

# TBS Group Anti-Bribery and Corruption Policy

The TBS Group has always worked to prevent acts of bribery and corruption in business activities through the TBS Group Code of Conduct and TBS Group Standards of Conduct.

With the awareness that corruption presents a major obstacle to the achievement of a sustainable society, we defined the TBS Group Anti-Bribery and Corruption Policy (hereafter, "this policy") to provide a set of fundamental points that must be adhered to with an even higher sense of ethics, and to ensure zero tolerance for bribery or any other acts of corruption.

## 1. Scope of our policy

This policy applies to the TBS Group and all of its corporate officers and employees, regardless of the country or region in which the activities take place.

Furthermore, all suppliers and business partners, such as the corporations and individuals involved in news interviews and the production of programs, are requested to comply with this policy.

## 2. Legal compliance

The TBS Group will comply with all applicable domestic and foreign laws and regulations related to the prevention of bribery and corruption (criminal law, unfair competition prevention laws, ethics laws for national civil servants, foreign anti-corruption laws and regulations, etc.).

## 3. The prohibition of bribery, etc. of domestic and foreign civil servants

The TBS Group will not provide, promise or offer money or benefits to civil servants or persons in equivalent positions (hereinafter referred to as "civil servants") in Japan or overseas with the intent of influencing them in the performance of their duties.

We will not pay, offer, promise, demand, or accept, whether directly or indirectly, any money, gifts, entertainment, or other economic benefits from civil servants, government agencies, international organizations, private companies or business partners, or private individuals in order to improperly influence business results or to obtain unfair advantages in business.

## 4. Facilitation payments

We reject the use of facilitation payments (payments in small amounts made to "facilitate" standard administrative procedures) to obtain unfair advantages and benefits, regardless of the country or region.

## 5. Donations to civil servants, political parties, etc.

The Group will not use its funds or assets to make donations to civil servants, political parties, or other related organizations, except as permitted under applicable laws and regulations.

## **6. Prohibition of excessive gifts and entertainment**

Gifts and entertainment shall neither be given nor received, except in cases where such gifts and entertainment conform to laws and regulations and are within the scope of socially accepted norms. In addition, we will not pressure anyone to engage in such gift-giving or entertainment.

## **7. Donations, sponsorships and social investment**

We will not make donations, sponsorships, social investments, or other social contributions using the Group's funds or assets for the purpose of unfairly extracting favorable decisions for the TBS Group or improperly obtaining business benefits.

## **8. Other corrupt practices**

The TBS Group will not engage in other corrupt practices in relation to its businesses such as rebates or kickbacks, illegal international remittances, money laundering, insider trading, and sending money to antisocial forces, etc.

## **9. Elimination of indirect involvement in corrupt practices**

The TBS Group also prohibits involvement in corruption through agents, representatives, or other intermediaries. To prevent involvement in such corruption, we will strictly control contracts and transactions.

## **10. Thorough record-keeping and storage**

The TBS Group will ensure appropriate internal controls by keeping and storing suitable and accurate accounting records to prevent bribery and other improper payments.

## **11. Education and training**

Through education and training, the TBS Group will make this policy known and fully implemented among all Group corporate officers and employees, as well as educate them on the status of our efforts to prevent international bribery and other forms of corruption.

## **12. Responding to the discovery of misconduct**

The TBS Group will carefully investigate any corruption-related misconduct or concerns regarding misconduct that are discovered or raised. If confirmed, the Group will investigate the causes, employ corrective measures, and take strict disciplinary action against the corporate officers and employees involved, in accordance with applicable laws and regulations and internal rules.

## The TBS Group's corruption risk management system

### 1. Risk management structure

It is mandatory to report to the Board of Directors of TBS Holdings on the status of internal controls, including the management of and response to various risks, such as bribery and other "corruption risks." Specifically, the TBS Group Corporate Activities Committee, chaired by the President, has been established under the Board of Directors to develop and improve the internal control structure, establish corporate ethics, and manage risks.

### 2. Internal reporting systems

The TBS Group has previously established and utilized the TBS Hotline, an internal reporting system available to all TBS Group corporate officers and employees, business partners, and other affiliated companies to report bribery and other corrupt practices or potential corruption. The confidentiality of reports is maintained, any prejudicial treatment of reporters is prohibited, and appropriate actions are taken if reports are made, such as the carrying out of investigations.

### 3. Responding to audits and investigations

The TBS Group will continue to fully cooperate with any audits carried out, whether by external auditing firms or the Internal Audit Office. In the event of investigations by relevant authorities in each country or region, the Group will also respond appropriately.

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