

SG Holdings Group Anti-Bribery Policy



Preamble

The SG Holdings Group Anti-Bribery Policy (hereinafter “This Policy”) conveys the specific content using an approach based on the SG Holdings Group Charter of Corporate Conduct and the SG Holdings Group Code of Ethics and Conduct.

1. Basic Principal

The executive officers and employees of companies (including temporary employees) of the SG Holdings Group (hereinafter the “Group”) shall aim to establish fair business practices by preventing bribery under This Policy and complying with the anticorruption laws of each country.

2. Prohibition of bribery

Executive officers and employees of companies in the Group shall not give or receive bribes in any countries or regions in which business is conducted. If a request or proposal for a bribe is received from a public servant, executive officers and employees of companies in the Group shall refuse it.

*This excludes instances in which bribes are necessary to avoid danger to the lives, persons, or freedom of executive officers or employees.

“Bribery” refers to a company in the Group or a trading partner providing or receiving money, gifts, entertainment, or other benefits, to or from public servants, for the purpose of encouraging or preventing actions relating to duties, in order to secure or maintain trading relationships.

3. Records

Companies in the Group shall create and retain appropriate records of transactions involving money or other benefits that occur in the process of work, in accordance with all internal regulations.

4. Training

Companies in the Group shall conduct education as appropriate, to prevent bribery involving executive officers or employees.

5. Internal auditing and reporting systems

Companies in the Group shall quickly uncover and rectify illegal activity through the operation of an internal auditing system and an internal reporting system. If there is a risk of illegal activity occurring, investigations and preventive measures shall be implemented as appropriate.

6. Penalties

If an executive officer or employee breaches This Policy, companies in the Group shall impose a penalty in accordance with their own internal regulations, and notify the relevant authorities as necessary.

7. Understanding and cooperation of business partners (suppliers)

We will seek the understanding and cooperation of our business partners (suppliers) as well.