's functions or duties.

3. Prohibition of Facilitation Payments

Each Group company, its officers, and employees shall not provide Facilitation Payments, regardless of the amount or purpose of any such payment, in any country or region in which the Group company carries out business, except in cases where its officers and employees face an imminent threat to its life or body.

4. Prohibition of Payment used for Bribery to Third Party

No Group company, its officers, or employees shall make any payment to any agent, distributor, dealer consultant or any other third party if such payment may be used or is suspected to be used for Bribery.

5. Retention of Records

Each Group company shall follow proper accounting procedures to process and record all transactions, expense payments and disposition of assets in accordance with internal rules and procedures, and shall retain relevant records in a proper manner.

6. Audit and Whistle-Blowing

Each Group company shall implement an internal audit system, whistle-blowing system or any other appropriate system and procedures to detect any actual or attempted Bribery. Also, if any such act is discovered, each Group company shall investigate it properly, report it to the relevant authority as necessary, and take other corrective measures.

7. Anti-Bribery Compliance by Group companies

Each Group company shall implement necessary and appropriate internal rules, guidelines, systems and procedures consistent with the principles of this Policy. Further, each Group company shall ensure compliance at all times with the anti-bribery laws and regulations of each country/region in which it operates. Also, for the purpose of promoting a compliance culture and prohibiting Bribery by any Group company or its officers or employees, each Group company shall provide periodical compliance training for and take all other appropriate action necessary or appropriate within an anti-bribery compliance culture.

Established: April 1, 2017
Latest revision; June 30, 2023

*1 A payment (other than a payment officially specified by law or regulation) to any Public Official to expedite or facilitate administrative actions or services, including but not limited to issuing a license or business permit, processing application such as visas, customs clearance, providing telephone, power or water service, or loading or unloading of cargo.