

Sekisui Chemical Group Compliance Policy

1. Compliance of Sekisui Chemical Group

We believe in integrity, and will raise compliance awareness and conduct ourselves in a compliance-oriented manner to make the Sekisui Chemical Group a trusted company.

2. Relationship with Society

2.1 Accounting Processing

We will carry out the proper accounting process based on facts and prepare financial statements properly.

2.2 Government Laws and Regulations

When undertaking sales activities, we will obtain any necessary permits and licenses, and will ensure that we always undertake renewal procedures and other such procedures in order to comply with administrative laws and regulations.

2.3 Security Export Control

We will not export any arms, weapons, and related technologies that may harm international peace and security.

2.4 Political Donations

We will not give illegal political donations.

2.5 Rejection of Association with Antisocial Forces

We will take a firm stance towards antisocial forces, and will not associate with such forces in any way.

2.6 Prohibition on Insider Dealings

If we become aware of insider information of the Sekisui Chemical Group or any of its business partners in the course of our work, we will not divulge it to any third party or trade in their shares until such information is made public.

2.7 Disclosure of Corporate Information

On the basis of our Corporate Information Disclosure Philosophy, we will disclose corporate information in a fair, timely, and appropriate fashion.

2.8 Conservation of the Global Environment

We are fully aware of the importance of environmental protection, and will endeavor to reduce our environmental impacts in all stages of our business activities ranging from product research and development to the procurement of raw materials, production, sales, and transportation and to contribute to environmental protection through Sekisui products.

2.9 Respect for Human Rights and Prohibition of Discrimination

On the basis of the “Sekisui Chemical Group Human Rights Policy,” we will respect the human rights of each and every person who is affected by our group’s business activities, and will strive to ensure we do not violate human rights.

3. Relationship with Customers, Business Partners and Competitors

3.1 Product Safety

For manufacture, development, sale, transport, maintenance, and repair of products, we will always pay attention to safety, fully understand laws and safety standards related to the safety of products, and observe them, to supply better products to customers.

3.2 Ensuring Sound Quality

We will not engage in misconduct regarding quality that leads to quality scandals, such as concealing product safety defects, misrepresenting performance, failing to comply with product-specific laws and regulations or official certification requirements, fraudulent labeling, and falsifying or fabricating quality data.

3.3 Marketing and Sales Activities in Good Faith

We will conduct marketing and sales activities with consideration given to the interests of customers and in compliance with applicable laws and regulations

3.4 Compliance with Antitrust and Competition Laws

We will not, under any circumstances, engage in conduct that constitutes a violation of antitrust and competition laws such as cartels, bid-rigging, constraints on resale price, or transactions with constraint conditions, and always strive to engage in fair and free business competition.

3.5 Fair Trading with Business Partners, Compliance with the Act against Delay in Payment of Subcontract Proceeds, etc. to Subcontractors

We will respect the rights of our business partners, deal with them honestly and in good faith, and treat them fairly and equitably.

3.6 Corruption Prevention

We will never engage in conduct that is considered or could be construed as bribery. We will also take care so as not to be complicit in money laundering.

3.7 Conflicts of Interest

If there is a conflict of interest between the company's interests and the interests of an individual in our dealings, we will consider the matter from the perspective of whether our actions are beneficial for the company, and ensure that we do not cause any damage to the company.

4. Relationship with Employees

4.1 Abuse of Power

We will not abuse our power or engage in any acts equivalent to an abuse of power towards others.

4.2 Sexual Harassment

We will not engage in sexual harassment or any acts that are equivalent to sexual harassment.

4.3 Compliance with Labor Relations Laws

We will comply with the labor relations laws to commit ourselves to maintaining a healthy and safe work environment.

5. Relationship with the Company's Property

5.1 Proper Management and Protection of the Company's Property

We will ensure adequate management of the company's property, whether tangible or intangible, and prevent assets from being damaged or stolen, or trade secrets from being divulged.

5.2 Proper Use of Intellectual Property

We will use intellectual property, which is the company's valuable assets, in an appropriate manner and ensure the protection of the intellectual property rights.

5.3 Proper Management and Protection of Personal Information

We will specify the purpose of use of personal information to the extent possible, clearly state this prior to obtaining such information in a fair manner, and use it only within the scope of the stated purpose. We will also handle personal information appropriately in accordance with the relevant laws.

Date of Enactment: October 1, 2022