

# Promotion of Compliance

Major changes in the business environment have led to a growing need for management that places greater emphasis on compliance. In order to establish a compliance structure capable of meeting these changes, the Tokyo Gas Group will exercise more stringent compliance and pursue its business activities in a fair and transparent manner.

Rate of Participation in Workshops on Preventing Bribery and Corruption Involving Foreign Public Officials

100%

Number of Participants in the Compliance Awareness Workshop

28,726

Number of Employees Taking E-learning Courses on Privacy Protection

21,342

(Figures for the Tokyo Gas Group in FY2017)

## Compliance Promotion Structure

We have created a structure centered on the Management Ethics Committee, chaired by the president, in which compliance managers and compliance promoters are appointed at each workplace to engage consistently and proactively in initiatives for promoting compliance. At the Group level, we pursue compliance by sharing the values and standards of conduct as stipulated in Tokyo Gas Group Our Code of Conduct.

We have developed a system for consultations on compliance to receive from Group companies and also business partners. We endeavor to discover and resolve problems at an early stage so that the company's self-regulating processes function effectively.

### Number of Cases Handled by Consultation Desks (Figures for the Tokyo Gas Group FY2017)

Consultation Topics	Cases
Interpersonal relations and employment matters	35
Laws and regulations	4
Internal regulations	7
Communication and other issues	58
Total	104

## Prevention of Bribery and Corruption Involving Foreign Public Officials

### "Foreign Public Official Anti-Bribery and Corruption Guidelines" Categories

- Prohibition of overseas bribery activities
- Prohibition of facilitation payment
- Prohibition of inappropriate hospitality, gift, invitation and overseas donation etc.
- Prohibition of bribery (other than with foreign public officials)
- Transactions with third parties
- Relationships with joint venture partners
- Prohibition of corruption
- Mergers and acquisitions
- Prohibition of accounting fraud
- Internal reporting responsibility/ investigation cooperation responsibility
- Emergency response
- Disciplinary measures
- Training and monitoring partners

The Tokyo Gas Group complies with the laws and regulations of each country and region where it operates and makes a thorough effort to prevent bribery and corruption.

In line with the expansion in our overseas business, we have established the Basic Policy On Overseas Business

Promotion, which pledges to carry out equitable and transparent corporate activities. In particular, bribery and corruption not only damages social credibility but can also hamper economic growth in developing countries. We have thus formulated the Foreign Public Official Anti-Bribery and Corruption Guidelines to outline specific actions we must take.

We seek to disseminate these guidelines so they become established among overseas business partners. Moreover, we are creating a system for consultation and reporting for local employees of overseas affiliates and monitoring the situation through internal audits and other means in an effort to prevent bribery and corruption.

## Protection of Personal Information

The Tokyo Gas Group has developed a system for appropriately protecting and managing the vast amount of personal information it possesses and uses.

To ensure stringent compliance with laws and regulations, we review our in-house rules and manuals as needed, have each department take regular inventory of personal information under their care, and check the status of personal information management during internal audits. In April 2017, we revised our pamphlet that explains the practical aspects of the Act on the Protection of Personal Information and distributed it to all Group employees.

Furthermore, to prevent accidents and minimize their impact, we have set up information security promotion systems for each division and department, installed hardware to protect against unauthorized access and provided information security education.

### Information Security Promotion System Chart

