

Mitsubishi Chemical Holdings Group Global Anti-Bribery Policy

Article 1 (Objectives)

This Mitsubishi Chemical Holdings Group Global Anti-Bribery Policy (the “Policy”) sets forth the policy governing the MCHC Group and its Officers and Employees to prohibit bribery and corruption in accordance with global standards and the laws and regulations of the countries in which we do business, as well as to maintain fair trade practices.

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 Anti-Bribery and Corruption Law)

Officers and Employees shall observe and comply with the anti-bribery and corruption laws of all countries in which the MCHC Group does business (the “Anti-Bribery Law”). Officers and Employees shall not engage in bribery or corruption or pursue private gains in violation of this Policy or Anti-Bribery Law.

Article 4 (Prohibition of Bribe to Public Officials)

Officers and Employees shall not, directly or through a third party (including an agent, distributor, representative, consultant or advisor), offer, give or promise a Bribe to a public official for the purpose of obtaining business or business advantage. A public official is anyone who is employed by a government-affiliated entity or organization. A “Bribe” is anything of perceived value, including but not limited to cash, stock, gift cards, club memberships, payment of expenses, loans, donations, contributions, guarantees, gifts, entertainment, sponsorship, gratuities, rebates, discounts, services or employment, whether provided to a public official or a third party associated with a public official.

Article 5 (Record Keeping)

Each company of the MCHC Group shall accurately reflect in its books and records all expenses, including but not limited to payments made to third parties, in sufficient detail to evidence that no Bribe has been paid to a public official directly or through a third party.

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 shall be supplemented by regional anti-bribery policies as needed to reflect local law and practice. Such policies shall be established by the company, its parent company, or the regional OAH. 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 only with the final approval of the Chief Compliance Officer of Mitsubishi Chemical Holdings Corporation.

Article 9 (Date of Effect)

This Policy shall come into effect on April 1, 2014.