

Request for Understanding of and Cooperation with
the KOBELCO Group Anti-Bribery Policy

To Our Business Partners

To prevent the provision of improper benefits to domestic or foreign public servants in connection with their duties and commercial bribery, the KOBELCO Group has stipulated compliance with all laws and regulations concerning bribery prevention in its internal rules, and has created guidelines and manuals regarding compliance matters, and has sought to raise thorough awareness through employee education programs.

Our Group has established and announced the KOBELCO Group Anti-Bribery Policy to clarify our position that we never approve of or tolerate bribery and never seek profits that can only be obtained by bribery or other wrongful means for any reasons. Based on this Anti-Bribery Policy, KOBELCO Group will continue to make further efforts for anti-bribery enforcement and conduct business activities in compliance with this Anti-Bribery Policy.

The thorough implementation of the Anti-Bribery could not be achieved through the initiatives of KOBELCO Group alone. It will also require the understanding of and cooperation with our business partners. We would appreciate it if you could understand our Anti-Bribery Policy and cooperate with us in ensuring the prevention of bribery.

April 2022

A handwritten signature in black ink, reading "M. Yamaguchi". The signature is written in a cursive, flowing style.

President, CEO and Representative Director
Kobe Steel, Ltd.

KOBELCO Group Anti-Bribery Policy

1. Kobe Steel, Ltd. and its subsidiaries (hereinafter collectively referred to as "KOBELCO Group") will comply with all applicable domestic and foreign laws, regulations, and guidelines prohibiting bribery (hereinafter referred to as "Anti-Bribery Laws"), and will not approve of or permit bribery for any reason.
2. KOBELCO Group will develop and operate the necessary systems to prevent acts that violate the Anti-Bribery Laws, and will endeavor to promptly detect any violation or suspected violation of Anti-Bribery Laws. In the event that any violation or suspected violation of the Anti-Bribery Laws is recognized within KOBELCO Group, KOBELCO Group will promptly investigate the alleged facts and take appropriate measures, such as suspending the act violating the Anti-Bribery Laws suspending payments that may be regarded as bribery, notifying the relevant authorities, and/or cooperating with investigations conducted by the relevant authorities.
3. KOBELCO Group requests that its directors, executive officers, employees, fixed-term employees, and other persons in KOBELCO Group (hereinafter collectively referred to as "Employees"), comply with the Anti-Bribery Laws as well as KOBELCO Group's relevant regulations. If any of the Employees have been found to have violated the Anti-Bribery Laws or KOBELCO Group's relevant regulations, KOBELCO Group will strictly punish them in accordance with the Rules of Employment and other rules and regulations.
4. KOBELCO Group also requests that all business partners, such as distributors, representatives, agents, consultants, and dealers with which KOBELCO Group does business (hereinafter collectively referred to as "Business Partners"), comply with the Anti-Bribery Laws. In the event that any Business Partners have been found to have violated the Anti-Bribery Laws, KOBELCO Group will strictly address it, including refusing to do business with such Business Partner, in accordance with this Anti-Bribery Policy.