

Nippon Paper Group Basic Policy on Prevention of Bribery to Public Officials

The Group formulates this basic policy in relation to the prevention of bribery to public officials and compliance with related laws and regulations in relevant countries (including Japan) based on the Group Mission and the provisions of the Action Charter as well as the spirit thereof.

1 . Prohibition of bribery

Officers or employees^{*2} of Nippon Paper Group^{*1} must not, either directly or indirectly^{*4}, provide a bribe in any form (whether the amount is large or small) to public officials^{*3}.

2 . Compliance with laws and regulations of relevant countries

Officers or employees of Nippon Paper Group must not, either directly or indirectly, give, offer or promise entertainment, gifts or other benefits that would violate laws and regulations of relevant countries (including Japan) to public officials.

3 . Duty of record keeping

If you make a payment to or give entertainment or gifts to public officials with the intention of it not constituting a bribe or violating laws or regulations, you must accurately record^{*5} such payment, entertainment or gifts in their entirety.

4 . Provision of education/training

Nippon Paper Group will provide education/training for its officers and employees on a regular basis based on these guidelines in order to prevent bribes to public officials and ensure the appropriateness of business execution.

*1 Nippon Paper Group: Refers to Nippon Paper Industries Co., Ltd. and its subsidiaries (meaning companies of which Nippon Paper Industries Co., Ltd. controls decisions on the financial and business policies, including indirect investment subsidiaries).

*2 Officers or employees: Refers to directors and auditors, as well as executive officers, full-time employees, contract employees, employees on a short-term contract, temporary employees, part-time employees and other persons who are employed by Nippon Paper Group.

*3 Public officials: Refers to those who hold legislative/administrative/judicial office, officials of public agencies/public corporations, officials of public international institutions and any other persons similar or equivalent to the foregoing.

*4 Indirect bribe: Refers to a bribe provided through a third party such as a distributor, agent, or consultant.

*5 Accurately record: Refers to keeping accurate books and records in reasonable detail.