

## **Detailed Regulations on the Prevention of Bribery of Public Officials (Excerpt)**

### Article 2 (Infocom Group Anti-Corruption Policy)

The Infocom Group Anti-Corruption Policy is as provided below.

#### 1. Basic Policy

Under this policy, “corruption” means the abuse of authority to obtain improper benefits, and refers to all forms of corrupt behavior, including extortion, bribery, conflicts of interest, and the improper receipt of rebates or kickbacks. The Infocom Group recognizes that preventing bribery is a particularly important issue, and prohibits strictly any direct or indirect involvement in bribery in violation of the law. In addition, the Infocom Group does not tolerate facilitation payments for illicit gains.

Infocom Group employees shall comply with all applicable anti-corruption laws and regulations. The Infocom Group prohibits any direct or indirect involvement in corruption in violation of laws and regulations, and we respond to the demands of society through sincere efforts to prevent corruption in our business activities.

Further, the Infocom Group pursues fair business practices more broadly and strives to contribute to more peaceful, just, and sustainable societies.

#### 2. Establishment of a Compliance Structure Under the Commitment of Top Management

The CSRO is the person responsible for compliance within the Infocom Group. The CSRO takes the initiative to communicate this policy internally and externally on an ongoing basis. The CSRO also ensures that a group compliance framework, including procedural rules and organizational systems, is in place to implement this policy across the group.

#### 3. Risk-Based Approach

In identifying corruption risks within the group, the Infocom Group conducts risk assessments based on a series of business processes, the nature of the products involved, the conditions local operating conditions, and the scale of the business in question. The group then implements focused responses to business activities entailing high corruption risks.

#### 4. Education and Training

The Infocom Group has established and implements a system to provide regular education and training for employees of the Infocom Group regarding the implementation of policies and procedures.

#### 5. Eliminating Indirect Involvement

The Infocom Group prohibits involvement in corruption not only directly but also through intermediaries such as agents. To prevent involvement in corruption through such intermediaries, the Infocom Group controls contracts and transactions with such intermediaries, including agents. We established procedures to monitor the compliance status

of such intermediaries on a regular basis.

6. Effective Operation of the Internal Reporting System

The Infocom Group established an effective whistle-blowing system that allows any executive or employee to report corruption. We maintain the confidentiality of reports and prohibit any prejudicial treatment of whistleblowers.

7. Appropriate Response to Corruption

The Infocom Group carefully investigates any irregularities related to corruption when discovered or when there is concern that irregularities may have occurred. If the fraud is found to be factual, we investigate the causes, take corrective measures to prevent recurrence, and take strict disciplinary action against the executives or employees involved in the corruption, regardless of their position in the company.

8. Measures Taken Before and After Mergers and Acquisitions

Before a merger, acquisition, or business alliance, the Infocom Group conducts due diligence on the target company from the perspective of corruption risk. Subsequently, we integrate our compliance systems for the merged or acquired company.

9. Monitoring and Continuous Verification/Review

Under the supervision of the board of directors, the Infocom Group monitors the implementation of this policy, verifies its effectiveness, and reviews the content as necessary.

10. Recording and Disclosure of Information

The Infocom Group keeps accurate business records, including accounting records, to prevent any suspicion of involvement in corruption. In addition, Infocom Group employees are made aware that anti-corruption is an important concern for both internal and external parties, and that they should endeavor to disclose the status of the Infocom Group's anti-corruption efforts to the extent possible.

Article 5 (Basic Rules)

1. Prohibition of Bribery of Public Officials, etc.

Infocom Group employees shall not engage in or authorize any bribery or any act that could be misinterpreted as bribery of public officials. Infocom Group employees are also prohibited from bribing public officials, etc., at their own personal expense.

2. Refusal of Requests From Public Officials, Etc.

If an Infocom Group employee receives a demand for a bribe, etc., from a public official, either directly or through a third party including an agent, etc., the employee must refuse said request firmly, whether such demand is received personally or organizationally.

3. Prior Consultation

Notwithstanding the provisions of Paragraphs 1 and 2 of this Article, Infocom Group employees must consult with the General Manager of the Infocom General Affairs Office in advance when providing benefits, bearing expenses, or making donations, etc., to public

officials, etc., whether personally or organizationally. This is the case, even though such expenses, etc., do not fall under the definition of bribery, etc. The same shall also apply in the case of receiving a demand from a public official, etc.

4. Emergency Situations

Notwithstanding the provisions of Paragraphs 1 and 2 of this Article, in certain cases, an Infocom Group employee may receive a demand from a public official, etc., directly or through a third party including an agent, etc., to provide benefits or incur expenses, whether personally or organizationally, and the refusal of said demand could place the employee's or a third party's life or physical safety in real danger. If the safety of life or limb of an employee or a third party would be endangered if not complying with said demand immediately, the said employee may with said demand to avoid endangerment. However, said demand must be reported to the General Manager of the General Affairs Office of Infocom immediately after the danger has passed.

Article 6 (Mergers, Acquisitions, and Important Business Alliances)

1. Due Diligence Prior to Mergers, Acquisitions, or Material Business Alliances

- I. In the event of a merger, acquisition, or material business alliance with a company outside the Infocom Group ("Target Company"), Infocom Group employees shall, in advance, conduct appropriate due diligence related to the risk of bribery or other corrupt practices in the Target Company's business, the development and implementation of internal control systems to prevent bribery and other corrupt practices, and other relevant matters. Infocom shall also confirm whether the target company is currently or has been in violation of these bylaws in the past.
- II. If the Target Company is found to be in violation of these bylaws, the employees of the Infocom Group must consult with the General Manager of the Infocom General Affairs Office.

2. Post-Merger and Post-Acquisition Activities

If an Infocom Group employee becomes aware after a merger or acquisition has taken place that the Target Company has engaged in conduct that violates or may violate these bylaws before the merger or acquisition takes place, the employee must consult immediately with the General Manager of the Infocom General Affairs Office.

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