

## **DENSO Global Anti-Bribery Policy**

- ➤ DENSO Group shall strictly comply with domestic and foreign laws and regulations regarding anti-bribery, shall always act in a manner that can be justified with dignity to DENSO Group stakeholders, and conduct DENSO Group business with integrity and fairness.
- DENSO Group shall <u>not</u> permit any of the following conduct (collectively, "**Bribery Activity**") whether performed within or outside Japan:

## (1) Offering Bribes

Provide, offer or promise any money or other interests or benefits ("**Financial Advantage**") directly or indirectly, to any public official or any person similar thereto ("**Public Official**") or any private individual to whom it is prohibited by laws or other regulations to offer bribes, with the intent to inappropriately influence the counterparty for the purpose of obtaining or continuing business or to receive any other preferential treatment in business.

## (2) <u>Accepting Bribes</u>

Receive, demand or promise to accept Financial Advantage directly or indirectly, from any Public Official or any private individual, if requested to provide preferential treatment in business when performing the duties of an officer or employee of DENSO Group.

- DENSO Group shall not instruct, solicit, aid, abet, or condone any third parties such as agents, consultants, sales customers, suppliers and the like to engage in Bribery Activity on behalf of the DENSO Group.
- DENSO Group shall specify and enforce the matters to be complied with by officers and employees under this policy in the internal rules of each DENSO Group company in order to prevent the occurrence of any of the above illegal acts.
- ➤ DENSO Group shall deal strictly with any Bribery Activity that is discovered, including taking disciplinary action against any officer or employee who engaged in the Bribery Activity.