



Basic Anti-Corruption Policy

1. Purpose

NS United Kaiun Group ("NSU Group") has established this policy to ensure compliance with anti-corruption laws and regulations applicable to the countries and regions in which we conduct business activities and to practice behavior that is compatible with social ethics.

2. Scope of Application

This policy applies to all officers, employees and seafarers, regardless of employment status. We will also seek the understanding and cooperation of all business partners related with our business activities with respect to this policy.

3. Laws and Regulations to be Observed

The NSU Group complies with the anti-corruption laws and regulations of the countries and regions in which it conducts business activities.

4. Anti-Corruption Initiatives

The NSU Group complies with the following prohibitions.

(1) Prevention of Corruption

We will pursue fair, transparent and free competition and appropriate transactions domestically and internationally, and will not engage in any illegal transactions such as money laundering, cartelization, and insider trading.

(2) Prohibition of Bribery

We will not engage in illegal activities such as giving or receiving money, goods, or other benefits or favors for the purpose of obtaining an improper reward from public officials or any other interested parties, whether in Japan or overseas,

(3) Prohibition of Illegal Facilitation Payments

We will not make facilitation payments, which are small payments to public officials and others for the purpose of facilitating or expediting administrative services.

(4) Prohibition of the Illegal Provision of Political Funds

We will comply with the Political Funds Control Act, strive to comply with its provisions on establishing sound and normal relationships with political and administrative organizations, and will not make any illegal donations related to political activities.

5. Compliance Structure

The NSU Group has established an Internal Control and Compliance Committee chaired by the President. The Committee is responsible for developing systems to improve compliance, including the prevention of corruption and bribery, and promoting adherence to compliance rules, and the Committee reports regularly to the Board of Directors.

6. Dealing with Violations

The NSU Group will take strict disciplinary action in accordance with internal rules and regulations in the event that any of its officers or employees violates any domestic or foreign anti-corruption laws or regulations.

7. Establishment of Advisory Service Desks (Whistleblower Hotlines)

The NSU Group has established internal and external compliance advisory service desks that guarantee the anonymity of whistleblowers and that ensure whistleblowers will not be treated unfairly for using these advisory service desks. We encourage employees to report suspected violations or concerns about violations of this basic policy so that appropriate action can be taken in a timely manner.

In addition, counselors have been assigned to internal advisory service desks and attorneys to external advisory service desks, and third-party organizations have been engaged as more anonymous contact points.

8. Education and Awareness

The NSU Group will conduct educational and awareness-raising activities for all officers, employees and seafarers to ensure that they are aware of the prohibited acts stipulated in this policy and that they comply with domestic and international anti-corruption laws and regulations.

This policy was approved by the Board of Directors on January 31, 2023. Subsequent revisions or abolition of this policy will also be determined by approval of the Board of Directors.

January 31, 2023

Kazuma Yamanaka, President and Representative Director
NS United Kaiun Kaisha, Ltd.