

Compliance Policy of Competition Law

This policy is formulated for the purpose of the companies, officers and employees of the G-TEKT Group respecting and complying with the competition laws, related laws and regulations of each country and region (hereinafter referred to as "the competition laws").

We declare here not to accept any violation of competition law

Article 1 (Applicable target)

- (1) This policy is applied to all companies, which include subsidiaries and affiliates (hereinafter referred to as "each company"), officers and employees belonging to the G-TEKT Group (hereinafter referred to as "each officer and employee").
- (2) Each company, officer and employee must carefully confirm the competition laws and pay attention not to violate the laws.

Article 2 (Meeting with competitors)

Each officer and employee should not participate in meetings where competitors attend. When participating in the meetings for reasonable reasons, it is necessary to give prior notice to the superiors and post-fact reports.

Article 3 (Prohibited matter)

- (1) Each officer and employee can't discuss or exchange information to conduct the following acts at the meeting where competitors attend.
 - ① Act to restrict competition by negotiating sales price, supply quantity, etc.
 - ② Agreement on pricing strategy, price composition, schedule of price change, substitution condition, etc.
 - ③ Agreement on restrictions on sales partners, sales region restrictions, manufacturing model restrictions, etc.
 - ④ Act of restricting competition by negotiating business partners, transaction volume, sales, market share, etc.
 - ⑤ Other acts that may conflict with competition law.
- (2) In addition to the preceding paragraph, each officer and employee shall not conduct any act that violates the competition law.

Article 4 (Prior confirmation of agenda and materials)

The person who designated to preside over a meeting where competitors attend (Hereinafter referred to as "chairperson") must confirm in advance that the agenda, materials, etc. at the meeting do not contain content that may conflict with competition law.

Article 5 (Proceedings)

In the event of a situation that conflicts with competition law at the meeting where competitors attend, each officer and employee do the following acts.

- ① The Chairperson takes measures such as calling attention to those who made remarks that conflict with competition law. Nevertheless, if the speaker does not stop speaking, the chairman takes appropriate measures such as ordering to leave.
- ② At the meeting, if participants judge that there is a statement that may conflict with competition law, participants assist the proceedings of the chairperson by notifying the chairperson of attention to the speaker. Nevertheless, if the speaker does not stop speaking, participants respond appropriately, such as leaving the meeting room.

Article 6 (Preparation of minutes)

Each officer and employee who attend the meeting where competitors attend promptly prepare the minutes of the meeting.

Article 7 (Organizational Structure)

- (1) The Compliance Officer, appointed from G-TEKT (headquarters in Japan)'s Officers, (hereinafter referred to as "the Compliance Officer"), supervises the G-TEKT Group's compliance. The Compliance Officer constantly monitors for this policy to be properly operated, and reports to the G-TEKT Board of Directors, in case of discovering problems.
- (2) Compliance managers are appointed from the management team at each company. Each company establishes a committee to deal with compliance including compliance of competition law.
- (3) Each company establishes an internal reporting desk that can be reported anonymously. Each company's committee to deal with compliance actively conducts educational activities of its existence.

- (4) In cases inappropriate acts are discovered in light of the competition laws, this policy and internal regulations, each company's committee to deal with compliance promptly reports the situation to the Compliance Officer and cooperates to investigate or deal with the problem.

Article 8 (Formulation of internal regulations)

- (1) Each company consults with lawyers or other experts as necessary to formulate internal regulations that embody this policy, considering the competition laws and the actual circumstances of the company. The internal regulations must be approved by the Compliance Officer.
- (2) Regardless of the position, officers and employees who committed inappropriate conduct in light of the competition laws, this policy or internal regulations shall be strictly punished in accordance with internal regulations.

Article 9 (Education)

- (1) Education of compliance of competition law is to be carried out continuously through training etc.
- (2) The contents of the education are practical contents including concrete examples, based on the understanding of the competition laws, this policies and internal regulations of each company.

Article 10 (Cooperation request to supplier)

- (1) Each company requests cooperation from suppliers so as not to commit inappropriate conduct in light of the competition laws, this policy and internal regulations.
- (2) In case violations of the competition laws, this policy or internal regulations by suppliers are discovered, each company promptly requests correction and if correction can't be expected, considering measures including elimination of business relations.

Article 11 (Audit)

- (1) The Compliance Officer audits the company's compliance with this policy and internal regulations on a regular basis, and reports the results to the G-TEKT Board of Directors.
- (2) Each company strives to make audit results widely shared among officers and employees.

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G-TEKT CORPORATION
PRESIDENT
NAOHIRO TAKAO