

Basic Policy for Prevention of Cartels and Bribery

This Basic Policy is based on the spirit of the “Business Ethics Standards and Code of Conduct” and has been established for the purpose of specifically setting forth Murata’s management policy for the determined prevention of cartels and bribery. Murata Manufacturing Co., Ltd., its subsidiaries and affiliates (collectively, “Murata Group”), and their directors, officers, and employees must all comply with this Basic Policy. Any person who violates this Basic Policy will be subject to disciplinary action according to the company rules and the relevant laws and regulations.

◆Basic Policy for Prevention of Cartels

1. We understand that the purpose of competition and antitrust laws is to ensure a free market and fair business practices, and we will comply with all such laws.
2. We will maintain a fair and independent relationship with all of our competitors and will not engage in any acts that may impede free competition, such as entering into a price-fixing agreement.
3. We will not enter into any agreement with our competitors regarding price, cost, profit, market share, production capacity, sales terms, supply chain, sales territory, customer, and any other matter that may have an impact on competition (collectively, “Sensitive Matters”).
4. We will not, either directly or indirectly, provide our competitors with information regarding Sensitive Matters or receive such information from our competitors under any circumstances.
5. If we accidentally obtain any information regarding Sensitive Matters of our competitors, we will clearly specify the source of the information, immediately report such incident to the responsible department listed below, and will follow its instructions.
6. We will not have contact with our competitors except when absolutely necessary.
7. When we unavoidably have contact with our competitors, prior to such contact, we will properly obtain prior approval in accordance with the procedures applicable to the company and department.
8. We will closely scrutinize whether or not the purpose of a meeting with a competitor or an organization formed with our competitors (including trade associations) constitutes a monopolization of the market or an impediment to free competition that is prohibited under competition or antitrust laws, and we will immediately withdraw from any meeting or organization, whether official or unofficial, that is suspected of being illegal.
9. Even if a meeting with a competitor or an organization formed with our competitors is lawful, we will obtain the approval of the department head before we participate, and will clearly inform the other participants that we intend to comply with all competition and antitrust laws and will actually comply with such laws.
10. If we become aware of cartel behavior or other violation of this Basic Policy or potential acts thereof, we will promptly report to the whistleblowing system in the company or the responsible department listed below.

◆Basic Policy for Prevention of Bribery

1. We will comply with all international anti-bribery laws, codes, and regulations to protect fair markets and prevent the acquisition of improper business advantage.
2. We will maintain healthy and transparent relationships with public officials and any persons equivalent thereto (collectively, “Public Officials”) in each country and the directors and employees of all of our business partners.
3. We will not engage in the following conduct except when clearly and definitely permitted under laws, regulations, and business practices.
 - (1) Provide, offer, or promise to provide entertainment, gifts, or preferential treatment in terms of money or other benefits and opportunities (collectively, “Benefits”), whether directly or indirectly, at the expense of the company or our own pocket money, even in small amounts, for the purpose of obtaining or maintaining business advantage, regardless of whether the other party is public or private; and
 - (2) Receive, request, or promise to receive Benefits, whether directly or indirectly, from any organization with which we do business, regardless of whether the other party is public or private, in exchange for the provision of business advantage.
4. We will not make facilitation payments (“facilitation payments” means small, unlawful payments to Public Officials required to facilitate or expedite the processing of routine administrative services such as customs clearance and visas).
5. We will prepare and maintain accurate and appropriate account books and financial records relating to all transactions and the provision of Benefits.
6. We will require all suppliers, contractors, distributors, agents, consultants, and other business partners involved in the business and operations of the Murata Group to comply with and uphold domestic and foreign laws, regulations, norms, and rules in accordance with this Basic Policy, and when engaging a new business partner, we will confirm the status of compliance therewith in advance.
7. We will maintain healthy and normal relationships with all political and administrative bodies and business partners, and when providing donations, contributions, or sponsorships, we will conduct such activities in accordance with applicable laws and regulations and internal rules after adequately taking into consideration the necessity and appropriateness to prevent the provision of any improper benefit
8. We will strive to gain understanding of social trends regarding this Basic Policy and will conduct necessary training and education for directors and employees in an effort to promote awareness of laws, regulations, and internal rules relating to anti-bribery.
9. To comply with this Basic Policy, we will create management systems, manage the status of compliance, and strive to maintain favorable conditions.
10. If we become aware of act of bribery, other violation of this Basic Policy or potential acts thereof, we will promptly report to the whistleblowing system in the company or the responsible department listed below.

◆Contact Information

Violation of competition law, Cartel	Legal Affairs Department supporting each company
Bribery / Entertainment and Gifts	General Affairs Department supporting each company