

# Anti-Bribery Policy

## 1. Purpose

Tera Probe, Inc. (including its subsidiaries, “Tera Probe”) continues to be a reliable partner to our customers around the world by establishing this policy to clarify Tera Probe's basic stance and rules on bribery in light of the globalization of business and the trend toward stricter regulations on bribery worldwide.

## 2. Compliance with Laws and Regulations

Tera Probe complies with all applicable anti-bribery laws and regulations in the countries and regions where it operates business.

## 3. Prohibition of Bribery

### (1) Conduct toward Public Servants, etc.

All board members and employees of Tera Probe (including temporary, contracted, part-time and dispatched employees; hereinafter the same) do not engage in any Provision of Bribery to the Public Servants etc., including facilitation payments.

### (2) Conduct of other companies

All board members and employees of Tera Probe do not engage in any bribery with other companies.

### (3) Acts through third parties

The provisions of (1) and (2) apply not only to bribery directly by Tera Probe's board members and employees, but also to bribery through third parties such as business partners and agents.

## 4. Organizational Structure

Tera Probe makes effort to detect and take a corrective actions against bribery or potential bribery at an early stage by appropriately establishing and operating an internal audit system and a whistle-blowing system.

## 5. Cooperation with Suppliers

Tera Probe cooperates with suppliers to prevent bribery by requesting suppliers to comply with applicable laws and regulations in the countries and regions in which they operate, and not to provide or accept inappropriate entertainment or gifts in accordance with the “Supplier CSR Guidelines”.

## 6. Management of books and records

Tera Probe maintains an effective internal control system and follows company regulations to ensure proper accounting procedures. In accordance with generally accepted accounting principles, Tera Probe accurately prepares its accounting book in reasonable detail based on the facts, and maintains relevant records appropriately.

## 7. Training

Tera Probe provides training for its board members and employees on the prevention of bribery, depending on the level of bribery risk.

## 8. Response to Violations

Tera Probe strictly takes disciplinary action against board members and employees who violate this policy in accordance with internal rules.

### [Definition of Terms]

- (1) "Public Servants, etc." means any of the following persons in Japan or overseas
  - a) Persons engaged in public service by a government or local public entity
  - b) Officers and employees of government-related organizations
  - c) Officers and employees of public corporations
  - d) Officers and employees of international organizations
  - e) Persons who are delegated by the government or local public entity to perform administrative duties
  - f) Political party officials
  - g) Candidates for public office
  - h) Other persons similar to the above.
- (2) "Provision of Bribery" means the offering or promising, directly or indirectly, of money, benefits or other advantages in order to obtain an improper business advantage.
- (3) "Receipt of Bribery" means demanding or receiving from (or promising to receive from) a third party, money or other benefits in connection with one's duties as consideration for improper benefits.
- (4) "Bribery" means the Provision of Bribery and the Receipt of Bribery.
- (5) "Facilitation Payment" means a type of bribery which refers to a small payment without legal basis to facilitate normal administrative services (e.g., customs clearance, issuance of permits, visa issuance, etc.).