

The JR East Group's Basic Approach to Compliance

The JR East Group advances compliance-related initiatives and has established the "Policy on Legal and Regulatory Compliance and Corporate Ethics" to provide guidelines on corporate conduct.

Also, the Group has established Compliance Hotlines inside and outside the Group for whistle-blowing.

In addition, the Group cultivates compliance awareness by conducting education for all Group employees annually.

The "Policy on Legal and Regulatory Compliance and Corporate Ethics" and the "Compliance Action Plan"

The "Policy on Legal and Regulatory Compliance and Corporate Ethics" establishes the JR East Group's approach to compliance and corporate ethics based on the Group Philosophy and Basic Principles. To heighten the policy's effectiveness and explain desirable employee conduct, the Group prepared the "Compliance Action Plan" and distributed a hand-book based on it to all Group employees. Further, given its stepped-up overseas business development, the Group prepared and announced the "Basic Policy Aimed at Preventing Bribery in Relation to Non-Japanese Civil Servants" in June 2014.

Education of All Employees

Aiming to further each employee's understanding of compliance's importance, the guidelines, and the action plan, the JR East Group has conducted an annual compliance education program that targets all Group employees since fiscal 2010. Initially, the program mainly involved lectures using DVDs as educational material. In recent years, however, the program educates by encouraging employees to consider and discuss issues. In this format, department leaders conduct study groups for each workplace using materials prepared by the Head Office, and the groups focus on case studies taken from operations that are familiar to each set of employees. The JR East Group will continue inculcating compliance awareness through education that reflects society's expectations regarding corporate social responsibility and changes in the awareness of Group employees.

Main Compliance Seminars in Fiscal 2016

Title	Number of Sessions	Participants	Contents and Objectives	Number of Participants
Compliance Training for All Employees	1	JR East and Group company employees	Rigorous compliance awareness	All employees
New Recruit Training	1	JR East new recruits	Rigorous compliance awareness	All new recruits
Basic Legal Training	1	Group company legal affairs and compliance personnel	Acquisition of basic legal and compliance knowledge	30
Legal Training for Newly Appointed Legal Affairs Personnel	1	Newly appointed legal affairs personnel of Head Office and branch offices	Acquisition of basic legal and compliance knowledge	16
Legal Skills Training	1	Legal affairs personnel of Head Office and branch offices	Acquisition of legal and compliance knowledge related to duties Enhancement of legal reasoning and problem-solving skills, etc.	20
Legal Seminar	3	JR East and Group company executives and employees	Explanation of new and amended laws Advancement of legal compliance awareness	600
Compliance Seminar	2	Head Office executives, general managers, etc.	Rigorous awareness of compliance-based business management	150
Group Company Compliance Seminar	1	Group company executives and employees	Rigorous awareness of compliance-based business management	80