

The Tokuyama Group Antimonopoly and Fair Competition Policy has been established under the Tokuyama Group Code of Conduct, and all officers and employees of the Tokuyama Group must comply with it.

Tokuyama Group Antimonopoly and Fair Competition Policy

Established April 1, 2023

1. Basic Stance

To ensure fair corporate activities, the Tokuyama Group engages in appropriate transactions that are fair, are transparent, and support free competition.

2. Scope

This Antimonopoly and Fair Competition Policy applies to all officers and employees of the Tokuyama Group. We also expect business partners of the Tokuyama Group to embrace this policy, and we encourage them to strive for fair, transparent, and free competition and appropriate transactions.

3. Organizational Structure

The Tokuyama Group maintains an effective organizational structure to prevent behavior that could violate applicable antimonopoly and competition laws, and to enable effective incident response.

4. Declaration of Compliance with Antimonopoly and Competition Laws

- (1) We faithfully comply with applicable antimonopoly and competition laws.
- (2) We take all necessary and appropriate measures to avoid violating antimonopoly and competition laws.
- (3) Whenever we become aware of information relating to a possible or actual violation of antimonopoly and competition laws, we will respond promptly and appropriately.
- (4) We continually improve our internal controls for antimonopoly and competition law compliance.
- (5) We comply with applicable laws and regulations intended to prevent cartel behavior, bid rigging, price fixing, abuse of superior bargaining position, etc., and we always engage in appropriate transactions that are fair, are transparent, and support free competition.
- (6) We also comply with the Basic Purchasing Policy, which we have established to ensure fairness and transparency in purchasing transactions, including contracting and consignment.
- (7) When selecting business partners, we will consider not only economic rationality but also the social responsibility efforts of prospective partners.
- (8) We comply with applicable laws and regulations concerning subcontracting.

- (9) When conducting business with any level of government or a public institution, we do so fairly in accordance with the applicable bidding process and other established rules and procedures.

5. Training and Awareness-Raising

The Tokuyama Group trains officers and employees to further improve their compliance awareness and prevent any activity that may violate antimonopoly and competition laws. The aim is to ensure transactions that are fair, are transparent, and support free competition, and to ensure proper operation of relevant systems.

6. Intermediaries

The Tokuyama Group does not engage in transactions that could violate antimonopoly and competition laws using intermediaries.

7. Monitoring and Continuous Verification/Review

The Tokuyama Group regularly monitors the level of group companies and business partners compliance with this Antimonopoly and Fair Competition Policy, verifies its effectiveness, and updates it as necessary.

8. Incident Response

In the event that any business-related activity that may violate an antimonopoly or competition law is discovered and confirmed, the Tokuyama Group will take corrective action and fully cooperate with investigations by the relevant authorities.