

## Fair Operating Practices

### Performance Indicators to Monitor the Achievement of the Medium- to Long-Term Vision and FY2019 Results

Performance indicators	Targets	FY2019 results
(1) Number of meetings of the Corporate Ethics Committee*1	(1) Hold meeting once a month (12 times a year).	(1) Once a month (12 times)
(2) Bases holding Autonomous Corporate Ethics Training*2	(2) Achieve 100% (covering all applicable bases).	(2) 100% (107 bases)

\*1 An organization overseeing internal controls, responsible for promoting a compliance framework to ensure that all business activities of the DNP Group are carried out in an appropriate manner. Consisting of directors and corporate officers in charge of organizational units within the head office, the committee holds regular monthly meetings to formulate and determine policies and various activity implementation plans concerning the compliance framework of the entire Group. The committee is also responsible for comprehensively inspecting, reviewing and providing guidance for the framework established and operated in accordance with the implementation plans.

\*2 Training provided on a continuous basis since 2003. The heads of each business division provide lectures on corporate ethics as a foundation of business and explain to their staff the issues and countermeasures relevant to the operations of their respective divisions.

### Partial Revision to and Thorough Implementation of the DNP Group Code of Conduct

DNP has formulated the DNP Group Code of Conduct, which serves as conduct guidelines to be observed by all employees in carrying out corporate activities, and distributed a booklet listing the 10 tenets of the code, such as “Compliance with the law and social ethics” to all employees. With the Corporate Ethics Committee\*1 taking the lead, we have been working to communicate the code and ensure its thorough implementation through a range of training programs, including New Employee

Training and other trainings according to rank as well as Autonomous Corporate Ethics Training\*2.

Keeping with changes in social situations, we revised “how employees should act” stipulated in the code in March 2019. The revision was intended to turn the code into more familiar and easier-to-understand guidelines for each employee to follow in everyday conduct. We have been providing various training and lectures at all DNP business sites in and outside Japan to inform and instill the revision details.



Lecture on the DNP Group Code of Conduct held in Southeast Asia



DNP Group Code of Conduct translated into local languages as necessary and distributed globally

## DNP Group CSR Management and Year Topics 2020

### Reinforcing Our Internal Whistle-Blower System and Structure at Overseas Business Locations

In 2002, DNP established the Open Door Room as a contact point to receive whistle-blowing reports in the DNP Group. We also set up an external helpline in 2015, in which lawyers receive relevant inquiries and reports. These inquiry and reporting systems are operated in accordance with our internal standards, which are based on Japan's Whistleblower Protection Act.

In January 2020, we revised and reinforced our internal whistle-blower system and structure at overseas locations in response to the globalization of the market as well as social issues. Specifically, we newly established a global whistle-blower contact

point with greater language compatibility in Southeast Asia, a region having relatively high bribery, improper accounting and other compliance risks among our overseas locations. The contact point gives regular and contract (fixed-term) employees of our overseas Group companies a means to directly report serious or potential legal violations. Going ahead, we will gradually expand the scope of the contact point to our Group companies in other regions, and by promoting more swift and appropriate response, increase the fairness of management.

[News Release / Topics \(in Japanese\)](#) [Link](#)

### Anti-Bribery Initiatives

With the aim of preventing bribery in and outside Japan, DNP formulated the DNP Group Anti-Bribery Policy in 2018. To turn the policy into specific practices, we have formulated and have been operating in accordance with the DNP Group Anti-Bribery Regulations and DNP Group Anti-Bribery Guidelines.

#### ▶ Efforts for instilling and establishing anti-bribery practices

- (1) Provided relevant e-learning training to about 18,000 employees in and outside Japan.
- (2) Included prevention of bribery as a topic in the Autonomous Corporate Ethics Training provided by each organization to instill and establish anti-bribery practices among all employees.
- (3) Managers and responsible persons of Group companies in Southeast Asia held an anti-bribery briefing session for local employees.

#### ▶ Checking the status of implementation (anti-bribery self-check)

We conduct an inspection at each division within the head office, business units and Group company in and outside Japan using our anti-bribery self-check sheet. The inspection includes a check on the occurrence or non-occurrence of related incidents, the number of applications made and the number of education and awareness-raising activities conducted.



Anti-bribery education lecture by Managing Director Sudo of Tien Wah Press Pte. Ltd.