

Sustainability

Compliance Awareness

Focus SDGs



Management information

Relation between themes and business activities

As a member of society, the Fuji Oil Group believes that it is important to promote compliance activities. We work to spread compliance awareness throughout the Group as a basis for remain essential to society.

Basic approach

The Fuji Oil Group complies with laws and regulations as well as internal policies and rules as usual practice. Acting with a strong sense of ethics in daily business operations is crucial to meet the expectations and needs of society (stakeholders). Compliance is included in the Fuji Oil Group Management Philosophy, which we formulated when the Group shifted to a holding company structure in October 2015.

Furthermore, we defined the Fuji Oil Group Three Code of Conduct Principles to clarify specific behaviors that all Group members are expected to follow in order to ensure compliance.

Fuji Oil Group Three Principles of Code of Conduct

1. Comply with the rules

We will comply with all applicable laws and regulations in each country and region where we operate.

We will act in accordance with the Company rules and regulations.

We will observe social norms and meet social expectations and trust.

2. Act with integrity

We will act in accordance with our conscience.

We will not hide any mistakes or failures.

We will make reports and explanations based on the facts in a timely and appropriate manner.

3. Conduct fair business

We will conduct fair and appropriate business transactions.

We will distinguish between work and private life and will not commit any dishonest acts.

We will respect the human rights of people involved in our business activities and consider diversity of race, gender and religion.

We will not engage in any form of extortion or bribery.

We will not allow intervention by antisocial forces.

Promotion system

We promote compliance initiatives for the entire Group, with the Chief Administrative Officer (CAO) as top person in charge. The Legal Affairs Department of FUJI OIL HOLDINGS INC. plans of various measures and improvements increase compliance awareness throughout the Group. The Management Council of FUJI OIL HOLDING INC. reviews compliance efforts upon reception of the appropriate reports from the Legal Affairs Department.

Specific initiatives

Education

Business Conduct Guidelines

We established the Fuji Oil Group Business Conduct Guidelines. These guidelines explain the action principles of the Fuji Oil Group Management Philosophy using representative case studies encountered in several daily duties. The guidelines are available in eight

languages, including Japanese, and are distributed to employees in booklet and PDF forms.

Compliance training

Since FY 2019, the Legal Affairs Department has been working to systematize compliance training to provide necessary compliance education to departments. This has been done in cooperation with the HR and other related departments. In addition, the Legal Affairs Department visits business locations in and outside Japan to review their compliance status and needs; and to help raise employee awareness in areas requiring priority attention. Since FY 2018, we have conducted e-learning training for Fuji Oil Group's employees in Japanese, English, Chinese, and Portuguese. The trainings take place every October, designating this month as "Compliance and Information Security Reinforcement Month."

Monitoring

We monitor the compliance status at Group companies, including those outside Japan, in cooperation with Audit & Supervisory Board members and departments responsible for internal audits. Since FY 2018, we have visited Group companies outside Japan to conduct on-site inspections using a compliance checklist (prepared in consideration of laws, regulations, and risks specific to each region).

Hotline system

The Fuji Oil Group Whistleblower Hotline is in place at Group companies in Japan. Moreover, we have outsourced a whistleblowing hotline to an outside law firm in order to ensure confidentiality and anonymity of informants by creating an environment that facilitates reporting. As part of efforts to promote fair transactions, a fair trade helpline operates as a whistleblowing contact point. This helpline serves cooperating companies in specified fields since FY2018.

Overseas, the Fuji Oil Group's Compliance Helpline is available for employees at Group companies outside Japan.

FUJI OIL HOLDINGS INC 's whistleblowing regulations prohibit the dismissal and unfair treatment of an employee by informing to the Fuji Oil Group Whistleblower Hotline, the outsourced whistleblowing hotline and the Fuji Oil Group's Compliance Helpline. They also stipulate that those who have unfairly treated or harassed an informant employee may be punished in accordance with the work, or other, rules and other rules.

Over the last few years, the number of reports received annually throughout the entire Group has remained in the range of five to ten. Upon receipt of a whistleblowing report,

we promptly investigate the details of the report, make necessary corrective measures, and provide feedback to the informant. We also conduct a Group-wide yearly survey on the hotline system to ensure that the hotline system is well known and to improve its operation.

Corruption Prevention

In addition to comply with the Antimonopoly Law, the prevention of bribery and corruption is one of our priority compliance areas related to fair transactions. We set global anti-bribery and corruption rules, and we actively raise awareness of anti-bribery and corruption among employees. To systematize compliance activities, we also established departments dedicated to raise awareness on anti-bribery and corruption. These departments conduct yearly trainings on corruption prevention.

Political contributions

The Fuji Oil Group does not make political donations.

Compliance Violation

There were no serious compliance violations linked to the Fuji Oil Group's operations in FY 2019.