

# Guideline

for Mitsubishi Chemical Holdings Group

# Charter of Corporate Behavior

First Edition



# Introduction

The Mitsubishi Chemical Holdings Corporation (MCHC) Group identifies itself as *THE KAITEKI COMPANY* with the ideal of realizing *KAITEKI*, a sustainable condition which is comfortable for people, society and the Earth, transcending time and generations. As *THE KAITEKI COMPANY*, the MCHC Group must contribute to resolving social issues in various fields and create a better future for future generations through *KAITEKI* Management in order to realize *KAITEKI*.

Humankind progressed to where we are today through scientific and technological advances and diverse economic activities. At the same time, the pursuit of better lifestyles and convenience has created numerous global social and environmental issues that are difficult to resolve. They include climate change, resource and energy depletion, food shortages, and the uneven distribution of water. As the global political and economic environments become more complex and disordered, the future prospects are extremely unclear. In these circumstances, society expects more and more from corporations in resolving such social and environmental issues. It has thus become more important than ever for companies to grow sustainably with society by undertaking corporate activities that society values and trusts as beneficial rather than simply pursuing profits.

In April 2013, in an effort to respond to such a situation, the MCHC Group drew up the Mitsubishi Chemical Holdings Group Charter of Corporate Behavior, which is based on the concept of Management of Sustainability (MOS).

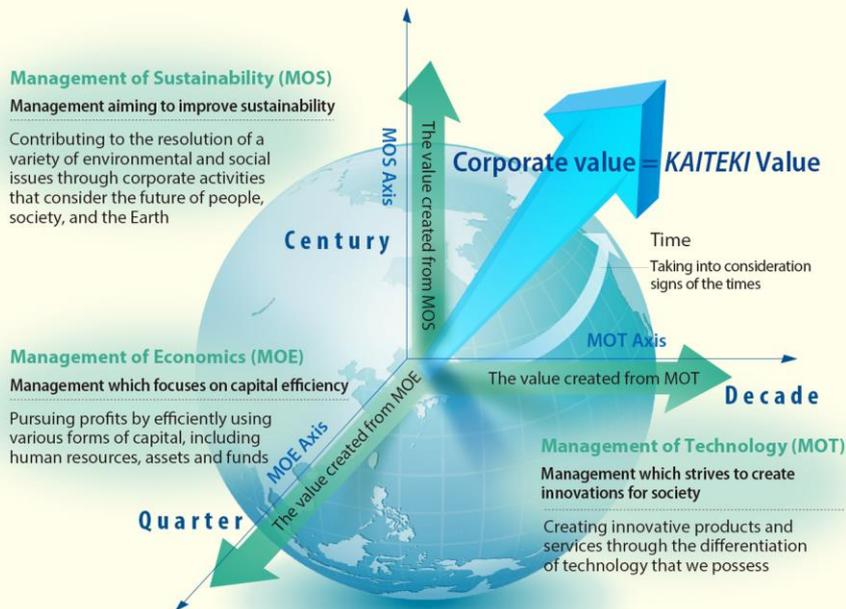
These guidelines describe the basic approach and specific actions expected from stakeholders as a member of the MCHC Group under the Mitsubishi Chemical Holdings Group Charter of Corporate Behavior.



## KAITEKI Management

KAITEKI Management is an original management method. It includes Management of Economics, which focuses on capital efficiency, Management of Technology, which strives to create innovations for society, and Management of Sustainability, which aims to improve sustainability. We seek to improve KAITEKI Value, which is generated by these three kinds of management while giving due consideration to factors of time and opportunity.

Based on this concept, the MCHC Group formulated guiding policies and programs to resolve a variety of environmental and social issues and laid out a solid framework to address and overcome these issues by appointing responsible officials and designating responsible departments. We plan to materialize KAITEKI through a balanced deployment of MOE, MOT, and our MOS concept.



## Corporate Governance

A framework (corporate governance) to determine policies for MCHC Group's activities and implement them and oversee these efforts is one of the most important elements in realizing KAITEKI. The MCHC Group is constantly updating processes and structures to realize KAITEKI and enhance corporate value (KAITEKI value).

WEB [▶ Governance System](#)



## Mitsubishi Chemical Holdings Group

# Charter of Corporate Behavior

The Mitsubishi Chemical Holdings Group Charter of Corporate Behavior comprises 13 chapters, and commits the MCHC Group to highly ethical and socially conscientious behavior in all aspects of our corporate activities.

Chapters 1 through 4 of this guideline present the basic behavioral principles of the MCHC Group for sustainable development with society. Chapters 5 through 12 of this guideline describe the MCHC Group's stance on major issues in realizing *KAITEKI*. Chapter 13 of this guideline pledges that we will share our basic concepts and endeavors to realize *KAITEKI* with business partners and the like beyond the MCHC Group.

We also establish guiding policies to implement our commitments described in each chapter.

**WEB**

▶ [Mitsubishi Chemical Holdings Group Charter of Corporate Behavior \(Full text\)](#)

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We shall not engage in any form of forced, compulsory, or child labor, and shall require our suppliers and other contractors to adhere to the same standards. Mitsubishi Chemical Holdings Group managers at all levels shall respect human diversity and create working environments where employees can exercise their abilities to the utmost in safe and healthy settings, in order to make optimal use of human resources. Managers shall build sound relations with employees through close dialogue, and shall respect employees' rights, including freedom of association and the right to collective bargaining.

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We shall strive to reduce environmental impact and protect the environment and ecosystems in our operations, in addition to supplying environmentally friendly products and services. Recognizing that the health and safety of our employees and communities in which we do business form the foundation for the very existence of our company and that we have a corporate social responsibility to assure the health and safety of others, we shall continue to ensure safe business activities.

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We shall conduct business fairly and sincerely, adhering to ethical principles and refraining from unfair trade practices and any form of bribery or corruption, to contribute to sound social and economic development through fair competition in the market. We shall refuse to work with any group, organization or individual engaged in unlawful activities, and under no circumstances shall we have any relations with anti-social influences.

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We shall advance R&D by bringing together outstanding researchers from Japan and overseas, and contribute to the realization of *KAITEKI* through innovation. We shall recognize the importance of our own and others' intellectual property rights and respect such rights.



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We shall contribute broadly to society through our businesses. In addition, we shall respond to the desires and expectations of local communities by enhancing our understanding of their cultures and customs and acting as a good corporate citizen.

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Mitsubishi Chemical Holdings Group managers shall recognize their responsibility to embody the spirit of this charter and shall ensure that employees are fully aware of its content. We shall expect our suppliers and other business partners to share all the standards set out in this charter, including but not limited to standards relating to human rights, employment, and labor.

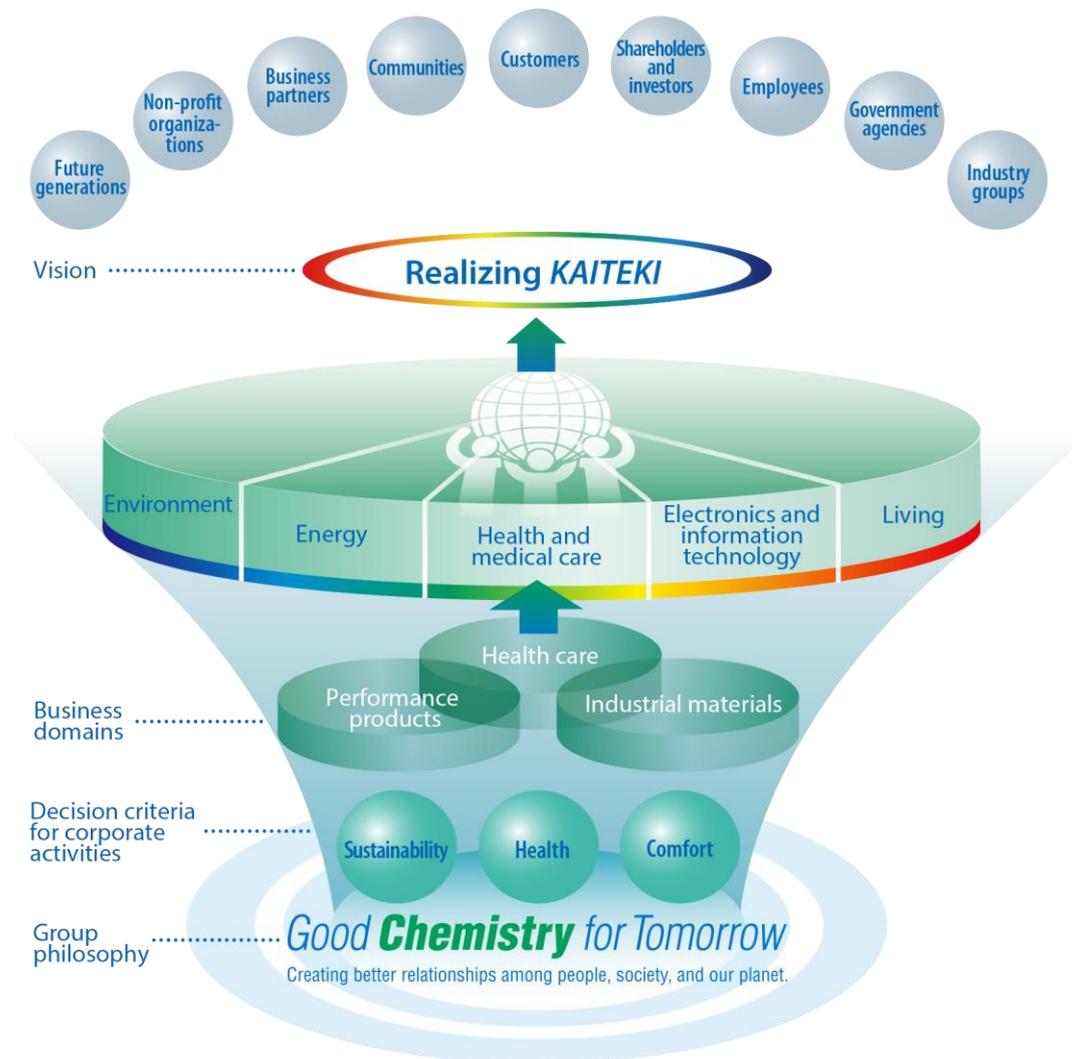
**Policy** Developing Cooperative business practices with suppliers and business partners



# Chapter 1 Awareness and Responsibility

**We shall contribute to the realization of *KAITEKI* through our business with a keen sense of corporate social responsibility, based on the fundamental understanding that the foundation of our corporate activities is society's trust and confidence in us.**

The MCHC Group's philosophy is "Good Chemistry for Tomorrow - Creating better relationships among people, society, and our planet." In keeping with this philosophy, the MCHC Group believes that it is our social responsibility to realize *KAITEKI* by maintaining stable supplies of socially beneficial products and services created or selected based on our criteria of environmental and resource sustainability, health and comfort and leveraging the diverse technologies and knowledge we have amassed over the years.



When implementing this philosophy, we embrace our social responsibility that we must act fairly and ethically, mindful of the impacts of our actions on society and the environment. Each one of us should remember that we are members of the Group and fully understand and act in compliance with all aspects described in the MCHC Group Charter of Corporate Behavior.

It is crucial that society appreciates our corporate activities and acknowledges our social value as a business. We will continue to endeavor in the course of business activities to increase trust from society.

WEB ▶ [KAITEKI management](#)

WEB ▶ [Governance System](#)

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## Realizing *KAITEKI* through business

We are proud that chemistry is essential for resolving various contemporary global issues. As a “solutions provider” leading society toward environmentally sustainable development, we will undertake further research and development based on our accumulated technologies and knowledge and will duly care for the environment and safety in engaging in business to contribute to realize a better society and *KAITEKI*.

Related items ▶ [Environment and Safety p. 18](#) ▶ [Customer Satisfaction p. 25](#)

Related items ▶ [Science and Technology p. 29](#)



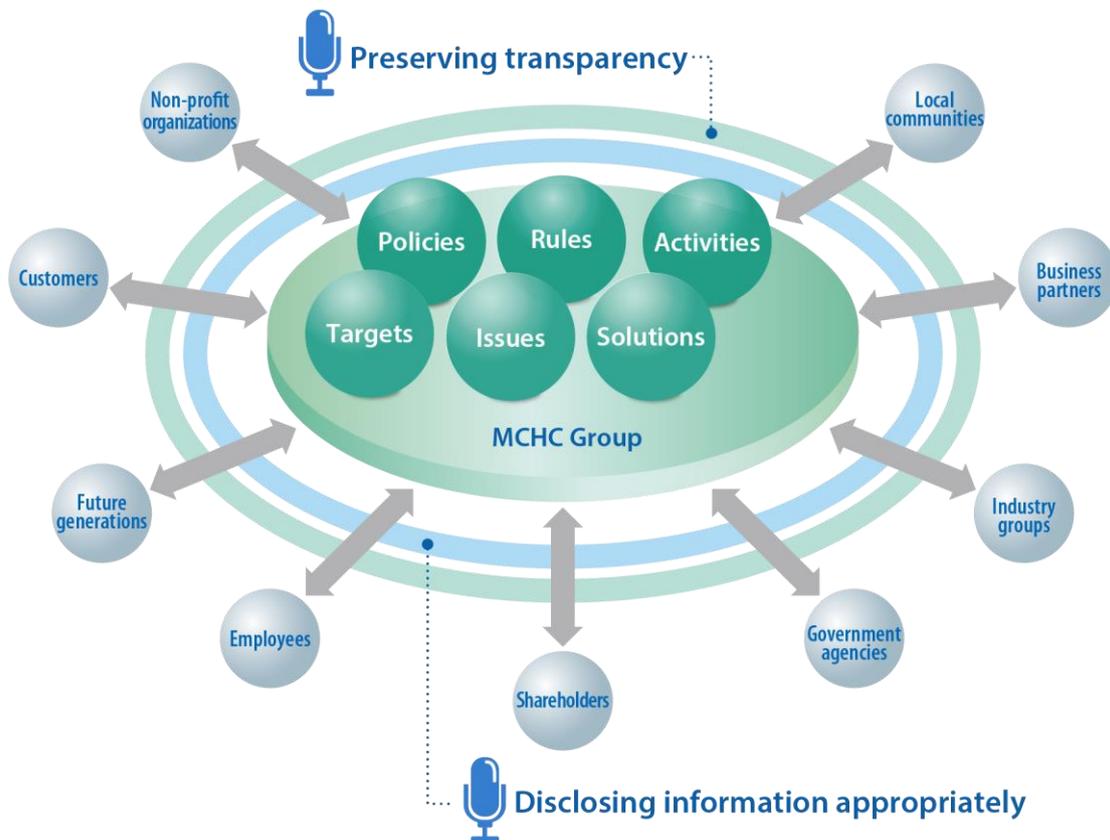
## Chapter 2

# Accountability and Transparency

**We shall, recognizing the importance of accountability in corporate activities, preserve transparency in such activities, disclose information appropriately, and always maintain a stance of openness, both internally and externally.**

Trust starts with knowing and deepens with understanding.

The first step in gaining social trust is to straightforwardly explain situations and the issues of the MCHC Group to enhance the transparency of our corporate activities. We endeavor to disclose information properly as part of an ongoing commitment to a socially open stance.



## 2-1 Recognizing the importance of accountability

**We consider that explaining the impacts of our activities on society, economy, and the environment (accountability) benefit both the Group and society. Keeping this in mind, we always ask ourselves whether we accomplish this accountability.**

### Enlightenment and education

We actively provide learning opportunities through training workshops and our intranet to ensure that everyone in the Group equally understands the values, the code of conduct, policies on specific actions and other ideas presented in the MCHC Group Charter of Corporate Behavior, so that we develop their skills to proactively resolve problems.

### Risk management

The MCHC Group defines risks as potential events that could, during the course of corporate activities, undermine public trust in or the corporate value of the MCHC Group.

We are committed to establishing and implementing risk management systems in order to maintain and enhance corporate value. Under the risk management structure headed by the president of MCHC as the overall risk manager of the Group, we compiled the MCHC Group Risk Management Basic Policy and endeavor to properly execute it. The policy has two main goals. The first is to prevent grave risks associated with business activities from being realized by identifying, analyzing, and assessing risks beforehand. The second is to mitigate human, financial or social damage should a risk be realized.

We periodically assess progress in organizational management and business activities to ensure that they are in line with initial plans and do not pose issues or adverse impacts, including those that were not evident in prior assessment. Internal audit departments and external specialists also conduct periodical audits. If such audit reveals issues that the Group needs to address, we swiftly share that information and formulate solutions.

**WEB** ▶ [Mitsubishi Chemical Holdings Group Risk Management Basic Rule](#)

## 2-2 Appropriate information disclosure

**As an open corporate group to the public, the MCHC Group maintains transparency in our corporate activities and fosters social understanding and trust for our activities by ensuring accurate and timely disclosure of information truly needed by all stakeholders\*, including customers, business partners and local communities, as well as our shareholders and investors, and members of the MCHC Group, including that with negative impact on the Group. Our commitment extends beyond information that laws and regulations require us to disclose.**

\* Stakeholders are individuals and organizations directly or indirectly involved with the Group's corporate activities, and include customers, business partners, shareholders and investors, local communities, employees, governments, industry organizations and the parent company (and subsidiaries).

**Related items** ▶ [Valuing Stakeholders p. 13](#)



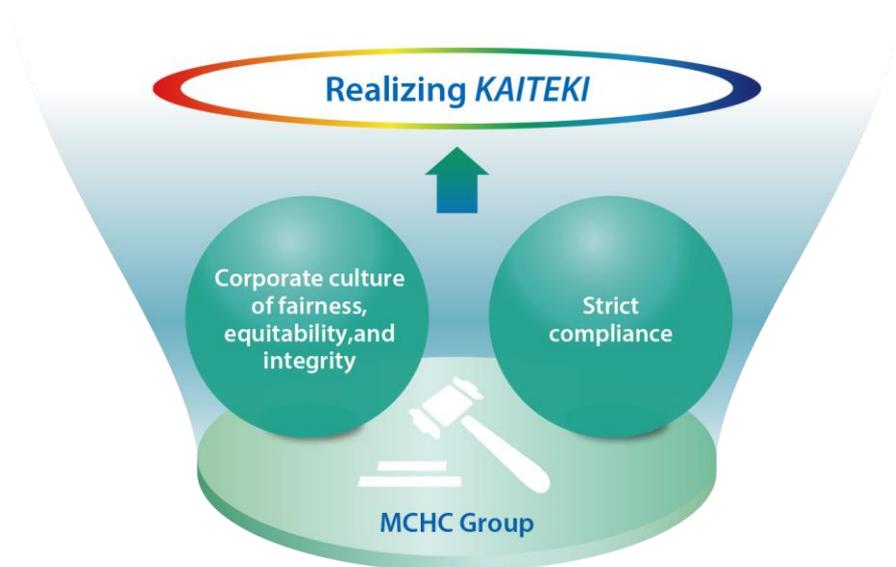
## Chapter 3

# Legal Compliance and Fairness, Equitability and Integrity

**We shall comply with laws and international standards and shall hold ourselves to the highest ethical conduct at all times. In addition, we shall always adopt an attitude of fairness, equitability, and integrity towards customers, business partners, shareholders, government agencies, local communities, and other stakeholders. This attitude shall also apply to our dealings with each other.**

As a member of society, we ensure strict compliance<sup>\*1</sup> at all times. We foster a corporate culture of treating all stakeholders fairly, equitably and with integrity as an equal partner in realizing *KAITEKI* together. MCHC Group members shall equally share all the commitments of the MCHC Group Charter of Corporate Behavior and act accordingly.

<sup>\*1</sup> Compliance generally means responding to the requests and demands of stakeholders and complying with rules, pledges, and laws. The MCHC Group uses the word compliance in a much broader sense, extending beyond legal compliance to encompass compliance to social rules, including corporate ethics.



## 3-1 Legal compliance

In always performing our duties in keeping with high standards of ethics and social responsibility, we comply with all business-related laws and regulations in Japan and overseas, such international codes of conduct as the United Nations Global Compact<sup>\*2</sup>, socially accepted standards and rules, contracts and promises exchanged with customers, business partners and local communities, company rules, manuals, and other rules (hereinafter, “Laws and Regulations”).

\*2 The United Nations Global Compact was announced by then UN Secretary-General Kofi Annan in his address to the World Economic Forum in Davos, Switzerland in 1999, and was inaugurated in July 2000. The Compact encourages businesses to collaborate as global citizens in resolving such global issues as poverty in developing nations. It requests participating companies to support and practice the Ten Principles established internationally regarding human rights, labor standards, environment and corruption within the remit of businesses.

Related items ▶ [Fair Business Practices p. 20](#) ▶ [Information Management p. 27](#)

Related items ▶ [Science and Technology p. 29](#)

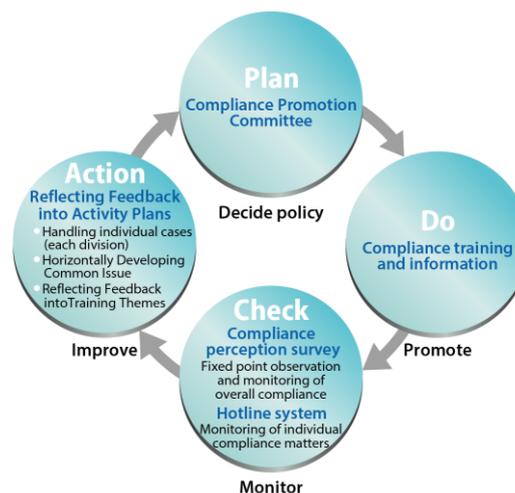
MCHC Group members shall always adhere to the following norms in the course of business to ensure compliance.

- 1) Constantly refine sensitivities to what constitutes illegality.
- 2) Never engage in anything that could be illegal.
- 3) Do not be optimistic when assessing the risks of illegality.
- 4) Do not hide or justify actions that could violate Laws and Regulations.
- 5) Always prioritize avoiding the risks of illegality over the pursuit of profits.

## Fostering compliance

The MCHC Group recognizes that maintaining and fostering compliance in the course of business is one of our social responsibilities. The Group establishes and implements compliance promotion programs that match each business, business format and organizational size and prevents infringements by enhancing Group member awarenesses on compliance issues.

Each core operating company has established a Compliance Promotion Committee, and the internal control promotion departments of each company function as secretariats to operate hotlines and conduct training and workshops, seminars, business audits, and compliance awareness surveys based on the MCHC Group Compliance Promotion Regulations.



If a compliance violation occurs, the MCHC Group immediately addresses the situation while reporting to each company's internal control promotion department, MCHC's Internal Control Office and MCHC CCO, identifying causes, implementing measures to prevent recurrences, and imposing the necessary punishments.



WEB ► [Mitsubishi Chemical Holdings Group Compliance Promotion Rule](#)

## Problem solving

We strive to create an open work environment that is conducive to employees reporting or consulting on issues so as to always identify issues and impacts before they become real problems. We also maintain hotlines<sup>\*3</sup> and other internal reporting programs. If uncovering an issue or impact, while remaining thoughtful of persons involved, the relevant department endeavors to identify causes while collaborating with external specialists and other parties to resolve problems. We inform about incidents internally and externally and issue cautions, and reflect what we learn in training and other educational programs to prevent recurrences.

\*3 A hotline is a system for consultations with and reports to internal expert departments or external specialist (including whistle-blowing as defined in the Whistle-Blower Protection Act) open to parties concerned with business management and implementation.

## 3-2 Fairness, Equitability and Integrity

**We always value fairness, equitability and integrity, never engage in unjustifiable discrimination for any reason whatsoever, and act ethically.**

## Respecting human rights

We respect human rights and individuality and do not engage in any actions outside or inside the Group that would detract from the dignity of individuals. Such harmful actions include discrimination based on race, nationality, origin, religion, belief, gender, disability, illness or social status, and unpleasant speech and behavior, including that which constitutes sexual or power harassment. We reject forced labor in any form and support efforts under the International Code of Conduct to effectively abolish child labor.

Related items ► [Respecting Human Rights p. 16](#) ► [Employment and Labor p. 17](#)

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## Creating motivated workplaces

We respect the individuality and values of each Group member. We endeavor to create a workplace full of people who feel positive about themselves and love their jobs, where our diverse people can reach their potential under mutual trust. To this end, we maintain liberal workplaces, treat our people fairly, and encourage work-life balance.

**Related items** ▶ [Employment and Labor](#) p. 17

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## Honest customer relations

We heed the opinions of consumers and users, think from their perspectives, and respond honestly to ensure that we provide safe, high-quality products and services that match their expectations.

**Related items** ▶ [Customer Satisfaction](#) p. 25

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## Appropriate relationships with business partners

The MCHC Group's many business partners include raw material suppliers, plant maintenance companies, logistics firms, and yard operation companies. We cannot operate without the cooperation of these partners.

In keeping with a basic understanding that all business partners and vendors help us conduct business, we endeavor to foster mutual trust through fair and equitable transactions.

**Related items** ▶ [Valuing Stakeholders](#) p. 13

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## Appropriate Political and government relations

We abstain from illicit political donations, illegal incentives, or giving bribes to politicians and public servants in doing business in Japan and abroad and always maintain healthy and transparent relationships with political and governmental authorities.

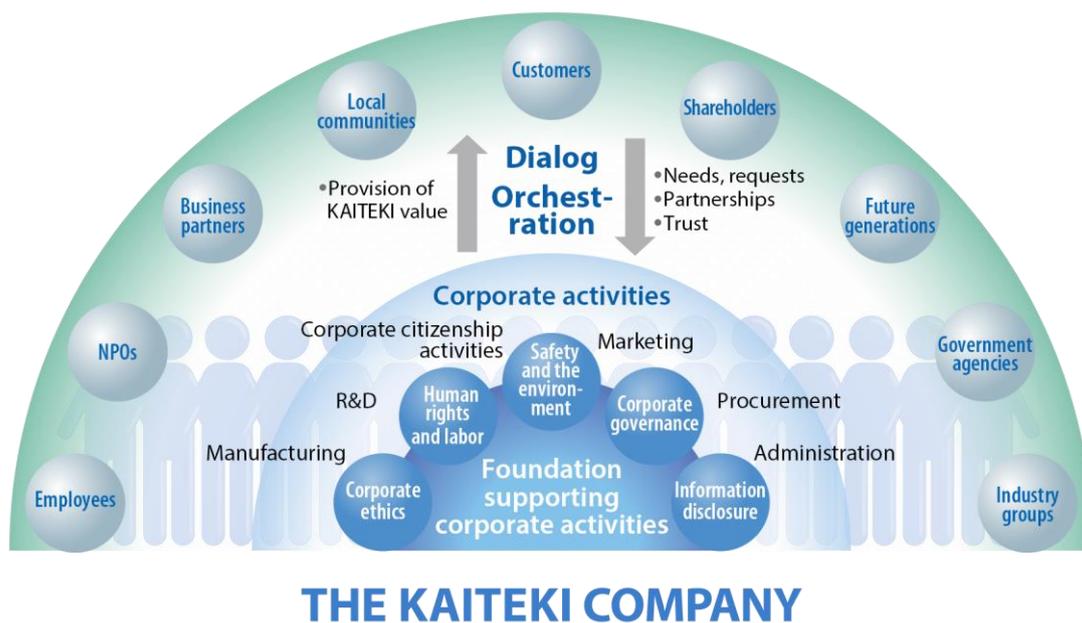
**Related items** ▶ [Fair Business Practices](#) p. 20



## Chapter 4 Valuing Stakeholders

**We shall respect and communicate closely with all stakeholders including customers, suppliers, shareholders, business partners, government agencies, local communities, and employees, and consider the outcomes of such communication in our corporate activities.**

We position all stakeholders as partners in realizing *KAITEKI*. We endeavor to build appropriate and amicable relationships with all stakeholders while respecting their standpoints.



## 4-1 Definition of stakeholders

**Our stakeholders are people, society, and areas of the environment that our activities affect directly or indirectly. As well as customers, shareholders, investors, local communities, employees, business partners, governments, non-profit organizations, future generations, and industry organizations, the Earth is also a stakeholder because it underpins all of the above. We always consider who will impact on our activities, and on whom/what our activities impact.**

## 4-2 Stakeholder engagement

**We engage clearly, objectively, and vigorously with stakeholders so they can accurately evaluate the impacts of our activities on them.**

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### Customer and business partner engagement

We disseminate information on MCHC Group's products, services and initiatives. At the same time, we heed the views of customers and business partners and faithfully deal with their inquiries.

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### Investor engagement

We conduct orientations for individual and institutional investors and analysts, fully explaining the MCHC Group's business status and goals, including business performances, management plans, and major business strategies and heeding the responses of investors and analysts and answer their questions. We strive to optimize attendance at general shareholders' meetings to enhance engagement with shareholders.

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### Employee engagement

We maintain open work environments at each workplace, ensuring that employees can freely exchange views about work and other matters regardless of their positions or where they work. If we notice any behavior that does or could violate the MCHC Group Charter of Corporate Behavior, we act appropriately to resolve such problems, such as by reporting to supervisors or the management so we can stop or prevent such violations.

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## Community engagement

We understand that we have an important mission as part of the communities in which we do business to act as a good corporate citizen in contributing to progress for future generations and local society by deepening our understanding of local cultures and practices and by respecting relevant social norms. We create opportunities to deepen mutual understanding with society through community activities and social contribution efforts in collaboration with nonprofit organizations, and thereby aim to earn trust from community members.

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## Political and governmental organization engagement

While maintaining appropriate political and government relationships, we advocate policies through industry association initiatives to improve the status of our industry or benefit society and the economy. We base such proposals on the knowledge that the MCHC Group has accumulated.

### 4-3 Materiality assessment and reflecting results in operations

**We periodically conduct materiality assessments to identify issues and evaluate their priorities and produce business strategies and plans that take these issues and priorities into account. The goal is to ensure that our operations properly reflect the requests and expectations of people and society and changes in the global and business environments.**

**In materiality assessments, we identify priority issues (materiality) that we need to address through self-analysis and engagement with stakeholders and assess the importance of each issue. We thereafter disclose findings (materiality matrix) and evaluation methods to ensure that we can properly engage with stakeholders regarding the activities of the MCHC Group.**

WEB ► [MCHC's Materiality Matrix](#)



## Chapter 5 Respecting Human Rights

**We shall respect the dignity and rights of all people, and shall not discriminate against people unfairly on the basis of race, sex, religion or other protected status. We shall also expect our suppliers and other contractors to refrain from any infringement of human dignity and rights or discriminatory practices.**

The MCHC Group supports the spirit and meaning of the Universal Declaration of Human Rights and the United Nations Global Compact and respects the dignity and rights of all people. We educate Group members to ensure that each of them correctly understands human rights issues.



**WEB** ► [Mitsubishi Chemical Holdings Group Global Policy on Respecting Human Rights, Employment and Labor](#)



## Chapter 6 Employment and Labor

**We shall not engage in any form of forced, compulsory, or child labor, and shall require our suppliers and other contractors to adhere to the same standards. Mitsubishi Chemical Holdings Group managers at all levels shall respect human diversity and create working environments where employees can exercise their abilities to the utmost in safe and healthy settings, in order to make optimal use of human resources. Managers shall build sound relations with employees through close dialogue, and shall respect employees' rights, including freedom of association and the right to collective bargaining.**

The MCHC Group believes that corporate growth comes from highly motivated employees. We all recognize our own roles and enhance our abilities while accepting diverse work styles and values. We endeavor to prevent occupational accidents as part of efforts to create and maintain healthy work environments.



**WEB** ▶ [Mitsubishi Chemical Holdings Group Global Policy on Respecting Human Rights, Employment and Labor](#)



**We shall strive to reduce environmental impact and protect the environment and ecosystems in our operations, in addition to supplying environmentally friendly products and services. Recognizing that the health and safety of our employees and communities in which we do business form the foundation for the very existence of our company and that we have a corporate social responsibility to assure the health and safety of others, we shall continue to ensure safe business activities.**

The MCHC Group's important social responsibilities include ensuring stable supplies of products and services and maintaining their quality and safety, providing safe and hygienic work environments, and minimizing the environmental impacts of our operations. We voluntarily safeguard the environment, safety, and health in all stages of product life cycles, from development and manufacturing to distribution, application, final consumption, and disposal. We announce the results of our responsible activities and engage with society.



## 7-1 Environmental considerations

As people involved in business and as individuals, we each bear a responsibility for protecting the precious global environment for generations to come. As well as developing environmentally friendly products and services so we can prevent air, water, and soil pollution as a result of our operations, we proactively and enthusiastically engage in addressing environmental issues worldwide, including through measures to combat global warming and resource depletion and conserve biodiversity.

WEB ▶ [Mitsubishi Chemical Holdings Group Biodiversity Preservation Policy](#)

WEB ▶ [Data, Target and the examples of our activities](#)

## 7-2 Safety considerations

Because we know more than others about the features, development, and manufacturing processes for our products and services, we are committed to eliminating accidents and disasters and maintaining stable operations in every process from research and development and manufacturing to distribution to ensure safety for communities and employees alike. We also provide appropriate information with regard to our products and services in order that they are dealt with appropriately in their whole life cycles.

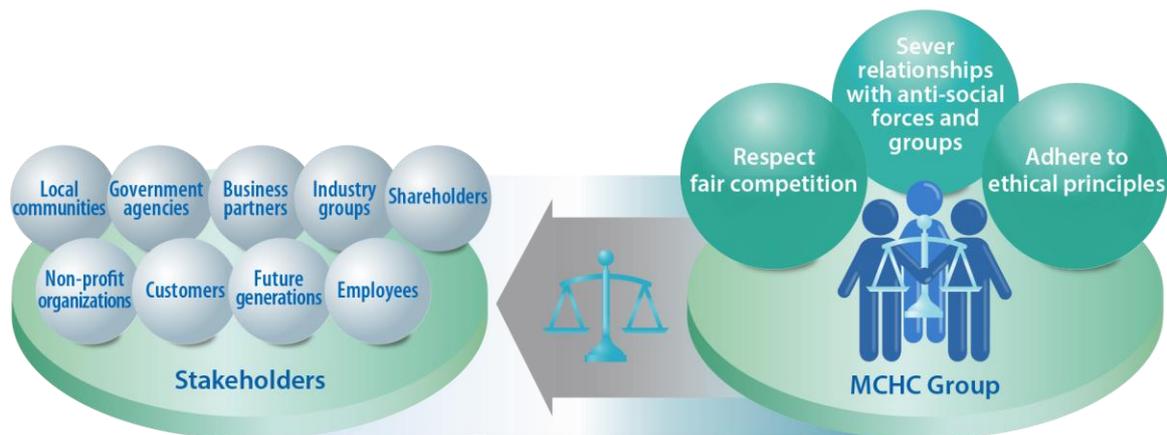
WEB ▶ [Data, Target and the examples of our activities](#)



## Chapter 8 Fair Business Practices

**We shall conduct business fairly and sincerely, adhering to ethical principles and refraining from unfair trade practices and any form of bribery or corruption, to contribute to sound social and economic development through fair competition in the market. We shall refuse to work with any group, organization or individual engaged in unlawful activities, and under no circumstances shall we have any relations with anti-social influences.**

In addition to our commitment to compliance, we avoid inappropriate relationships with business partners, collaborating companies, with political and governmental authorities, and internally and among Group companies, and always adhere to healthy and right relationships and socially acceptable behavior with no possibility of misleading people in the light of the then current common sense.



## 8-1 Respecting fair competition and businesses

Fair and free competition promotes economic growth and improves living standards. Anticompetitive behavior not only incurs legal or regulatory punishments but also causes us to lose social trust. We are collectively committed to avoiding any anticompetitive activity as part of efforts to contribute to a society that does not tolerate such negative behavior. We have always operated in keeping with high ethical and moral standards and comply with all laws and regulations in Japan and abroad in the course of business. We neither seek nor accept gains from anticompetitive behavior, we do not partake in cartels or bid rigging or abuse any dominant bargaining positions, and value fair and free market competition. We recognize that one of our corporate social responsibilities is to return profits from business successes in the form of taxes, and must properly understand taxation requirements.

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### Compliance with competition laws and regulations

We understand and comply with international standards and laws and regulations regarding maintenance of fair trade in the countries and regions in which we do businesses. The MCHC Group established a global policy on compliance with competition laws and regulations. We have set up area-specific policies in keeping with the laws, regulations, and practices of countries and regions in which we do business.

WEB ► [Mitsubishi Chemical Holdings Group Global Anti-Bribery Policy](#)

Japan has the following laws and regulations regarding the maintenance of fair competition and trade.

### **The Antimonopoly Act**

This law fosters market economy development through free and fair competition. This is a basic regulation that we must comply with in doing business.

The three key focuses of the Antimonopoly Act are to prohibit monopolization, unreasonable trade restraints (cartels and bid-rigging), and unfair trade practices. Engaging in such anticompetitive acts as partaking in cartels or bid-rigging can incur heavy penalties and criminal charges, including monetary ones, and also cause us to lose trust in society.

### **The Subcontract Act**

This law deems a party placing an order with a subcontractor under manufacturing, repair, or transportation or other service contracts as being in a dominant bargaining position because of capital classifications and prohibits such party from leveraging such position in dealing with subcontractors.

This legislation prohibits such party (parent businesses) from such activities as knocking down prices, refusing to accept work, returning goods, lowering proceeds for subcontracted work, delaying payments, issuing bills that are hard to discount, or forcing earlier payments of supplied raw materials. It also mandates delivery of written order forms and agreement on due payment dates.

### **The Unfair Competition Prevention Act**

This law aims to ensure fair competition among businesses and proper implementation of related international agreements. It prohibits such anticompetitive behavior as unjustly accessing and using the trade secrets of other companies, selling counterfeit products, using names or signs that seem like those of other companies' products, circulating falsehoods that harm the credibility of other companies, and giving monetary or other benefits to foreign public officials.

### **The Foreign Exchange and Foreign Trade Act**

This act covers regulations on imports and exports of raw materials, products, and technologies. For the purpose of security export control, the law restricts exports of specific listed items, covering cargos and technologies relating to the development, manufacture, and use of weapons of mass destruction, including nuclear and biochemical weapon, and requires exporters to themselves confirm final destinations, users, and applications for all cargo and technologies.

### **Accounting regulations and tax law**

Corporate accounting processes require adherence to generally accepted accounting principles and to the Companies Act, the Corporation Tax Act and other accounting and tax-related laws and regulations. Intentionally manipulating profits is forbidden. We recognize that one of our corporate social responsibilities is to return profits from business successes in the form of taxes, and must properly understand taxation requirements.

### **Securities trading laws and regulations**

The Financial Instruments and Exchange Act and other related laws and regulations prohibit trading in securities or corporate bonds based on material undisclosed information acquired in the course of one's work (insider trading).

## 8-2 Ensuring restraint

**We always do business based on high ethical and moral standards, and do not abuse our authority to gain profits, notably through bribery, conflicts of interest, fraud, money laundering, misappropriation, concealment, obstruction of justice, or improper business transactions. In dealing with business partners and collaborating companies, we do not engage in, both actual and suspicious, collusion or mix business with personal interests, which include offering or receiving hospitality or gifts exceeding social norms or social etiquette, seeking to profit dishonestly or harming the interests of others.**

**WEB** ▶ [Mitsubishi Chemical Holdings Group Global Antitrust Policy](#)

**WEB** ▶ [Mitsubishi Chemical Holdings Group Information Security Policy](#)

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### Appropriate political and government relations

We abstain from illicit political donations, illegal incentives, and bribe-giving in the course of business in Japan and abroad, and seek to maintain wholesome and transparent relations with political and government authorities at all times.

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### Appropriate relationship with business partners

The MCHC Group's many business partners include raw material suppliers, plant maintenance companies, logistics firms, and yard operation companies. We cannot operate without the cooperation of these partners.

Based on the basic understanding that all business partners and vendors are our collaborators, we foster mutual trust by sharing profits with them and by not taking advantage of our dominant bargaining position.

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### Preventing conflict of interest

We recognize that we must act according to the best interests of the company when performing our duties. We shall not exploit our official positions or authority or information we may have in performing our duties to improperly benefit ourselves or third parties, nor shall we, without corporate permission, engage in activities that compete against our company businesses.

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### Appropriate use of corporate assets

We must use corporate assets and expenses, both tangible and intangible, to achieve our business objectives and not for personal purposes.

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### Appropriate use of information systems

Pursuant to relevant internal rules, corporate networks, operation software and other IT systems can be used only for management-authorized operations. Such wrongdoings as hacking into information systems, damaging, falsifying or altering data, or using computer software without authorization are forbidden.

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## Prohibition in political and religious activities in workplaces

We must not engage, without management authorization, in political or religious activities in workplaces. Such actions include solicitations on behalf of political or religious groups or requests for votes.

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## Discontinuance of empty formalities

We recognize the importance of cultivating trust between MCHC Group members by deepening workplace communications. Except for actions within business norms, we prohibit in-house and inter-Group gift-giving and other transactions in keeping with a desire to abolishing empty formalities and building a sound corporate culture.

### 8-3 Avoiding ties with anti-social forces or groups

**We take a firm stand against anti-social forces or groups that disrupt the social order and threaten sound corporate activities, and never involve ourselves in malfeasance or antisocial conduct. We will never provide any financial or other favors to any anti-social forces or groups.**

**A specialized department has created a manual on dealing with anti-social forces or groups and informs and educates MCHC Group members. We also gather information and check on business partners in close cooperation with law enforcement agencies and attorneys.**



## Chapter 9

# Customer Satisfaction

**We shall constantly strive to satisfy our customers by keeping the promises made in contracts with them, doing our utmost to ensure the safety and quality of the products and services we supply, and engaging in dialogue and R&D.**

We heed the opinions of consumers and users, think from their perspectives, and respond honestly to ensure that we provide safe, high-quality products and services that match their expectations. We recognize that customers ultimately determine the value of our products and services and listen sincerely to their requests, opinions, inquiries, and concerns and honestly endeavor to meet their expectations.



## 9-1 Quality management and product safety

**We protect the health and safety of customers by providing products and services that are safe and do not cause harm or pose risks in the use or consumption. We accordingly manage quality and provide appropriate information on safe usage and consumption.**

**WEB** ▶ [MCHC Group Product Stewardship Policy \(In preparation\)](#)

## 9-2 Ensuring sustainable consumption

**We recognize that the resources and energy that underpin our operations are finite. We therefore believe that we have a responsibility to consider future generations and keep sustainable social development uppermost in mind when consuming resources and energy. We help construct a recycling-oriented society by improving energy efficiency, reducing discharges and waste, fostering energy saving and recycling in product cycles and manufacturing processes based on medium- and long-term plans, and maximizing the use of the technologies and knowledge that we have accumulated over the years.**

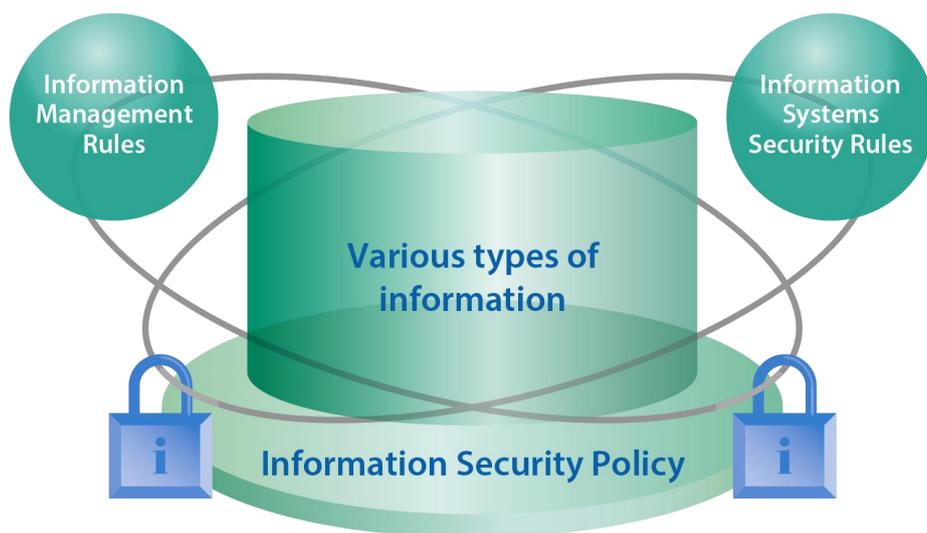


## Chapter 10

# Information Management

**We shall, in the course of our corporate activities, maintain appropriate records and make reports as required by law and regulation. We shall manage information carefully to prevent leakage of confidential data relating to customers, business partners, or our own business.**

Information is an important asset in doing corporate business. Leaking or altering information can significantly affect operations and could also detract from the social credibility of the entire MCHC Group or lead to a suspension of operations. Upon constructing information systems, we must store and use information in recognition of the importance of and responsibility to protect such assets.



WEB ► [Mitsubishi Chemical Holdings Group Information Security Policy](#)

WEB ► [Mitsubishi Chemical Holdings Group Information Management Rules](#)

WEB ► [Mitsubishi Chemical Holdings Group Information Systems Security Rules](#)

### **10-1 Preserving records of corporate activities**

**We accurately record corporate transactions, activities, and contracts in paper or electronic formats. Such materials encompass research and development, raw materials and products transactions, the manufacture of products, acquiring and disposing assets, borrowing and lending funds, donations, and debt guarantees. After securing the necessary internal approvals, we manage and store records according to their importance in line with the relevant laws and regulations and in-house rules.**

### **10-2 Protecting personal data**

**We adhere to relevant laws and regulations in strictly managing third-party personal information pertaining to employees and business partners that we access in performing our duties. We shall not disclose or leak any personal data to third parties or other employees who have no need to acquire such information for business purposes, and shall use such information solely for the originally intended purposes.**

### **10-3 Safeguarding confidentiality**

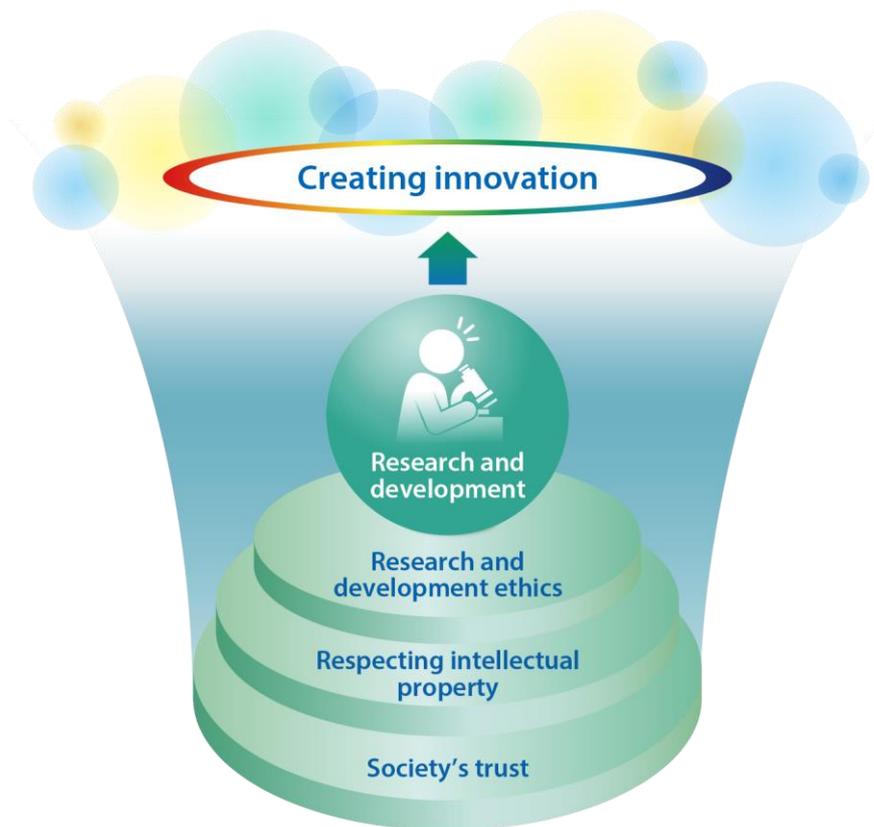
**We adhere to relevant laws and regulations in strictly managing confidential information belonging to the company or third parties, including trade secrets and technological know-how that we access in performing our duties. Without the express permission of the proper authorities, we shall not disclose or leak such information to third parties or internal staffers with no legitimate need for it, and shall use such information solely for the originally intended purposes.**



## Chapter 11 Science and Technology

**We shall advance R&D by bringing together outstanding researchers from Japan and overseas, and contribute to the realization of *KAITEKI* through innovation. We shall recognize the importance of our own and others' intellectual property rights and respect such rights.**

We are driving forward with research and development by leveraging the technologies and knowledge that we have accumulated over the years. We therefore endeavor to help resolve social issues and create a better society by providing beneficial new products and services that lead to globally sustainable development.



## **11-1 Research and development ethics**

**We recognize that undertaking scientific and technological research and development comes from earning the trust of society. We shall therefore faithfully and humbly undertake such activities in keeping with high standards of ethics so we can fulfill the trust and expectations of society.**

**Dishonesty in research and development not only compromises science and technology but also undermines the essence of innovation that underpins corporate survival, which is R&D activities and application of the results. Research fraudulence, especially fabrications, falsifications, and plagiarism of samples or data, violate our Charter, and we must strictly avoid engaging in such actions. We shall punish offenders strictly in line with internal rules.**

## **11-2 Respecting intellectual property**

**When developing new technologies, products, or services, we obtain the rights to such value through patents or other means and ensure legal protection thereof. We shall act appropriately against third parties that violate our intellectual property rights.**

**We also respect the intellectual property of other parties and strive to avoid infringing on their rights. We shall, for example, avoid using the intellectual property of third parties by developing alternative technologies, avoiding the use of their technologies, or by licensing from third parties.**



## Chapter 12 Community Involvement

**We shall contribute broadly to society through our businesses. In addition, we shall respond to the desires and expectations of local communities by enhancing our understanding of their cultures and customs and acting as a good corporate citizen.**

As well as undertaking social contributions in the course of business, we plan and implement initiatives to accommodate the requests and expectations of society in diverse respects. They include efforts to foster future generations, engage with local communities, and provide disaster assistance in keeping with the MCHC Group Corporate Citizenship Activities Policy. We also encourage Group members' active participation.



**WEB** ▶ [Mitsubishi Chemical Holdings Group Corporate Citizenship Activities Policy](#)

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## Fostering future generations

We believe that the wholesome development of young people is crucial for the sustainability of humankind and the earth. The MCHC Group is committed to fostering the growth of and providing opportunities for the young by leveraging its facilities, experience, and knowledge.

WEB ▶ [Our activities](#)

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## Engaging with communities

We contribute to the sound development of local communities and help create a better environment by accommodating local requests and expectations, addressing a variety of local issues and participating actively in community life.

WEB ▶ [Our activities](#)

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## Disaster assistance

We accept the need to accommodate requests and expectations from stakeholders facing difficulties because of large disasters around the world, and are prepared to provide everything from emergency aid through post-disaster restoration assistance.

WEB ▶ [Our activities](#)

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## Contributions to international society

As well as paying back to society through business, we will act, as a company that does business globally, to contribute to international social progress by improving community environments, providing training, accepting trainees from abroad as part of exchanges of people and technologies.

WEB ▶ [Our activities](#)



## Chapter 13 Shared Standard

**Mitsubishi Chemical Holdings Group managers shall recognize their responsibility to embody the spirit of this charter and shall ensure that employees are fully aware of its content. We shall expect our suppliers and other business partners to share all the standards set out in this charter, including but not limited to standards relating to human rights, employment, and labor.**

The MCHC Group must concertedly formulate solutions to global issues through business. At the same time we recognize that our endeavors can only succeed through the understanding and cooperation of all stakeholders.

We endeavor to share the ideas in the Mitsubishi Chemical Holdings Group Charter of Corporate Behavior among all Group members and business partners and the like.



### **13-1 Sharing norms with Group members**

Each MCHC Group member plays a vital role in maintaining a healthy organization and businesses while contributing to society. We ensure that all Group members adhere to the values and norms of the MCHC Charter of Corporate Behavior by providing opportunities to share information through internal magazines and workshops. We will periodically confirm progress with understanding and adherence through surveys and other means.

### **13-2 Sharing the norms with business partners and vendors**

All business partners and vendors are our valuable for the MCHC Group. To deepen trust with partners, we disclose the values and norms of the MCHC Group Charter of Corporate Behavior and hold orientations as needed. We also encourage partners and vendors to understand Group activities, while we fully respect their ideas in surveying them.

**WEB** ► [Developing Cooperative business practices with suppliers and business partners](#)

