

# Compliance

Rather than relying on external standards and adopting passive compliance stance that centers on just adhering to regulations required by laws, the Mandom Group sets voluntary standards that exceed legal requirements, taking an independent and proactive stance for the purpose of “usefulness to consumers,” toward protecting consumer safety and benefits.

The Mandom Group has established the “**Mandom Group Code of Conduct**” as a compliance program that officers and employees should always keep in mind in order to realize the corporate philosophy (five times since 1999). In order to ensure thorough compliance with the Code of Conduct, the Company has established the Code of Conduct Promotion Committee, which focuses on awareness-raising and education on compliance for all departments.

In addition, in December 2002, we introduced (expanded the target up to business partners in 2007) a helpline system, which is an internal reporting system for compliance violations, aimed at early detection, early correction, and prevention of risks related to compliance violations. With this system, legitimate information providers are completely protected, and retaliatory acts against information providers are absolutely prohibited.



▶ Mandom Group's Code of Conduct

## Excerpt from the Mandom Group Code of Conduct (FY2018 revised version)

### Mandom Group Compliance

As a member of society, we fully understand domestic and international laws, customs, and all other social norms and their respective mentality, comply with them with a spirit of legal compliance, and always act ethically with a high degree of social decency.

The compliance of the Mandom Group is based on “usefulness” (founding spirit) and “honesty toward society” (corporate philosophy).

In other words, rather than relying on external standards and adopting passive compliance stance that centers on just adhering to regulations required by laws, the Mandom Group sets voluntary standards that exceed legal requirements, taking an independent and proactive stance for the purpose of “usefulness to consumers,” toward protecting consumer safety and benefits.

In addition, for the sake of honesty towards society, we will strictly adhere to compliance management and never use fraudulent methods as a means of achieving results.

Therefore, at the Mandom Group,

**(1) End does not justify the means.**

We do not accept the idea that any means can be adopted to achieve business results.

**(2) Morals are superior to results. (Results are inferior to morals)**

No matter how good the Company's business performance is, the Company does not recognize results obtained through immoral (unlawful) means.

## Helpline System

In December 2002, we introduced the “Helpline System,” which is an internal reporting system for compliance violations, aimed at early detection, correction, and prevention of recurrence of risks related to compliance violation. This is a system for accepting reports and consultations when one sees an act that violates various laws and the code of conduct in the workplace, or when there is a risk of violation thereof. The Code of Conduct Promotion Committee, including external parties (attorneys), serves as a reception desk and the operation of the whistle-blowing system ensures that whistle-blowers are not treated unfavorably by the Company. Since September 2007 we have been expanding the scope of the Helpline

System to include all domestic business partners of the Mandom Group.

Our wish is that suppliers who have become aware of a violation of compliance by a Group company, its officers or employees in Japan, or an act that may cause a compliance violation, contact the helpline reception desk in accordance with the following guidelines. Upon receipt of the report, led by the Code of Conduct Promotion Committee, the Company will promptly investigate the facts and causes to correct, stop and prevent recurrence thereof and work to resolve them.



Group Company Information

▶ Corporate Governance > Helpline System

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1. Business partners that are subject to the helpline system are suppliers, customers, and other business partners of the domestic Group companies, including the Company.
2. In order to conduct a fair investigation, we ask that you report your information under your real name, rather than anonymously.
3. The facts and the details (including personal information such as the name of the person reporting) are held only by the Company's investigating body (Code of Conduct Promotion Committee) and will not be used for any purpose other than investigation and response based on the report.
4. The Group will not cause any disadvantage to the person reporting, and will not make any request to the business partner to which the person reporting belongs to that would cause him or her a disadvantage due to the fact that the report was made. However, this does not apply to fraudulent reporting that goes against the intent of the Helpline System (avoiding or minimizing the risk of non-compliance) such as slander or defamation.
5. You can make reports by phone, e-mail, or postal letter. Please refer to the report reference form attached at the end of the document, and make the report following with the form as much as possible. Upon receipt of the report, the helpline will contact the person who made the report for confirmation. Therefore, please be sure to clearly indicate the contact information and contact method.

Special reception desk for business partners

5-12, Juniken-cho, Chuo-ku, Osaka 540-8530, Japan

Mandom Corporation

Helpline Desk, Code of Conduct Promotion Committee

• Special telephone: +81-6-6767-5170

• Special e-mail address: mandom-helpline@mandom.com

