



## Charitable Donation Declaration

*Authorized Company personnel should use this form to request pre-approval to make a charitable donation on behalf of their Company. Charitable donations are monetary contributions, goods and other assets, and/or services that are provided on behalf of your Company to non-profit groups, usually organized for civic, educational, scientific, or other charitable purposes\*.*

<b>Completed by:</b>	
1. Name	<input type="text"/>
2. Title	<input type="text"/>
3. Name of your Company	<input type="text"/>
4. Phone number	<input type="text"/>

<b>Information about the proposed recipient:</b>	
1. Name, address, and website of the proposed recipient.	<input type="text"/>
2. Name, title, and phone number of the primary contact at the proposed recipient.	<input type="text"/>
3. Date of the proposed recipient's founding.	<input type="text"/>
4. Description of the proposed recipient and its mission statement.	<input type="text"/>
5. Attach proof of the proposed recipient's status as an authorized non-profit organization, such as registration, tax, or other official documents. Please explain here if such documents are unavailable.	<input type="text"/>

*\* This form should not be used for gifts or business expenditures. Gifts include benefits given to individuals.*

Please allow at least three (3) New York City business days for review of this declaration.  
For questions about, and when submitting completed declarations, please e-mail:  
[americascompliance@sojitz.com](mailto:americascompliance@sojitz.com).

**Information about the proposed recipient (continued):**

6. If the proposed donation will ultimately benefit a person or entity that is different from the proposed recipient identified here, please identify the ultimate beneficiary.

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**Information about the proposed donation:**

1. Amount or value of the proposed donation (in local currency and U.S. dollars).

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2. Date proposed donation is needed.

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3. Purpose of the proposed donation.

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4. Nature of the proposed donation (e.g., monetary, in-kind donation, services, etc.).

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5. If the proposed donation is monetary, please provide the method of payment (e.g., corporate credit card, direct deposit, check, wire transfer) and, if applicable, payment details of the proposed recipient (e.g., bank name and account number).

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6. If the proposed donation is non-monetary, such as goods or services, please describe in detail what will be provided, how it will be provided, and to whom (i.e., the person(s) within the relevant organization) it will be provided.

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7. Is your Company's giving of the proposed donation conditioned upon your Company receiving business or other benefits? If yes, please explain.

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8. Is the proposed donation being made in one country but being used in a different country? If yes, please provide details.

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**Due diligence requirements:**

1. Please describe any anticipated benefits of the proposed donation to the Company.

2. Has the Company in the past year made any donation to this proposed recipient, or any organization or person affiliated with the proposed recipient? If yes, please provide details, including date, value, and purpose. Please append hereto the previously filed, relevant Charitable Donation Declaration.

3. Are there plans to make another donation to this proposed recipient? If yes, please explain.

4. Did anyone solicit this donation? If yes, who and why? If yes, was the donation solicited by a “Government Official”<sup>†</sup> or “Close Family Member”<sup>‡</sup>? If no, how did you identify and choose this proposed recipient?

<sup>†</sup> “Government Official” means (a) any officer, employee, or representative (including anyone elected, nominated or appointed to be an officer, employee, or representative) of any Government Entity, or anyone otherwise acting in an official capacity on behalf of a Government Entity; (b) any political party, political party official, or political party employee; (c) any candidate for public office; (d) any member of a royal or ruling family; or (e) any agent or representative of any person listed in sub-categories (a) through (d).

“Government Entity” means (a) any national, state, regional or local government, and any government agency or department, or political party; (b) any entity or business that is owned or controlled by any of those bodies listed in sub-category (a); or (c) any international organization such as the United Nations or the World Bank.

<sup>‡</sup> A “Close Family Member” of a Government Official means the Official’s spouse; the Official’s or the spouse’s grandparents, parents, siblings, children, nieces, nephews, aunts, uncles, and first cousins; the spouse of any of the above persons; and any other person who shares the same household with the Official.

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**Due diligence requirements (continued):**

5. Has the proposed recipient or anyone else asked that the donation be kept secret or disguised in any way? If yes, please explain.

6. Has the proposed recipient or anyone else asked that the donation be provided by unusual means (e.g., payment to an offshore bank account, in a name different from that under which it operates, or to a third party)? If yes, please explain.

7. Please describe the Company's current and planned business in the proposed recipient's location (e.g., country, state, province city).

8. To your knowledge, is there any employee, officer, director, board member, or other individual affiliated with the proposed recipient who is a "Government Official" or "Close Family Member"? If yes, please explain.

9. To your knowledge, are there any employees, officers, directors, board members, or other individuals affiliated with the proposed recipient who can influence the Company's business now or in the future? If yes, please explain.

10. To your knowledge, will this proposed donation benefit any "Government Official" or "Close Family Member"? If yes, please explain.

11. Could the Company receive any other benefit not listed in response to question 1 in this section, including any action or inaction by any person or entity, in exchange for this proposed donation? If yes, please explain.

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**Due diligence requirements (continued):**

12. Run the proposed recipient's name in the Specially Designated Nationals and Blocked Persons List and provide the result (<http://sdnsearch.ofac.treas.gov/default.aspx>).

**Mandatory Principles for All Charitable Donations:**

1. The charitable donation cannot be offered, promised, or given in exchange for any improper favors or benefits.
2. The charitable donation must be permitted by applicable local laws.
3. The charitable donation must be provided transparently.
4. The nature and value of the charitable donation must be appropriate in the circumstances.
5. The charitable donation must be accurately recorded in the Company's books and records.

**Requester Certification:**

I confirm that I have answered these questions completely and accurately, to the best of my knowledge. I have no reason to believe that the proposed donation is intended to or will influence anyone to engage in unethical or improper behavior or will be provided in exchange for an official act or decision of a Government Official or a Government Official's assistance in obtaining a competitive advantage or receiving favorable treatment.

**Date:**  **Signature:**

If the requester is not the General Manager, the General Manager's (or any Company Officer's) signature is also required.

**Date:**  **Signature:**

**Name:**

**Title:**

**Person-in-Charge of Anti-Corruption Matters<sup>§</sup> Approval:** **Proposed donation approved**

I approve the proposed donation as described and have no reason to believe that it will result in a violation of applicable anti-corruption laws, applicable local laws, the Sojitz Group Code of Conduct and Ethics, or the Sojitz Group Anti-Corruption Policy.

 **Proposed donation not approved**

I do not approve the proposed donation.

**Date:**  **Signature:**

<sup>§</sup> The Person-in-Charge of Anti-Corruption Matters is the General Manager of Sojitz Corporation of America's Legal and Compliance Department, and can be reached at: [americascompliance@sojitz.com](mailto:americascompliance@sojitz.com).

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