

Key Points for Formulating and Drafting Internal Rules, Manuals, etc., Regarding the AMA Compliance Guide

- The table below summarizes the key points for formulating and drafting the Code of Conduct, the Basic AMA Compliance Regulations, and the AMA Compliance Guide Manual, as listed in Chapter 2, Section 1(3) of the Guide for the Design and Implementation of an Effective Antimonopoly Act Compliance Program.

Note that the items in the table are merely examples. When actually formulating these internal rules, manuals, and other documents, it is desirable to include necessary items in light of the company's specific circumstances and AMA violation risks.

[Code of Conduct]

Items(e.g.)	Points	Relevant Sections of the Guide
Message from Top Management	<ul style="list-style-type: none"> ➤ The Message from Top Management should be articulated by the top executive in their own words, specifically addressing the following points (a message with the top executive's photo may also be considered), so that their genuine commitment to compliance is conveyed to every officer and employee: <ul style="list-style-type: none"> ✧ The importance and positioning of compliance for the company. ✧ The necessity of complying with the Code of Conduct to achieve compliance. ✧ The need to consult or report to the company's consultation point or internal reporting desk (including situations where the individual was involved in the violation) if a question arises regarding compliance with the Code of Conduct or if an action violating the Code of Conduct is observed or heard. ✧ Commitment to strictly maintain the confidentiality of consultations/reports, to not subject individuals to detrimental treatment for making a consultation/report, and to appropriately respond to consultations/reports according to pre-established processes. 	PartII-1(1) (P10) PartII-2(3) (P63) PartII-3(2) (P84)

Items(e.g.)	Points	Relevant Sections of the Guide
Purpose and Positioning	<ul style="list-style-type: none"> ➤ State that the document serves as a specific and clear set of guidelines on the ethical actions and attitudes that individual officers and employees should take in their daily business activities to realize the company's philosophy and values. ➤ Also consider explicitly clarifying its relationship with the company's corporate philosophy and values (which may be referred to in practice as "Purpose, Mission, Values, Vision," etc.). 	PartII-1(3) (P24)
Scope of Application	<ul style="list-style-type: none"> ➤ Specify the officers, employees, and group companies covered by the scope of the Code of Conduct. (Examples of officers, employees, and group companies that may be included in the scope of application): <ul style="list-style-type: none"> ✧ Officers and Employees: Directors/Officers, regular employees, or temporary employees such as part-timers, etc. ✧ Group Companies: The company itself (parent company), consolidated subsidiaries, unconsolidated subsidiaries, or affiliated companies, etc. ➤ Also consider whether to require third parties, such as contractors and business partners, to comply with the company's Code of Conduct (it is also possible to create a separate Code of Conduct specifically for contractors and business partners). 	PartII-1(5) (P44)
Consultation and Whistleblowing	<ul style="list-style-type: none"> ➤ Stipulate that officers and employees must consult or report to the company's consultation desk or internal reporting channel if a question arises regarding compliance with the Code of Conduct or if an action violating the Code of Conduct is observed or heard (including situations where the individual was involved in the violation). ➤ Specify that the content of consultations and reports will be kept strictly confidential, that no 	PartII-2(3) (P63) PartII-3(2) (P84)

Items(e.g.)	Points	Relevant Sections of the Guide
	<p>detrimental treatment will be imposed for making a report or consultation, and that reports/consultations will be appropriately handled according to a pre-established process.</p> <ul style="list-style-type: none"> ➤ Include the name of the company's consultation desk and internal reporting channel, the relevant department/person in charge, telephone/FAX number, email address, physical address (for sending documents), the internal intranet URL, their reception hours, and the handling flow. 	
Code of Conduct Regarding AMA	<ul style="list-style-type: none"> ➤ Briefly state that officers and employees must not engage in actions that violate the AMA or actions that may raise suspicion of an AMA violation. ➤ If referring to specific types of violations (unreasonable restraint of trade, private monopolization, and unfair trade practices), prioritize detailing the types of conduct that are deemed to pose a high risk to the company, based on the results of the AMA violation risk assessment. 	PartII-1(3) (P24)
Department in Charge	<ul style="list-style-type: none"> ➤ Clearly specify the Responsible Department for the Code of Conduct to clarify responsibilities regarding its dissemination, awareness, and revision, as well as handling inquiries about its content. 	PartII-1(4) (P35)
Creation and Revision History	<ul style="list-style-type: none"> ➤ Include the date of formulation and date/history of revision of the Code of Conduct at the beginning or end of the document. 	PartII-1(3) (P24)

[AMA Compliance Basic Rules]

Items(e.g.)	Points	Relevant Sections of the Guide
Purposes	<ul style="list-style-type: none"> ➤ Stipulate the aim of establishing basic policies and procedures that officers and employees must comply with for the purpose of preventing AMA violations, ensuring their early detection, and responding appropriately after detection (hereinafter referred to as "Prevention and Early Detection, etc."). 	PartII-1(3) (P24)
Definitions	<ul style="list-style-type: none"> ➤ Stipulate the definitions for terms whose meaning and scope should be clarified (e.g., competitors, market, contact, meeting, sensitive information, etc.) when setting the basic policies and procedures that officers and employees must comply with. 	PartII-2(1) (P49) etc.
Scope of Application	<ul style="list-style-type: none"> ➤ Stipulate the officers, employees, and group companies covered by the scope of application of these regulations (examples of officers, employees, and group companies that may be included in the scope of application are the same as for the Code of Conduct). ➤ Also consider whether to include third parties, such as contractors and business partners, in the scope of application. 	PartII-1(5) (P44)
Application and Relationship to Other Rules	<ul style="list-style-type: none"> ➤ Organize and stipulate the application relationship (e.g., priority) between these regulations and the Code of Conduct and other internal rules (such as basic regulations concerning general compliance, internal rules on internal reporting, and regulations on the disciplinary action of officers and employees). ➤ Also consider establishing separate detailed rules or manuals regarding the specific details of the implementation of these regulations. 	PartII-1(3) (P24) etc.

Items(e.g.)	Points	Relevant Sections of the Guide
AMA Compliance Guide Promotion System	<ul style="list-style-type: none"> ➤ Specifically stipulate the authority and responsibilities (division of duties) of each organizational unit regarding the organizational structure for the design and implementation of the AMA Compliance Guide Program, so that the matters to be undertaken by officers and employees are clear. (Examples of organizational units whose authority and responsibilities (division of duties) may be stipulated): ✧ Director or Manager in charge of Compliance ✧ Compliance Committee ✧ Department or Person in charge of general Compliance ✧ Dedicated Department or Person in charge of AMA Compliance ✧ Internal Audit Department or Person in charge, etc. 	PartII-1(4) (P35)
Risk Assessment	<ul style="list-style-type: none"> ➤ Stipulate the entity responsible for conducting the AMA violation Risk Assessment, the method of implementation, and the frequency of review. 	PartII-1(2) (P16)
Prohibitions and Obligations	<ul style="list-style-type: none"> ➤ Stipulate the prohibition of AMA violations and any conduct that may raise suspicion of an AMA violation. ➤ Specifically define the prohibited conduct for the types of violations (unreasonable restraint of trade, private monopolization, and unfair trade practices) that are deemed to pose a high risk to the company, based on the results of the AMA violation risk assessment. ➤ Stipulate the obligation for officers and employees to comply with the policies and procedures set forth in these regulations and to cooperate with the various initiatives specified herein for the purpose of Prevention and Early Detection, etc. of AMA violations. 	PartII-1(2) (P16) PartII-1(3) (P24)

Items(e.g.)		Points	Relevant Sections of the Guide
Rules for Contact with Competitors	Policy Regarding Contact with Competitors	<ul style="list-style-type: none"> ➤ Stipulate the basic policy regarding contact with competitors (e.g., prohibition of contact/information exchange with competitors concerning matters that are important means of competition, such as pricing, and cases where contact with competitors is permissible without issue). 	PartII-2(1) (P49)
	Prior Application for Contact with Competitors	<ul style="list-style-type: none"> ➤ If it is necessary to apply for and obtain approval from the person in charge of the Compliance Department or equivalent before contacting a competitor, stipulate that requirement and the specific procedures. (Examples of matters that may be stipulated regarding prior application): <ul style="list-style-type: none"> ✧ Applicant and recipient of the application ✧ Required details in the application form (e.g., purpose of contact, name of the competitor, names of the individuals involved (from both the company and the competitor), date and time of contact, a pledge to comply with the AMA, etc.) ✧ Approving authority and approval criteria, etc. 	PartII-2(1) (P49)
	Prohibitions and Compliance Requirements during Contact with Competitors	<ul style="list-style-type: none"> ➤ Stipulate the prohibitions and compliance requirements when engaging in contact with a competitor after obtaining prior application/approval, or when contact is initiated by a competitor. (Examples of Prohibitions and Compliance Requirements during Contact with Competitors): <ul style="list-style-type: none"> ✧ Prohibition of disclosure, receipt, or exchange of matters that are important means of competition, such as pricing. ✧ Requirement to refuse to discuss any topic that raises an AMA concern if brought up. ✧ Protesting and leaving the meeting or gathering if the above requirement is not accepted. ✧ Requirement to record the fact of the departure in the minutes of the meeting or gathering 	PartII-2(1) (P49)

Items(e.g.)		Points	Relevant Sections of the Guide
		<p>concerning the contact.</p> <ul style="list-style-type: none"> ✧ Promptly contacting the Compliance Department if any AMA issue arises, etc. 	
	Post-Contact Report regarding Competitors	<ul style="list-style-type: none"> ➤ If post-contact reporting to the person in charge of the Compliance Department or equivalent is required following contact with a competitor (either after prior application/approval or when contact is initiated by the competitor), stipulate that requirement and the specific procedures. (Examples of matters that may be stipulated regarding post-contact reporting): <ul style="list-style-type: none"> ✧ Officers and employees required to submit a post-contact report ✧ Recipient of the report ✧ Required details in the report, minutes, etc. (e.g., purpose of contact, name of the competitor, names of the individuals involved (from both the company and the competitor), date and time of contact, content and factual details of the exchange during the contact, etc.) ✧ Authority responsible for checking the report and minutes, etc. 	PartII-2(1) (P49)
	Participation in Trade Associations, etc.	<ul style="list-style-type: none"> ➤ Stipulate policies (e.g., prohibition of contact/information exchange concerning matters that are important means of competition, such as pricing) and procedures (e.g., prior application, post-contact reporting) similar to those for contact with competitors, as necessary, regarding membership in trade associations, participation in their activities, provision of information to them, and acquisition of information from them (hereinafter referred to as "Participation in Trade Associations, etc."). 	PartII-2(1) (P49)
	Internal Training	<ul style="list-style-type: none"> ➤ Stipulate the implementation of internal training regarding the AMA, the obligation of officers and employees to attend (which may be determined based on position, rank, department, timing of joining the company, etc.), and other necessary matters concerning the execution of internal training. 	PartII-2(2) (P56)

Items(e.g.)	Points	Relevant Sections of the Guide
Commitment Letter	<ul style="list-style-type: none"> ➤ If officers and employees are required to submit a written pledge regarding AMA compliance, stipulate the obligation to submit the pledge, as well as matters concerning its creation, submission, retention, and management. 	PartII-1(3) (P24)
Consultation	<ul style="list-style-type: none"> ➤ Stipulate the obligation to consult and the specific procedures for consultation when an officer or employee is unsure whether their own actions constitute an AMA violation. (Examples of specific consultation procedures): <ul style="list-style-type: none"> ✧ Location of the consultation desk ✧ Responsible department or person for handling consultations ✧ Response flow for consultations, etc. 	PartII-2(3) (P63)
Audit	<ul style="list-style-type: none"> ➤ Stipulate the implementation of audits regarding the AMA, the obligation of officers and employees to cooperate (including the prohibition of obstruction), and other necessary matters concerning the execution of the audit. ➤ If email monitoring is to be implemented, stipulate that fact and the specific implementation procedures as necessary. 	PartII-3(1) (P76)
Reporting and Internal Whistleblowing	<ul style="list-style-type: none"> ➤ Stipulate the obligation to report and the specific procedures for reporting when an officer or employee observes or hears of an AMA violation in their surroundings. (Examples of specific reporting procedures): <ul style="list-style-type: none"> ✧ Recipient(s) of the report (e.g., operational reporting line, internal whistleblowing hotline) ✧ Location of the internal whistleblowing channel ✧ Responsible department or person for handling internal reports ✧ Confidentiality of the reporter and the content of the report ✧ Prohibition of detrimental treatment against the reporter 	PartII-3(2) (P84)

Items(e.g.)	Points	Relevant Sections of the Guide
	<ul style="list-style-type: none"> ✧ Response flow for reports, etc. ➤ Regarding the preceding items, it is also possible to apply the internal regulations concerning internal reporting mutatis mutandis (with necessary changes). 	
Internal Leniency Program	<ul style="list-style-type: none"> ➤ Stipulate matters regarding the reduction or exemption of disciplinary action (hereinafter referred to as "Reduction/Exemption") when an officer or employee voluntarily reports their involvement in an AMA violation and cooperates with the internal investigation. ➤ If certain conditions or factors are established for the Reduction/Exemption of disciplinary action, stipulate those conditions or factors. (Examples of conditions or factors for Reduction/Exemption of disciplinary action): <ul style="list-style-type: none"> ✧ Timing of the voluntary report ✧ Novelty and specificity of the reported information ✧ Degree of cooperation with the internal investigation ✧ Contribution to mitigating the company's disadvantage, etc. ➤ Regarding matters concerning the acceptance of voluntary reports on AMA violations, it is also possible to apply the internal regulations concerning internal reporting mutatis mutandis (with necessary changes). 	PartII-3(3) (P92)

Items(e.g.)	Points	Relevant Sections of the Guide
Response to Suspected AMA Violations	<p>➤ Stipulate the implementation of an internal investigation into the facts, the obligation of officers and employees to cooperate (including the prohibition of obstruction), and other necessary matters regarding the Response to Suspected AMA Violations.</p> <p>(Examples of necessary matters regarding the Response to Suspected AMA Violations):</p> <ul style="list-style-type: none"> ✧ Department or person responsible for the internal investigation ✧ Scope of the internal investigation ✧ Authority to investigate data on company-provided devices (PCs, smartphones, etc.) ✧ Submission and review of personal belongings of officers and employees (PCs, smartphones, diaries, memo pads, notebooks, etc.) ✧ Applicant and application flow for the Leniency Program (for surcharges) ✧ Matters concerning the root cause analysis and the development and implementation of recurrence prevention measures for the suspected violation, etc. 	PartII-3(4) (P96)
Disciplinary Action and Personnel Evaluation	<p>➤ Stipulate the individuals subject to disciplinary action and the details of the disciplinary action (it may be possible to apply the Rules of Employment, regulations on the disciplinary action of officers, or regulations on the disciplinary action of employees, etc., mutatis mutandis for the details of the disciplinary action).</p> <p>(Examples of individuals subject to disciplinary action):</p> <ul style="list-style-type: none"> ✧ Officers or employees involved in an AMA violation ✧ Officers or employees who unduly failed to implement measures for the prevention or early detection of an AMA violation, etc. ✧ Officers or employees who violated the prohibitions or compliance requirements set forth in these regulations, etc. 	PartII-2(4) (P70)

Items(e.g.)	Points	Relevant Sections of the Guide
	<ul style="list-style-type: none"> ➤ It may also be considered to stipulate that awards or compensation may be granted, or that favorable consideration may be given during personnel evaluations (promotion/salary increase), based on the degree of compliance with these regulations. 	
Third-Party Monitoring	<ul style="list-style-type: none"> ➤ To prevent and facilitate the early detection of AMA violations involving third parties, it may be considered to stipulate matters concerning the management of third parties, such as outsourced service providers and business partners. (Examples of matters concerning the management of third parties): <ul style="list-style-type: none"> ✧ Including a clause regarding AMA compliance in contracts with third parties. ✧ Ensuring thorough guidance and supervision to prevent third parties from engaging in AMA violations. ✧ Terminating the contract if it is discovered that a third party is involved in an AMA violation, etc. 	PartII-1(5) (P44)
Periodic Evaluation and Update of the Program	<ul style="list-style-type: none"> ➤ Stipulate the implementation of an effectiveness evaluation of the AMA Compliance Program, including the method, frequency, and procedures for the evaluation, and whether external experts will be engaged. 	PartII-4 (P103)
Record Retention and Management	<ul style="list-style-type: none"> ➤ Stipulates the department responsible for storage, retention period, and other details for records created and submitted concerning the implementation of this regulation. (Examples of records subject to retention) <ul style="list-style-type: none"> ✧ Applications, reports, and minutes concerning contact with competitors ✧ Written oaths/pledges of compliance with AMA ✧ Records related to training, consultations, audits, whistleblowing/reports, and internal investigations, etc. 	PartII-2(1) (P49) etc.

Items(e.g.)	Points	Relevant Sections of the Guide
Responsible Department and Amendment/Abolition Procedures	<ul style="list-style-type: none"> ➤ Stipulates the department responsible for the implementation and review of this regulation, and the procedures for its revision or abolition. 	PartII-1(4) (P35)
Enactment and Revision History	<ul style="list-style-type: none"> ➤ Records the date of enactment, revision dates, and revision history of this regulation. 	PartII-1(3) (P24)
Various Forms and Appendices	<ul style="list-style-type: none"> ➤ Various forms and templates may also be attached to the end of this regulation. <ul style="list-style-type: none"> ✧ Application form for pre-approval regarding contact with competitors ✧ Report/Minutes for post-contact reporting regarding contact with competitors ✧ Written pledge of compliance with AMA etc. 	PartII-2(1) (P49) etc.

[AMA Compliance Manual]

Items(e.g.)	Points	Relevant Sections of the Guide
Message from Top Management	<ul style="list-style-type: none"> ➤ In order to convey Top Management's commitment to AMA Compliance Guide to every officer and employee, the CEO/President should provide a concrete message in their own words covering the following points (it is also an option to include a photo of the CEO/President with the message). <ul style="list-style-type: none"> ✧ The importance and positioning of AMA Compliance Guide for our company ✧ The necessity to utilize the manual to achieve AMA Compliance ✧ In cases where there is a doubt regarding AMA or when witnessing or hearing about actions that violate AMA (including situations where oneself is involved in the violation), it is required to consult or report to the company's consultation or internal whistleblowing channels ✧ Strict confidentiality must be maintained regarding consultations and reports; no disadvantageous treatment shall be given for making consultations or reports; and consultations and reports shall be handled appropriately according to the predetermined process 	PartII-1(1) (P10)
Purpose of Establishment	<ul style="list-style-type: none"> ➤ It describes, in a concrete and easy-to-understand manner, the matters to be complied with and points to be noted regarding AMA, so that each officer and employee does not become involved in AMA violations in daily business activities. ➤ It is also possible to clarify the relationship with the code of conduct and the basic rules for AMA Compliance Guide. 	PartII-1(3) (P24)
Scope (Applicability)	<ul style="list-style-type: none"> ➤ Regulations regarding officers and employees as well as group companies included in the scope of the manual (examples of officers, employees, and group companies considered to be 	PartII-1(5) (P44)

Items(e.g.)	Points	Relevant Sections of the Guide
	<p>included in the scope are the same as those in the code of conduct and the basic rules for the AMA Compliance Guide).</p> <ul style="list-style-type: none"> ➤ It is also conceivable to consider whether to distribute the company’s manual to third parties such as subcontractors and business partners (separately, it is also possible to create a manual specifically for subcontractors and business partners). 	
Outline of the AMA	<ul style="list-style-type: none"> ➤ The following matters, etc., are simply described in language that can be understood by on-site employees: <ul style="list-style-type: none"> ✧ The purpose of the AMA ✧ The main regulatory provisions related to individual officers and employees ✧ The organizational structure and authority of the Japan Fair Trade Commission ✧ The procedures for handling AMA violation cases (flowchart), etc. 	PartI-1 (P4)
Sanctions and Disadvantages for Violations of AMA	<ul style="list-style-type: none"> ➤ To help officers and employees perceive AMA Compliance as their own responsibility, describe the severity of sanctions and disadvantages in the event of a violation of the AMA. (Examples of sanctions and disadvantages for violating the AMA) ✧ Sanctions and disadvantages imposed on the company <ul style="list-style-type: none"> ● Criminal penalties ● Administrative sanctions (including cease and desist orders and surcharge payment orders by the Japan Fair Trade Commission, as well as business improvement orders and business suspension orders by the relevant administrative authorities) ● Suspension from bidding in public tenders ● Contract termination and claims for penalties or damages ● Loss or damage to social credibility 	PartI-2 (P6) PartII-2(4) (P70)

Items(e.g.)	Points	Relevant Sections of the Guide
	<ul style="list-style-type: none"> ● Shareholder derivative lawsuits ● Costs for emergency response, etc. ◇ Sanctions and disadvantages against individuals <ul style="list-style-type: none"> ● Criminal penalties ● Disciplinary actions, etc. ➤ From the perspective of encouraging voluntary reporting and internal whistleblowing of the AMA violations, as well as cooperation with investigations by the Japan Fair Trade Commission, it is also possible to include explanations about the Leniency Program and the reduction system for cooperation. 	
Examples of AMA Violations by a Company or Other Companies	<ul style="list-style-type: none"> ➤ To help officers and employees understand the significant impact of the AMA violations, past violation cases of the company or other companies may be included. (When including violation cases of your own company, it is advisable to describe items such as the following.) <ul style="list-style-type: none"> ◇ The situation during on-site inspections and subsequent investigation responses ◇ The details and amounts of sanctions and disadvantages actually incurred by the company, as well as those suffered by officers and employees ◇ The causes of the AMA violations within the company and the status of formulating and implementing recurrence prevention measures ◇ The determination never to allow AMA violations to occur again within the company, etc. 	PartII-1(3) (P24)

Items(e.g.)	Points	Relevant Sections of the Guide
Explanation of Individual Types of Violations	<p>➤ Include explanations of the specific types of violations involving your company’s officers and employees (unreasonable restraint of trade , private monopolization, and unfair trade practices).</p> <p>(Note: Points to consider when describing each type of violation)</p> <ul style="list-style-type: none"> ✧ Rather than explaining all types of violations in a flat, uniform manner, prioritize and provide thorough explanations of the items assessed as high-risk for your company based on the AMA violation risk evaluation. ✧ For acts corresponding to each type of violation, avoid using the exact legal wording or technical terms so that frontline employees can understand; instead, replace them with general terms and explain in plain language (consider using illustrations, charts, etc.). ✧ Provide concrete explanations of prohibited behaviors (illegal acts) and expected behaviors (acts that are not illegal) by citing examples of situations that frontline employees encounter in their daily business activities. ✧ For matters where frontline employees are likely to be uncertain in their daily business decisions, explain the decision-making criteria and how to respond in a Q&A format or similar. ✧ In addition, emphasize and explain points requiring particular attention in light of various guidelines and actual law enforcement situations. 	PartII-1(3) (P24)

Items(e.g.)		Points	Relevant Sections of the Guide
Explanation of Rules on Contact with Competitors	Policy Regarding Contact with Competitors	<ul style="list-style-type: none"> ➤ Include an explanation of the basic policy regarding contact with competitors (e.g., prohibition of contact or information exchange on important competitive factors such as prices). In addition, it may be advisable to include explanations on the following points: <ul style="list-style-type: none"> ✧ Risks associated with contact and information exchange on important competitive factors such as prices with competitors ✧ Definition of competitors for your company and how to identify them ✧ Cases where contact with competitors is permissible without issues ✧ Criteria for determining whether contact is allowed and the necessity of prior approval or post-contact reporting procedures (flowchart), etc. 	PartII-2(1) (P49)
	Pre-Approval Application for Contact with Competitors	<ul style="list-style-type: none"> ➤ If prior application and approval from the compliance department or relevant personnel are required before contacting competitors, include an explanation of the specific procedures involved (including methods for circulating the workflow, etc.). (Examples of matters to be explained are similar to those in the basic regulations.) 	PartII-2(1) (P49)
	Prohibited and Compliance Matters When Contacting Competitors	<ul style="list-style-type: none"> ➤ Include explanations of the prohibitions and compliance requirements when contacting competitors after prior application and approval, or when approached by competitors. (While the examples of matters to be explained are similar to those in the basic regulations, it may also be advisable to provide concrete explanations with examples of sensitive information content and scope as encountered in actual business activities.) 	PartII-2(1) (P49)

Items(e.g.)		Points	Relevant Sections of the Guide
	Post-Contact Reporting Regarding Contact with Competitors	<ul style="list-style-type: none"> ➤ If post-contact reporting to the compliance department or relevant personnel is required when contacting competitors after prior application and approval, or when approached by competitors, include an explanation of this requirement and the specific procedures involved (including methods for circulating the workflow, etc.). (Examples of matters to be explained are similar to those in the basic regulations.) 	PartII-2(1) (P49)
	Participation in Trade Associations etc.	<ul style="list-style-type: none"> ➤ Include an explanation regarding membership in trade associations, participation in activities within trade associations, provision of information to trade associations, and obtaining information from trade associations (hereinafter referred to as "membership in trade associations, etc."). (Examples of matters that may be explained regarding membership in trade associations, etc.) <ul style="list-style-type: none"> ✧ AMA-related risks associated with membership in trade associations, etc. ✧ Definition of trade associations ✧ How to identify trade associations that include competitors ✧ Policies and procedures regarding membership in trade associations, etc. (such as prohibition of contact or information exchange on important competitive factors like prices, and requirements for prior application and post-reporting) ✧ Scope of information permitted to be provided to or obtained from trade associations, etc. 	PartII-2(1) (P49)
	Consultation, Whistleblowing, and Internal Leniency	<ul style="list-style-type: none"> ➤ Matters to be explained are the same as those in the basic regulations. ➤ From the perspective of encouraging consultation, whistleblowing, and voluntary reporting by officers and employees, clearly state your company's consultation and internal reporting 	PartII-2(3) (P63)

Items(e.g.)	Points	Relevant Sections of the Guide
	contact points, including the names of the departments and persons in charge, phone and fax numbers, email addresses, mailing addresses (for sending documents), intranet URLs, and their hours of availability.	
Response to an On-Site Inspection by the JAPAN Fair Trade Commission (JFTC)	<ul style="list-style-type: none"> ➤ Include explanations on important points to ensure that officers and employees do not engage in obstruction of on-site inspections—such as destruction, concealment, or falsification of relevant evidence—as well as the procedures for applying to the Leniency Program. 	PartII-3(4) (P96)
Third-Party Management	<ul style="list-style-type: none"> ➤ It may also be advisable to include explanations regarding the AMA violation risks related to the engagement of third parties such as contractors and business partners, as well as matters concerning their management, in order to prevent and detect AMA violations involving third parties at an early stage. (Examples of matters to be explained are similar to those in the basic regulations.) 	PartII-1(5) (P44)
Your Company's AMA Compliance Program	<ul style="list-style-type: none"> ➤ In addition, as matters related to your company's AMA Compliance Program, it may be advisable to include explanations regarding the overall structure of the organizational system for AMA compliance, the authority and roles of each organization, and the implementation of internal training and audits related to the AMA. 	PartII-1(4) (P35) etc.
Responsible Department	<ul style="list-style-type: none"> ➤ It may also be advisable to specify the department responsible for the manual to clarify responsibilities related to the dissemination, awareness-raising, and revision of the manual, as well as handling inquiries regarding its content. 	PartII-1(4) (P35)
History of Establishment and Revision	<ul style="list-style-type: none"> ➤ Include the manual's creation date, revision date(s), and the history of revisions at the beginning or the end of the manual. 	PartII-1(3) (P24)

Items(e.g.)	Points	Relevant Sections of the Guide
Appended Materials	<ul style="list-style-type: none"> ➤ It may also be advisable to attach the following materials at the end of the manual: <ul style="list-style-type: none"> ✧ Various internal regulations and manuals related to AMA Compliance ✧ Application forms for prior approval of contact with competitors ✧ Report and minutes templates for post-contact reporting with competitors ✧ Pledge forms regarding compliance with the AMA, etc. 	PartII-2(1) (P49) etc.

(Note) Regarding the page count of the manual, it is desirable to have an appropriate number of pages so that employees on the front lines can easily reference and utilize it in their daily business activities, after incorporating the minimum necessary matters that officers and employees who may be involved in AMA violations should understand.