

Mitsubishi Chemical Holdings Group Global Antitrust Policy

Article 1 (Objectives)

This Mitsubishi Chemical Holdings Group Global Antitrust Policy (the “Policy”) sets forth the policy governing the MCHC Group and its Officers and Employees so as to ensure fair trade practices by the MCHC Group in accordance with global standards and the laws and regulations of the countries in which we do business.

Article 2 (Applicable Scope)

This Policy applies to each company of the MCHC Group and all of its Officers and Employees. “MCHC Group” means Mitsubishi Chemical Holdings Corporation (“MCHC”) and any company, corporation, partnership, association or other organization controlled by or under common control of MCHC, where “control” means the power to direct the affairs of such entity by reason of the ownership of majority of the voting shares or partnership interests. “Officers and Employees” means all directors, corporate auditors, officers and employees hired by or working for any entity in the MCHC Group.

Article 3 (Observance of Antitrust and Competition Law)

Officers and Employees shall observe and comply with antitrust and competition law and regulations of all countries in which the MCHC Group does business (the “Antitrust Law”). Officers and Employees shall not pursue private gains in violation of the Antitrust Law, and shall promote fair and free competition.

Article 4 (Prohibited Agreements with Competitors)

4.1 Officers and Employees shall not make any agreement with a competitor, verbal or written, explicit or implicit, that could have the effect of limiting competition. Prohibited agreements and activities include any agreement with a competitor that (a) affects price, terms and conditions of sale or production capacity; (b) impacts competitive bidding; or (c) allocates markets by product, territory or customer.

4.2 Officers and Employees shall not contact or communicate with a competitor for any purpose other than a wholly legal purpose.

4.3 In the event an Officer or Employee needs to communicate with a competitor, such communications should be limited to legal subjects and appropriate procedures should be followed to record the nature and scope of such communications in accordance with the company’s internal

rules.

Article 5 (Prohibition of Other Unfair Trade Practices)

Officers and Employees shall refrain from engaging in unfair trade practice in their dealings with customers, suppliers and other third parties, such as resale price maintenance, price discrimination and other practices articulated in the Antitrust Law.

Article 6 (Compliance System)

6.1 Any questions or concerns regarding this Policy should be addressed to the Chief Compliance Officer, or the compliance, internal control or legal department of the company or its parent company group, or to the local Overseas Administrative Headquarters in each region, namely Mitsubishi Chemical Holdings America, Inc., Mitsubishi Chemical Holdings Beijing and Mitsubishi Chemical Holdings Europe GmbH (each an “OAH”).

6.2 The president of each company of the MCHC Group shall cooperate with its parent company and/or OAH to promote this Policy, and shall be responsible for enforcing compliance with this Policy by the company’s Officers and Employees.

6.3 This Policy may be supplemented by regional antitrust and competition policies as needed to reflect local law and practice. Such policies shall be established by the company, its parent company, or the regional OAH as needed. Responsibility for the promotion and enforcement of such regional policies shall be the same as with respect to this Policy.

Article 7 (Penalties)

Each company of the MCHC Group is responsible for imposing penalties on any Officer or Employee who is found to be in violation of this Policy. The investigation of potential violations and any resulting penalties shall be in accordance with the company’s internal rules and policies.

Article 8 (Amendment and Abolishment)

Amendment and abolishment of this Policy shall be carried out with the final approval of the Officer in charge of the Legal Office of Mitsubishi Chemical Holdings Corporation. However, minor changes of this Policy may be implemented by the final approval of the General Manager of the Legal Office.

Department in Charge : Legal Office

History

This policy shall be implemented on April 1, 2014.

Revised and implemented on April 1, 2017