Fair Operating Practices

Basic Policy

(Under review)

With the shared goal of sustainable social development, we will build good relationships with our suppliers and partners and fulfill our social responsibilities through our business activities.

Long-Term Goals

Priority Initiatives

•Draft Supplier CSR Guidelines and gain the cooperation of suppliers to build and operate a CSR procurement system (Based on the specific topics within three core subjects— human rights,

Toward Fair and Transparent Transactions

Mandom established the Antimonopoly Act Compliance Program back in July 2004, which was revised in 2010, to establish fair and transparent business transactions and build stable relationships of trust as a good partner to all with whom we are engaged.

Our legal affairs office holds seminars for the sales division and purchasing department based on this program. The purchasing department also participates in outside seminars related to purchasing and procurement to acquire greater knowledge.

Once a year, Code of Conduct education is carried out at all Japan-based divisions in the Mandom Group at which time various guidelines on procurement and sales are read together to instill their principles in employees.

Since September 2007 the Mandom Group has been expanding the scope of its Helpline System to include business partners. See below for more details.



Fair Operating Practices

Building and Implementing a CSR Procurement System

Building and Implementing a CSR Procurement System

We have selected "the building and implementing a CSR procurement system" as a CSR material issue and are engaged in drafting supplier CSR guidelines and gaining the cooperation of suppliers to achieve this goal.

As times change in an age of rapid globalization, social and environmental issues are becoming more varied and complex. We currently give consideration and take action based on our Procurement Guidelines, but we need to strengthen their implementation, which includes making ongoing improvements and revisions to prevent new social and environmental issues from arising and thereby avoiding such risks. Another reason for better implementation is to be able to continue responding to expectations and demands from a broad range of stakeholders.

We strive to achieve fairness and transparency in all transactions and will try to gain the cooperation of our partners as we practice due diligence with respect to specific topics in core areas such as human rights, labor practices and the environment, alongside taking other measures to build a sustainable and CSR procurement system.



Fair Operating Practices

About the Mandom Group's Supplier CSR Guidelines (Ver. 2)

To move toward sustainable procurement, we issued the Mandom Group Supplier CSR Guidelines (Ver. 2) in November 2017, asked all of our suppliers to develop an understanding of these guidelines, and started monitoring using the CSR Procurement Self-Assessment Tool Set recommended by the Global Compact Network Japan.

Going forward, we will secure the understanding and cooperation of all our suppliers—through steps such as requesting that these guidelines be shared with secondary, tertiary, and overseas suppliers—and we will continue discussions, working step-by-step to make our supply chain more transparent.

Mandom Group Supplier CSR Guidelines (Version 2)

Mandom Group values our suppliers as partners in promoting sustainable development. We extend our support to suppliers that comply with the Guidelines as set forth below.

Corporate Governance

- Understand and comply with laws and regulations, relevant voluntary standards and international conventions related to business operations.
- 2. Develop policies and a code of conduct related to CSR and provide in-house support and training.
- Structure an internal control system to conduct compliance management.
- 4. Establish a business continuity plan.

Human Rights

- Respect human rights and avoid complicity in any human rights violations.
- 2. Respect diversity and prohibit discrimination.
- Respect the lifestyles of indigenous peoples and local communities.
- 4. Eliminate all forms of harassment.

Labor

- Recognize and adopt international rules regarding labor.*
 *Including the Universal Declaration of Human Rights, the ILO's Core Labor Standards, the ten principles of the UN's Global Compact, the UN's Guiding Principles for Business and Human Rights, and the OECD's Guidelines for Multinational Enterprises.
- 2. Provide equal opportunities for upskilling and career development for all employees.
- Provide a safe and clean work environment and care for employees' health.
- 4. Ensure workers are paid fair wages and ensure proper management of working hours.
- 5. Eliminate forced labor, child labor, and inhumane treatment of workers.
- 6. Respect local religions, traditions, and customs.
- 7. Support the effective recognition of the freedom of association and the right to collective bargaining.

The Environment

- 1. Structure a system to promote environmental management and set goals for continuous improvement.
- Implement measures to save energy, reduce greenhouse gases, prevent pollution and conserve biodiversity.
- 3. Ensure proper management of chemicals and waste disposal.

Fair Operating Practices

- 1. Ensure fair, transparent and free business transactions and respect contractual terms.
- 2. Respect property rights and prevent infringement.
- 3. Eliminate any involvement with groups that make illegal demands of the company or the general public.
- 4. Prevent all forms of corruption, including coercion and bribery.
- 5. Establish a customer inquiries function to receive and deal with complaints and feedback from outside the company.

Quality and Safety

- 1. Structure a management system that ensures quality and safety of goods and services.
- 2. Provide appropriate information that ensures quality and safety of goods and services.
- 3. Provide products and services that contribute to sustainable development.

Information Security

 Implement strict information security practices to ensure confidential information (including personal information) is handled safely.

Supply Chain

 Ensure companies in your supply chain and/or subcontracting companies, related to business with the Mandom Group, comply with the Guidelines.

If your company already has guidelines in place with at least the same requirements and requests supplier compliance, no further action is required.

Coexistence with Local Communities

- 1. Build good relationships with local communities through collaboration.
- Respond promptly and sincerely to complaints from surrounding areas.
- 3. Support communities through business activities.

Revisions to the Guidelines

We will make revisions to the Guidelines to respond to changes both within and outside the Mandom Group as circumstances demand. Revisions will be posted on our website. Please note that further consent and/or confirmation of compliance status will be required.

Confirmation of compliance status

of compliance status will be required. The Suppliers' CSR Self-Assessment Survey has been compiled based on the CSR/Sustainable Procurement

Self-Assessment Tool Set published by UN Global Compact Network Japan as the ninth instalment in their series of Building the Sustainable World. See below for more details.



Global Compact Network Japan

CSR/Sustainable Procurement Self-Assessment Tool Set (English version)