

# **Global Policy for Preventing Anti-Competitive Practices**

## **1. Commitment to Preventing Anti-Competitive Practices**

Anti-competitive practices, including cartels, are acts that hinder free markets and fair business activities. Based on the spirit of "4. Fair and free competition and transparent relations" in the Piolax Code of Conduct, the Piolax Group declares that it will fully respect and comply with the competition laws of each country and region, including the Antimonopoly Act (Act on Prohibition of Private Monopolization and Maintenance of Fair Trade) (including related laws and regulations, hereinafter referred to as "Competition Laws").

## **2. Scope of Application**

### **(1) Scope of application**

This Policy applies to all officers and employees (hereinafter referred to as "Employees") of the Piolax Group (PIOLAX, INC. and its subsidiaries).

### **(2) Definition of Competitor**

The term "Competitor" refers to any company that is in a business competition relationship with the Piolax Group.

### **(3) Definition of Business Partner**

The term "Business Partner" refers to any entity to which the Piolax Group places orders for services, materials, equipment, etc., including but not limited to suppliers, subcontractors, distributors, agents, and consultants, regardless of industry type.

## **3. Basic Principles**

In order to contribute to the realization of fair and free competition in the market, the Piolax Group will comply with the Competition Laws in all countries and regions where it operates.

## **4. Prohibitions**

### **(1) Cartels**

The Piolax Group will maintain fair and independent relationships with the Competitors, and will not enter into any agreements or arrangements, whether express or implied, regarding sales prices, costs, profits, production capacity, sales terms, sales territories, customers, market share, bidding terms, or other matters that may affect competition (collectively, "Sensitive Matters").

### **(2) Exchange of information with Competitors**

The Piolax Group will not in any case exchange information on the Sensitive Matters, whether directly or indirectly, with the Competitors. In addition, we will not engage in any contact that may raise suspicion of agreement, arrangement, or other exchange of information regarding the Sensitive Matters.

### **(3) Contact with Competitors**

When participating in industry associations, organizations, or meetings involving or in contact with the Competitors (collectively, "Meetings"), whether official or unofficial, the Piolax Group will comply with the internal procedures and rules determined for the purpose of legal compliance. If there is any doubt about the legality of the Meetings, we will immediately withdraw from the Meetings.

**(4) Abuse of superior position**

The Piolax Group will not use its advantageous trading position to implement unreasonable conditions or demands or give undue disadvantages to the Business Partners.

**(5) Other unfair trade practices**

The Piolax Group will not, without legitimate reason, engage in unfair transactions as defined by the Competition Laws, such as undue price reduction, during business activities with the Business Partners.

**5. Responses Within the Piolax Group**

**(1) Education policy**

The Piolax Group will provide education on anti-competitive practices and related issues to the Employees regularly and as deemed necessary.

**(2) Internal whistleblowing system**

The Piolax Group will establish a system to promptly report any potential or actual violations by the Employees against the Competition Laws, code of ethics, and this Policy in accordance with the internal whistleblowing regulations stipulated by the Piolax Group.

**(3) Regular audits**

The Piolax Group will establish a system to undergo audits by the internal audit department regularly and as deemed necessary to ensure compliance with this Policy.

**(4) Review of system and measures for preventing anti-competitive practices**

The Piolax Group will revise, as appropriate, relevant internal regulations stipulated by the Piolax Group, such as the Global Regulations for Preventing Anti-Competitive Practices, to commit to preventing anti-competition practices and properly implement this Policy.

Established: September 2016

Revised: June 9, 2025

Last Reviewed: June 9, 2025

PIOLAX, INC.

President

Satoshi Yamada