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# Kyocera Group Basic Policy Anti-Corruption

## Policy

The Kyocera Group has been conducting business based on the Kyocera Philosophy. The basis of the Kyocera Philosophy is "Do the Right Thing as a Human Being". The Kyocera Philosophy emphasizes the importance of conducting business activities in a fair manner, as exemplified by principles such as, "Pursue Profits Fairly" and "Insist on Playing Fair". Therefore, in light of the Kyocera Philosophy, it is impermissible for Kyocera Group employees to take unfair measures to gain profits.

Anti-corruption regulations have been strengthened around the world, and efforts to curb corruption are recognized as a social responsibility of the company. The Kyocera Group is a participant of the "United Nations Global Compact", which requires its participants to follow its principle, "Businesses should work against corruption in all its forms, including extortion and bribery". In response to the efforts to eradicate corruption, the Kyocera Group has formulated the Kyocera Group Basic Policy on Anti-Corruption ("Basic Policy on Anti-Corruption") in accordance with the Kyocera Philosophy and the Kyocera Compliance Statement, in order to become "The Company" which is respected by all.

## Prohibition of Bribery

- The Kyocera Group will not provide, offer or promise to provide bribes to any person directly or indirectly, but will compete based on quality and price and pursue profits fairly.
- Officers and employees of the Kyocera Group will not engage in acts of bribery, including making facilitation payments to public officials, or those equivalent to public officials, or persons with business influence, even if we are asked to do so. Officers and employees of the Kyocera Group will follow the straight and true road.
- Officers and employees of the Kyocera Group will separate personal matters from business and will never receive bribes.

## Establishment of the Anti-Corruption Compliance System

The Kyocera Group will establish an Anti-Corruption Compliance System to prevent people from committing fraud. For example, the Kyocera Group will take the following measures:

- Establishing anti-corruption regulations for each Kyocera Group company and guidelines for officers and employees to refer to in specific situations, according to each country and region.
- Implementing anti-corruption training to ensure that officers and employees are fully familiarized with the contents of the anti-corruption regulations and guidelines.
- Ensuring that business partners are familiar with the contents of this Basic Policy on Anti-Corruption and reconsidering transactions with business partners that violate anti-corruption laws and regulations, including the suspension of transactions with such business partners.
- Establishing a hotline for Kyocera Group employees to consult or report any instances of corruption.

## Bribery Risk Assessment and Control Procedures

The Kyocera Group conducts risk assessments based on anti-corruption laws and regulations in countries all over the world. The Kyocera Group will conduct periodic reviews of the Anti-Corruption Compliance System, and make improvements as necessary.

In order to prevent bribery through third parties such as distributors, agents etc., and to reduce the bribery risk relating to business mergers and acquisitions, the Kyocera Group will conduct preliminary evaluation of such third parties and candidates for acquisitions, mergers, joint ventures, etc. in accordance with bribery risks prior to the commencement of transactions.

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When engaging a third party, such as a distributor, an agent, etc. the Kyocera Group will require such third party to comply with this Basic Policy on Anti-Corruption and the anti-corruption regulations in order to build a healthy business relationship.

### Appropriate Accounting and Monitoring

To ensure transparent management, the Kyocera Group will perform accurate accounting based on the Kyocera Management and Accounting Principles, and will keep proper accounting books and records pursuant to the rules of each Kyocera Group company.

The Kyocera Group will monitor the implementation of this Basic Policy on Anti-Corruption through self-reviews, internal audits, etc. and will take corrective measures promptly should there be any problems found.

### Disciplinary Measures

Each Kyocera Group company will fairly and strictly discipline its officers and employees who violate this Basic Policy on Anti-Corruption and any applicable anti-corruption laws and regulations, according to the internal rules of each Kyocera Group company.

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