

Corporate Statements

The 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

Message from the Chairman of the Board of Directors

Points of Corporate Governance

Outside Directors' Roundtable Discussion

Risk Management

Compliance

Tax Policy

GRI Standards Content Index

Kuraray Report (integrated report) / Sustainability website

Initiatives, etc.

Governance

Message from the Chairman of the Board of Directors



Points of Corporate Governance



Outside Directors' Roundtable Discussion



Risk Management



Compliance



Tax Policy



Compliance

Group Compliance

The statement "Our Commitment" outlines the principles of conduct to which the Kuraray Group should adhere to in our business activities that have diverse points of contact with society. The "Kuraray Group Code of Conduct" serves as a guideline to implement the commitment into practice in day-to-day operations. 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 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.

[>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 set up the Kuraray Group Employee Counseling Room for Group employees in Japan (including contract employees, temporary employees, and part-time employees) as an internal reporting system for either preventing or detecting and resolving at an early stage any compliance violations.

The whistleblower system handles all issues on compliance reported by employees, such as business transactions in general (e.g., bribery/corruption), violation of company rules, and personnel affairs including respect for human rights and harassment. In 2024, the Kuraray Group's Employee Counseling Room received 29 consultations in Japan.

In addition to above, we have set up the Global Compliance Hotline, making it accessible for Group employees around the world, in response to the rapid progress of globalization. We have established a Governance Hotline to serve as an internal reporting point independent of management, via outside law firm that is different from the firm we use for legal counsel.

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.

In addition, following the June 2022 amendment of Japan's Whistleblower Protection Act, the contact person who receives information that can identify persons consulting or reporting has been individually designated as a Whistleblower Response Worker.

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Kuraray Group Employee Counseling Room Consultations in Japan	23	11	29	31	29

Thorough Compliance Measures

Compliance with the Antitrust Law

In order to establish an effective antitrust Group-wide compliance program, the Kuraray Group continues to monitor the compliance framework in high-risk businesses and areas and takes 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

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 by managing of entertainment and gifts etc. and assessing and managing bribery risks through third parties such as agents (including the countries and regions where third parties are employed, the existence of contacts with public officials, risk assessment and approval procedures based on prior investigations of such third parties, and obtaining representations and warranties regarding legal compliance in contracts and covenants), providing education and training to directors, officers, and employees.

Compliance Seminar

Since 2017, Group employees in Japan, including contract employees, temporary employees, and part-time employees, have undergone departmental compliance education once a year to promote greater compliance awareness and a more open organizational culture. In 2024, we held an online compliance seminar, led by an outside instructor, for general managers, including affiliated companies, in Japan. The seminar focused on the theme of "A workplace that encourages open dialogue," and participants learned through discussions that elicited voluntary and proactive comments and opinions. Seminar participants then implemented the procedures they learned at the seminar in their own departments and held discussions with all department members.

