

DeNA Group Policy for the Prevention of Bribery & Corruption

Established April 1, 2024

DeNA Co., Ltd. (hereinafter referred to as “DeNA”) and all its subsidiaries (collectively with DeNA, the “DeNA Group”) in the DeNA Code of Conduct establish the principle that in our business activities we shall comply with laws and regulations concerning the prohibition of bribes. We shall under no circumstances engage in any conduct that could be considered bribery, corruption, or offering of benefits for preferential treatment to domestic or foreign public officials, and we shall always follow social common sense and sound business practices, and we shall not engage in any conduct that could be considered a commercial bribe or accept private benefits from business partners.

Based on the above, the DeNA Group Policy for the Prevention of Bribery & Corruption (hereinafter referred to as the "Policy") was established to prevent bribery and corruption by establishing a relevant system and rules to be complied with by the DeNA Group, and the Policy was adopted through a board of directors resolution. This Policy applies to all officers and employees of the DeNA Group.

We sincerely appreciate the understanding and cooperation of our business partners with the intent and content of this Policy so that the DeNA Group can achieve our initiatives to prevent bribery and corruption.

1. Compliance with Laws & Regulations, etc.

The DeNA Group shall comply with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2010, the Commercial Bribery Regulations of the PRC, the Unfair Competition Prevention Act of Japan, and other applicable laws and regulations against bribery and corruption in each country and region, as well as internal rules such as this Policy, and rules and guidelines against bribery and corruption (collectively, the "Anti-Bribery Rules").

2. Prohibition of Bribery & Corruption

The DeNA Group shall not offer or accept, directly or indirectly, any bribe or other benefit to any person for the purpose of obtaining or maintaining business or other improper advantage. Bribes and other benefits include, but are not limited to, entertainment, gifts, invitations, donations, political funds, etc., in addition to money.

3. Entertainment & Gifts, etc.

With respect to entertainment, gifts, invitations, donations, and political fund contributions, etc. to public officials and/or similar persons, etc., the DeNA Group shall comply with applicable relevant laws and regulations and follow proper procedures in accordance with the Anti-Bribery Rules.

In addition, the DeNA Group prohibits facilitation payments (small payments made solely for the purpose of facilitating procedures in connection with ordinary administrative services). However, this excludes cases where there is a risk of endangering the safety of officers and employees.

With respect to entertainment, gifts, invitations, donations, and political fund contributions, etc. to persons other than public officials and similar persons, etc., the DeNA Group shall comply with applicable relevant laws and regulations and follow proper procedures in accordance with the Anti-Bribery Rules.

4. Appointment of Agents, etc.

The DeNA Group shall follow the appropriate prior approval procedures, etc., in accordance with the relevant internal rules when appointing third parties such as agencies, agents, consultants, etc., who provide services such as providing information or mediating, representing, or facilitating transactions for the DeNA Group (hereinafter referred to as "Agents, etc."), and shall not engage in bribery and corruption through or using Agents, etc.

5. Handling Throughout Process Before & After M&A

When investing in or acquiring a third party, DeNA Group shall conduct due diligence on the company to be invested in or acquired in advance from the perspective of bribery and corruption risk, and shall take appropriate measures from an anti-bribery and corruption perspective if it becomes aware of bribery and/or corruption before the investment or acquisition takes place. For merged or acquired companies, the DeNA Group will appropriately manage the anti-bribery and corruption system to ensure that it is promptly put in place.

6. Thorough Recordkeeping & Storage

The DeNA Group shall accurately and appropriately record all transactions in its accounting books, etc., and store related documents in accordance with relevant internal regulations.

7. Monitoring & Audits

The DeNA Group regularly monitors and conducts internal audits according to the degree of bribery and corruption risk.

8. Training

The DeNA Group will regularly provide our officers and employees with the education and training necessary to prevent bribery and corruption, and review them as necessary to ensure compliance with this Policy and the Anti-Bribery Rules.

9. Structure

The DeNA Group has established a whistleblowing hotline for reporting violations or potential violations of laws and regulations. Whistleblowers may report anonymously and will not be treated unfairly because of their reporting.

Appropriate action will be taken against violations of laws and regulations, this Policy, and the Anti-Bribery Rules, including correction of the violation, punishment of the perpetrator, and introduction of measures to prevent recurrence of such violations.

Updates and revisions of this Policy and the Anti-Bribery Rules will be made as necessary.