



# Kurita Group Code of Conduct



## Message from the President

The Corporate Philosophy of the Kurita Group is to “Study the properties of water, master them, and we will create an environment in which nature and humanity are in harmony”. Based on this philosophy, we aim to make wide-ranging contributions to society through our business activities in the areas of water and the environment. The Kurita Group has provided solutions to ever-changing water-related challenges in a variety of different customer sites (Gemba) around the world, and we have achieved sustainable, long-term growth alongside society. We have a responsibility to maintain our status as a company that is highly regarded by our stakeholders, including our customers, business partners, employees, shareholders and investors, and society at large.

The Kurita Group Code of Conduct constitutes a commitment to the group’s stakeholders and our Code of Ethics constitutes the basis of our decisions and actions. In order to go about fulfilling our commitment to the group’s stakeholders, we brought more specificity to our Code of Ethics, which is the foundation of our decisions, by creating a new set of Five Questions to guide us when we are unsure of our decisions or actions. We will follow the Kurita Group Code of Conduct in our daily work, and when in doubt about a decision or action, use the Five Questions to ensure that any decision or action is the correct one. It is this accumulation of daily efforts which will have us both highly regarded and trusted by our stakeholders. Eventually, it will also lead to the realization of our Corporate Philosophy and Vision.

In the long history of the Kurita Group, we have cultivated “Values” for promoting our business activities. These values are an essential element to the high regard in which we are held by our stakeholders. Our mission is to pass these values on to future generations. One of our Values provides a particularly important keystone for our business activities – “Maintain unwavering integrity”. Looking ahead, I vow to provide leadership for each and every person working at the Kurita Group, so that we can act correctly in an autonomous way, based on “Integrity”.

I am proud to contribute to society alongside everyone who works for the Kurita Group. As we work to realize our Corporate Philosophy, let’s continue to carry out business activities openly and fairly, maintain the trust of society, and build the Kurita Group that meets our responsibilities to the future, based on the Kurita Group Code of Conduct and Code of Ethics.

**Hirohiko Ejiri**  
President and Representative Executive Officer  
Kurita Water Industries Ltd.

## Introduction

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The Kurita Group Code of Conduct (hereinafter referred to as the “Code of Conduct”) stipulates the basic actions to be taken by all officers and employees of Kurita Water Industries Ltd. and its consolidated subsidiaries (hereinafter collectively referred to as the “Kurita Group”). Behavior and actions that go against the Code of Conduct may result in disciplinary actions, such as punitive dismissals, that are taken in accordance with the rules and regulations of each Kurita Group company (hereinafter referred to as the “Internal Rules”). The Kurita Group takes a rigorous approach to illegal conduct and violations of rules. These actions will never be tolerated, even if they are taken for the sake of the company or customers or at the behest of superiors.

### Duties of all officers, etc. and employees

- (1) Read, understand and comply with this Code of Conduct and Code of Ethics.
- (2) In the event that any act or behavior in violation of these Rules is witnessed, or if there is any suspicion of illegal or rule-breaking activities, promptly consult and report to your supervisor, the relevant department, or the consultation and reporting service provided by each company. Do not let doubts and suspicions go unchecked.
- (3) Work in an ethical, honest manner, with a sense of awareness and your responsibilities as a member of the Kurita Group, and strive to create a healthy and comfortable work environment by respecting the character and individuality of others.
- (4) Be able to make right and proper decisions even when faced with situations where officers etc. and employees struggle to do so. When doing so, use the following Five Questions to determine whether your actions are right and proper.

### The Five Questions

Ask yourself the following five questions about the action you are about to take:

- Fairness: Are you sure that the action is compliant with laws, regulations, and internal/external rules?
- Transparency: Are you sure that you are not hiding inconvenient facts from someone?
- Safety: Are you sure that the action will not increase the risk of putting someone in danger?
- Compatibility: Are you sure that the action will not further impact the environment or violate human rights?
- Integrity: Are you sure that this is an action that no one would be ashamed to take?

### Duties of officers, etc. and management-level employees

Officers, etc. and management-level employees have the following additional duties:

- (1) Guide your organization by serving as an example to others of correct practice of the contents of this Code of Conduct and Code of Ethics.
- (2) Ensure the thorough integration of this Code of Conduct and Code of Ethics into the organization by correctly and continuously communicating their contents to subordinates.
- (3) Create a psychologically safe work environment in which the character of each subordinate is respected, opinions are listened to, and frank communication can exist within the organization.
- (4) When problems are raised or discovered within the organization, immediately share them with the relevant parties without concealment and take responsibility for carrying out corrective efforts or steps to improve.

## 1. Fairness

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### 1.1 Compliance with competition law

We will comply with the Kurita Group Antitrust Policy and the Group Guideline on Antitrust, as well as the Internal Rules, and aim to earn the trust of customers, business partners, and society through fair and free competition. We will not engage in any acts that violate the competition laws of any country or region.

### 1.2 Anti-bribery

We will comply with the Kurita Group Anti-Bribery Policy and the Group Guideline on Anti-Bribery, as well as the Internal Rules, and will not provide any illegal entertainment, gifts, benefits, or other economic benefits to public officials or persons in equivalent positions, whether in Japan or overseas.

### 1.3 Import and export security

We will import and export products, technologies, and services by following laws and regulations related to importing and exporting, such as the Foreign Exchange and Foreign Trade Act, to ensure that these acts do not lead to a state of affairs or act that will threaten international peace or safety.

### 1.4 Management and protection of intellectual property

We will respect the value of intellectual property and manage the company's intellectual property appropriately in accordance with the Policy of Intellectual Property-Related Activities for Kurita Group and the Guidelines for Policy of Intellectual Property-Related Activities in Kurita Group. We will not infringe on the intellectual property rights of others.

## 2. Transparency

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### 2.1 Appropriate recording and disclosure of information

In order to ensure proper financial reporting and appropriate information disclosure, we will accurately record and appropriately report all information relating to accounting and tax affairs, as well as to management and business activities, in accordance with laws, regulations, and the Internal Rules. For example, we will not report orders, sales, or costs in a manner that is in any way incorrect.

### 2.2 Prevention of data falsification

We will accurately measure and record data on the quality and performance of our products and services and all other data. We will not engage in any improper act such as data falsification and fabrication.

### 2.3 Refusing association with antisocial forces

We will not have any relationships with anti-social forces such as organized crime groups and terrorist groups and will uncompromisingly maintain a resolute attitude against such groups. Furthermore, we will comply with anti-money-laundering and anti-terrorism laws and regulations in each country and region.

### 2.4 Prevention of insider trading

We will not trade stocks or other financial instruments on the basis of material information about the Kurita Group or its customers that is not publicly available, nor will we recommend or suggest transactions based on this information to third parties such as family, relatives or friends.

### 2.5 Separation of public and private affairs

We will manage the (tangible and intangible) assets of the company appropriately, and will not use them for purposes other than business, such as private use.

## 3. Safety

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### 3.1 Ensuring product safety

We will comply with the Kurita Group Product Quality Policy and the laws and regulations of each country and region concerning product safety.

### 3.2 Compliance with safety, health, and labor-related laws

We will give the highest priority to ensuring safety in accordance with the Kurita Group Occupational Health and Safety Policy and the labor laws of each country and region, striving to prevent labor accidents during business activities.

## 4. Compatibility

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### 4.1 Conserving the environment

We will respect biodiversity and sustainability and reduce the environmental impact through operational improvement and innovation in conducting our daily business activities, in accordance with the Kurita Group Environmental Policy.

### 4.2 Respect for human rights

We will act with respect for human rights in all aspects of our business activities in accordance with the Kurita Group Human Rights Policy. We will not abuse the human rights, protected by the laws of different countries, of employees or any other persons involved in our business activities.

## 5. Integrity

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### 5.1 Prohibition of conflicts of interest

We will not engage in acts that prioritize or are likely to prioritize our personal interests, including the interests of our families, over the interests of the company. For example, when selecting business partners, we will not eschew objective and rational judgment in favor of selecting companies managed by our relatives.

### 5.2 Protection of confidential information

We will observe the Kurita Group Confidential Information Management Policy and the Confidential Information Management Group Guideline, as well as the Internal Rules, and strictly manage the confidential information of the company and third parties, including our customers and business partners.

We will not use or disclose this confidential information illegally while working for the company or after leaving it.

### 5.3 Protection of personal information

We will strictly manage the personal information of officers, employees, and third parties, including our customers and business partners, by observing the personal information protection laws of the individual countries and regions, the Kurita Group Personal Information Management Policy, and the Internal Rules.

We will not use or disclose this personal information illegally while working for the company or after leaving it.

### 5.4 Proper payment of tax

The Kurita Group will pay taxes properly by following both the letter and the spirit of the taxation-related laws and regulations of the countries and regions where it does business, and will not consider any improper tax avoidance measures.