

Compliance

Fair Business Practices

2-25, 2-26, 2-27, 205-1, 205-2, 205-3

Our Basic Approach and Strategy

Our management policy is expressed in the Unicharm Ideals, which state “we strive to pursue proper corporate management principles that combine corporate growth, employee well-being, and the fulfillment of our social responsibilities.” Unicharm has established the Unicharm Group Charter of Actions to ensure that directors and employees maintain the highest ethical standards and comply with laws and regulations and the Articles of Incorporation. We prevent bribery, excessive entertainment and gifts, improper political contributions, insider trading, money laundering, and corruption that would lead to other forms of misconduct by ensuring that all employees comply with the Unicharm Group Charter of Actions. We also strive to comply with labor standards and other laws and regulations. With all executive officers, led by the president & CEO, continuously communicating the spirit set forth in the Unicharm Group Charter of Actions to all employees, we endeavor to raise awareness of corporate ethics and ensure that all our corporate activities are based on compliance.

Management Structure

The ESG Committee monitors and supervises all activities related to social responsibility centered around a framework of quality, safety, and the environment. Specifically, the ESG Committee ensures the legality, fairness, and soundness of corporate activities and reports regularly to the Board of Directors. Moreover, the Compliance Hotline has been established as a consultation and whistleblowing contact point for violations of laws and regulations, internal regulations, and major corporate ethics while the Ring-Ring Employee Hotline has been established for problems in the workplace, such as internal harassment acts and interpersonal issues, as part of efforts to develop and enhance the compliance structure. The Corporate Ethics Office has been established within the ESG Division as the contact point for the management of these bodies. In the event of a serious problem, the executive officer in charge of the Corporate Ethics Office takes the helm to resolve the issue by convening the Corporate Ethics Committee, which consists of all members of the Audit & Supervisory Committee. The Corporate Ethics Committee reports on the

actions it has taken to the Board of Directors so that the effectiveness of the committee can be verified on a regular basis. In addition, in order to conduct audits on whether business execution in each division is being conducted appropriately in accordance with laws and regulations, etc., and to provide advice as necessary, the Internal Audit Department has been established to serve as an internal auditing section that is independent from each business execution division and is directly supervised by the president & CEO and to conduct internal audits on all Group companies.

► Compliance Promotion Structure



P.115 Corporate Governance Structure

► Unicharm Group Charter of Actions / Action Guidelines for Practicing Our Beliefs & Pledges and Corporate Code of Conduct (Excerpt)

Practicing Our Pledge to Society

Compliance with Laws and Regulations, Voluntary Industry Standards, and Internal Regulations

1. We comply with not only the laws and regulations of the countries and regions in which we operate but also voluntary industry standards as well as the voluntary standards and rules and regulations of the Company. Therefore, we consistently ensure awareness of all the laws and regulations pertaining to our business activities.
2. We refrain from the use of terms or expressions that may be construed as forms of slander or social discrimination against other companies or individuals.

Respect for Rules and Cultures of the International Society

1. We conduct business activities at a global level by complying with international rules and respecting the cultures and customs of each country and region.
2. We work to foster sound relationships with local communities and gain their trust.

Political Contributions, Donations, and the Exchange of Entertainment and Gifts with Government Officials

1. We ensure that political contributions and donations to organizations are made in a transparent manner upon in-house approval.
2. We prohibit the exchange of entertainment and gifts with government officials or those equivalent thereto. We also forbid the use of facilitating payments for the purpose of expediting administrative processes.

Preparation for Disasters, Infectious Diseases, Antisocial Forces, Cyberattacks, and Other Risks

1. We respond appropriately in accordance with the designated Risk Management Manual in the event of disasters, infectious diseases, terrorism, or other risks.
2. We do not engage in relationships with antisocial forces or respond to the unreasonable demands thereof in any way whatsoever. Moreover, we will cooperate with the police and various organizations and take a resolute stance toward antisocial forces.
3. We will positively engage in the development of an advanced cybersecurity management system.

Initiatives and Achievements

Prohibition of Insider Trading

To prevent executives and employees from engaging in insider trading, Unicharm established the Insider Trading Prevention Regulations. The executive officer in charge of ESG, who is appointed by the president & CEO, is designated as the person responsible for managing insider information in order to prevent illegal acts. In addition to prohibiting transactions with a high risk of insider trading, we require the submission of a trade notice for Unicharm's shares each time they are traded and release cautionary information as appropriate to set specific limits on the trading of such shares based on the circumstances of the positions and departments of executives and employees.

Anti-Corruption Measures

The Board of Directors has established policies to prevent all forms of corruption including unreasonable demands and bribery and such efforts are also being conducted in conjunction with the related departments. In addition, the Unicharm Group Sustainable Procurement Guidelines, which aim to maintain fair relationships with suppliers and prevent acts of corruption in transactions, clearly indicate the necessity of compliance with laws, regulations, and social norms and fair trade, as well as the prohibition of bribery and kickbacks, and promote the comprehensive prevention of corruption in transactions.

P.103 Unicharm Group Sustainable Procurement Guidelines

Regular Reviews of the Effectiveness of the Standard of Conduct

The Company confirms the effectiveness of its standard of conduct through monitoring using the employee survey and internal audits conducted annually and revises this standard as necessary. The Company reviewed the Unicharm Group Action Guidelines and renamed them the Unicharm Group Charter of Actions on February 10, 2021.

P.089 Employee Survey

Fines, Surcharges, Settlements, and Dismissals Resulting from Acts of Corruption

In 2022, there were no fines, surcharges, or settlements resulting from acts of bribery or other forms of corruption, including facilitation payments. In addition, there were no disciplinary actions imposed on employees for such acts.

	2020	2021	2022	Coverage
Number of fines, surcharges, and settlements resulting from serious legal violations related to corruption and bribery	0	0	0	Unicharm Corporation
Number of employees subject to disciplinary action due to acts of corruption or bribery	0	0	0	

Whistleblowing System

The Compliance Hotline has been established for Group employees, both within and outside Japan, as a consultation and whistleblowing contact point for the violation of laws and regulations, violation of internal regulations and acts of corruption such as the taking and receiving of bribes, etc., or major corporate ethics violations. The Ring-Ring Employee Hotline has been established for employees to report or receive consultation on their concerns over human rights issues, acts of harassment, and workplace interpersonal issues. In principle, the system is available to all executives and employees* of the Company and its subsidiaries and affiliates, who can then remain anonymous

when reporting or receiving consultation. These matters are handled in accordance with the Consultation and Whistleblowing Management Regulations of the Corporate Ethics Office and the results are shared with both whistleblowers and employees receiving consultation, with the exception of those who requested anonymity. The privacy of employees who use this system is respected and every effort possible is made to ensure that both whistleblowers and employees receiving consultation are protected from harm. In addition, if it becomes necessary to involve a third party, the whistleblower's consent to this will be sought. Along with the Compliance Hotline and the Ring-Ring Employee Hotline, Unicharm has also put in place a system that makes it easy for employees and their families to consult with external organizations. Outside of Japan, similar hotlines have been established and are being operated at our subsidiaries in China, Taiwan–Greater China, Thailand, Indonesia, India, Brazil, South Korea, the United States, Vietnam, Saudi Arabia, and Egypt.

* Includes contract, part-time, temporary, and dispatched employees, and former employees who resigned within a year

▶ Consultations and Reports via the Whistleblowing System (Japan)

	2020	2021	2022
Number of consultation/whistleblowing cases	41	68	100
Of which, are in violation of compliance	0	0	0

▶ Whistleblowing System Response Process



Response to Serious Compliance Violations

In Kyo-sei Life Vision 2030, Unicharm has set the goal of realizing zero cases of serious compliance violations and is working to further enhance compliance awareness to this end. A compliance violation that impairs corporate value, has an adverse impact on management, and requires external information disclosure is defined as a “serious compliance violation.” In 2022, there were no cases of serious compliance violations at Unicharm.

Initiatives to Raise Compliance Awareness

The Unicharm Group Charter of Actions, which is utilized by all Group employees, states the behaviors that should be kept in mind in order to achieve our pledge to each stakeholder and, through the recital of this charter, we are working to improve awareness of compliance in relation to issues such as corruption prevention. In addition, compliance-related questions have been added to the employee survey, which is conducted across the Group each year, to prevent acts of fraud, enhance awareness of legal compliance, and monitor compliance awareness.

P.089 Employee Survey

Compliance Education and Training

Aiming to raise awareness of compliance with laws and regulations and prevent problems from occurring, Unicharm holds workshops, distributes email newsletters, and posts information on the Company intranet to constantly share details of revised laws and compliance information related to its business as a means to enhance compliance awareness throughout the Group. In addition, we held a workshop on the whistleblowing system for department heads and scrum leaders in conjunction with the amendments to the Whistleblower Protection Act in June 2022.

► Measures to Raise Compliance Awareness

Target	Details	2022 Results	
		No. of Times	No. of Attendees
All employees	All areas of compliance (distribution through email newsletters and posting on Company intranet)	11 times	All employees
New employees	Compliance and basis of contracts	Two times (upon joining the Company and assignment to respective divisions)	41 employees
New leaders	Harassment prevention	One time	26 employees
Employees to be posted overseas (pre-posting training)	Prohibition of bribery, protection of confidential information, contract compliance, etc.	One time	30 employees
Divisional basis (workshops)	Themes according to business activity	Three times (once a month)	Approx. 30 employees
Directors and executive officers	Compliance in global companies	One time	Approx. 30 employees

Harassment Prevention

Unicharm has established the Harassment Prevention Regulations with the goal of establishing a comfortable workplace environment. According to these regulations, any act that causes a disadvantage or damage to others in the workplace, damages their dignity, or infringes their human rights, regardless of the intentions of the person responsible for the harassment, is defined as “harassment,” and such acts are completely forbidden by the Company. Moreover, a curriculum on harassment prevention is covered in our training according to levels and roles and training for new leaders.

	2020	2021	2022	Coverage
Number of participants in harassment prevention manager training	0	52	26	Unicharm Corporation

P.030 Promotion of Diversity Management