

GLOBAL POLICY ON ANTI-BRIBERY AND ANTI-CORRUPTION

ASICS' STATEMENT

a) Bribery and Corruption

Bribery and Corruption is harmful to business and society. Bribery and Corruption undermines political systems, weakens economies, makes business uncompetitive and deprives people of essential services.

b) Anti-bribery and Anti-Corruption Commitment

ASICS Corporation, through its Board of Directors, makes the following commitment as ASICS Headquarter. ASICS includes ASICS Corporation, its subsidiaries and its affiliates.

ASICS is committed to a zero tolerance approach to the making or receiving of Bribes or Corrupt handling, in any way or form and wherever in the world.

From our corporate philosophy and the values, it is clear that Bribery and Corruption are not tolerated.

It is our policy and conviction to ensure that we do business according to the highest standards and that our practices comply with all applicable laws, including Anti-Bribery and Anti-Corruption, in any country we operate in through directly related companies or third parties. These laws include, but are not limited to, the Japanese Unfair Competition Prevention Act, U.K. Bribery Act and US Foreign Corrupt Practices Act.

POSITION AND CHARACTERISTIC OF THIS POLICY

As ASICS Headquarters we wish to present a clear guideline as to our opinion on Bribery and Corruption in this policy.

This policy should be considered as complementary to local Anti-Bribery and Anti-Corruption policies in place. All the subsidiaries and affiliates should comply with this policy and local policy. In case of absence of such a local policy, this policy will be applicable.

DEFINITION

Bribery is defined as the receiving, offering, giving of money or any other valuable consideration given or promised to a government official or a private individual to obtain or retain business, business advantage or private favors, whether or not solicited or unsolicited.

Corruption is defined as the abuse of entrusted power for private or perceived corporate gain.

Business Partners is defined as ASICS' suppliers, (sub) contractors, intermediaries, commercial agents, consultants and other service providers.

PROHIBITED CONDUCTS

Bribery and Corruption are never acceptable.

As a result, gifts, hospitality, facilitation payments and kickback may be prohibited.

Facilitation payments mean payments or gifts made to facilitate the performance by a government official of a routine or necessary governmental action or process.

Kickback means receipt of payment of money or anything else of value, made to a person who is in the position to open or control a source of income for the payer.

DONATIONS

Community support and donations are acceptable, be it in-kind services, knowledge, services exchange or direct financial contributions; All in accordance to the limits of authority. However, it needs to be ensured that Bribery is never disguised as charitable contributions or sponsorships and that such contributions and sponsorship do not constitute Bribery.

Donations or support may never be given to political or religious organizations or communities.

SCOPE

This policy applies to ASICS Corporation, its subsidiaries and its affiliates.

ASICS establishes a business relationship exclusively with Business Partners who comply with this policy.

ASICS and its Business Partners will not, directly or indirectly, offer, promise, give, or demand a bribe or other undue advantage to obtain or retain business or other improper advantage. Bribery and Corruption are not tolerated and as such prohibited.

All modern Bribery laws have extra-territorial effect. This implicates that they apply to the actions of ASICS and its Business Partners wherever they are in the world and irrespective of what is considered normal under local standards and cultural norms.

RESPONSIBILITY OF EMPLOYEES AND MANAGEMENT

All ASICS' directors and employees worldwide must read and understand this policy thoroughly and comply with it at all times. Any questions or doubts should be forwarded in accordance with chapter of Record-Keeping and Report sub b).

It is the responsibility of Management to communicate this policy and ensure that all employees and external parties working on behalf of ASICS, within their area of responsibility, understand and comply with this policy.

It is the responsibility of Management to provide relevant training to employees with the aim of helping them understand and deal with dilemmas regarding Bribery and Corruption.

BUSINESS PARTNERS

It is vitally important that Business Partners not engage in Bribery, Corruption or any other behavior that is against this policy in order to obtain business with ASICS or to obtain services on behalf of ASICS. Business Partners who deal with governments or government officials are of particular concern. Rigorous due diligence should be applied to high-risk areas and compliance with this policy should be a condition of doing business with ASICS and included in agreements where relevant.

ASICS may be held responsible for the conduct of our Business Partners under all Bribery laws. It is therefore important that we know our Business Partners and make sure that they do not violate Bribery laws (allegedly) on ASICS' behalf.

It is a condition of the engagement of any other party who performs services for or on behalf of ASICS that they do not engage in Bribery in the performance of their activities.

RISKS

Violations of this policy may trigger severe sanctions against ASICS which include, but are not limited to, the followings:

- a) Authorities may impose substantial fines on ASICS (in some countries unlimited fines);
- b) ASICS may be forced to repay profits and ASICS may be excluded from public contracts;
- c) ASICS, its directors and employees may be subject to criminal sanctions. These sanctions may include fines against ASICS, its directors and employees, and imprisonment against ASICS' directors and employees;
- d) Competitors who suffered damages may take ASICS to court and seek compensation; and/or
- e) Allegations of Bribery against ASICS may lead to substantial reputational damage and may impact our business and stock price.

CONSEQUENCES OF VIOLATIONS

The consequences for violating this policy will depend upon the facts of each situation, but may range from denial of director's or employee's expense reimbursement of unauthorized gifts or payments to disciplinary action which may include termination of employment.

Falsifying any expense report, mislabeling the nature of any gift or expense, or any gift or expense for an improper purpose are considered major policy violations.

RECORD-KEEPING AND REPORTING

- a) All accurate records including accounting records shall be kept regarding the exact nature of recorded business transactions and the nature of all expenses reimbursed to directors and employees in accordance with the related internal policies. All these records shall be clear and transparent.
- b) All directors, employees and Business Partners are expected to report any Corruption or Bribery or any other behavior that is against this policy when they become aware of it. If you become aware of any actual or suspected breach, you must raise your concerns as soon as possible. This can be done by contacting the legal department or internal audit of the company or administrating (controlling or parental) company through an ordinary reporting line or the Global Whistleblowing Line. Reporters to the Global Whistleblowing Line can remain anonymous, if they wish. How to contact the Global

Whistleblowing Line is shown in the Global Policy on Protected Disclosure (Whistleblowing), and all the reports to the Global Whistleblowing Line should be treated in accordance with Global Policy on Protected Disclosure (Whistleblowing).

c) It is the policy of ASICS to report illegal acts to the appropriate authorities and to fully cooperate in any subsequent investigation.

d) All concerns raised directly to those mentioned under b) of this chapter will be reviewed and, if warranted, investigated.

e) It is recommended that, before reporting, reporters gather as much information, evidence or relevant documentation as possible, taking one's personal risk into consideration, so that the concern can be effectively evaluated.

f) Malicious reporting and retribution of any kind against anyone suspected of reporting a concern will not be tolerated and will be treated as serious disciplinary misconduct. ASICS' directors, employees and Business Partners are protected in accordance with this policy and Global Policy on Protected Disclosure (Whistleblowing). Concerns of harassment, intimidation or unfair treatment as a result of a report may be reported immediately in accordance to chapter Responsibility sub b) of this chapter.

COMMUNICATION AND TRAINING

Communication and training are being implemented so that this policy is fully understood.

MONITORING AND REVIEW

The effectiveness of the implementation of this policy will be monitored and reviewed regularly considering its suitability, adequacy and effectiveness.

GLOBAL POLICY ON ANTI-BRIBERY AND ANTI-CORRUPTION ANNEX

DO'S and DON'TS

- 1) DO NOT accept or offer any form of bribe, even if it means short-term delays or difficulties to our business.
- 2) DO return immediately any form of bribery whether handed over or sent to you and report according to the chapter Record-Keeping and Report sub b).
- 3) DO fully and accurately record any expediting payments you have made after receiving appropriate approval.
- 4) DO NOT make unofficial payments to officials in order to obtain any permission, permit or stamp.
- 5) DO pay the expenses directly to those providing the service, or get invoices. For example, DO NOT pay anyone for the purposes of being a 'fixer' to open doors and make connections for ASICS.
- 6) DO NOT pay or offer any other advantage to any private business contact other than what is explicitly allowed for under this policy. In case of doubt, please contact the relevant party as mentioned under the chapter Record-Keeping and Report sub b).

7) DO immediately report in accordance with the chapter Record-Keeping and Report sub b).on any attempt of a public official or private business contact soliciting for a bribe.

8) DO timely seek written permission from legal department of the company or administrating (controlling or parental) company if you strongly believe that an exception should be permitted in a given situation or if you have doubts about it.

9) When it comes to hospitality

a) DO ensure that our customer invitation was openly offered and appropriately documented.

b) DO ensure that our customer invitation extends to an appropriate level business contact, and be cautious in extending to others as a spouse, guests or the recipient.

c) DO verify that, if the recipient has been invited to a number of events, due consideration has been given to the possible cumulative effect and a resulting appearance of impropriety.

d) DO give only modest gifts that are not easily converted into cash.

e) DO verify if an invitation or the event itself coincides with the key business decision such as the renewal of an existing contract etc. Ask yourself: does accepting the invitation make it difficult to remain impartial when it comes to business decisions (RED FLAG).

f) DO define and document a legitimate business purpose in our hospitality program and/or entertainment, such as the development of a specific business relationship or the promotion of a particular product or service.

g) DO benchmark our expenditures against the market and against what has been acceptable in our particular industry to ensure that the hospitality falls within generally accepted business practice. Please do remember, 'everyone else does it' is not a accepted defense.

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POLICY

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