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Code of Conduct

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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.

In fiscal 2021, we renewed the handbook with a user-friendly design to make it accessible for all employees. We localized the handbook into twelve languages and distributed it to Group companies in Japan and overseas.

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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. In fiscal 2021, the Employee Counseling Room received 11 consultations in Japan. The content of these consultations included personnel and labor issues in terms of the nature of work and the workplace environment during the COVID-19 pandemic.

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.

Kuraray Group Employee Counseling Room Consultations in Japan



Thorough Risk Management and Compliance Measures

Preventing Leakage of Confidential Information

In October 2021, we detected unauthorized entry to a server operated by the Kuraray Group and confirmed that some information it contained was leaked. Subsequent investigation revealed that some of the information that may have been leaked included personal data, such as names and company contacts of business partners and Kuraray Group employees. We have taken necessary response measures, including contacting the relevant parties. We are cooperating with an outside expert institution as we work to further strengthen information security and ensure strict enforcement of our information management system.

Compliance with the Antitrust Law

The Kuraray Group considers compliance with the Antitrust Law to be one of its most important management issues. We have established and operate a Group-wide compliance program aimed at ensuring an effective antitrust compliance system.

In fiscal 2021, we continued to monitor the compliance framework in high-risk businesses and areas and took measures such as providing education and training to officers and employees and conducting an annual audit of public bid projects. From fiscal 2022 onward, the entire Kuraray Group will steadily implement the Antitrust Law Compliance Program to prevent Antitrust Law violations and monitor compliance status.

Status of implementation of priority measures in fiscal 2021

- Assessed the Antitrust Law risks in each business
- Assessed the Antitrust Law risks through trading associations, etc.

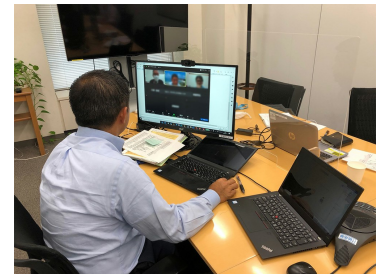
- Conducted annual audits of public bidding tenders
- Provided a range of education and training for officers and employees

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 basic policies against bribery are set forth in the Kuraray Group Global Anti-Bribery Policy. In accordance with these policies, we are developing and reinforcing a bribery prevention framework at the Group level, including formulating relevant internal rules for each Group company, providing education and training for officers and employees, and introducing procedures for managing bribery risks through agents or other third parties.

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 2021, we held an online seminar for managers (section managers) of Group companies in Japan. Through dialogue with external lecturers, participants learned basic knowledge about ways of giving guidance to department members while avoiding harassment. The training aimed for a level at which participants could talk about what they learned in their own words to their subordinates. 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.



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