

Simple Summary Table¹

Question 2 General Discussion

How does your company prioritize the design and implementation of the Antimonopoly Act (AMA) compliance program (Note) within its efforts to establish systems and initiatives aimed at preventing violations of various laws and regulations, detecting them early, and responding appropriately after detection? [Select one / Required response]

(Note) "AMA Compliance Program" refers to the mechanisms and efforts to appropriately avoid and reduce the risk of the AMA violations and the losses incurred in case of the AMA violations.

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	Our company does not prioritize responses to various legal violations and other issues.	282	32.5
2)	Lowest.	2	0.2
3)	Rather low.	36	4.1
4)	Neither.	103	11.9
5)	Rather high.	266	30.6
6)	Highest.	180	20.7

Question 3 Overall Efforts for Compliance Related to the AMA

Question 3-1 Commitment and Initiative of the Top Management

Question 3-1-1

Does your company's top management (meaning the President and Representative Director, Representative Director and CEO, or other individual with final decision-making authority and responsibility for your company's overall management; the same applies below) communicate messages related to the AMA compliance to your company's executives and employees? [Multiple selections allowed / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	Nothing in particular is communicated.	36	4.1
2)	An abstract message emphasizing the importance of overall compliance is communicated.	564	64.9
3)	With regard to compliance in general, a specific message that denies the motives of executives and employees who intend to engage in violations is communicated, such as "we do not want even 1 yen of profit from compliance violations".	291	33.5
4)	An abstract message emphasizing the importance of the AMA is communicated.	214	24.6
5)	With regard to the AMA, a specific message that denies the motives of executives and employees who intend to engage in violations is communicated, such as "we do not want even 1 yen of profit from the AMA violations".	136	15.7

¹ Excluding the free-response fields, the results for "Question 1: Overview of Your Company" are on pages 4 and 5 of the main report.

Tentative translation

Question 3-1-2

For those who selected any one of options 2) through 5) in Question 3-1-1:

How does your company's top management communicate messages to its executives and employees?

[Select one / Required response]

(Number of Respondents: 831 companies)

Answer Choices		Real Number	%
1)	Communicates via textual information (Note). (Note) This includes posting in easily accessible locations on the company intranet, distributing internal emails, and publishing/distributing materials such as codes of conduct, compliance manuals, company newsletters, and cards.	271	32.6
2)	Oral communication during in-house training sessions, various assemblies, meetings, gatherings, etc. (Note). (Note) Includes direct statements during e-Learning or web conferences, as well as the distribution or screening, and other related handling of pre-recorded video messages.	99	11.9
3)	Both textual and oral communication.	461	55.5

(Note) Since 2 companies didn't respond, they have been excluded from the tabulation.

Question 3-2 Assessing the Risk of the AMA Violations in Accordance with Respective Situations of Companies and Responding to the Risk in Risk-Based Approach

Does your company implement measures to assess the risk of AMA violations within your company (meaning the risk that your company may violate the AMA; the same applies hereafter) by categorizing the types of AMA violations and evaluating them separately for each of your company's products, locations, and departments? [Select one / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	579	66.6
2)	Yes.	290	33.4

Question 3-3 Design and Implementation of Policies and Procedures for Promoting the AMA Compliance

Question 3-3-1

Has your company formulated or prepared internal rules, manuals, etc. (Note) that define basic policies and procedures for promoting AMA compliance? [Multiple selections allowed / Required response]

(Note) This includes not only internal rules and manuals specifically focused on AMA compliance, but also those covering general compliance that include provisions related to AMA compliance.

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	Nothing specific has been formulated or prepared.	92	10.6
2)	A Code of Conduct (Note) has been formulated. (Note) "Code of Conduct" refers to guidelines that specifically and clearly indicate the ethical behavior and attitude to be taken by individual executives and employees in their daily business activities in order to realize the corporate philosophy and values.	716	82.4
3)	AMA compliance basic rules (Note) has been formulated. (Note) "AMA compliance basic rules" refer to internal rules that comprehensively stipulate matters concerning the design and implementation of an AMA compliance program.	283	32.6
4)	AMA compliance manual (Note) has been prepared. (Note) "AMA compliance manual" refers to a guidebook that summarizes knowledge and matters to be noted concerning the AMA in an easy-to-understand manner.	360	41.4

Tentative translation

Question 3-3-2

For those who selected any one of options 2) through 4) in Question 3-3-1:

Does your company implement any measures to inform executives and employees regarding the internal rules, manuals, etc. selected in Question 3-3-1? [Multiple selections allowed / Required response]

(Number of Respondents: 777 companies)

Answer Choices		Real Number	%
1)	No.	21	2.7
2)	Yes, our company implements measures for the Code of Conduct.	681	87.6
3)	Yes, our company implements measures for the AMA compliance basic rules.	251	32.3
4)	Yes, our company implements measures for the AMA compliance manual.	327	42.1

Question 3-4 Design of Organizational Structure and Allocation of Adequate Resources and Authority

Question 3-4-1

What organizational structure (Note) has your company established for the AMA compliance? [Multiple selections allowed / Required response]

(Note) This includes not only organizational structures dedicated to AMA compliance, but also organizational structures responsible for general compliance matters when such structures also oversee matters related to AMA compliance.

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	Not established organizational structure at all	19	2.2
2)	Compliance officer	578	66.5
3)	Compliance Committee	665	76.5
4)	Department or designated personnel in charge of overall compliance with laws and regulations, etc. outside of business divisions	622	71.6
5)	Department or designated personnel dedicated to the AMA compliance that independent from business divisions and separate from 4) outside of business divisions	81	9.3
6)	Department or designated personnel in charge of overall compliance with laws and regulations, etc. within a business division	241	27.7
7)	Department or designated personnel dedicated to the AMA compliance that independent from business divisions and separate from 6) within a business division	20	2.3
8)	Department or designated personnel in charge of internal audit	715	82.3
9)	Other	29	3.3

Tentative translation

Question 3-4-2

How are your outside directors and outside audit & supervisory board members involved in the design and implementation of your company's AMA compliance program? [Multiple selections allowed / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	There are no outside directors and outside audit & supervisory board members in our company.	20	2.3
2)	They are not involved.	59	6.8
3)	They make statements at meetings such as the board of directors or the compliance committee regarding the status of company's AMA compliance efforts.	494	56.8
4)	They request to submit reports from the compliance department, internal audit department, and other relevant units regarding the status of company's AMA compliance efforts through methods other than making statements at the meetings described in 3).	281	32.3
5)	They serve as one of the whistleblowing channels for executives and employees who witness or become aware of AMA violations.	189	21.7
6)	They are included in the reporting channels when suspicions of AMA violations arise within the company.	325	37.4
7)	Other	57	6.6

Question 4 Specific Measures to Prevent the AMA Violations

Question 4-1 Design and Implementation of Internal Rules for Contacts with Competitors

Question 4-1-1

Has your company formulated internal rules (Note) related to contact with competitors? [Select one / Required response]

(Note) This refers to internal rules designed to manage the risk of violating the AMA regarding contact with competitors, such as prohibiting contact with competitors or requiring applications, approvals, reports, etc., concerning contact with competitors.

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	439	50.5
2)	Yes.	430	49.5

Tentative translation

Question 4-1-2

For those who selected option 2) in Question 4-1-1:

What rules has your company formulated related to contact with competitors? [Multiple selections allowed / Required response]

(Number of Respondents: 430 companies)

Answer Choices		Real Number	%
1)	In principle, contact with competitors is prohibited.	181	42.1
2)	Executives and employees must apply in advance to their department supervisor or superior and obtain approval before contacting competitors.	205	47.7
3)	Executives and employees must apply in advance to the compliance department and obtain approval before contacting competitors.	116	27.0
4)	Executives and employees must take an oath that they will not engage in any conduct that may violate the AMA prior to contacting competitors.	103	24.0
5)	Executives and employees must take appropriate measures, such as protesting and leaving the meeting, if they encounter situations during contact with competitors that could potentially violate the AMA.	285	66.3
6)	Executives and employees must prepare minutes or notes regarding the circumstances of contact with competitors after such contact.	222	51.6
7)	Executives and employees must report the circumstances of any contact with competitors to their department supervisor or superior after such contact.	239	55.6
8)	Executives and employees must report the circumstances of any contact with competitors to the compliance department after such contact.	165	38.4
9)	Evidence and records related to contact with competitors (including documents, emails, meeting minutes, memos, etc.) must be properly retained (including rules regarding retention periods and methods).	188	43.7
10)	Other	89	20.7

Question 4-1-3

For those who selected option 2) in Question 4-1-1:

Does your company implement any measures to inform executives and employees of the Internal Rules for Contact with Competitors? [Select one / Required response]

(Number of Respondents: 429 companies)

Answer Choices		Real Number	%
1)	Not implemented	25	5.8
2)	Implemented	404	94.2

(Note) Since one company didn't respond, it has been excluded from the tabulation.

Tentative translation

Question 4-2 Providing In-House Trainings on the AMA

Question 4-2-1

Did your company provide in-house training sessions (Note) on the theme of the AMA during the most recent fiscal year? [Select one / Required response]

(Note) "In-house training sessions on the AMA" include sessions where your company's executives and employees served as instructors, as well as sessions where external organizations, groups, or individuals were commissioned as instructors. It also includes sessions provided in conjunction with training on other compliance-related topics. The same applies below.

(Number of Respondents: 868 companies)

Answer Choices		Real Number	%
1)	No.	309	35.6
2)	Yes, face-to-face trainings were provided.	97	11.2
3)	Yes, online trainings (e-Learning, web conferencing, etc. The same applies below) were provided.	250	28.8
4)	Yes, both face-to-face and online trainings were provided.	212	24.4

(Note) Since one company provided an invalid response, it has been excluded from the tabulation.

Question 4-2-2

For those who selected any one of options 2) through 4) in Question 4-2-1:

Please select the applicable option regarding the content and format of your company's in-house training sessions on the AMA during the most recent fiscal year. [Multiple selections allowed / Required response]

(Number of Respondents: 559 companies)

Answer Choices		Real Number	%
1)	Explained general knowledge related to the AMA in lecture-style.	439	78.5
2)	Explained matters requiring attention under the AMA based on the business activities of the departments subject to training and their respective risks of violating the AMA.	322	57.6
3)	Created a drama based on actual AMA violation cases involving itself or competitors, using a story format to explain the disadvantages and other related issues that arise when involved in AMA violations.	55	9.8
4)	Incorporated formats requiring active participant involvement, such as discussion-based and role-playing formats.	56	10.0
5)	Other	80	14.3

Tentative translation

Question 4-2-3

How often does your company provide in-house training sessions on the AMA for its executives and employees in the positions, ranks, and departments listed in the response field? For each position, rank, department, etc., select the applicable option. [Select one / Required response]

(Number of Respondents: 869 companies)

Item		Do not provide in-house training	Provided irregularly	About once quarter	About once every six months	About once a year	About once every two to three years	About once every four to five years
Top management	%	39.2	28.7	0.7	3.5	21.3	5.4	1.3
	Real Number	341	249	6	30	185	47	11
Management team members other than top management (Note)	%	34.8	28.5	0.9	4.7	23.8	6.0	1.3
	Real Number	302	248	8	41	207	52	11
Persons in managerial positions at the level of general manager or above	%	27.0	28.7	1.0	5.4	28.1	8.2	1.6
	Real Number	235	249	9	47	244	71	14
New employees	%	32.3	16.8	0.7	5.8	38.8	4.5	1.2
	Real Number	281	146	6	50	337	39	10
Employees in the sales department	%	24.2	26.1	1.4	6.7	31.6	8.1	2.0
	Real Number	210	227	12	58	275	70	17
Employees in the purchasing and procurement departments	%	27.0	26.2	1.7	5.6	29.8	7.9	1.6
	Real Number	235	228	15	49	259	69	14

(Note) This includes executive officers and similar positions that do not qualify as officers under the Companies Act. The same applies below.

Tentative translation

Question 4-2-4

Over the past three years (FY2021 to FY2023), approximately what percentage of your company's executives and employees participated in in-house training sessions focused on the AMA? Please select the percentage of executives and employees in each of the following positions, ranks, departments, etc., who have participated in at least one in-house training session focused on the AMA over the past three years (an approximate figure is acceptable if the exact percentage is unknown). [Select one / Required response]

(Number of Respondents: 869 companies)

Item		0%(Note)	Less than 25%	25% or more and less than 50%	50% or more and less than 75%	75% or more and less than 100%	100%
Top management	%	47.8	7.0	1.5	2.2	10.2	31.3
	Real Number	415	61	13	19	89	272
Management team members other than top management	%	40.5	10.4	2.9	3.5	14.5	28.3
	Real Number	352	90	25	30	126	246
Persons in managerial positions at the level of general manager or above	%	31.8	13.5	4.9	5.9	19.6	24.4
	Real Number	276	117	43	51	170	212
New employees	%	35.8	8.4	2.6	2.2	16.2	34.8
	Real Number	311	73	23	19	141	302
Employees in the sales department	%	28.3	13.1	5.3	6.4	22.0	24.9
	Real Number	246	114	46	56	191	216
Employees in the purchasing and procurement departments	%	31.6	12.1	4.7	6.6	21.7	23.2
	Real Number	275	105	41	57	189	202

(Note) This includes cases where no in-house training sessions on the AMA have been provided over the past three years.

Question 4-2-5

Does your company conduct tests to confirm the degree of understanding among its executives and employees regarding AMA compliance? [Select one / Required response]

(Number of Respondents: 559 companies)

Answer Choices		Real Number	%
1)	No.	248	44.4
2)	Yes, it is conducted before in-house training.	16	2.9
3)	Yes, it is conducted after in-house training.	292	52.2
4)	Yes, it is conducted both before and after in-house training.	3	0.5

(Note) In Question 4-2-1, respondents who selected '1) No.' are excluded from the denominator when aggregating the data.

Question 4-3 Design and Operation of a Consultation System on the AMA

Question 4-3-1

Have your company established an internal consultation desk where executives and employees could seek advice on whether their actions may constitute violations of the AMA? [Select one / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	75	8.6
2)	Yes, it has established only outside business divisions (legal and compliance departments, etc.).	631	72.6
3)	Yes, it has established only within business divisions .	8	0.9
4)	Yes, it has established both outside and within business divisions .	155	17.8

Question 4-3-2

For those who selected any one of options 2) through 4) in Question 4-3-1:

Does your company implement any measures to inform executives and employees of the acceptance of consultations on the AMA, the use of the consultation desk, and related matters? [Select one / Required response]

(Number of Respondents: 794 companies)

Answer Choices		Real Number	%
1)	No.	149	18.8
2)	Yes.	645	81.2

Question 4-3-3

For those who selected any one of options 2) through 4) in Question 4-3-1:

How many internal consultations related to the AMA does your company receive annually? Please provide the annual number of internal consultations received related to the AMA (Note) in numerical form (half-width characters), keeping in mind the situation over the past three years (FY 2021 to FY 2023).

If there were no internal consultations related to the AMA during this period, please enter “0”. [Essay format / Required response]

(Note) “Number of internal consultations received related to the AMA” refers to the number of consultations received by your company's internal consultation desk concerning the AMA. If it is not possible to accurately determine the total number of internal consultations received—for example, if your company responds to inquiries verbally or via email outside the formal consultation desk—an approximate number is acceptable. (If you can accurately determine the number of internal consultations received related to the AMA over the past three years (FY2021 to FY2023), please state the average number received over those three years.)

(Number of Respondents: 794 companies)

Answer		Real Number	%
1)	Annual number of internal consultations received related to the AMA	0 cases	48.1
		Between 1 and 10 cases	38.0
		Between 11 and 20 cases	4.2
		Between 21 and 30 cases	2.6
		31 cases or more	5.5
2)	No consultation desk was established during the period concerned.	12	1.5

Tentative translation

(Note) Regarding “1) Annual number of internal consultations received related to the AMA,” the table presents the aggregated results by category based on the number of responses provided in the free-text answer field.

Question 4-4 Design and Implementation of Internal Disciplinary Rules for the AMA Violations

Question 4-4-1

Could your executives and employees be subject to disciplinary action or other adverse measures (hereinafter referred to simply as “disciplinary action”) for the AMA violations? [Select one / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No, no executives or employees will be subject to disciplinary action.	14	1.6
2)	Yes, executives and employees could be subject to disciplinary action.	855	98.4

Question 4-4-2

For those who selected option 2) in Question 4-4-1:

At your company, could executives and employees in the positions/ranks, etc. listed in the response field be subject to disciplinary action for the AMA violations? For each of the following positions/ranks, please select the applicable option. [Select one / Required response]

(Number of Respondents: 855 companies)

Item		Not be subject to disciplinary action	It is clearly stated in the internal rules that executives and employees could be subject to disciplinary action for AMA violations	Executives and employees could be subject to disciplinary action though such a provision is not clearly stated in the internal rules (Note 1)
Top management	%	3.7	23.0	73.2
	Real Number	32	197	626
Senior managers other than top management	%	2.6	24.8	72.6
	Real Number	22	212	621
Those who are involved in AMA violations	%	0.4	37.1	62.6
	Real Number	3	317	535
Those who bear supervisory responsibility for the duties of an individual involved in AMA violations (superior)	%	1.3	27.8	70.9
	Real Number	11	238	606
Those who unreasonably fail to make efforts to prevent AMA violations and detect them early (Note 2)	%	9.7	21.6	68.7
	Real Number	83	185	587
Superior of those who unreasonably fail to make efforts to prevent AMA violations and detect them early	%	10.6	19.8	69.6
	Real Number	91	169	595

(Note 1) This includes cases where general grounds for disciplinary action, such as violations of laws and regulations or damage to the company's reputation, are applied.

(Note 2) For example, individuals who repeatedly fail to submit required prior notifications regarding contact with competitors or attend mandatory in-house training sessions, or those who, despite knowing that antitrust violations are occurring around them, fail to report or consult with their superior or the appropriate department, are referred to.

Tentative translation

Question 4-4-3

For those who selected option 2) in Question 4-4-1:

Does your company implement any measures to inform executives and employees that engaging in conduct that violates the AMA or unjustly neglecting efforts toward the prevention or early detection of such violations may be subject to disciplinary action? [Select one / Required response]

(Number of Respondents: 854 companies)

Answer Choices		Real Number	%
1)	No.	403	47.2
2)	Yes.	451	52.8

(Note) Since one company didn't respond, it has been excluded from the tabulation.

Question 4-4-4

Does your company have an incentive system (Note) in place that links cooperation in efforts to prevent, detect, and related activities of violations of the AMA to the benefits of its executives and employees? [Multiple selections allowed / Required response]

(Note) This question excludes the so-called "internal leniency program," whereby your company considers the voluntary disclosure of involvement in AMA violations by its executives and employees, or their cooperation in internal investigations, as grounds for mitigating or waiving disciplinary action.

(Number of Respondents: 868 companies)

Answer Choices		Real Number	%
1)	Cooperation in efforts to prevent, detect and related activities regarding AMA violations does not benefit executives and employees.	709	81.7
2)	The company recognizes executives and employees or departments that have demonstrated outstanding efforts in preventing, detecting, and related activities regarding AMA violations.	24	2.8
3)	Financial rewards are provided to executives and employees who demonstrate outstanding efforts in preventing, detecting, and related activities regarding AMA violations.	6	0.7
4)	The degree of cooperation in efforts to prevent, detect, and related activities regarding AMA violations shall be considered in personnel evaluations (promotions, grade advancements, and salary increases).	48	5.5
5)	Other	99	11.4

(Note) Since one company didn't respond, they have been excluded from the tabulation.

Tentative translation

Question 5 Specific Measures to Detect the AMA Violations at an Early Stage and Take Appropriate Actions

Question 5-1 Conducting Audits on the AMA

Question 5-1-1

Does your company conduct audits on the theme of the AMA (Note)? [Select one / Required response]

(Note) "Audits on the theme of the AMA" include audits organized by your company, as well as audits entrusted to external organizations, groups, individuals, etc. It also includes audits conducted in conjunction with other compliance themes.

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	405	46.6
2)	Yes (irregularly).	144	16.6
3)	Yes (approximately once every quarter or more frequently).	26	3.0
4)	Yes (approximately once every six months).	28	3.2
5)	Yes (approximately once every year).	163	18.8
6)	Yes (approximately once every two to three years).	36	4.1
7)	Yes (approximately once every four to five years).	5	0.6
8)	Other	62	7.1

Question 5-1-2

For those who selected any one of options 2) through 8) in Question 5-1-1:

What procedures does your company implement in its audits on the theme of the AMA? [Multiple selections allowed / Required response]

(Number of Respondents: 401 companies)

Answer Choices		Real Number	%
1)	Reviewing written documents such as agreements with competitors and meeting minutes related to meetings with competitors	108	26.9
2)	Checking records of applications, approvals, reports, and other documents related to contact with competitors	159	39.7
3)	Checking evidence such as invoices and receipts related to travel, transportation, and entertainment expenses	115	28.7
4)	Conducting keyword searches of histories on email, chat, social media, etc.	31	7.7
5)	Conducting surveys and interviews for executives and employees	229	57.1
6)	Conducting data analysis related to expenditure status of travel, transportation, and entertainment expenses, changes in operating profit margins, and bid-winning rates in public tenders, etc.	29	7.2
7)	Other	71	17.7

(Note) Since one company didn't respond, it has been excluded from the tabulation. Furthermore, regarding the response of "8) Other" in Question 5-1-1, after carefully examining the answers provided in the descriptive response field concerning the specific details, some responses were found to be unclear as to whether audits themed on the Antimonopoly Act had been conducted or not; therefore, these responses were excluded from the aggregation.

Tentative translation

Question 5-1-3

For those who selected any one of options 2) through 8) in Question 5-1-1:

Does your company use AI when conducting audits on the theme of the AMA? [Select one / Required response]

(Number of Respondents: 400 companies)

Answer Choices		Real Number	%
1)	No.	386	96.5
2)	Yes.	14	3.5

(Note) Since two companies didn't respond, they have been excluded from the tabulation. Furthermore, regarding the response of "8) Other" in Question 5-1-1, after carefully examining the answers provided in the descriptive response field concerning the specific details, some responses were found to be unclear as to whether audits themed on the Antimonopoly Act had been conducted or not; therefore, these responses were excluded from the aggregation.

Question 5-2 Design and Operation of a Whistleblowing System

Question 5-2-1

Has your company established a whistleblowing hotline to receive reports from executives and employees regarding AMA violations (including voluntary reports from executives and employees who were involved in such violations)? [Select one / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	15	1.7
2)	Yes, only outside the company (e.g., at a law firm).	41	4.7
3)	Yes, only inside the company.	80	9.2
4)	Yes, both outside and inside the company.	733	84.3

Question 5-2-2

For those who selected any one of options 2) through 4) in Question 5-2-1:

Does your company implement any measures to inform executives and employees about information on AMA violations and the use of the whistleblowing hotline, etc.? [Select one / Required response]

(Number of Respondents: 854 companies)

Answer Choices		Real Number	%
1)	No.	66	7.7
2)	Yes.	788	92.3

Tentative translation

Question 5-2-3

For those who selected any one of options 2) through 4) in Question 5-2-1:

How many whistleblowing reports related to the AMA does your company receive annually? Please provide the annual number of whistleblowing reports received related to the AMA (Note) in numerical form (half-width characters), keeping in mind the situation over the past three years (FY 2021 to FY 2023).

If there were no whistleblowing reports related to the AMA during this period, please enter "0." [Essay format / Required response]

(Note) "Number of whistleblowing reports received related to the AMA" refers to the number of whistleblowing reports related to the AMA received by both the internal and external whistleblowing hotline of your company. If it is not possible to accurately determine the total number of whistleblowing reports related to the AMA, an approximate number is acceptable. (If you can accurately determine the number of whistleblowing reports received related to the AMA over the past three years (FY2021 to FY2023), please state the average number received over those three years.)

(Number of Respondents: 854 companies)

Answer		Real Number	%	
1)	Number of whistleblowing reports received related to the AMA	0 cases	788	92.3
		Between 1 and 10 cases	57	6.7
		Between 11 and 20 cases	1	0.1
2)	No whistleblowing hotline was established during the period concerned.	8	0.9	

(Note) Regarding "1) Number of whistleblowing reports received related to the AMA," the table presents the aggregated results by category based on the number of cases reported in the descriptive response field.

Question 5-3 Introduction of an Internal Leniency System about the AMA

Question 5-3-1

Does your company have a system or initiative to consider the fact that an executive or employee has voluntarily reported their involvement in an AMA violation or cooperated with an internal investigation as a reason for mitigating or waiving disciplinary action? (Hereinafter, such a system or initiative is referred to as an "internal leniency system.") [Select one / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No, our company doesn't consider it.	266	30.6
2)	Yes, it is not explicitly stated in our internal rules, but our company considers it.	240	27.6
3)	Yes, it is not explicitly stated in our internal rules that our company considers it for AMA violations, but it is explicitly stated in our internal rules that our company considers it for fraudulent acts and other misconduct in general, and AMA violations are included.	162	18.6
4)	Yes, it is explicitly stated in our internal rules that our company considers it for AMA violations.	65	7.5
5)	Other	136	15.7

Tentative translation

Question 5-3-2

For those who selected any one of options 2) through 5) in Question 5-3-1:

Does your company implement any measures to inform executives and employees that they can receive or have the possibility of receiving mitigation or a waiver of disciplinary action if they voluntarily report their involvement in an AMA violation or cooperate with an internal investigation? [Select one / Required response]

(Number of Respondents: 464 companies)

Answer Choices		Real Number	%
1)	No.	316	68.1
2)	Yes.	148	31.9

(Note) Since three companies didn't respond, they have been excluded from the tabulation. Furthermore, regarding the response of "5) Other" in Question 5-3-1, after carefully examining the answers provided in the descriptive response field concerning the specific details, some responses were found to be unclear as to whether the company considers voluntary reporting of involvement in violations of the Antimonopoly Act or cooperation with internal investigations by executives or employees as a reason for reducing or exempting disciplinary action; therefore, these responses were excluded from the aggregation.

Question 5-3-3

For those who selected any one of options 2) through 5) in Question 5-3-1:

Over the past three years (FY 2021 to FY 2023), has your company received any voluntary reports from your executives or employees regarding their involvement in the AMA violations under circumstances where such facts, including voluntary reporting or cooperation with internal investigations, would be considered reasons for mitigating or waiving disciplinary action? [Select one / Required response]

(Number of Respondents: 465 companies)

Answer Choices		Real Number	%
1)	No.	458	98.5
2)	Yes.	7	1.5

(Note) Since two companies didn't respond, they have been excluded from the tabulation. Furthermore, regarding the response of "5) Other" in Question 5-3-1, after carefully examining the answers provided in the descriptive response field concerning the specific details, some responses were found to be unclear as to whether voluntary reporting of involvement in violations of the Antimonopoly Act or cooperation with internal investigations by executives or employees is considered a reason for reducing or exempting disciplinary action; therefore, these responses were excluded from the aggregation.

Question 5-4 Appropriate Response to Suspected Violations of the AMA

Question 5-4-1

Has your company formulated internal rules, manuals, or similar documents (hereinafter referred to as an "emergency response manual") (Note) that specify the system, response policy, and procedures for when a suspected AMA violation occurs within your company as a result of an audit or whistleblowing report (including a voluntary report regarding involvement in an AMA violation), etc.? [Select one / Required response]

(Note) This includes not only internal rules, manuals, or similar documents specifically for AMA violations, but also cases where matters regarding AMA violations are stated in internal rules, manuals, or similar documents regarding fraudulent acts and other misconduct in general, or where internal rules, manuals, or similar documents regarding fraudulent acts and other misconduct in general are also applied to AMA violations. Also, if the system, response policy, and procedures etc. for when a suspected AMA violation occurs within the company are specified in the internal rules, manuals, or similar documents asked about in Question 3-3-1, the rules for conducting audits, internal reporting rules, etc., please select option 2).

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	350	40.3
2)	Yes.	519	59.7

Question 5-4-2

For those who selected option 2) in Question 5-4-1:

If a suspected AMA violation occurs within your company, what kind of response is to be taken according to your company's emergency response manual? [Multiple selections allowed / Required response]

(Number of Respondents: 519 companies)

Answer Choices		Real Number	%
1)	Report to the top management (or the final decision-maker other than the top management if the top management's involvement in the AMA violation is suspected) and seek their instructions on the response policy.	344	66.3
2)	Establish a system for implementing emergency responses such as internal investigations (e.g., an internal investigation committee).	363	69.9
3)	Consult with pre-listed external experts such as a lawyer.	207	39.9
4)	Inform executives and employees to cooperate with the investigation and not to destroy, conceal, alter, or otherwise tamper with evidence.	209	40.3
5)	Conduct an internal investigation into the facts related to the AMA violation.	436	84.0
6)	Conduct an internal investigation into similar cases other than the facts related to the AMA violation.	156	30.1
7)	Consider using the leniency system and the reduction system for cooperation in investigation.	137	26.4
8)	If an AMA violation is confirmed within the company, thoroughly analyze the cause of the violation.	315	60.7
9)	If an AMA violation is confirmed within the company, formulate and implement measures to prevent recurrence so that the violation does not happen again.	366	70.5
10)	Other	43	8.3

Question 6 Periodic Evaluation and Update of the Program

Question 6-1

Does your company periodically evaluate the effectiveness of your AMA compliance program and update the program if any points for correction or improvement are identified? [Select one / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	293	33.7
2)	Yes (irregularly).	351	40.4
3)	Yes (approximately once every year or more frequently).	145	16.7
4)	Yes (approximately once every two to three years).	26	3.0
5)	Yes (approximately once every four to five years).	8	0.9
6)	Other	46	5.3

Question 6-2

Does your company implement any measures to measure the degree of improvement in the awareness and behavior of your executives and employees related to AMA compliance? [Select one / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	643	74.0
2)	Yes.	226	26.0

Question 7 Integrated Efforts by Corporate Group and Related Initiative

Question 7-1

Does your company implement any measures to prevent and promptly detect, and take appropriate actions regarding AMA violations by your domestic consolidated subsidiaries, equity method affiliates (referring to non-consolidated subsidiaries and affiliated companies; hereinafter the same), outsourcing contractors, and business partners (including suppliers; hereinafter the same)? After checking the box in the first row of the table below for the existence of companies that fall into each category, please check the box in the answer field for each item from the second row onwards if the measure is being implemented for the companies that fall into each category (if there are no companies that fall into each category, or if no measures are being implemented for all categories, please check "Not applicable to all categories.") (Note). [Multiple selections allowed / Required response]

(Note) If your company is a so-called "pure holding company," please respond regarding the situation of the entire corporate group from your company's perspective. Also, for each category of domestic consolidated subsidiaries, equity method affiliates, outsourcing contractors, and business partners, even if you are not implementing measures for all companies that fall into each category, please check the box if you believe that you are implementing measures for companies where the risk of an AMA violation could also become a risk for your company.

Tentative translation

(Number of Respondents: 868 companies)

Item		Not applicable to all categories	Domestic consolidated subsidiaries	Domestic equity method affiliates	Domestic outsourcing contractors	Domestic business partners
Existence of companies that fall into each category (Check if at least one company that falls into the category exists.)	Real Number	56	782	408	583	605
Sending messages related to the AMA by the top management of your company or your corporate group	Real Number	388	467	135	90	92
Conducting risk assessment related to AMA violations (including consideration and decision on risk response policy)	Real Number	509	350	82	31	37
Requirement to comply with the code of conduct of your company or your corporate group	Real Number	135	722	185	113	115
Application of the AMA compliance basic rules of your company or your corporate group	Real Number	463	401	89	18	12
Distribution of the AMA compliance manual of your company or your corporate group	Real Number	490	376	85	12	10
Implementation of training on the theme of the AMA	Real Number	409	457	96	13	9
Acceptance of consultations related to the AMA at the consultation desk of your company or your corporate group	Real Number	202	653	184	136	129
Clarification of the response policy for AMA violations (e.g., claims for damages, contract termination)	Real Number	643	186	44	77	81
Implementation of audits on the theme of the AMA	Real Number	544	322	74	5	5
Acceptance of whistleblowing reports related to the AMA at the whistleblowing hotline of your company or your corporate group	Real Number	141	711	231	217	206
Sharing of information related to the AMA (including requiring reports when an AMA violation occurs within the company)	Real Number	279	581	151	41	35
Periodic evaluation of the AMA compliance program	Real Number	633	230	47	10	9
Implementation of due diligence related to the AMA during M&A and new transactions	Real Number	472	372	107	47	53

(Note) Since one company provided an invalid response, it has been excluded from the tabulation.

Question 7-2

Does your company implement any measures to prevent and promptly detect, and take appropriate actions regarding violations of the AMA or foreign competition laws (hereinafter, both are collectively referred to as "competition laws") by your overseas consolidated subsidiaries, equity method affiliates, outsourcing contractors, and business partners? After checking the box in the first row of the table below for the existence of companies that fall into each category, please check the box in the answer field for each item from the second row onwards if the measure is being implemented for the companies that fall into each category (if there are no companies that fall into each category, or if no measures are being implemented for all categories, please check "Not applicable to all categories.") (Note). [Multiple selections allowed / Required response]

(Note) If your company is a so-called "pure holding company," please respond regarding the situation of the entire corporate group from your company's perspective. Also, for each category of overseas consolidated subsidiaries, equity method affiliates, outsourcing contractors, and business partners, even if you are not implementing measures for all companies that fall into each category, please check the box if you believe that you are implementing measures for companies where the risk of a competition law violation in those companies could also become a risk for your company.

(Number of Respondents: 867 companies)

Item		Not applicable to all categories	Overseas consolidated subsidiaries	Overseas equity method affiliates	Overseas outsourcing contractors	Overseas business partners
Existence of companies that fall into each category (Check if at least one company that falls into the category exists.)	Real Number	195	619	274	385	446
Sending messages related to competition laws by the top management of your company or your corporate group	Real Number	505	357	70	31	37
Conducting risk assessment related to competition law violations (including consideration and decision on risk response policy)	Real Number	612	251	44	13	19
Requirement to comply with the code of conduct of your company or your corporate group	Real Number	317	541	94	52	61
Application of the competition law compliance basic rules of your company or your corporate group	Real Number	589	275	45	5	10
Distribution of the competition law compliance manual of your company or your corporate group	Real Number	640	224	38	6	8
Implementation of training on the theme of competition laws	Real Number	633	232	40	3	3
Acceptance of consultations related to competition laws at the consultation desk of your company or your corporate group	Real Number	419	442	96	51	51
Clarification of the response policy for competition law violations (e.g., claims for damages, contract termination)	Real Number	707	129	27	50	52
Implementation of audits on the theme of competition laws	Real Number	683	183	31	0	1
Acceptance of whistleblowing reports regarding competition laws at the whistleblowing hotline of your company or your corporate group	Real Number	395	463	112	94	96
Sharing of information related to competition laws (including requiring reports when a competition law violation occurs within the company)	Real Number	453	407	75	17	18
Periodic evaluation of the competition law compliance program	Real Number	709	153	24	1	5
Implementation of due diligence regarding competition laws during M&A and new transactions	Real Number	548	298	74	32	43

(Note) Since two companies provided an invalid response, it has been excluded from the tabulation.

Question 8 AMA Compliance Guide

Question 8-1

On December 21, 2023, the Japan Fair Trade Commission (JFTC) published the "Guide for the Design and Implementation of an Effective Antimonopoly Act Compliance Program: Focusing on Responses to Cartels and Bid-rigging" (hereinafter referred to as the "AMA Compliance Guide") to support companies in their AMA compliance efforts.

URL : <https://www.jftc.go.jp/en/pressreleases/yearly-2023/December/231221.html>

We ask the respondent to this survey: Were you aware of this AMA Compliance Guide before this survey was conducted? [Select one / Required response]

Tentative translation

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	470	54.1
2)	Yes.	399	45.9

Question 8-2

For those who selected option 2) in Question 8-1:

We ask the respondent to this survey: Where did you learn about the AMA Compliance Guide? [Multiple selections allowed / Required response]

(Number of Respondents: 398 companies)

Answer Choices		Real Number	%
1)	JFTC's website	280	70.4
2)	Social media such as Facebook and X (formerly Twitter)	8	2.0
3)	News reports in newspapers and on the internet	108	27.1
4)	Articles/papers in legal magazines, etc.	113	28.4
5)	Information provided by economic or trade organizations (including mailing lists, newsletters, and similar sources)	54	13.6
6)	Information provided by external experts such as lawyers (including mailing lists, newsletters, and similar sources)	121	30.4
7)	Seminars where JFTC staff served as speakers	46	11.6
8)	Seminars where speakers other than JFTC staff (e.g., lawyers) served as speakers	32	8.0
9)	Explanation meetings for enforcement actions such as cease and desist orders related to AMA violation cases	3	0.8
10)	Other	8	2.0

(Note) Since one company didn't respond, they have been excluded from the tabulation.

Question 8-3

For those who selected option 2) in Question 8-1:

Did the AMA Compliance Guide help your company promote its AMA compliance efforts? [Select one / Required response]

(Number of Respondents: 398 companies)

Answer Choices		Real Number	%
1)	No, it did not help.	44	11.1
2)	Yes, it helped.	354	88.9

(Note) Since one company didn't respond, they have been excluded from the tabulation.

Tentative translation

Question 8-4

The AMA Compliance Guide introduces a total of 14 items, which are also asked about in this survey form. In order to improve the awareness and behavior of your executives and employees related to AMA compliance, which items in the table below does your company prioritize? Please select five items from the table below, from first to fifth place in order of importance. [Select five / Required response]

(Number of Respondents: 869 companies)

Item		1)	2)	3)	4)	5)	6)	7)	8)	9)	10)	11)	12)	13)	14)
First place	%	42.7	15.8	11.7	1.2	2.9	5.2	9.9	2.2	0.3	0.2	4.8	0.0	2.8	0.3
	Real Number	371	137	102	10	25	45	86	19	3	2	42	0	24	3
Second place	%	5.5	18.5	16.0	3.2	9.4	10.1	14.2	7.8	0.9	2.9	6.8	0.5	3.1	1.0
	Real Number	48	161	139	28	82	88	123	68	8	25	59	4	27	9
Third place	%	3.7	6.0	12.1	5.2	9.3	8.9	19.7	10.8	1.2	3.2	10.4	0.3	7.4	2.0
	Real Number	32	52	105	45	81	77	171	94	10	28	90	3	64	17
Fourth place	%	3.5	8.4	7.4	8.5	6.7	7.7	14.0	13.1	3.0	4.9	10.7	1.0	7.7	3.3
	Real Number	30	73	64	74	58	67	122	114	26	43	93	9	67	29
Fifth place	%	3.6	4.9	5.2	5.2	12.0	4.6	11.4	8.4	3.2	6.9	13.1	2.3	12.8	6.4
	Real Number	31	43	45	45	104	40	99	73	28	60	114	20	111	56

(Note) The circled numbers in the table correspond to the respective items listed below.

- 1): Commitment and Initiative of the Top Management
- 2): Assessing the Risk of the AMA Violations in Accordance with Respective Situations of Companies and Responding to the Risk in Risk-Based Approach
- 3): Design and Implementation of Policies and Procedures for Promoting the AMA Compliance
- 4): Design of Organizational Structure and Allocation of Adequate Resources and Authority
- 5): Integrated Efforts by the Corporate Group
- 6): Design and Implementation of Internal Rules for Contacts with Competitors
- 7): Providing In-House Trainings on the AMA
- 8): Design and Operation of a Consultation System on the AMA
- 9): Design and Implementation of Internal Disciplinary Rules for the AMA Violations
- 10): Conducting Audits on the AMA
- 11): Design and Operation of a Whistleblowing System
- 12): Introduction of an Internal Leniency System Related to the AMA
- 13): Appropriate Response after Suspected Violations of the AMA Arise
- 14): Periodic Evaluation and Update of the Program

Tentative translation

Question 8-5

Regarding each item in Question 8-4, are there any items where your company is facing problems or obstacles in improving the awareness and behavior of executives and employees related to AMA compliance, or any items that you are concerned about as a person in charge of the compliance department? [Select up to five items in order of the most significant challenges or concerns / Optional response]

(Number of Respondents: First place - 520 companies, Second place - 441 companies, Third place - 365 companies, Fourth place - 294 companies, Fifth place - 274 companies)

Item		1)	2)	3)	4)	5)	6)	7)	8)	9)	10)	11)	12)	13)	14)
First place	%	11.2	19.4	8.1	22.3	13.3	6.2	6.0	1.2	0.6	0.8	1.9	2.5	3.1	3.7
	Real Number	58	101	42	116	69	32	31	6	3	4	10	13	16	19
Second place	%	1.8	13.6	10.2	13.6	13.2	7.7	10.7	4.5	2.5	4.5	2.0	4.8	4.1	6.8
	Real Number	8	60	45	60	58	34	47	20	11	20	9	21	18	30
Third place	%	3.3	5.2	9.6	9.0	11.0	8.2	8.8	5.8	3.0	5.8	4.1	7.1	11.0	8.2
	Real Number	12	19	35	33	40	30	32	21	11	21	15	26	40	30
Fourth place	%	3.7	5.4	4.1	9.2	9.9	7.5	9.5	5.8	4.4	9.9	6.1	4.8	9.2	10.5
	Real Number	11	16	12	27	29	22	28	17	13	29	18	14	27	31
Fifth place	%	4.7	6.6	3.6	4.7	9.1	4.7	11.3	6.2	4.4	8.8	4.7	7.7	9.5	13.9
	Real Number	13	18	10	13	25	13	31	17	12	24	13	21	26	38

(Note) The numbers in the table are the same as those in Question 8-4.

Question 9 Other Initiatives

Question 9-1

In recent years, as algorithms (Note) are being utilized for investigating competitors' prices and for setting prices for a company's own products and services, it is conceivable that cartel agreements and their implementation may become easier, or that new forms of cooperative behavior may emerge. Does your company implement any measures to prevent such AMA violations by algorithms and promptly detect them?

[Select one / Required response]

(Note) In this question, "algorithm" refers to a set of computational procedures that convert an input into an output.

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	834	96.0
2)	Yes.	35	4.0

Tentative translation

Question 9-2

Regarding labor costs, raw material prices, energy costs, etc., (1) maintaining transaction prices unchanged as before without explicitly discussing the necessity of reflecting these cost increases in transaction prices during price negotiations, or (2) maintaining transaction prices unchanged despite a counterparty requesting an increase due to these cost increases, without explaining the reasons for not passing on the costs to the counterparty in writing, email, or other forms of communication , may constitute an abuse of superior bargaining position under the AMA (Article 2, Paragraph 9, Item 5(c) of the AMA). Specifically, regarding labor costs, the Cabinet Secretariat and the JFTC published “the Guidelines for Labor Costs Pass-Through” on November 29, 2023.

Related to the above, does your company implement any measures to prevent or promptly detect early instances of abuse of superior bargaining position concerning the passing on of labor costs, raw material prices, energy costs, etc.? [Select one / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	225	25.9
2)	Yes.	644	74.1

Question 9-3

Does your company implement any measures to prevent or detect violations of the AMA committed by companies other than cartels or bid rigging (acts constituting Unreasonable Restraint of Trade under Article 2, Paragraph 6 of the Act), such as private monopolization (under Paragraph 5 of the same Article) or unfair trade practices (under the items of Paragraph 9 of the same Article), excluding the abuse of superior bargaining position related to price pass-through inquired about in Question 9-2? [Select one / Required response]

(Number of Respondents: 869 companies)

Answer Choices		Real Number	%
1)	No.	414	47.6
2)	Yes.	455	52.4