

## SKY Perfect JSAT Group Anti-Bribery and Corruption Policy

Legal measures to prevent corruption are currently being strengthened around the world, and corporations are under pressure to operate with higher ethics and stricter standards than ever before. In consideration of these trends, and based on our Group Mission and Sustainability Policy of "Space for your Smile," the SKY Perfect JSAT Group established the SKY Perfect JSAT Group Anti-Bribery and Corruption Policy (hereinafter, "the Policy") to define basic compliance items for zero tolerance of corrupt acts, including bribery. The Policy applies to all officers and employees of the SKY Perfect JSAT Group, regardless of the country or region in which they operate. The Group also requests that all suppliers and clients comply with the Policy.

### 1. Scope

All officers and employees of the SKY Perfect JSAT Group

### 2. Compliance with Laws and Ordinances

The SKY Perfect JSAT Group complies with applicable domestic and international laws and ordinances related to the prevention of bribery and corruption.

### 3. Prohibition of Bribery, Etc.

Officers and employees shall not provide, promise or offer benefits such as money to public servants or persons in equivalent positions (hereinafter, "Public Servants, Etc."), domestic or international, with the intention of influencing the conduct of their duties.

Whether directly or indirectly, officers and employees shall not pay, offer, promise, request, or accept money, gifts, entertainment, or other economic benefits with Public Servants, Etc., government agencies, international organizations, private companies, business partners, or private individuals in order to unduly influence business results or obtain unfair business benefits.

### 4. Facilitation Payments

Officers and employees shall not make facilitation payments (small payments to facilitate normal administrative procedures) with the intent of obtaining unfair profits or benefits, regardless of country or region.

### 5. Donations to Public Officials, Political Parties, Etc.

Unless permitted by relevant laws and ordinances, officers and employees shall not use the Group's funds or assets to make donations to Public Servants, Etc., political parties, or other related organizations.

### 6. Prohibition of Excessive Gifts and Entertainment

Gifts and entertainment shall only be provided or received in compliance with laws and ordinances and within a scope which is socially acceptable. Additionally, such gifts and entertainment shall not be forced.

### 7. Other Corrupt Acts

Officers and employees shall not engage in corrupt acts such as rebates, kickbacks, illegal international remittances, money laundering, insider trading, remittances to anti-social forces, etc., related to the Group's business.

### 8. Eliminating Indirect Involvement in Corrupt Acts

Involvement in corruption through intermediaries such as dealers and agents is also prohibited. In order to prevent involvement in such corruption, officers and employees shall strictly manage contracts and transactions.

#### 9. Thorough Recording and Storage

In order to prevent bribery and other improper expenditures, officers and employees shall ensure the creation and storage of appropriate and accurate accounting records and appropriate internal controls.

#### 10. Education and Training

The Group will disseminate and thoroughly instill the Policy through education and training for officers and employees of the Group. The Group will also raise awareness regarding the status of initiatives, etc., for preventing international bribery and other corrupt acts.

#### 11. Response to Discovery of Misconduct

If misconduct related to corruption is discovered or suspected, the Group will carefully investigate the related acts. If the facts indicate misconduct, the Group will investigate the cause, implement corrective measures, and take strict action against the officers and employees involved in accordance with relevant laws, ordinances, and internal regulations.

Formulated on October 4, 2023  
SKY Perfect JSAT Holdings Inc.  
Eiichi Yonekura, Representative Director, President