

Nippon Sanso Holdings Group Global Competition Law Compliance Policy

1. Ensuring Fair and Free Competition

In many countries and regions in which we conduct business activities, laws and rules that are generally called competition laws prohibit anticompetitive acts using a dominant position in the market, cartels, anticompetitive mergers and acquisitions, and other anticompetitive acts to ensure fair and free competition. In some countries and regions, laws of such countries and regions may be applied and enforced even on an act conducted outside the countries and regions if such act affects the market in the countries and regions.

We understand that compliance with such competition laws contributes to the benefit not only of consumers but also of the entire society, will respect the competition laws, and endeavor to ensure fair and free competition. We provide to our officers and employees necessary education on the importance of compliance with competition laws.

2. Examples of Violation

Although contents of competition laws are complicated, the following acts conducted with a competitor are generally prohibited regardless of country and region. We do not conduct such act as impeding fair competition in the market. To prevent such acts, we will not contact our competitors unless there is justifiable reason, and will not exchange information on production volume and other information concerning trade secrets with competitors.

- (1) Agreement with a competitor on price;
- (2) Agreement with a competitor on limitation of production volume, sales volume, and capital investment;
- (3) Agreement with a competitor to make allocation of customers, suppliers, sales regions, or fields of trade; and
- (4) Bid rigging.

3. Consultation with Relevant Department

We will promptly consult with the legal or compliance department of the company they belong to if we come to know that an act that violates, or is likely to violate, this policy is conducted or if we suspect that an act may be against fair competition when conducting business activities.

4. Cooperation with Investigating Authorities

In case an investigating authority requests for provision of information, we will cooperate with the investigating authority and endeavor to provide full reply as quickly as possible.

This policy may be revised or abolished by the Board of Directors of the Company.

Established on February 2nd, 2021