

Governance

Corporate Statements

The Kuraray Group
Code of Conduct

TOP STATEMENT

Sustainability Long-term
Vision and Sustainability
Medium-term Plan

Materiality of Kuraray
Group

Planet

Product

People

Governance

Points of Corporate
Governance

Message from the
Outside Executives

Risk Management

Compliance

Tax Policy

GRI Standards
Content Index

Kuraray Report
(integrated report) /
Sustainability website

Initiatives, etc.

Points of Corporate Governance

Updated

Message from the Outside Executives

Risk Management

Updated

Compliance

Tax Policy

Compliance

Group Compliance

“Our Commitment” states the principles of our conduct which we should adhere to in our business activities that have diverse points of contact with society. The “Kuraray Group Code of Conduct” serves as guidelines to implement the commitment in performing day-to-day work. The President has declared that we will comply with laws and regulations and “Our Commitment” under all circumstances. To share these principles and commitments among all Kuraray Group employees throughout the world, the Compliance Handbook has been compiled containing the foregoing declaration by the President and explanations of the “Kuraray Group Code of Conduct” and distributed to all employees in Japan and overseas.

> WEB

In addition, we have appointed compliance officers at plants and overseas offices of Kuraray and Group companies, and have organized regional compliance committees. Since fiscal 2019, we have linked the timing of the activities of the regional compliance committee and Risk Management and Compliance Committee to raise awareness of compliance throughout the Group



Whistleblower System

The Kuraray Group has the Kuraray Group Employee Counseling Room in place for all employees of the Kuraray Group in Japan (including contract employees, temporary employees, and part-time employees) as a whistleblower system to prevent or detect and resolve compliance violations at an early stage.

In addition, we established the Global Compliance Hotline, which is available to all Group employees across the globe, in response to the rapid progress of globalization. The whistleblower system handles all issues on compliance reported from employees, such as business transaction in general (e.g., bribery/corruption), violation of company rules, and personnel affairs including respect for human rights and harassment.

As established by the Guideline for the Operation of the Kuraray Group Employee Counseling Room and the Guideline for the Operation of the Global Compliance Hotline, they can report anonymously and are protected from any disadvantageous treatment that may occur due to the report.



Thorough Compliance Measures

Efforts to Comply with the Antimonopoly Act

We seriously and sincerely accept the gravity of the violations of the Antimonopoly Act on two recent occasions, consider compliance with the Antimonopoly Act to be one of the highest-priority management risks, make every effort to prevent recurrence through a range of measures, and are developing and strengthening compliance programs throughout the Kuraray Group.

In fiscal 2020, in order to establish an effective global system for complying with the Antimonopoly Law, we carried out measures at each of the Kuraray Group companies around the world, such as the establishment of related internal rules, education and training for officers and employees, risk assessments for each business, and audit of businesses that participate in bidding. From fiscal 2021 onward, the entire Kuraray Group will continue to ensure that the Antimonopoly Act Compliance Program is enforced and thoroughly monitor compliance systems in high-risk businesses and fields.

Status of implementation of priority measures in fiscal 2020

- Established and updated various internal rules regarding compliance with the Antimonopoly Act
- Assessed the Antimonopoly Law risks in each business
- Assessed the Antimonopoly Law risks through trading associations, etc.
- Conducted annual audits of public bidding tenders
- Provided training for officers
- Hosted seminars for employees engaged in sales, etc.
- Applied the in-house leniency program for participants of the seminars and obtained a declaration from them to comply with the Antimonopoly Law
- Expanded the management rotation program for certain departments (in Japan only) in order to prevent the risk of fraud, including violation of the Antimonopoly Act

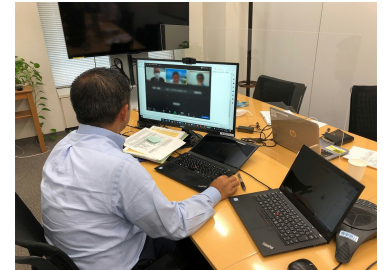
Anti-Bribery Initiatives

The development and strengthening of an anti-bribery program is an ongoing objective that must be addressed by the entire Kuraray Group, and we recognize it as a management risk. In the Kuraray Group Code of Conduct, action guidelines to prevent bribery and that cover the handling of donations and gifts are declared, and the basic policy against bribery is set forth in the Kuraray

Group Global Anti-Bribery Policy. In accordance with these basic policies, each company of the Kuraray Group will focus on developing and operating an anti-bribery program, including development of relevant internal rules, education and training for officers and employees, and the evaluation and management of bribery risks conducted through third parties. We have signed the United Nations Global Compact and will continue to work to further strengthen anti-corruption activities.

Compliance Seminar

Since fiscal 2017, departmental compliance education and seminars have been provided once a year to all Group employees in Japan (including contract employees, temporary employees, and part-time employees), with the aim of improving communication and openness within the department. In fiscal 2020, the seminar was held on the Internet for managers of the Group companies in Japan due to the COVID-19 pandemic. Through dialogue with external lecturers, participants learned why it is necessary to foster awareness of compliance and aimed at a level where they can speak about the importance of compliance in their own words to their subordinates. In the group discussion held in the latter half of the seminar, participants engaged in lively discussions on topics of high interest such as new risks after COVID-19, information security, and harassment. Subsequently, the participants brought back the knowledge and awareness they had gained at the seminar to their departments, and through interactive departmental education they sought to boost their awareness of compliance and improve communication.



About Us

Corporate Overview
 Message from the President
 Corporate Statements
 Executives
 Organization Chart
 History
 Awards and Accolades
 Main Group Locations
 Corporate Profile Video
 covid19

Product Information

Search by Business
 Search by Product Name
 Search by Key Word

R&D

Basic Policy
 Technologies and Products
 Organization
 Progress
 Highlights

Sustainability

Corporate Statements
 Kuraray Group Code of Conduct
 Kuraray Group Human Rights Policy
 TOP STATEMENT
 Sustainability Long-term Vision and Sustainability Medium-term Plan
 Materiality of Kuraray Group
 Planet
 Product
 People
 Governance
 GRI Standards Content Index
 Kuraray Report (integrated report) / Sustainability website

Investor Relations

Management Policies
 IR News
 Learn about Kuraray
 Results and Financial Information
 IR Library
 Stock Data
 IR Calendar
 FAQ

