

## Anti-Bribery Policy

In order to conduct business activities in a fair and ethical manner, MIXI Group ("We") will comply with all applicable anti-bribery laws and regulations in the countries and regions where MIXI Group is located and conducts business. "Anti-Bribery laws and regulations".)

### 1. Prohibition of Bribery

Whether directly or indirectly, we do not give, promise, or offer bribes to any persons.

### 2. Entertaining / giving gifts to public officials or others

In accordance with regulations, we do not provide entertainment or gifts to public officers or similar persons beyond the scope of socially accepted norms, whether in Japan or overseas.

### 3. Facilitation Payments

We do not make "Facilitation Payments", small payments to public officials or others for the purpose of facilitating or expediting routine administrative procedures.

### 4. Building sound business relationships

We endeavor to only conduct business with transparent and lawful parties.

### 5. Thorough management of accounting records

We keep accurate books and records, in reasonable detail, of all company transactions and take special care to ensure the proper treatment of disbursements related to public officials and other related matters.

### 6. Regular risk assessment, review, and improvement

We regularly assess the risk of bribery as it relates to the nature of each business, review anti-bribery rules and measures, and revise and improve them as necessary.

### 7. Disciplinary action

We shall punish those who violate Anti-Bribery laws and regulations, as well as rules and regulations of the company to which they belong, will be subject to disciplinary action or other punishment in accordance with the rules and regulations of their company