

UACJ Group Policy on Compliance with Competition Law

The following is UACJ Group Policy on Compliance to ensure compliance with the competition laws of Japan, the United States, various individual states within the United States, the European Union, and other nations, where UACJ Group conducts business (hereinafter referred to as “Competition Related Laws and Regulations”). All Officers and Employees of UACJ Group Companies (hereinafter referred to as “Officers and Employees”) must comply with this policy.

1. UACJ Group shall establish Group Competition Law Compliance Rules and their Guidelines (hereinafter referred to as the “Rules and Guidelines”), and Officers and Employees shall know, observe and comply with the Rules and Guidelines.
2. UACJ Group shall compete fairly and honestly.
3. Officers and Employees shall not contact any competitors without legitimate purpose.
4. Officers and Employees shall not enter into any improper agreements (whether a formal written agreement or an oral understanding) with any Competitors relating to pricing, volume, production or sales capacity, customers, territories, trade conditions, market share, or bids relating to any subject of competition with that Competitor;
5. Officers and Employees shall not send to, or receive from, any Competitor any sensitive competitive information such as information relating to pricing, volume, production or sales capacity, customers territories, trade conditions, market share, or bids, or conduct any acts that could raise suspicion that there is an improper agreement on these topics;
6. Officers and Employees shall report any violations, or suspected or potential violations, of Competition Related Laws and Regulations, this Policy, or the Rules and Guidelines to the division responsible for legal affairs and compliance of UACJ Corporation or the UACJ Corporate Ethics Consultation System.
7. Officers and Employees shall consult with the division responsible for legal affairs and compliance of respective companies or UACJ Corporation if they have any questions concerning Competition-Related Laws and Regulations, this Policy, or the Rules and Guidelines.

Established: December 17, 2018