CSR Procurement (Purchasing) Guidelines of Mitsubishi Gas Chemical Trading

- I. Human Rights and Labor
 - 1. Prohibition of discrimination

We shall endeavor to ensure equality of opportunity and impartial treatment, without discrimination in hiring or employment on the basis of race, gender, age, nationality, ethnic group, religion, disability, etc.

2. Prohibition of inhumane treatment

We shall respect employees' human rights, and shall not treat them in any way that imposes an excessive physical burden, or otherwise violates their personal dignity, such as by abusive treatment, or by sexual harassment, power harassment, or other types of harassment.

3. Prohibition of forced labor

All workers shall be employed on the basis of their own free will, and we shall make no use of forced labor. We shall also ensure that all employees are free to make their own decisions as to whether or not to leave employment.

4. Prohibition of child labor

We shall not employ children who have not reached the legal working age in the countries or territories where the relevant business activities are performed. In addition, we shall not employ young workers in such a way as to harm their growth and development.

5. Appropriate wages

We shall comply with the legal minimum wage regulations of the countries or territories where the relevant business activities are performed. In addition, we shall not make any unfair wage reduction.

6. Working hours

We shall comply with the working hours stipulated by the laws and regulations of the countries or territories where the relevant business activities are performed. We shall also manage employees' working hours, days off, and vacations appropriately.

7. Employees' right to organize

We shall respect employees' right to organize, as a means to achieve labormanagement negotiations about working conditions, working environment, wage levels, etc.

II. Health and Safety

1. Safety measures for mechanical equipment

We shall evaluate the danger of, establish appropriate safety measures for, and perform maintenance of manufacturing equipment and other equipment used by MTI.

2. Workplace safety

We shall expose and evaluate risks relating to workplace safety, that is, the potential for accidents and/or damage to health while working, and shall take satisfactory measures in relation to the causes or origins of these risks. If satisfactory measures in relation to these causes or origins cannot be taken, we shall provide appropriate protective equipment and education/training about safety.

3. Response to emergencies

In order to protect life and physical safety, we shall predict disasters, accidents, etc., that may occur, and shall establish emergency response measures. In addition, we shall have training to enable performance of the emergency response measures.

4. Occupational accidents and diseases

We shall classify and record any occupational accidents and diseases, shall determine their status of occurrence, and shall take any measures needed for medical treatment, assessment, and/or corrective action.

5. Occupational health

We shall ascertain the status of physical contact in the workplace between humans and harmful organisms, chemical substances, noises, odors, etc.; shall establish management standards, and perform operations on that basis; and shall establish measures for providing appropriate education, training, and protective equipment to employees.

- Care with work that subjects employees to physical burdens
 We shall identify work that subjects employees to physical burdens, and shall manage it appropriately so as not to lead to injury or disease.
- 7. Safety of facilities

We shall ensure as appropriate the health and safety of facilities that are provided for employees' biological and lifestyle requirements, such as dormitories, canteens, and toilets.

8. Employees' health management

We shall have all employees undergo regular health check-ups, and shall manage their health appropriately.

III. Environment

- Management of chemical substances included in products
 We shall comply with the appropriate regulations for the relevant site, and shall
 not include in any products chemical substances the inclusion of which is
 prohibited by regulations, etc. We shall also comply with the appropriate
 labeling requirements, and shall perform the required test evaluation.
- 2. Management of chemical substances used in production processes We shall ascertain the quantities of chemical substances used in production processes, and the quantities released into the external environment, and shall provide reports to governmental bodies as appropriate. We shall also endeavor to reduce the quantities of chemical substances released.
- 3. Environmental permits and administrative approval We shall obtain, maintain, and keep up to date all required environmental permits and licenses, in compliance with the laws and regulations, etc., of the countries or territories where the relevant business activities are performed, and shall comply with the reporting requirements stipulated in applicable permits, authorizations, and regulations.
- 4. Control, and reduction of quantities, of water intake, water discharge, sludge, exhaust, etc.

We shall comply with laws and regulations, etc. relating to water intake, water discharge, sludge, exhaust, etc., of the countries or territories where the relevant business activities are performed; shall set voluntary standards; shall aim to reduce water intake and discharge; and shall endeavor to prevent pollution.

5. Efficient use of resources and energy

We shall establish appropriate measures, for resource conservation, reuse, recycling, resource substitution, etc.; shall set voluntary targets for achieving energy- and resource-saving, and shall regularly monitor the implementation status, so as to continuously use energy and resources efficiently. "Resource-saving" means reducing the quantity of materials used to make products, and the quantity of waste, and promoting use of recycled resources and parts; and "energy-saving" means rationalizing the use of thermal and electrical energy.

6. Greenhouse gas release reduction

We shall continuously search for methods to achieve energy-saving by means such as improving the efficiency of energy use, with the aim of reducing the quantity of greenhouse gases released. 7. Reduction of final waste quantity

Aside from harmful substances, we shall identify and manage final waste; and, with the objective of reducing the quantity of final waste, shall put into practice approaches such as recycling, thus continuously reducing the quantity.

- Approaches to protection of the environment and biodiversity
 We shall endeavor to avoid damaging the ecosystem by use of resources in our business activities, and by waste disposal and release, in order to maintain a rich and diverse ecosystem.
- IV. Fair Trade and Business Ethics
 - Prohibition of bribery, corruption, etc.
 We shall maintain sound and proper relationships with governments and political authorities in the countries or territories where we perform relevant business activities, and shall under no circumstances engage in bribery or make illegal political contributions.
 - Prohibition of abuse of superior bargaining positions
 We shall under no circumstances act in such a way as to disadvantage suppliers or contractees by making use of a superior bargaining position as purchaser or contractor.
 - 3. Prohibition of giving or receiving improper advantages In our relationships with stakeholders, we shall under no circumstances give or receive improper advantages. To "give or receive improper advantages" refers to giving or receiving money and/or goods beyond the legally stipulated level and/or the level required by social convention; providing advantages to antisocial forces; and insider trading, such as buying or selling relevant companies' stocks, on the basis of important information that relates to the business activities of customers, etc., and is not publicly available.
 - Prohibition of anticompetitive activities
 All our transactions shall be fair, with fair, transparent and free competition, and
 we shall not perform any actions that hinder fair transactions, such as joining
 cartels or engaging in collusive bidding.
 - 5. Provision of accurate information about products and services We shall provide consumers and customers information about products and services that is accurate and without falsehood. In particular, we shall provide information about the use, quality, and methods of handling products and services, and about substances, etc. included in parts and materials used in products.

6. Respect for intellectual property

We shall protect intellectual property rights that belong to or are held by MTI, so that these rights are not infringed by any other party. Care must be taken in this respect. In addition, we shall not infringe the intellectual property rights of any other party.

7. Appropriate export control

With respect to export of technologies and goods that are restricted by laws and regulations, etc., we shall investigate and comply with the relevant laws and international agreements. We shall follow the appropriate export procedures on the basis of a clear control system.

8. Publication of information

We shall provide and disclose information about labor, health and safety, environmental activities, business activities, organization, the financial situation, performance, and risks, irrespective of whether this provision and disclosure is required by laws and regulations, etc. The information about risks includes information about damage due to major disasters; about negative impacts on society or the environment; and about major violations of laws coming to light.

- Prevention and prompt discovery of misconduct
 By providing education to and raising the awareness of employees, we shall endeavor to prevent misconduct. We shall also establish a reporting desk for misconduct, and take measures to ensure the early detection of misconduct.
- V. Quality and Safety
 - 1. Ensuring product safety

By complying with laws and regulations relating to the relevant product in all relevant countries, and meeting the appropriate standards, we shall design products that enable product safety to be ensured sufficiently, as stipulated in the laws and regulations, etc. in each country. In addition, our measures to ensure product safety shall include rapid measures for managing traceability (the history of materials, parts, processes, etc.), etc. and resolving any problems.

- VI. Information Security
 - 1. Protection against threats to computer networks

As measures for protection against threats to computer networks, we shall establish the required security firewall, and shall manage the network in such a way as to prevent negative effects on MTI and other parties.

2. Preventing leakage of personal and confidential information

We shall endeavor to manage appropriately, protect, and prevent the leakage of personal and confidential information relating not only to MTI but also to our clients and any parties with which we have business-related dealings, and by extension third parties.

VII. Social Contributions

1. Contributions to society and the local community

We shall endeavor to ensure that our business activities have no negative impacts on the health, safety, etc. of the local society and residents. At the same time, with the aim of achieving a sustainable society, we shall vigorously perform activities that enable contributions to international and local society to be made through our business.

VIII. Responsible Sourcing of Raw Materials

 Prohibition of procurement of conflict minerals
 We shall establish an investigation system for minerals used in the
 manufacturing of products, minerals handled as merchandise, and minerals
 included in merchandise, and shall not procure such minerals from supply
 chains that include war-torn regions, human rights violations, conflict,
 environmental destruction, etc.