Kao Business Conduct Guidelines

Principles of Corporate Ethics

- 1. We shall strive to be an honest and exemplary company, by thoroughly instilling "Integrity," which is one of the core values of the Kao Way, in everything that we do to earn the true respect of all stakeholders.
- 2. We shall comply with the Kao Business Conduct Guidelines, and we shall not pursue profits at the expense of the ethical principles set out therein.
- 3. Even within the acceptable scope of laws and regulations, we shall take the most exemplary initiatives.
- 4. We shall not take any action which violates laws and regulations, goes against the Kao Business Conduct Guidelines or is otherwise unethical, even if such action is for the purpose of benefitting the company or under the instruction of a line manager. The company does not condone any such action. If an employee takes such actions, that employee may be subject to disciplinary action up to and including termination of employment based on the internal rules of the company.
- 5. We shall not ignore illegal or unethical conduct that goes against the Kao Business Conduct Guidelines, nor shall we ignore any other questionable conduct. All such conduct should be brought immediately to the attention of a line manager or appropriate department to confirm the validity and appropriateness of the conduct in question and implement corrective measures. If we are uncomfortable about reporting such matter to a line manager or appropriate department, we shall call a compliance hotline.
- 6. The company shall protect and safeguard to the fullest extent possible the privacy of anyone who reports information regarding illegal, unethical or other questionable conduct or seeks consultation about such conduct in good faith. The company does not tolerate any attempt at identifying the person who made a report or who complied with an interview relating to such report. In addition, the company does not tolerate any form of threat or retaliation against any person who reports suspected illegal, unethical or other questionable conduct, or seeks consultation about such conduct in good faith. The company does not tolerate behavior which obstructs or interferes with an investigation related to such reporting or consultation.



Founder Tomiro Nagase