

TAIHEIYO CEMENT Group Anti-Bribery Basic Principle (Policy)

January 1, 2017

Section 1 (Purpose)

This Principle has the purpose of contributing to prevention of corruption, and to establish and maintain fair business operation through compliance with the laws and regulations of each country and Unfair Competition Prevention Act of Japan and the U.S. Foreign Corrupt Practices Act (“FCPA”) in particular and prevention of bribery.

Section 2 (Group Anti-Bribery Policy)

All directors and employees of TAIHEIYO CEMENT CORPORATION and its subsidiaries (the “Group Companies”) are prohibited from offering, giving and promising bribes to a government official (including foreign government official and directors and employees of governmental enterprise), directly or indirectly, in violation of any domestic and foreign laws.

Section 3 (Prohibition of Bribery)

All directors and employees of TAIHEIYO CEMENT CORPORATION and the Group Companies shall commit to compliance and refuse to provide any bribes in the course of business, even if there is a demand for bribe.

Section 4 (Producing and Keeping a Payment Record)

TAIHEIYO CEMENT CORPORATION and the Group Companies shall ensure corporate accounting books and records are kept accurately and faithfully, and the payment records are maintained under an effective internal control system.

Section 5 (Improvement of Compliance System)

TAIHEIYO CEMENT CORPORATION and the Group Companies establish and improve effectiveness of anti-bribery compliance system including rules, the organizational structure, and education on anti-bribery in order to comply with this Anti-Bribery Basic Principle.