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# 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.

In fiscal 2021, we renewed the handbook with a userfriendly 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. > 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.

# Kuraray

Global

Careers

# 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 2022, the Employee Counseling Room received 29 consultations in Japan. Consultation and reporting can be anonymous, and we have put strict regulations in place to protect people making reports from being treated unfairly.

In addition, following the June 2022 amendment of Japan's Whistleblower Protection Act, we designated separate contact personnel to receive information that can identify persons consulting or reporting. We also revised relevant regulations based on the amended Act.

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.

	FY2018	FY2019	FY2020	FY2021	FY2022
Kuraray Group Employee Counseling Room Consultations in Japan	16	35	23	11	29

# **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 implement information security measures, such as enhanced network monitoring.

In June 2022, with the appointment of the person in charge of Confidential Information Management, we formed Confidential Information Management Team to implement anti-fraud access measures and ensure the operation of Kuraray Group Confidential Information Management policy globally. We will further strengthen information security and tighten the information management system by conducting e-learning-based information security education and suspicious e-mail response training for employees.

%In December of last year, we conducted an e-learning program on Confidential Information Management for all domestic employees.

## 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. 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. The entire Kuraray Group will steadily implement the Antitrust Law Compliance Program to prevent Antitrust Law violations and monitor compliance status.

### 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 2022, we held an online seminar for general managers of Group companies in Japan to learn about the kind of communication that fosters an open workplace through preliminary issues, on-line training by an external instructor and post-issues with the aim for a level at which participants could talk about what they learned in their own words to subordinates. Subsequently, the participants brought back the knowledge and awareness they had gained at the seminar to their departments, and also used educational materials (textbooks, e-learning materials, etc.) provided by the secretariat through interactive departmental education they sought to boost their awareness of compliance and improve communication.



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