

**For Compliance with Competition Laws
(Nippon Shokubai Group's Code of Conduct)**

In recent years, aggressive prosecution has been seen in the field of Competition Laws (Japanese Anti-Monopoly Law and equivalences in other countries) in many foreign countries or regions. More and more competent authorities are developing enforcement regimes, and leading authorities impose severe sanctions such as huge amount of fines and imprisonment.

An investigation or prosecution in one country in violation of Competition Laws relating to global business activities can lead to another enforcement in other countries and spread throughout an industry, as the international auto parts cartel case illustrates. Therefore, Nippon Shokubai Group Company should build up the compliance program as a team, irrespective of the country of its establishment.

Nippon Shokubai Group is aiming to be “A company that everybody can be proud of”; “A company that people can be proud to work for.” To achieve this aim, a decision in our business activities should always be made based upon “what is right and what is wrong” rather than the profit/loss perspective.

Nippon Shokubai Group Companies will conduct all business transactions based on free and fair market competition principle. In order to express and give shape of such group policy, we adopt the following group code of conduct, which all the individuals working for Nippon Shokubai Group Companies should comply with.

We will avoid any conduct which restricts free and fair market competition (abuse of market dominant position, cartel, and unfair trade practice) in every business activity including sales, procurement, research and development, and manufacturing, in order to ensure free and fair business activities.

Needless to say, any individual within Nippon Shokubai Group Companies in violation of the Competition Laws or our code of conduct will be subject to strict discipline procedures in accordance with the relevant organization's internal rules, which might lead to dismissal or other discipline actions.

All individuals are hereby requested to comply with our group code of conduct and follow internal rules in relevant organization, to prevent the violation of the Competition Laws.

Masanori Ikeda
President
Nippon Shokubai Co., Ltd.