

Anti-corruption Policy

Established: May 31, 2022

dip Corporation (hereinafter, “dip”) sets forth its Anti-corruption Policy as follows with the aim of ensuring unrestricted and fair transactions based on dip’s corporate philosophy of ‘Here at dip, we want to tap into dreams, ideas and passion to create a better society’. By clarifying and pursuing a policy that serves as the foundation of the efforts of its officers and employees to prevent corruption, dip aims to earn the trust of stakeholders and society in general.

Basic policy

We do not engage in any corrupt practices (e.g., bribery, corruption, money laundering, embezzlement, fraud), either directly or indirectly.

To ensure unrestricted and fair transactions, we offer entertainment, gifts and other benefits to clients we offer entertainment, gifts and other benefits to clients only to the extent that is recognized as appropriate.

Scope of application

This policy is applied to all officers and employees of dip irrespective of the country or region in which they carry out activities.

Compliance with anti-corruption laws and regulations

dip’s officers and employees shall comply with all anti-corruption laws and regulations applied in each country or region, as well as this policy and internal regulations (hereinafter, the “Relevant Rules”).

Prohibition on offering bribes

Except in cases allowed by the Relevant Rules, dip’s officers and employees do not provide, propose or promise with deceptive intent financial or any other benefits to public servants, private customers, clients and other business operators (hereinafter, “clients, etc.”), either directly or indirectly.

We also request agencies, outsourcees and business partners (hereinafter, “business partners, etc.”) to observe this policy and do not tolerate any act of offering bribes by them.

Furthermore, we do not instruct bribe-giving through business partners, etc.

Prohibition on bribe-taking

dip’s officers and employees do not accept, demand or promise to accept illegal or improper benefits in the course of their duties, either directly or indirectly.

Lawful entertainment and gifts

Entertainment, gifts, travel expense payments, donations, support or sponsorship provided lawfully to clients, etc. for legitimate business purposes are handled appropriately in accordance with the Relevant Rules.

Thorough keeping and storing of records

In order to fulfill accountability on compliance with the Relevant Rules, we keep accurate records in the account book based on facts and store the relevant forms in accordance with internal regulations.

Audit

Concerning compliance with the Relevant Rules, we appropriately operate a system for performing self-inspections and internal audits according to the degree of risk.

System and response

To secure a system for complying with the Relevant Rules, we provide and effectively operate an internal reporting contact point where officers and employees can report matters concerning compliance in general, including corruption prevention.

If any act of violation or a potential violation of the Relevant Rules is discovered, a strict internal investigation will be conducted. We will offer full cooperation should an investigation by the authorities be required.

Penalties

Officers and employees violating the Relevant Rules will face strict disciplinary action in accordance with internal regulations.

Hideki Tomita
Representative Director, President and CEO