Compliance Policy Regarding Anticorruption

This Compliance Policy represents and affirms the Ultrafabrics Holdings Group's adoption of an Anticorruption Policy under which every member of the Ultrafabrics Holdings Group and their respective directors, officers, employees, representatives, agents and other personnel, as well as third parties acting on their behalf, will not make, offer, promise or authorize any payment, gift, promise, entertainment or other advantage, whether directly or indirectly, to or for the direct or indirect use or benefit of any individual, entity, government, political party, official, candidate or other person, where such offer, payment, gift, promise, entertainment or other advantage would violate any law, rule, regulation or good business practices, or which may hinder fair and free competition; nor shall any director, officer, employee, representative, agent or other personnel employed by or acting on behalf of a member of the Ultrafabrics Holdings Group accept, receive or take benefit of any payment, gift, promise, entertainment or other advantage from any person or entity that has or may have dealings with any member of the Ultrafabrics Holdings Group which would violate this Policy. For purposes of this Policy, the Ultrafabrics Holdings Group means any company that controls, is controlled by, or is under common control with Ultrafabrics Holdings Co., Ltd. Each company of the Ultrafabrics Holdings Group and its directors, officers, employees, representatives, agents and other personnel are required to comply with this Policy and any violation hereof may lead to disciplinary action. In particular, Ultrafabrics Holdings Co., Ltd., on behalf of the Ultrafabrics Holdings Group hereby makes the following declaration.

- 1. We understand that any bribery, which hinders fair and free competition, must not be permitted to occur, and all members of the Ultrafabrics Holdings Group and their respective personnel shall strictly comply with the provisions of the Penal Code, the Unfair Competition Prevention Act, the National Public Service Ethics Act, and the National Public Service Ethics Code of Japan, as well as the Foreign Corrupt Practices Act of the U.S., the Bribery Act of the U.K., and all other anti-bribery laws of any country where the Ultrafabrics Holdings Group may have dealings or a presence, as amended, and the rules and regulations issued thereunder (collectively, "Anti-Bribery Laws"). In addition, we shall not commit any acts that may be suspected or considered as bribery.
- 2. We shall maintain appropriate relationships with any person with whom we may contact in the course of dealings or in the performance of our duties in the name of or on behalf of the Ultrafabrics Holdings Group.
- 3. We shall not commit any act of providing, or be the recipient of any 'wine and dine', gifts or

rewards, or other entertainment, unless such act is acceptable in the context of Anti-Bribery Laws and either no unfair intention is found from an objective perspective or the event is truly unavoidable in order to protect the life, body, property or freedom of an individual or his/her family members.

- 4. Even in the event that provision or receipt of entertainment, gifts or rewards to or from others is permitted, we may only do so after undergoing prescribed approval procedures and only to the extent necessary in order to perform our duties.
- 5. We will require any supplier, contractor, dealer, agent, consultant or other third party which is engaged in the Ultrafabrics Holdings Group's businesses and services to strictly comply with all Anti-Bribery Laws.
- 6. For purposes of this Policy, "Good Business Practices" shall mean the more stringent of (i) any applicable requirements under Anti-Bribery Laws or (ii) internationally accepted practices, methods, means and standards observed by top tier companies whose stocks are listed on the Tokyo stock exchange.