

# Fair business practices policy

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Version 2.0

Policy written by SDPI\*

The Miyoshi Kasei Group is in full compliance with all applicable fair trade laws of the countries and regions in which it operates, and conducts business with partners that are in compliance with such laws. We conduct business fairly and sincerely, with the highest ethical principles, to ensure a high level of trust among the group and its various stakeholders.

This policy's aim is to describe our group provisions in regard to fair business practices.

It applies to all Miyoshi Kasei Group workers, who are encouraged to abide by it in the course of their work, and are the most involved to prevent any potential breaches of the group's ethical charter.

## I. Corruption

- Bribery

The Miyoshi Kasei group strictly prohibits bribery and corruption in conducting business with our partners. Our workers will neither provide nor accept gifts or entertainment that may cause suspicion regarding fairness or are in violation of the law.

- Anti-competitive practices and anti-trust issues

The Miyoshi Kasei group prohibits any practice that has, or could have the effect of restricting, distorting or preventing competition. We operate in total autonomy with respect to competitors, preventing any agreed practices or exchanges of confidential information.

- Conflicts of interest

All employees must avoid engaging in activities, using their position with the company or acting in ways that may place the Miyoshi Kasei Group to disadvantage, compromise its legality or profit a competitor.

- Money laundering

\* SDPI : Sustainable Development Performance Initiative : Miyoshi Kasei executive body for CSR questions, including assessment, action planning, reporting, strategy building...

We strongly prohibit money laundering, funding of criminal activities, and any activity designed to conceal or disguise the true origins of criminally derived proceeds to make them appear as legitimate.

In the anti-corruption field, our aims are:

- To train and maintain 80% of our employees on basic awareness regarding anti-corruption practices, including refreshing, by end of 2023.
- To include this awareness training during the integration of any new permanent employee
- To provide a specific in-depth training for 100% of Sales, Procurement and Finance departments employees by 2023.

## **II. Whistleblowing**

In 2023, our companies will generalize a common whistleblowing procedure. The aim is to create an effective channel, communicate on it to our employees and stakeholders, train our employees, and ultimately, create a company culture around this matter.

Our targets on this are:

- 100% of employees trained on whistleblowing procedure by 2023.
- 100% of reporting investigated.

## **III. Information security**

We ensure that the confidential and personal information we hold or are responsible for is safeguarded where necessary against inappropriate disclosure. We are committed to preserve the confidentiality and integrity of documents and data supplied by our employees, suppliers and customers. We have a policy on information disclosure in place, for all sites to refer to, in case the need arises in communicating with stakeholders.

We aim:

- To train 100% of our employees on general information security and data disclosure management by 2025.
- To provide corrective actions against 100% of identified security breaches.



Sales managers, IT managers, Human resources managers, or any people in charge of these topics through the companies, are responsible to enforce this policy.

This policy will be reviewed every 2 years or as soon as the need arises.