

## Management Systems

## Compliance

As it expands globally, it is important that Akebono, beyond complying with the law and regulations, correctly understands and fulfills its corporate social responsibility. Accordingly, we have set up the Compliance Committee, chaired by the president, and established the "akebono Global Code of Conduct" and "akebono Global Standard of Behavior" to be observed by each associate.

To respond to the globalization of management, Akebono endeavors to correctly recognize and carry out its corporate social responsibility. To this end, we have established and promoted the akebono Global Code of Conduct together with the akebono Global Standard of Behavior, and we also work to improve awareness of compliance by conducting a variety of educational programs. Specific examples include training on Japan's subcontracting act for workplaces that carry out outsourcing operations and training on insider trading regulations. Moreover, in our job level-based training program, we include compliance training to raise the level of awareness on general compliance issues such as information control and prevention of harassment. In addition to this, in fiscal 2017 compliance proficiency tests were given to all associates in Japan, and in November we held a month dedicated to strengthening compliance, which generated thoughtful workplace discussions. Furthermore, in fiscal 2017, we introduced a global compliance e-learning program.

To prevent compliance violations or to detect them at an early stage, and resolve them, Akebono conducts compliance hearings for associates selected at random, and has set up consultation counters, both in-house and outsourced, to accept requests for counseling from all associates, including temporary employees and contract employees. Among these, some of the outsourced consultation has been entrusted to specialized agencies. At all of these counters, the personnel in charge keep the name of the person seeking the consultation and the nature of their consultation confidential. Akebono also ensures that the person seeking consultation does not receive any prejudicial treatment because of making a report or seeking consultation.

## **Risk Management System**

Akebono strives to identify the risks surrounding the Company and conducts risk control and monitoring to reduce them. We also conduct risk management activities aimed at minimizing the impact of any damage that might materialize. Akebono's risk management activities are supported by the Risk Management Committee, comprising a group of directors chaired by the Representative Director & CEO, and the Risk Evaluation Committee a subcommittee of the Risk Management Committee that is chaired by the Representative Director & Executive Vice President. The Risk Evaluation Committee controls Group-wide critical risks. In fiscal 2017, the Company confirmed the implementation status and efficacy of countermeasures for critical Group-wide risks. In addition, the Company promoted a risk management plan for its major overseas locations.

## **Information Security Activities**

Akebono has established an Information Security Committee, as well as information security policies, guidelines and rules for the handling of information in order to implement appropriate measures to protect information assets properly. We clarify measures according to materiality and risk, in order to provide appropriate protection for data owned in-house or provided by customers or business partners from all kinds of threats, including negligence, accidents, natural disasters, and criminal acts. Under the Information Security Committee, the Company has also set up a working group and established a system where information security personnel or an information system administrator in each section carries out their own checks against the information security risks to which their respective operations are vulnerable. Using a PDCA cycle to raise awareness of and adherence to the various regulations and guidelines through education and training, the Company is working to ensure information security. In the unlikely event that a violation does occur, such as with regard to the Company's rules of employment, it is strictly dealt with. The Company complies with all relevant laws and regulations and other social norms, and strives to achieve continuous improvement of its management systems, including in response to changes in the environment.

Moreover, in recent years, in light of the increasing risk of information leakage due to global business expansion, growing dependence on IT and the increased liquidity of employment, the Company has strengthened its network environment so that its security exceeds a certain level globally.

In the future, while Akebono continues to implement global education and awareness-raising activities, it will continue to routinely conduct security assessments based on cybersecurity management guidelines, adopt new security measures, build the organization and structure in preparation for contingencies, and strengthen its countermeasures to cyber-attacks, which are becoming increasingly sophisticated.