

Anti-Corruption

Anti-Bribery Policies and Initiatives

We have established the Anti-Bribery Policy of Group of Sumitomo Bakelite Co., Ltd. and the Basic Rules and Regulations for Bribery Prevention for Group of Sumitomo Bakelite Co., Ltd., thereby establishing standards of conduct and compliance for Officers and employees, as well as a zero-tolerance approach to bribery and extortion of benefits. We advance antibribery initiatives based on the anti-bribery laws and regulations in the countries where our Group companies are located, and the level of bribery risk in each country and business field.

Anti-Bribery Policy of Group of Sumitomo Bakelite Co., Ltd.

- (1) Each Officer or employee of the Group must comply with the Anti-Bribery Laws and Regulations.
- (2) Each Officer or employee of the Group must not, either directly or through third parties, such as Agents, provide any bribe or conduct any Provision of Goods, Money, or Other Benefits to any Public Officer for the purpose of obtaining any "Wrongful Gain in Business."
- (3) Each Officer or employee of the Group must not make any demand to any of our business partners for the Provision of Goods, Money, or Other Benefits.
- (4) If any business partner makes an offer to provide a gift or entertainment to any Officer or employee of the Group, and if that gift or entertainment is excessive considering ordinary social norms in business practices, then that Officer or employee of the Group must decline that offer.
- (5) Each company of the Group must make ongoing efforts to develop and operate an appropriate anti-bribery and compliance system in accordance with the Anti-Bribery Laws and Regulations of the country where the relevant company is located and the degree of bribery risk in the country where the relevant company is located and the business fields of the relevant company.

This "Anti-Bribery Policy of Group of Sumitomo Bakelite Co., Ltd." was established after approval by the Company's Compliance Committee and reporting to the Company's Board of Directors.

Basic Rules and Regulations for Bribery Prevention for Group of Sumitomo Bakelite Co., Ltd.

As the framework common across each company of our group in relation to (a) codes of conduct and matters to be observed by the Officers and employees of the Group when they encounter bribery or any act that may constitute bribery and (b) measures to be taken and efforts to be made by each company of our Group, our Group has established the "Basic Rules and Regulations for Bribery Prevention for the Group of Sumitomo Bakelite Co., Ltd."

➤ [Basic Rules and Regulations for Bribery Prevention for Group of Sumitomo Bakelite Co., Ltd.](#)

Other Anti-Corruption Policies and Initiatives

The Code of Ethics for Group of Sumitomo Bakelite Co., Ltd. prohibits corrupt acts such as embezzlement, breach of trust, money laundering, and insider trading, which constitute abuse of authority or position in one's duties for personal or organizational gain. In addition, these corrupt acts are also prohibited as necessary in the employment rules and other internal rules of each Group company.

Code of Ethics for Group of Sumitomo Bakelite Co., Ltd. (excerpt)

III-4 Compliance with Money Laundering and Terrorist Financing Regulations

- We will comply with the applicable laws and regulations that regulate money laundering and terrorist financing. We will exercise due caution in order to prevent our group from being used for money laundering or terrorist financing in the course of doing business.
- We will never accept unreasonable demands by organized crime groups or other anti-social forces. We will never utilize anti-social forces. We will exercise due caution in order to prevent our group from being used by anti-social forces in the course of doing business.

III-7 Prevention of Insider Trading

- We will not conduct insider trading of our company's or other companies' stocks, etc. either by ourselves or through others (such as our relatives, friends, etc.) from the time we become aware of undisclosed information that may have a material impact on the stock prices, etc. of our company or other companies (insider information), until the official announcement of such insider information. In addition, we will not share insider information regarding our company or other companies with any persons other than those who need to know such information to conduct our business.

IV-1 Restrictions on Competitive Activities and Conflict-of-Interest Transactions

- We strive to act and make decisions in the best interests of our group in the conduct of our business. We do not engage in competitive activities or conflict-of-interest transactions that place the interests of ourselves, our relatives and friends above those of our group in the conduct of our business.

- We will not engage in any competitive activities or conflict-of-interest transactions (typical examples include, but are not limited to, the following) without the prescribed prior approval procedures.

Example of competitive activities:

- Becoming Executive Director, Officer, employee, or consultant to one of our group's competitors or business partners Example of conflict-of-interest transactions:

Example of conflict-of-interest transactions:

- Giving work to any entity that is owned or managed, directly or indirectly, by ourselves or friends and relatives
- We will not receive kickbacks by giving preferential terms to our business partners or unfairly raising prices.

IV-2 Prohibition of Misappropriation of Company Assets

- We will not use company assets (cash, deposits, securities, cash vouchers, products and raw materials, automobiles, office equipment, IT equipment, facilities equipment, etc.), whether tangible or intangible, for personal use or for any other improper use.

➤ [Code of Ethics for Group of Sumitomo Bakelite Co., Ltd.](#)

Whistleblowing System against Corruption

Our Group's Compliance Reporting System as an whistleblowing system covers corrupt practices such as bribery, embezzlement, breach of trust, money laundering, and insider trading. For more information on Our Group's Compliance Reporting System, see the following link.

➤ [The Group's Compliance Reporting System](#)

Disciplinary Actions and Fines Related to Corruption

For the number of convictions, amount of fines, penalties, and settlement money, and number of cases that resulted in dismissal or disciplinary action that our Group's Officers and employees who participated in bribery or corruption, see the following link.

➤ [Data > Detailed Data Related to Sustainability \(Governance\)](#)