



Kurita Group Code of Conduct

To achieve sustainable growth, we will base our business activities and decisions on our Core Values, and we will not take any actions that do not comply with the Kurita Group Code of Conduct.

Message from the President

At the Kurita Group, we aim to contribute broadly to society through business activities in the field of water and the environment under the corporate philosophy of “Study the properties of water, master them, and we will create an environment in which nature and man are in harmony.” We have achieved sustainable growth by working to solve the issues faced by customers around the world. This growth is a testament to the trust customers in different countries place in the Kurita Group. We feel honored by this trust, but also recognize the heavy responsibility that comes with it.

The Kurita Group has a responsibility to remain a company that is highly valued by our customers, business partners, employees, shareholders, and local communities. To fulfill this responsibility, we ensure that the following Core Values are shared by all officers and employees as the basis of our judgments and actions in our business activities.

— Core Values —

Fairness

To be a flexible and competitive company that can survive in the market environment, we will conduct business activities in a fair manner, moving away from old values and ideas that are no longer appropriate.

Transparency

To become a global corporate group, we will proactively adopt the rules of international society and conduct our business activities with transparency.

Integrity

We will conduct business activities in a sincere manner, while making strenuous efforts to meet social expectations and further enhance our reputation as a company true to its word.

Safety

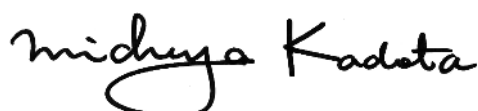
As a company that leads the world with its technologies, we will provide our customers with high-quality products and services while minimizing the negative impacts that technologies may have on the lives and properties of people.

Compatibility

As an advanced water and environmental management company, we will conduct business activities in such a manner as to ensure the compatibility of economic growth and environmental protection, so that we can help keep the global environment in good shape for the next generation.

While the Core Values form the basis of our judgments and actions, the Kurita Group Code of Conduct shows what we must follow in compliance with laws and regulations and to take the specific correct actions that are based on social ethics. It clearly specifies how we should act together, transcending differences in language, custom, cultural background, and other attributes. We must act in compliance with the Kurita Group Code of Conduct, regardless of the country, region, or nature of the work we are doing. I ask for all officers and employees to familiarize themselves with the Kurita Group Code of Conduct and use it as a manual for daily operations. The proper actions taken by each of us are essential for maintaining the trust placed in the greater Kurita Group and for achieving our corporate philosophy and corporate vision.

I am proud of our officers and employees, for the broad contributions they make to society through the actions they take in compliance with laws and regulations and rooted in social ethics. Let's work together in line with the Core Values and through actions that are consistent with the Kurita Group Code of Conduct, ensuring that the Kurita Group remains highly trusted by society and continues growing sustainably in the future.



President and Representative Director
Kurita Water Industries Ltd.



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1. Introduction

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”). The Kurita Group vows to observe the Code of Conduct and asks all of its officers and employees to read, understand, and comply with it.

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. 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”).

1.1 Compliance with laws, regulations, and social ethics

- (1) All officers and employees of the Kurita Group (hereinafter referred to as “we”) will treat compliance as more than just abiding by laws. We will strive to gain more credibility as a company that meets social expectations and fulfills its commitment by acting in compliance with laws, regulations, and social ethics in daily business activities.
- (2) If there is concern over possible illegal conduct or a violation of the rules, we will immediately report it to our superiors, relevant departments, or other similar authorities and seek their advice. (See “6. Whistleblowing.”)

1.2 Duties of officers and management level employees

All officers and management level employees of the Kurita Group are required to ensure that their actions serve as good examples. They are also required to do the following to develop a workplace culture that values compliance with laws and regulations as well as social ethics.

- (1) Make sure subordinates understand the Code of Conduct and the Kurita Group’s policies and action plans related to compliance.
- (2) Create opportunities to talk about the Code of Conduct with subordinates and explain the importance of social ethics and compliance.
- (3) Do not instruct subordinates, either explicitly or implicitly, to act in a way that violates social ethics, laws or regulations, or the Internal Rules, even if these acts are aimed at achieving performance goals. Likewise, do not give tacit approval to the performance of these acts by subordinates.
- (4) Create an open workplace environment that allows subordinates to point out compliance problems without fear or worry.
- (5) Create a written record of compliance problems that have been pointed out, and report these problems by the appropriate means.
- (6) Take corrective actions immediately against compliance problems that have been identified.

2. Relationship with society and the global environment

2.1 Respect for human rights

- (1) We will observe the Universal Declaration of Human Rights. 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.
- (2) We will not discriminate against any person based on their race, sex, religion, political opinion, nationality, social origin, disability, sexual orientation, or other characteristic in the recruitment and treatment of employees and in all business activities, including business transactions.
- (3) We will not accept child labor or forced compulsory labor in any business setting. We will not do business with operators that use child labor or forced compulsory labor.

2.2 Environment

- (1) The Kurita Group will contribute to the realization of a sustainable society by developing new products and technologies that are conducive to environmental improvement.
- (2) The Kurita Group will work with customers to improve the environment by providing products, technologies, and services that boost productivity, reduce environmental impact and offer innovative energy solutions.
- (3) We will respect biodiversity and sustainability and reduce the environmental impact through operational improvement and innovation in conducting our daily business activities.

2.3 Social contribution

- (1) The Kurita Group will actively give back to society, sharing the findings and knowledge obtained through its businesses, instead of merely contributing to society through its businesses.
- (2) The Kurita Group will support the voluntary social contribution activities of its officers and employees.

2.4 Anti-social 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.

2.5 Political contributions

The Kurita Group will not give political contributions, donations, or other similar contributions to organizations of any kind, in principle. If a donation or similar contribution is made, prior approval must be received in accordance with the Internal Rules.

2.6 Tax payment

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.

2.7 Money laundering

- (1) We will comply with laws and regulations that regulate money laundering.
- (2) If a financial transaction of cash or cash equivalents is suspected to be a form of money laundering, we will make sure to check and consult with the finance and accounting department or our superiors and act appropriately.

3. Relationship with shareholders and investors

3.1 Appropriate recording and disclosure of information

- (1) To ensure appropriate financial reporting, we will accurately record and store all information related to accounting and tax affairs by following laws, regulations, and the Internal Rules.
- (2) We will accurately record information about our management and business activities that is necessary for appropriate information disclosure, and report the information in an appropriate manner and on a timely basis in accordance with the Internal Rules, relevant internal procedures, and other regulations.

3.2 Prevention of insider trading

- (1) We will not engage voluntarily in transactions involving financial products based on important information that has yet to be released to the public (hereinafter, “insider information”).
- (2) We will not recommend or suggest transactions involving financial products to other people based on insider information.
- (3) We will not provide insider information to people other than those who the company deems need to know this information.

4. Relationship with customers and business partners

4.1 Safety of products and services

- (1) We will comply with laws and regulations concerning product safety when we conduct business activities.
- (2) We will actively provide appropriate information about our products and services, prevent accidents involving our products, and thereby preserve and strengthen the trust of our customers.

4.2 Fair trades

- (1) We will aim to gain 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 each country and region.
- (2) We confirm the competition laws and regulations related to the work we undertake.
- (3) We make sure to check and consult with the legal affairs department or our superiors and act appropriately where we discover a contract condition or a form of transaction that restricts, or is likely to restrict, fair competition.

4.3 Entertainment and gift-giving

- (1) We will not offer money to a business partner, a business partner official, or other individual from the business partner to receive advantageous treatment in business.
- (2) Where we entertain or give gifts to someone, we will do so within the range deemed appropriate in light of social norms and by following the Internal Rules on entertainment, gift-giving and the provision of benefits and other economic benefits that are stipulated by each company.
- (3) We will not accept entertainment or gifts that may affect the business judgments made by the Kurita Group.

4.4 Public officials

- (1) We will not extend illegal entertainment, gifts, benefits, or any other economic profit to a public official or person in an equivalent position, either in Japan or in other countries.
- (2) If we discover that a portion of the money we will pay to an agent to whom we entrust business, a consultant, or other party will or may be used to illegally lobby public officials or other authorities, we will not make the payment.

4.5 Importing and exporting

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.

4.6 PR and advertising

- (1) We will always indicate the quality, specifications, and other attributes of our products and services in an appropriate manner based on facts.
- (2) We will not make representations which are false, misleading, or associated with discrimination.

5. Relationship with employees

5.1 Creation of a healthy workplace environment (safety and health)

- (1) We will give the highest priority to ensuring safety in accordance with the labor laws of each country and region, striving to prevent labor accidents during business activities.
- (2) To enable a diverse range of individuals to demonstrate their capabilities, we will respect the standpoints of others at all times, and strive to maintain a workplace environment that is free of harassment or discrimination, enabling all individuals to work comfortably regardless of their employment status.
- (3) We will endeavor on our initiative to maintain and improve our health and strive to improve our business performance by cooperating with the people working for the Kurita Group.
- (4) We will not consume alcohol or illegal drugs while working or work under the influence of alcohol or illegal drugs.
- (5) We will not carry or use weapons while working.

5.2 Assets of the company

- (1) 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.
- (2) When we leave the company, we will return the assets of the company in accordance with the Internal Rules.

5.3 Intellectual property

We will respect the value of intellectual property, manage the company's intellectual property appropriately, and will not infringe on the intellectual property rights of others.

5.4 Confidential information

- (1) We will observe the Kurita Group's Confidential Information Management Policy and the Internal Rules, strictly manage the confidential information of the company and third parties, including our customers and business partners, and will not use or disclose this confidential information illegally while working for the company or after leaving it.
- (2) We will not use improper means to obtain the information needed for business activities.

5.5 Protection of personal information

- (1) 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 and the Internal Rules. We will not use or disclose this personal information illegally while working for the company or after leaving it.
- (2) We will not use improper means to obtain the personal information of officers, employees, and third parties, including our customers and business partners.

5.6 Avoiding conflicts of interest

- (1) We will not engage in acts that will or may result in conflicts between our personal interests, including the interests of our families, and the interests of the company.
- (2) If our personal interests, including the interests of our families, conflict or may conflict with the interests of the company, we will make sure to check and consult with the legal affairs department or our superiors and act appropriately.

6. Whistleblowing

The Kurita Group encourages persons working for the Kurita Group to report any actual or potential violations of the Code of Conduct, following the procedures below. The Kurita Group will strive to protect the anonymity of whistleblowers and will not tolerate any actions in retaliation to whistleblowing.

- 1) Report the incident to your superior first.
- 2) Report the incident to the personal affairs department/legal affairs department or compliance consultation desk of your company
- 3) Report the incident to the dedicated consultation desks set up inside the Kurita Group
 - (Japan)
 - Kurita Group Compliance Soudan-shitsu (compliance consultation desk)
 - Koueki tsuhou madoguchi (whistleblowing office)
 - (Outside Japan)
 - Kurita Global Helpline

