

## Anti-Corruption Policy and Measures

The Seibu Group provides all its businesses and services under the [Group Vision](#), which is the Group's management philosophy and policy, and the [Seibu Group Code of Corporate Ethics](#), which sets out the Group's basic principles of compliance. In addition, the [Seibu Group Principles of Conduct](#) (referred to below as Principles of Conduct) set out what all officers and employees must observe in the course of their duties. Specifically, these are principles showing our stance on all forms of anti-corruption, including: compliance with laws, regulations, notices, internal rules, etc.; resolute action against criminal groups and never doing anything that could encourage the activities of such groups; not accepting gifts or entertainment beyond the bounds of social decency; and maintaining moderate relationships with politicians and public officials and not doing anything that would cause distrust from society.

In particular, we have established the [Seibu Group's Sustainable Procurement Policy](#), which sets out the matters to be observed by the Group with respect to all procurement, and the [Seibu Group Supplier Guidelines](#), which set out our requests to all our business partners (suppliers.) In addition to clearly stating our stance on the prevention of all forms of corruption, including money laundering, embezzlement, corruption, bribery, and extortion, we also call on our business partners to take measures that involve our supply chains.

### Specific Measures

#### Education and awareness

To prevent corruption as stated in the Principles of Conduct, we distribute the Compliance Manual and Compliance Card to Group officers and employees, and conduct internal education and awareness activities through periodic compliance-related e-learning and other training.

#### Guidelines on gifts and entertainment

We have established guidelines for Group officers and employees regarding gifts and entertainment (referred to below as the Guidelines) that provide a basic guide for determining whether gifts or entertainment are within socially acceptable limits, and define appropriate relationships with business partners and government officials. The Principles of Conduct stipulate appropriate fact-based reporting and recording, and the Guidelines also require that, as a general rule, prior internal approval be obtained for gifts and entertainment, for example, and that the date, time, recipient, value, etc. of the gift or entertainment be recorded respectively and reported appropriately.

#### Dealing with violations

In the unlikely event of corruption or other misconduct by a Group officer or employee, a thorough investigation will be conducted, and if a violation of laws, regulations or internal rules is found, disciplinary action will be taken in accordance with internal rules.

#### Implementation system

Other cases of corrupt practices reported to the Corporate Ethics Hotline, established to quickly identify internal issues, are investigated in good faith and reported to the Seibu Group Corporate Ethics Committee (referred to below as the Committee). The Committee is composed of members of the Board of Directors, including the President, as well as outside experts, and is responsible for resolving issues related to corporate ethics and considering measures to prevent their recurrence.

Click [here](#) to see the Group's governance structure for compliance and anti-corruption, as well as other specific measures.

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