

MOL Group Anti-Corruption Policy

The MOL Group “MOL CHARTS” are designed to convey the core values to be embraced by all group employees. “MOL CHARTS” are communicated in order to guide you to keep compliance as a Top Priority and to ensure that your actions comply with social norms and the highest ethical standards, and to seize the initiative in social issues and take responsibility for your behavior.

We will strive to eliminate bribery and corruption through this policy to improve business operation and satisfy the expectations of all stakeholders

1. Basic Policy

The MOL Group recognizes the importance of anti-corruption and bribery and prohibits any corruption and bribery. Further, we will not allow conflict of interest, facilitation payments or money laundering. We will seek to improve our business fairly.

2. Scope of Application

This policy applies to all executives, employees, and seafarers of MOL Group companies. We also expect all Business Partners involved in our business activities to support this policy.

3. Compliance

The MOL Group complies with laws and regulations concerning Bribery prevention. Especially, all executives, employees, and seafarers shall comply with any acts or laws related to Bribery prevention enacted in any countries or areas, including but not limited to Japanese laws as the Penal Code, Unfair Competition Prevention Act, National Public Service Ethics Act, National Public Service Ethics Code and the ethics codes enacted by local governments of Japan, US Foreign Corrupt Practices Act, the UK Bribery Act 2010, or any other act enacted in any other country or area by which Bribery is prohibited or penalized.

4. MOL compliance structure

Mitsui O.S.K. Lines have established a Compliance Committee as a subordinate committee of the Executive Committee to examine and deliberate on matters related to compliance.

. In 2015, we established an internal rule, named “Anti-Corruption Policy”, to clearly outline rules and procedures to be observed by all executives, employees, and seafarers of MOL Group companies. We will continuously take action to prevent any corruption and bribery through the above compliance structure and enforcing these internal rules and procedures. The Board of Directors receives regular reports from the Compliance Committee and is responsible for overseeing compliance efforts.

5. Initiatives on Anti-Corruption

The MOL Group provide sessions and programs about anti-corruption for group companies in Japan and overseas every year.

Appendix: Definitions

1. “Bribery” refers to giving of, or offering or promising to give, any money or other benefit to Public Official or Non-Public Official in order to obtain illicit business gain.
2. “Public Official” refers to a person engaged in public service for the Government of a country or territory outside Japan, a person engaged in the affairs of the Government-related entity, a person prescribed as an employee engaged in public service, a person engaged in public sectors substantially controlled by the government, a political party or an employee, staff or official of a political party, a candidate of an official position, a person engaged in public service for an international public body or organization, or a person authorized from the Government or an international body or organization to engage in the affairs of the Government or the international body or organization.
3. “Business Partners” refers to a person or an entity engaged in providing services, such as providing information, acting as an intermediary or an agent for a trade or a business or introducing a trade or a business, etc., for MOL regardless of name of occupation, including but not limited to, an agent, broker or consultant.
4. “Facilitation Payments” refers to a small amount of payment made to Miscellaneous Public Official with the intention of expediting an administrative process.