

## Group Basic Policy on Prevention of Bribery

Money Forward, Inc. (the “Company”) and its subsidiaries (collectively, the “Group”) have established the following Basic Policy on Prevention of Bribery and will strive to ensure the appropriateness and transparency of business operations.

### Basic Policy

The Group establishes the following items as the basic principles for preventing bribery of public officials and others, and for building an appropriate and transparent relationship with customers and business partners that are free from corruption, and the Group and its officers and employees shall comply with these principles.

#### (1) Prohibition of bribery of public officials, etc.

We shall not provide or offer or promise to provide money or other benefits, directly or indirectly, to public officials or others for the purpose of obtaining or maintaining business benefits. However, in exceptional cases, when we do so within the scope of common sense and not in violation of laws and regulations, we will follow the appropriate approval procedures in accordance with internal rules.

#### (2) Establishment of appropriate and transparent business relationships free from corruption

Even with persons other than public officials, we shall not transfer any money, etc., that raises questions about the appropriateness or transparency of such transactions and will follow appropriate approval procedures in accordance with internal rules for the transfer of money and other transactions.

#### (3) Recording and Preservation

The provision, transfer, and receipt of money, etc., shall be accurately recorded and stored in accordance with internal rules.

#### (4) Reporting

Any suspected violation of laws, regulations, or internal rules regarding the prevention of bribery shall be immediately reported in accordance with internal rules so that appropriate action can be taken in a timely manner.

#### (5) Thorough Dissemination of Rules

We shall establish internal rules concerning the prevention of bribery and make them known to officers and employees of the Group. In addition, the Company shall educate and train officers and employees of the Group through periodic compliance training.