Anti-corruption Policy of the Morinaga Milk Group

As a food company that aims to contribute to healthy and enjoyable lifestyles through offering unique products derived from advanced milk technology, the Morinaga Milk Group engages in activities with ethics and integrity and strives to prevent corruption.

1. Compliance with Anti-corruption Laws and Regulations

In order to prevent corruption, we will comply with all applicable anti-corruption laws and regulations in countries and regions in which the Group operates, in accordance with our Guiding Principles and ethical standards.

2. Prohibition of Bribery, etc.

We will not provide, offer, or promise bribes to civil servants (including foreign civil servants) or parties corresponding to civil servants (hereinafter collectively "civil servants, etc."), whether directly and indirectly, domestically or internationally. We will maintain fair and transparent relationships with business partners, civil servants, etc., and will comply with laws, regulations, guidelines, norms, internal regulations, sound business practices, etc. regarding the prevention of bribery and corruption. We will also prohibit the giving or receiving of improper money, gifts, entertainment, or other gains that deviate from social standards.

3. Handling of Audits and Investigations

We will fully cooperate with audits by external auditors and internal auditing departments and with investigations by relevant authorities of each country and region, and will bear accountability for compliance with this policy.

4. Improvement of Relevant Structures

In order to ensure the prevention and early detection of corruption, we will improve our internal whistleblowing system-based structures for accepting whistleblowing reports and consultations from all employees (including officers) regarding acts that violate or may violate this policy. We will properly operate the internal whistleblowing system to ensure that whistleblowers are not subject to unfair treatment and that confidential information concerning whistleblowers is not leaked.

5. Education and Training for the Prevention of Corruption

We will strive to prevent corruption by making this policy known to all employees (including officers) through education and training, and by enlightening all employees concerning the prohibition of bribery. We will also ask that our business partners and other relevant parties understand and cooperate with these efforts.

6. Disciplinary Measures, etc.

We will strictly discipline employees (including officers) who have violated anti-corruption laws and regulations or internal regulations regarding prevention of corruption (including this policy), in accordance with personal legal liability and with internal work regulations and other rules.