



BASIC CSR POLICY

AnaSpec is committed to adhere and fully adopt the ethical code of the Kaneka Group.

AnaSpec is committed to improve continuously the process and practices of our policy based on “Zero tolerance”.

Kaneka Group will fulfill our corporate social responsibility through the materialization of our corporate philosophy with the earnest and forward-looking efforts of each employee.

1. We will strive to fully understand the cultural backgrounds, manners and customs of the countries and regions where we do business as a means of actively contributing to local societies and communities.
2. We will abide by all relevant laws and regulations and, in undertaking our business activities, conduct ourselves in a fair manner based on free competition.
3. We will place high priority on communicating with all our stockholders and stakeholders, and will disclose all pertinent information.
4. We will respect the personalities and individuality of all our employees to support and encourage the development and utilization of their abilities.
5. We will uphold safety as the top-priority concern of management as we dedicate our best efforts to securing a sound and safe workplace environment, offering safe products, and working to protect the global environment.

ETHICAL CODE OF CONDUCT

The following Ethical Code of Conduct set forth basic requirements which shall be complied with by all the directors, officers and employees of Kaneka Group companies in their daily activities. If you violate any Standard, it may result in serious damage to the company and its reputation for integrity, which the company strives to maintain. Therefore, disciplinary action for any such violation may include reprimand, probation, suspension, reduction in salary, demotion or dismissal, depending upon the facts and circumstances and any applicable company policies and rules.

1. You must have adequate knowledge of all laws, regulations and requirements applicable to your performance of your duties (collectively the "Statutes"), the Basic CSR Policies, this Ethical Code of Conduct, the company's internal regulations and rules (collectively the "Rules"), and must perform your job and duties faithfully in accordance with them.
2. You must not act in violation of Statutes or Rules for any reason. In the case that you come to any question regarding the contents or application of Statutes or Rules, you must consult with or inquire to your staff which is overseeing the business and function, and act only after you confirmed the legitimacy of the act.
3. You must abide by all laws and governmental regulations pertaining to free competition, and must deal fairly and lawfully in all transactions, including in performing the company's marketing and sales activities.
4. You must maintain any relationship or contacts that you may have with governmental authorities, customers, suppliers and contractors in a lawful, ethical and appropriate manner.
5. You must response to any illegal or antisocial elements with decisive attitude and must not deal in any way with them even as an individual.
6. You must not disclose or divulge any information or data you have obtained under any confidentiality obligation through, or in connection with your duties, and must not use any such information or data for any unauthorized purpose. You must not conceal facts or make any false report or document, in relation to transaction or business.
7. You must segregate your office business and your private activities. Without authorization, you must not remove or take away any of the company's property or information including that entrusted to you during the course of your duties. You must not abuse, or use for your own private interest, the company's property or information, your status in the company or authority given to you by the company.
8. You must respect each other's rights as individuals and as co-employees, and shall not engage in any unlawful discrimination or any sexual harassment.
9. The management and the managers must behave themselves, take initiative lead and establish and make known to everyone in the company, the internal control system for the compliance and practice of this Ethical Code of Conduct.
10. In the event of the occurrence violating this Ethical Code of Conduct, the management itself must be responsible to solve the problem, to identify the cause and to take the preventive action, to make timely and appropriate disclosure and to punish the violator rigidly.

I. Relationship with Society

1. Environmental Preservation and Protection

- (1) Throughout our business activities including R&D, production, sales and disposal of our products, we pay much attention to the environment, respect the treaties and comply with the laws and regulations relating to the preservation and protection of the environment.
- (2) We vigorously promote energy-saving efforts and other countermeasures to prevent global warming.
- (3) Being keenly aware of the importance of the environment, we promote the activities helpful to protect the environment, such as recycle/reuse purchasing and paperless office work.

2. Compliance with Laws and Regulations

- (1) In every aspect of our business practice, we comply with the laws, regulations and voluntary standards of the industry, both local and international.
- (2) We abide by corporate ethics and behave ourselves through good common sense and responsibility as a “good corporate citizen”.
- (3) We comply with the industry-related laws and regulations, file and obtain necessary approvals, permits and licenses for the business we conduct and the products and services we provide.

3. Compliance with Export Controls

- (1) We are not to be involved in any exporting which may hinder the international peace and the public safety, such as dealing of arms, weapons and the related technology.
- (2) We undergo the appropriate export/import customs clearance procedures for our products, in accordance with the relevant laws and regulations.
- (3) We do not export or import – either directly or indirectly – of any articles under embargo.

4. Contributions and Political Donations

- (1) When we make contributions to any kind of organizations or political donations, we adhere to relevant laws and regulations and follow the set forth standard and procedures.
- (2) We maintain clear and transparent relation with any political parties and any organizations. We refrain from bribing, illegal offer of profits or donations, and we avoid any behavior which may imply any undue relations with any political parties or any administrative officials.

5. Determined Response to Antisocial Elements

- (1) With basic legal knowledge, social common sense and dignity of justice, we always behave decently, and avoid any involvement in illegal or antisocial activities.
- (2) We never have any relation with antisocial elements such as organized crimes. Against any unjust demand, we respond with decisive attitude and we would not seek solution with money or unfair profit.
- (3) We do not depend on any antisocial element to gain profit for the company or for ourselves.
- (4) We never deal with any antisocial elements or their related parties.

6. Timely Disclosure

We convey the company’s management ideals and policies clearly to our stockowners, investors and other stakeholders, and we make disclosure precisely and timely the management information on the financial conditions and business operations of the company to provide fair and appropriate data and information which may serve the investor’s judgment.

7. No Insider Trading

If we obtained any insider information of a listed company, including Kaneka Corporation, its subsidiaries or their customers or suppliers, we do not trade the stocks or bonds of those companies until such information has been formally disclosed to the public, even if through a third party, whether our own profit is involved or not.

II. Relationship with Customers, Partners and Competitors

1. Product Safety

- (1) At all times we pay much attention to safety of our products throughout the lifecycle of those; including R&D, raw materials purchasing, production, sales, transport and distribution, use and consumption, and disposal. We, with adequate understanding, comply with the relevant laws, regulations and safety standards. We keep seeking for higher levels of safety for our products.
- (2) When we obtained the information as to the safety problem or necessity of improvement of our products for safety reason, we promptly investigate the facts and situation, and in the case of need urgently take appropriate countermeasures.

2. Compliance with Antitrust Laws

- (1) We never be involved in any unfair arrangement among competitors such as price fixing, collusive bidding, production or sales volume restriction, user/market allocation, the exchange of sensitive marketing information.
- (2) We refrain from unfair behaviors such as boycott against specific companies (ex. low-price offering competitor or newcomer) together with others or among trade association or restrict the resale price of our distributors/customers.
- (3) Upon M&A transactions, such as stock purchase, merger, business transfer or dividing company, we follow the appropriate procedure, including the timely filing, in accordance the antitrust laws and related regulations.

* Always carry the "Competition Compliance Card" (Yellow Card) and refer to it from time to time.

3. Fair Dealings with Contractors

When we make production/processing contract, service contract or repair contract, we follow the related laws and regulations, and deal with our contractors with decency and honesty, treat them fairly and impartially.

4. Trade Secret

We do not try to obtain other companies' trade secret through illegal way, or use any information illegally gained or those carrying the risk of being illegal.

5. Appropriate Advertise and Publicity

- (1) In our publicity, documents for advertisements and related information, we do not use such expressions that slander or smear others or other companies or that socially discriminate others.
- (2) In our comparative advertising, our data or figures are to be based on facts, and they are to be accurate at the time of advertisement, ensuring that no misunderstanding by the readers arises.
- (3) We do not conduct any unfair competitive action such as to make false advertisement, pretend trademarks or business of others.

6. Entertainment and Gift

- (1) We follow common social standards when we entertain or offer gift to our trading partners. No entertainment or gifts to any public servants or those of similar occupations.
- (2) The entertainment or gift from our trading partner or business acquaintances must stay within the limit of common social standards.

III. Relationship with People

1. Respect Human Rights, No Discrimination

We use our efforts to maintain always healthy workplace environment, respect the human rights of individual members and will not tolerate any action that may lead to discrimination.

- (1) We do not allow any unreasonable discrimination based on birth, nationality, race, belief, religion, sex, educational background, age, physical appearance and so forth.
- (2) We do not allow any action that violates a person's human rights, including violence, seduction, slander, threats and so forth, as a means to enforce work upon employees. Likewise, we do not allow any violation of human rights by bullying or otherwise.

2. No Sexual Harassment

We do not allow any action or behavior that leads to sexual harassment or any such action that may be mistaken for sexual harassment. We absolutely do not admit such behavior by others as well.

3. Protection of Privacy

We use personal information, in-house or otherwise, that has been obtained through the course of business, exclusively for the intended business purposes, and we strictly protect such information from the leak to outside.

4. Safety and Hygiene at Workplace

We strictly adhere to safety and hygiene-related laws and regulations, and create and maintain safe, comfortable and healthy workplaces.

- (1) Safety and hygiene is our top priority. We make every effort to preserve safe and hygienic work environments.
- (2) We understand and comply with the laws and regulations relating to safety and hygiene.
- (3) Upon the occurrence of accident or disaster at our work place, we take appropriate actions including the immediate reporting to the management, minimize the damage, identify the cause and take preventive measures against recurrence.

5. Strict Observance of Labor-related Laws

We strictly observe the labor-related laws and regulations, and secure a comfortable and healthy work environment.

- (1) We monitor working days and hours of employees to avoid overwork.
- (2) We pay attention at all times to employees and their state of health, both mental and physical.

IV. Relationship with Company and its Properties

1. Secret Information

We properly control company's secret information, and, do not disclose or leak any of them without authority or permit.

- (1) We strictly control the secret information of our company's and others. We do not disclose any of them to any unauthorized person, even in the company, or use other purpose than the specified business.
- (2) When we disclose the secret information of the company to the outside party, we prepare for any unauthorized leakage by, for instance, making a non-disclosure agreement. Even after the retirement from the company, we do not divulge or use the secret information of the company or others without the prior company's consent.

2. Use of Company's Properties

- (1) We handle all of our company's properties carefully and effectively.
- (2) We do not misappropriate any of the company's properties or expenses for our own private use, nor do we use them for any other purposes than business.

3. Protection of Intellectual Properties

We appropriately use the intellectual properties of our company, which are valuable assets of the company.

- (1) In case that we made invention or contrivance, or created designs related to the business such as R&D, production and so forth, we make every effort to protect them as company's intellectual properties including the immediate application for a patent or other means.
- (2) We respect the intellectual properties of others, and refrain from the acts that would infringe such rights.

4. Appropriate Use of Information Systems

- (1) We use our company's information systems only for conducting our business; do not use them for any private purpose.
- (2) We strictly control the use of our IDs or passwords to prevent any leakage to within or outside of the company.
- (3) We do not use the IDs or passwords of others, or encroach upon the computer systems of others.

If you consider yourself to be a victim or a witness of acts contrary to the ethical code, please contact:
HR.US@anaspec.com

The HR and Legal departments will handle information by ensuring anonymity and protection against retaliation.