

Japan Urethane Raw Materials Association

Compliance Guidelines

Objectives

These Guidelines shall be formulated to serve as a foothold for the directors, committees, task force members and each staff of Japan Urethane Raw Materials Association (“JURA”) to comply with laws, regulations, social ethics and the rules and regulations of JURA, play the social roles expected of or required to the polyurethane industry, be fully aware of their mission and social responsibility in the execution of jobs related to polyurethane industry and uphold appropriate conduct and behavior.

Basic Concept

1. Philosophy of JURA

The objective of JURA is to strive for dissemination of correct understanding of polyurethane raw materials and contribute to the society and healthy development of polyurethane industry through the study and research of environment and safety of “isocyanates and polyols” which are raw materials of polyurethane products (“polyurethane raw materials”) and through the interaction and exchange with relevant overseas organizations.

2. Basic rules on compliance

To observe related laws and regulations of Japan and abroad as well as the rules and regulations of JURA

To respect the norms of the society, be conscious of the objective of establishment of JURA and act with responsibility and sound judgment.

To have a deep understanding of these Guidelines and use it as the standard of conduct.

Applicable Scope

These Guidelines apply to the directors, committee members, subcommittee members, task force members and staff of JURA.

Social Responsibilities of Members of JURA

The members of JURA shall contribute to the development of polyurethane industry as well as the development of local and international communities through dissemination of correct knowledge, development of applications and technical advancements relating to environmental initiatives, industrial health and safety and polyurethane raw materials.

The members of JURA shall understand the expectations and requirements to the activities of JURA and business activities of member companies of JURA through the communication with various stakeholders of JURA in Japan and abroad; and develop symbiotic relationship with the society by engaging in activities taking the profit of the aforementioned parties into consideration.

The members of JURA shall comply with laws and regulations of the countries and regions where JURA and/or its member companies are operating and have a good understanding of local culture and customs in order to contribute to the development of local industry of those countries.

- iv The members of JURA shall be aware that the conservation of global environment is one of the most important issues common to all humankind and consider the conservation of local and global when engaging in any activity of JURA or business activity of its member companies in any field.

Management and Protection of Confidential Information and Intellectual Property Rights

The members of JURA shall build a strong awareness of the importance of confidential information and intellectual property rights of JURA and/or its member companies as well as those of any third party; and ensure the stringent protection of such confidential information and intellectual property rights in accordance with the rules and regulations of JURA.

The members of JURA shall strictly manage and protect the confidential information (such as trade secrets and personal information) of JURA and/or its member companies obtained through the activity of JURA.

The members of JURA must not illegally or fraudulently obtain, disclose, divulge or provide to others any confidential information of any third party.

- iv The members of JURA shall respect intellectual property rights of any third party and strive to prevent infringement of such rights.
- v The members of JURA must not disclose or provide any unannounced important facts (insider information) in the course of activities of JURA.

In the event where a member of JURA comes to know any insider information of a member company, the member must not purchase or sell any share or others of such member company until such information is publicly announced.

Observing Anti-Monopoly Act and Competition Act

Pursuant to the “Principles of Conduct based on the Guidelines on Anti-Monopoly Act” formulated by JURA, the members of JURA shall observe anti-monopoly act and applicable competition act of each country and region and must not engage in any conduct which falls under unfair trade, such as cartel or collusion between other companies in the same business or any discussion or information exchange which may be considered as cartel or collusion; and unjust discrimination or exclusionary practice against any party which is not a member of JURA.

Observing Anti-Bribery Regulations

The members of JURA shall observe applicable anti-bribery laws and regulations of the countries where JURA and/or its member companies are operating and must not give, receive or accept any bribe. The members of JURA shall also cause their agents and trade partners to observe such anti-bribery laws and regulations.

Elimination of Antisocial Forces

The members of JURA must have no relation with antisocial forces including business transactions.

The members of JURA must not use antisocial forces for the profit of JURA and/or its member companies.

Operation of These Guidelines

JURA shall disclose these Guidelines on JURA website and brochures to keep its member companies thoroughly informed.

These Guidelines may be amended or abolished only by the resolution of the Board of Directors.

These Guidelines shall come into effect on December 9, 2016.