

Hitachi Capital (UK) PLC

Anti- Bribery & Corruption Policy

Policy Statement

Hitachi Capital (UK) PLC (“HCUK”) is committed to the prevention, detection and elimination of all forms of corrupt business practice. The HCUK Board does not tolerate any form of bribery or corruption and will strive to ensure that the HCUK Group meets its obligations under the Bribery Act 2010 as a minimum standard.

Purpose

The Group has adopted a formal Anti-Bribery & Corruption Policy sets out the framework for the prevention, detection and elimination of all forms of corrupt practice in the conduct of business of the HCUK Group so that the principles of ethical conduct remain embedded in its corporate culture. HCUK’s principles of business conduct are set out in its Business Ethics and Corporate Social Responsibility policy.

Scope

The Anti-Bribery & Corruption Policy applies to all personnel within HCUK, including those permanently employed by HCUK, temporary agency staff and contractors.

HCUK also expects its business partners, especially those introducing business to HCUK, to promote and follow its policy or equivalent policies of their own. HCUK will not do business with third parties which fail to demonstrate to HCUK’s satisfaction that they conduct business in a manner which is consistent with its Anti-Bribery & Corruption Policy.

Training and Guidance

The HCUK Board is committed to allocating adequate resources to the provision of training to ensure that personnel understand their obligations under the Bribery Act and under HCUK's policies, including the potential sanctions for non-compliance.

Guidance is provided in the form of Codes of Conduct, tailored to the needs of the various businesses within the HCUK Group, to enable HCUK and its personnel to comply with the Act and follow the principles of good business conduct.

Breaches of HCUK's Anti-Bribery & Corruption Policy and failure to follow the Codes of Conduct will be dealt with under HCUK's disciplinary procedures. In the event of criminal conduct, HCUK will involve the police or other relevant enforcement agencies.

Corporate hospitality, promotional expenditure and gifts

HCUK's policy on giving and receiving corporate hospitality and gifts is set out in guidance and procedures made available to all personnel and is designed to ensure that personnel are not, and are not perceived to be, engaging in unethical business practice. Personnel are prohibited from giving gifts, corporate hospitality or other inducements to, or accepting them from, a third party without appropriate permission.

Each business in the HCUK Group is required to maintain a register of details of any hospitality or gifts offered or received and to operate an approval process for vetting such hospitality or gifts, which is overseen at Group level.

Incident Reporting

Personnel are encouraged to report potential breaches of the Bribery Act or HCUK's Anti-Bribery & Corruption Policy to their line managers or through the Group's whistleblowing procedure (as appropriate).

Monitoring and Supervision

Adherence to HCUK's Anti-Bribery & Corruption Policy and the Codes of Conduct will be monitored internally and any breaches will be reported to the Audit & Risk Committee.