

USUI Group Competition Law Compliance Policy

1. Declaration of compliance with competition laws

USUI Group will comply with the competition laws (Anti-Monopoly Act, Anti-Trust Act, etc.) that are applicable in territories where USUI Group is conducting business activities.

2. Violation of competition laws

(1) Examples of violation of competition laws

Competition laws broadly prohibit acts that inhibit or restrict fair competition, and the primary prohibited acts are as follows.

- Price-fixing
- Allocation of market share
- Agreement on production capacity
- Market allocation
- Customer allocation
- Designation or restriction of resale price
- Abuse of dominant bargaining position and group boycott against customers

(2) Precautions in interpreting prohibited acts

The foregoing prohibited acts include any and all types of concerted action, informal meeting or "gentlemen's agreement" which intends to restrict competition or would result in such restriction of competition. We must not even convey the impression that USUI Group is complicit in such conspiracy. Any violation of competition laws is a criminal offense and, depending on the country, the offender may be sentenced to imprisonment. There may be cases where USUI Group Employees are required to sit together with employees of our competitors in a meeting sponsored by a trade association. While this act is not in itself illegal, the restrictions imposed by the competition laws need to be observed. Accordingly, when an employee is to participate in such a meeting, that employee is required to fill out a written pledge, and take action as required under the written pledge. For instance, employees are not allowed to exchange information with competitors regarding customer relations, pricing, upcoming price change or any other similar matters, or disclose our production capacity or future plans.

3. Compliance with competition laws

USUI Group will establish a Competition Law Committee in its parent company USUI Co., Ltd. to constantly monitor business activities so that the competition laws are actually observed, as well as offer training and guidance to employees regarding compliance with competition laws and respond to inquiries from employees.

Furthermore, all directors, officers and employees who discover any violation of competition laws or come into any such information must inform the Competition Law Committee.

The informant is protected based on our Whistleblower Protection Rules.

4. Sanctions against violations

USUI Group will not tolerate any violation of competition laws. All violations will be discussed in the Disciplinary Committee, and employees who committed the violation will be subject to disciplinary action such as salary reduction, suspension or dismissal.