

# ○ Marubeni Group Anti-Corruption Due Diligence (DD) Framework

## Three Core Points

1. Perform due diligence on the company's business partners (including potential agents/consultants and sub-contractors) participating in Government-Related Business on an International Business Transaction.
2. Conduct due diligence based on risk assessment.
3. Compliance Control Department conducts review in advance and Audit Department conducts audit of anti-corruption due diligence.

## Due Diligence Based on Risk Assessment

|                     |      | The bribery risk based on CPI* Score of Country where Project is Implemented |            |           |
|---------------------|------|--|------------|-----------|
|                     |      | Low  | Middle     | High      |
| project cost Amount | High | Relaxed DD   | Usual DD   | Strict DD |
|                     | Low  |  | Relaxed DD | Usual DD  |

\*CPI (Corruption Perception Index) :  
Corruption Perceptions Index published by the  
Transparency International  
[Home - Transparency.org](http://Home-Transparency.org)

Main DD items :  
Checking red flags of our business partners,  
executing contracts with business partners that  
incorporate provisions to prevent bribery and  
acceptance of bribes, collecting questionnaires  
from our business partners, and, in some cases,  
having a reliable investigation company and law  
firm conduct detailed background investigations of  
and interviews with a business partner.