

CSR Code of Conduct

January 1,2018

Zeon Group's Goal of CSR

The Zeon Group's goal of CSR is achieved when we are able to answer the question from the society asking "Does the Zeon Group meet the expectations of the society?" "Yes." To meet the expectations of the society means to be a company which provides value to the society and is trusted by the society. Every member of the Zeon Group aims to offer value to the society through our products and services produced with our original technology and to become a company trusted by the society by carrying out safe, secure and sincere activities.

Zeon CSR Policy and CSR Code of Conduct

To act in a manner that is trusted by the society, we have established the Zeon CSR Policy (cornerstone of values, ethics and actions which every member of the Zeon Group values).

<Zeon CSR Policy>

- We will ensure compliance and meet society's needs for safety and security.
- We will contribute to sustainably developing society and protecting the global environment through our corporate activities.
- We will ensure that each and every Zeon person is aware of CSR and acts accordingly.

The CSR Code of Conduct has been established based on the Zeon CSR policy and the corporate philosophy.

CSR Code of Conduct

I, a member of the Zeon Group, understand the corporate philosophy and the Zeon CSR Policy and act as follows.

Chapter 1. Compliance (Moral Awareness and Laws and Regulations)

(1-1 Things which each person values)

I will value moral actions and comply with laws and regulations of a country where the company conducts its business activities and the company rules.

(1-2 Labor laws and regulations)

- (i) I will comply with labor laws and regulations, work rules and agreement voluntarily established between the employer and workers.
- (ii) I will sufficiently manage working hours, rests, holidays and acquisition of

leaves to prevent excessive labor.

- (iii) I will not commit discrimination based on birth, nationality, race, ethnic group, creed, religion or sex/gender.

(1-3 Trade laws and regulations)

- (i) I will comply with treaties, laws and regulations concerning trade.
- (ii) When exporting products, goods, services, product recipes, methods of production, manufacturing plant designs, I will fully examine the limitation on use such as weapons development.

(1-4 Competition laws and regulations)

I will comply with competition laws and regulations for fair and free competition.

(1-5 Prohibition on unjust act)

I will not engage in a transaction through which I receive or give unjust benefit or gain for fair and free competition.

(1-6 Market rules)

I will not engage in a securities trading based on the internal information obtained in the course of business (insider trading).

Chapter 2. Safety (Safety First)

(2-1 Things which each person values)

I will value the concept “the safety is the basis of our business activities and takes priority over everything else.”

(2-2 Regional safety)

I will value the regional safety and carry out business activities.

(2-3 Safety and health of workplace)

- (i) I will comply with laws, regulations and company rules and make efforts to improve the safety and health of the workplace.
- (ii) I will value the personality, dignity and mental and physical health of each worker of the Zeon Group.

Chapter 3. Security (Quality Assurance)

(3-1 Things which each person values)

I will provide customer with better, safer and reliable products, goods and services with a proper labeling.

(3-2 Provision of information)

I will sincerely provide customers with information when receiving inquiries on products, goods or services.

Chapter 4. Corporate Activities (Daily Tasks)

(4-1 Things which each person values)

I will carry out the mission to contribute to the society in proper cooperation with stakeholders.

(4-2 Fair transaction)

I will not be engaged in a transaction abusing dominant bargaining position or transaction with an anti-social force.

(4-3 Diversity)

I will value community values such as cultures, traditions, customs and religions.

(4-4 Business processing and accounting)

I will conduct the business processing and accounting in accordance with laws, regulations, fair criteria and company rules.

(4-5 Information provision)

I will provide financial information such as financial conditions and business results and non-financial information such as environment and governance.

(4-6 Trade secret)

I will properly manage and use the corporate information which falls under the category of the confidential information of the company, confidential information of other companies or personal information.

(4-7 Intellectual property rights)

When using the intellectual property rights, I will comply with laws, regulations and company rules.

Chapter 5. Sustainable Development (Our Goal)

(5-1 Things which each person values)

I will value the corporate activities which lead to the sustainable development of society.

Chapter 6. Global Environment (Environmental Protection)

(6-1 Things which each person values)

I will value the global environment.

(6-2 Environmental protection)

- (i) I will comply with treaties, laws and regulations concerning environment at each stage: research, development, manufacture, purchase, sale and destruction.
- (ii) I will make efforts to reduce generation of toxic chemical substances, industrial wastes and greenhouse gases.

Chapter 7. Awareness and Action (Awareness of Employees)

(7-1 Things which each person values)

I will share a social contribution as important value with my colleagues and value mutual trust.

(7-2 Human rights)

I will value the human rights.

(7-3 Respect for each other)

I will value the respect for each other.

(7-4 Communication)

I will value the communication with the society and participate in regional activities.

(7-5 Dialogue and problem solving)

If there is an act that does not conform to this Code of Conduct, I will listen to the voices of the members of the society, consult with my superior, colleagues and responsible department and solve a problem through dialogue within the Group.

(Definitions of terms)

- (i) “I will value...”
Even if the relevant matters is not provided for in laws, regulations or company rules, to attempt to do the thing that is morally and ethically right.
- (ii) “I will comply with...”
To comply with concrete laws, regulations and company rules.
- (iii) “sustainable”
To be able to continue without difficulty. Not to take future resources in advance, fully examining the impact on future or following process.
- (iv) “laws and regulations”
Established laws, cabinet orders, ordinances, rules of a securities exchange imposed on listed companies and others.
- (v) “rules”
Target, criteria, industrial rules, authentication rules and other rules internationally encouraged.

Note: This is a direct translation of the document for Zeon Corporation in Japan. Zeon Group companies in the world will have their own CSR Code of Conduct, which is adjusted to their countries.