

Kirin Group Anti-Corruption Policy

The Kirin Group shall fully understand and comply with the laws and guidelines of the countries and regions where it conducts businesses, and shall not tolerate, directly or indirectly, any involvement in corrupt practices* at any time. This Policy, which sets forth the basic attitude and actions to prevent corrupt practices, shall apply to all executives and employees working for the Kirin Group. In addition, all business partners and agents of the Kirin Group are also required to comply with this Policy.

(*) "Corrupt practices" in this Policy refers to any act of abusing authority to gain an unfair advantage, including bribery, facilitation payments to gain an unfair advantage, giving or receiving excessive entertainment or gifts, embezzlement such as the improper receipt of kickbacks or rebates, unfair competition such as bid-rigging or collusion, extortion, fraud, and money laundering.

1. Organizational structure to prevent corruption

The Kirin Group shall ensure that all executives, employees, and related parties, including business partners and agents, are fully aware of this Policy, and shall establish the required system for anti-corruption compliance.

-We shall establish departments in charge of compliance and whistleblower hotlines for the prevention of corruption, and shall strive for equality and fairness in their operation.

-We shall establish a system for promptly consulting with and reporting on any acts or suspected acts in violation of all applicable anti-corruption laws, agreements, guidelines, etc. in each country and of this Policy.

-We shall stipulate the "Kirin Group Sustainable Supplier Code of Conduct" which reflects this Policy, and shall strive to prevent indirect involvement in corrupt practices by making acceptance of the Code a precondition for transactions with business partners, agents, and others.

-In the event of understanding of a suspected violation of this Policy, we shall promptly investigate the facts and take appropriate measures.

2. Education and training

The Kirin Group has prepared the Group Compliance Policy, the Group Compliance Guidelines, the Group Anti-Bribery Rules, and the Rules on the Establishment and Operation of the Kirin Group Whistleblower Hotline, in addition to this Policy, and has made them available to the entire Group at all times through internal notifications, the intranet, and other means.

The Kirin Group shall continue to provide ongoing education and training on a regular basis to its executives, employees, and related parties, including business partners and agents, in order to further disseminate ethical awareness and to maintain and improve its

anti-corruption system.

3. Proper accounting procedures and records

The Kirin Group shall, in order to fulfill its accountability for compliance with the anti-corruption laws and guidelines of each country and with this Basic Policy, keep factual and accurate records of all authorized documents, accounting books, etc., relating to expenditures, and properly store related reports under an appropriate system of internal controls.

4. Monitoring and continuous improvement

The Kirin Group shall conduct periodic self-inspections and internal audits of its anti-corruption initiatives and compliance status in accordance with the risks in each deployed country and its business to confirm that the anti-corruption system is functioning properly. On the basis of the results, the Kirin Group will revise and improve this Policy and its compliance procedures as necessary.

5. Establishment and operation of whistleblower hotlines

The Kirin Group shall establish a whistleblower hotline for the prompt consultation and reporting of any acts or suspected acts in violation of all applicable anti-corruption laws, agreements, guidelines, etc. in each country and of this Policy.

The Kirin Group shall conduct a fair investigation, working with the whistleblower to confirm the facts and resolve the actual problem. It shall strive to prevent any disadvantageous treatment or reprisals against whistleblowers or persons who cooperate in investigations.

6. Measures and penalties

The Kirin Group shall refuse to continue transactions with any business partner or agent in the event that it becomes aware of any form of corrupt practices by said partner or agent. The Kirin Group shall strictly and promptly punish executives and employees who violate anti-corruption laws and regulations or this Policy, in accordance with the internal rules and work regulations of each Group company.

<Revised in March 2023>