

Bribery Prevention Regulations

Internet Initiative Japan Inc.

Enacted: April 1, 2012

Article 1. Purpose

The purpose of these regulations is to prevent malfeasance in connection with bribery in the business activities of the Company and subsidiaries of the Company (collectively, "IIJ Group") in Japan and overseas.

Article 2. Definitions

Words and expressions used in these regulations have the meanings defined below.

(1) Civil servants, etc.

Civil servants, persons employed with administrative agencies and institutions, members of parliament, persons employed with political parties, and other persons, irrespective of nominal designation, who belong to an organization corresponding in substance to a government agency of Japan or a foreign country.

(2) Cash payments, etc.

Cash payments or the provision of added value, whether offered, actually carried out, promised to be carried out, or internally decided to be carried out

(3) Bribery

Cash payments, etc., made to civil servants, etc., for the purposes listed below and acts prohibited as bribery under the statutes of other countries

- (a) To influence actions or decisions of civil servants in their public positions
- (b) To induce civil servants, etc., to commit acts in breach of the lawful execution of their duties
- (c) To secure an inappropriate advance in relation to civil servants, etc.
- (d) To exert influence through civil servants, etc., on the actions or decisions of government agencies

(4) Partners

Transaction counterparties cooperating in business undertakings that involve some form of participation from governmental institutions

Article 3. Prohibition of bribery

Corporate officers and employees of IIJ Group are prohibited from engaging in bribery.

Article 4. Determination of bribery

The specific judgment criteria as to whether or not cash payment to civil servants, etc., corresponds to bribery must be determined in the context of the laws and regulations of the particular country concerned. If a clear judgment poses difficulty, the matter must be judged by the department in charge of compliance at the Company.

Article 5. Internal control

1. Each company of IIJ Group must for each country where its operating sites are located create internal control

frameworks for the prevention of bribery

2. Each company of IJJ Group must among their corporate officers and employees appropriately promulgate the prohibition of bribery.

Article 6. Supervision of partners

Transacting with partners must be based on thorough research of the partner concerned and involve appropriate monitoring of partners including transaction agreements that stipulate the prohibition to engage in bribery.

Article 7. Disciplinary measures

Corporate officers or employees who breach these regulations will incur disciplinary measures based on the employment rules.

Article 8. Scope of application

These regulations apply to the entire IJJ Group.

Article 9. Amendments and rescissions

Amendments and rescissions of these regulations require decision of the board of directors.

End of text