

# Anti-Bribery Handbook



## Introduction

As a result of globalization of economic activities, multi-national companies are confronting various problems and issues both in own and foreign countries. In such an ever-changing economic and political environment, stringent compliance with laws and regulations is more important than ever.

Unfortunately, the bribery of public officials is an issue that still persists around the world. Since around 2004, however, regulatory authorities have drastically changed their attitudes especially towards bribery committed in global business transactions and U.S. authorities, as vanguards, have rapidly intensified their crackdown on violations of FCPA. In recent years, the total amount of charges, the quantum of fines and the number of individuals imprisoned have increased significantly. Presently, the intensive approach adopted by the U.S. authorities is spreading to other regulatory authorities all over the world, including Japan and the U.K.

NTT Group has always recognized all along that it is essential not only to comply with laws and regulations, but also for our businesses to operate with high ethical standards in carrying out corporate activities. To this end, NTT Group has established “NTT Group Corporate Ethics Charter,” which has been addressing the prevention of non-compliance, and focusing on ensuring that employees fully understand the necessity to maintain high ethical standards. Bribery of any kind will not be tolerated in NTT Group.

This handbook, as an educational and training tool for NTT Group, is written to supplement the activities that each Group company is currently conducting to prevent bribery. In order to fully understand important points to be noted in conducting domestic and global business, this handbook (i) introduces basic concept and outline of anti-bribery regulations in the world (Chapter 1 – Basic Knowledge) and (ii) gives important advice on how to prevent bribery by using actual cases and verdicts as examples (Chapter 2 – Case Studies). By effectively utilizing this handbook, each NTT Group company's employees and officers will properly understand the Anti-Bribery regulations and enhance its compliance.

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This handbook is prepared with easy reading and comprehension as a priority for reader's understanding the outline of major anti-bribery laws and regulations. If you have any question or need clarification on this handbook, please consult with the Legal Group of NIPPON TELEGRAPH AND TELEPHONE CORPORATION. Please refrain from making your own interpretation of the contents in this handbook.