

CTC Group Policy on Fair Trade and Prevention of Corruption

The CTC Group defines its mission as "Leveraging IT's potential to change future for the Global Good." This mission can only be realized by attracting various stakeholders by our services, products, and technological capabilities, and cannot be realized through business processes that violate compliance. Furthermore, if we seek profit through unfair competition or bribery, it could cause immediate loss of the whole trust and expectation accumulated ever since.

The "Fair Trade and Prevention of Corruption" in terms of compliance is already stated in the "CTC Group Code of Conduct." However, considering the recent globalization of business and trends in domestic and overseas laws and regulations, we hereby clearly announce this policy.

We, together with our business partners, will comply with all applicable laws and regulations of the countries and regions in which the CTC Group carries out its business, and will continue to do our utmost to promote fair trade and prevent corruption.

1. [Prohibition of acts that impede fair competition]

We will promote fair trade, and never engage in any conduct that impedes fair competition, such as coordinating orders or adjusting the price of services or products, etc. with competitors, whether in Japan or overseas.

2. [Prohibition of bribery]

For the purpose of preventing corruption, we will not provide, propose or promise any entertainment, gifts, or other facilities to public officials or persons in equivalent positions, or other business partners for the purpose of obtaining illegal benefits, whether in Japan or overseas. In addition, we will not cause our business partners to conduct such bribery.

3. [Establishment and Operation of Systems]

We will appropriately develop and operate a system of personnel, organization, and internal rules, necessary for ensuring the observance of the preceding two clauses, by understanding the risks of each CTC Group company.

4. [Monitoring and Revision]

We will monitor the system of personnel, organization, and internal rules in the preceding clause on a regular basis, including whether it is appropriately established and operated, and whether its function is effective. In addition, we will review and improve the system as necessary, in light of the status of risks or the revisions of laws and regulations.

5. [Full Dissemination]

We will implement this policy and ensure that this policy and the related efforts of each CTC Group company are continuously disseminated.

April 1, 2024

Tatsushi Shingu

President and CEO

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