Eat Well, Live Well.



AGP Ajinomoto Group Policies

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CONTENTS

Message from the President & CEO	1
Our Philosophy	2
AGP (Ajinomoto Group Policies)	3
Scope of application	
Corporate responsibility	
• Hotline	
We support the United Nations Global Compact.	5
We actively implement initiatives supporting the achievement of the Sustainable Development Goals.	5
1. Initiatives to Improve Nutrition	6
2. Provision of Safe, High-Quality Products and Services	7
3. Contribution to the Global Environment and Sustainability	8
4. Fair and Transparent Transactions	8
5. Approach to Human Rights	10
6. Human Resources Training and Ensuring Safety	11
7. Working with Local Communities	12
8. Responsibilities to Stakeholders	13
9. Protection and Management of Corporate Assets and Information	14
10. Clear Separation of Business and Personal Affairs	15
11. Establishment and Implementation of Good Governance	16
Reporting	17

Message from the President & CEO

At the Ajinomoto Group, our mission is to contribute to the world's food and wellness, and to better lives for the future. That's why we pursue ASV (The Ajinomoto Group Creating Shared Value) initiatives—our unique approach to resolving social issues through our business and improving economic value by creating shared value with society and local communities.

Pursuing ASV requires collaboration with



various stakeholders, and this collaboration is only possible if each of us at Ajinomoto works hard to earn the trust of society. Recognizing this, we have revised the principles that illustrate the beliefs and behaviors which the companies in the Ajinomoto Group and each of us who work there should uphold, naming them the Ajinomoto Group Policies (AGP). The AGP represent our fundamental, globally shared views as well as the code of conduct that governs the Ajinomoto Group's business activities as they relate to compliance in each country and region in which we operate, international rules concerning "21st-century issues of human society," and the pursuit of ASV.

The AGP apply to all of our activities and provide a written commitment to all of our stakeholders that we will uphold them. Our goal is to be a genuine global specialty company that earns trust by upholding the AGP in everything we do.

Taro Fujie Representative Executive Officer President & Chief Executive Officer Ajinomoto Co., Inc.

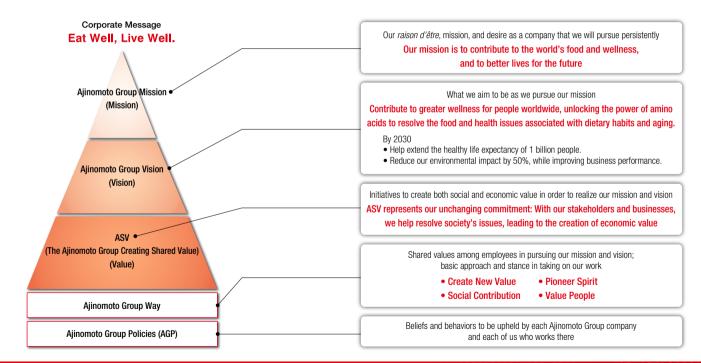
Our Philosophy

Since our founding, the Ajinomoto Group has engaged consistently in initiatives to resolve social issues through our businesses. These initiatives have contributed to the Group's growth by improving economic value through the creation of shared value with society and with local communities. We call these initiatives ASV (The Ajinomoto Group Creating Shared Value). ASV serves as the core of Our Philosophy, the Group's approach to achieving the mission and vision adopted under this philosophy.

AGP (Ajinomoto Group Policies)

Underlying our ASV, Mission and Vision are our Ajinomoto Group Policies, or "AGP." These policies set out the beliefs and behaviors to which all Ajinomoto Group companies and each of us who works there are committed. These policies also serve as a written pledge to all of our stakeholders that we will work earnestly to uphold these beliefs and behaviors.

The chart below illustrates the relationship between these important components of our philosophy.



Scope of application

The Ajinomoto Group Policies, or "AGP," apply to all Ajinomoto Group companies and their officers and employees.

Corporate responsibility

- Ajinomoto Group companies do not ask officers and employees to disregard the AGP. Further, Ajinomoto Group companies ensure that no officer or employee is adversely affected for complying with the AGP.
- Top management of Ajinomoto Group companies recognize their own roles in complying with the AGP and set an example of compliance. Top management also ensure compliance within their companies and establish effective internal systems incorporating opinions from both inside and outside their companies.
- When there is a serious infringement of the AGP, such as a violation of a law
 or regulation, top management is expected to make clear to stakeholders
 their stance on resolving the issue and to take the needed steps to determine
 the cause and prevent any recurrence.

Hotline

- Ajinomoto Group companies set up ways for employees to report violations and problems in accordance with our "Group Shared Policy on Whistleblowing," described in Chapter 11.
- Ajinomoto Group companies secure the personal information of and protect the privacy of any person making a report and ensure that reporting is not used to the detriment of the reporter.

· We support the United Nations Global Compact.

The United Nations Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labor standards, the environment and anticorruption.

Human Rights Businesses should:

- Principle 1: support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

Labour Businesses should:

- Principle 3: uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment Businesses should:

Principle 7: support a precautionary approach to environmental challenges; Principle 8: undertake initiatives to promote greater environmental responsibility; and Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption Businesses should:

Principle 10: work against corruption in all its forms, including extortion and bribery.

• We actively implement initiatives supporting the achievement of the Sustainable Development Goals.

The Sustainable Development Goals (SDGs) were set forth in the 2030 Agenda for Sustainable Development adopted at the United Nations Summit in September 2015, replacing the Millennium Development Goals formulated in 2001. The SDGs consist of 17 internationally agreed goals for the period between 2016 and 2030.

1. Initiatives to Improve Nutrition

- 1.1 We aspire to focus on the nutritional needs of people of different regions, ages, lifestyles, and health conditions, and to provide products and information that improve the nutritional balance of daily meals.
- 1.2 We contribute to emotional and physical nourishment not only with products that provide the appropriate nutrients, but also through recommendations for delicious meals, diverse menus, smart cooking, and eating together.
- 1.3 We work to help consumers improve nutrition by offering a total package of information, products, and services based on a deep understanding of local conditions.
- 1.4 We provide opportunity for nutritious meals with products that are both affordable and in appropriate styles, and that meet consumer needs in each country.

Group Shared Policies

- 1. Group Shared Policy on Nutrition
- 2. Group Shared Policy on Product Accessibility

2. Provision of Safe, High-Quality Products and Services

- 2.1 We constantly aim to put the customer first and, through advanced technology and creativity, develop and provide safe, high-quality products and services.
- 2.2 We provide accurate and helpful information about our products and services in order to earn and maintain the trust of our customers, to meet their expectations, and to ensure their satisfaction.
- 2.3 We ensure that all of our marketing and advertising is done interactively with our customers and in a responsible manner, especially when directed at children.

- 1. Group Shared Policy on Quality
- 2. Group Shared Policy on Food Safety
- 3. Group Shared Policy on Marketing Communications
- 4. Group Shared Policy on Package Description

3. Contribution to the Global Environment and Sustainability

- 3.1 We work with communities and customers to coexist harmoniously with the earth and to bring about a sustainable "recycling-oriented society."
- 3.2 We encourage all individuals to use resources and energy more efficiently and pursue environmentally responsible lifestyles.

Group Shared Policies

- 1. Group Shared Policy on Environment
- 2. Group Shared Policy on Animal Welfare

4. Fair and Transparent Transactions

- 4.1 We are dedicated to fairness and transparency in all of our transactions and maintain fair business practices, recognizing our valuable business partners.
- 4.2 We take steps to ensure a thorough understanding of and compliance with antitrust and other laws and rules related to competition in each country where we do business. We do not engage in collusion with competitors to fix prices or sales/production volume to limit competition (cartels), or in bid-rigging. We do not employ unfair means to eliminate competitors from or block entry into the market.

- 4.3 When selecting subcontractors and suppliers, we make decisions by fairly comparing and evaluating terms such as price, quality and service. We do not engage in conduct that results in any disadvantage to our business partners by abusing our dominant position.
- 4.4 We involve our subcontractors and suppliers in our efforts to fulfill our social responsibilities, including environmental preservation and protection of human rights.
- 4.5 In dealing with our customers and business partners, we act with good judgment and do not engage in inappropriate conduct such as offering improper gifts, entertainment, or money.
- 4.6 We do not provide gifts, entertainment, money or other benefits as bribes to domestic or foreign public officials or persons equivalent to them, regardless of the means. We maintain sound and normal relations with governments and officials.

- 1. Group Shared Policy on Procurement
- 2. Group Shared Policy for Suppliers
- 3. Group Shared Policy on Bribery Prevention
- 4. Group Shared Policy on Political Activities and Political Contributions

5. Approach to Human Rights

- 5.1 We conduct business activities based on an understanding of internationally recognized human rights and respect for international rules of conduct concerning human rights.
- 5.2 We work together with a wide array of stakeholders to avoid any complicity in the violation of human rights.
- 5.3 We respect fundamental principles and rights at work as follows. We: (a) recognize the right to freedom of association and collective bargaining;(b) prohibit the use of forced labor in any form; (c) prohibit the use of child labor; and (d) do not tolerate discrimination in employment.

Group Shared Policies

1. Group Shared Policy on Human Rights

6. Human Resources Training and Ensuring Safety

- 6.1 We do our best to provide meaningful employment opportunities that allow our employees to develop and exercise their skills and abilities in a manner that respects their diversity, character and individuality.
- 6.2 We take a global perspective on our work, emphasize teamwork, exercise creativity, and value a pioneering spirit, striving to contribute to the development of the Ajinomoto Group.
- 6.3 We support employees' efforts to enjoy fulfilling lives and contribute to the prosperity of society through the continuous development of the Ajinomoto Group. To this end, we constantly strive to improve ourselves through new initiatives and programs.
- 6.4 We aim for a workplace climate that improves our job satisfaction and promotes high productivity.
- 6.5 We respect the laws and culture of each country and region where we do business. We prohibit discrimination against anyone on the basis of race, ethnic group, nationality, religion, belief, birthplace, gender, age, disability, LGBT identity, etc.
- 6.6 We build and maintain positive workplaces, based on open communication, that are free from discrimination and harassment, where people respect one another's human dignity.
- 6.7 We respect each person and place occupational safety and health as one of the most important components of corporate activities.

- 1. Group Shared Policy on Human Resources
- 2. Group Shared Policy on Occupational Safety and Health

7. Working with Local Communities

- 7.1 We strive to make positive social contributions to create healthy communities where we do business and across broader society. We focus on economic, cultural and educational development of each community where we do business.
- 7.2 As members of local communities, we are encouraged as individuals to participate in social contribution activities.
- 7.3 We recognize that each and every one of us as a Group employee represents the Ajinomoto Group whenever we interact with the public, and as such, our actions are governed at all times by an awareness of social etiquette.

Group Shared Policies

1. Group Shared Policy on Local Community Enhancement

8. Responsibilities to Stakeholders

- 8.1 We make every effort to employ sound management practices, to provide appropriate returns to shareholders, and to increase corporate value.
- 8.2 We disclose information in a timely and appropriate manner to our diverse stakeholders, and we respond fairly and faithfully to the expectations and trust placed in us.
- 8.3 We maintain and operate a framework of appropriate internal controls to ensure the credibility and accuracy of the financial information disclosed to stakeholders.
- 8.4 We do not engage in illegal activities such as insider trading, which includes trading in stocks or other investment vehicles using nonpublic information for publicly listed Ajinomoto Group companies and/or publicly listed business partners.
- 8.5 We comply with tax laws in each country in which we operate. We respond to changes in taxation systems and administration and minimize tax risks in order to maximize shareholder value.

- 1. Group Shared Policy on Global Tax
- 2. Group Shared Policy on Information Sharing with Stakeholders

9. Protection and Management of Corporate Assets and Information

- 9.1 We strictly protect and manage confidential information and tangible and intangible company assets, including trade secrets and intellectual property.
- 9.2 We recognize the importance of protecting personal information and obtain, use and provide personal information only in appropriate ways so as to prevent information leaks.
- 9.3 We recognize that our brand and intellectual property rights are important corporate assets and use these in an appropriate and correct manner according to laws and the rules of the Ajinomoto Group.
- 9.4 We respect the legitimate intellectual property of third parties.

Group Shared Policies

- 1. Group Shared Policy on Information Security
- 2. Group Shared Policy on Privacy
- 3. Group Shared Policy on Intellectual Property

10. Clear Separation of Business and Personal Affairs

- 10.1 We take steps to ensure that the interests of employees, including their families, and the interests of Ajinomoto Group companies do not conflict.
- 10.2 We use corporate assets or information only for business purposes and not for the pursuit of private interests.
- 10.3 We understand that business relationships established by employees belong to the company even after the retirement of the employees.
- 10.4 We clearly distinguish between corporate public posts and individual personal posts with regard to information on social media. We are conscious of our roles and responsibilities as members of the Ajinomoto Group, even when posting information as an individual, and do not commit acts that could damage the Ajinomoto Group, its reputation, or any of its other assets.
- 10.5 We engage in political activity only as individuals taking a personal stance, and only outside of working hours and outside company property.

11. Establishment and Implementation of Good Governance

- 11.1 We establish governance systems centered on appropriate delegation of authority and accountability and manage the Group in a fair, transparent, and efficient manner to continuously increase our corporate value.
- 11.2 We implement strategic risk management and organized crisis management to ensure preparedness for political, economic, and social concerns such as terrorism, cyber-attacks, and natural disasters.
- 11.3 We strictly avoid any involvement with organized criminal elements, which pose a threat to civic order and safety. Moreover, we stand resolutely against organized criminal elements and refuse any and all inappropriate demands.
- 11.4 We speak up if we become aware of fraud or violation of laws and regulations or the AGP in the workplace and in business. We consult with appropriate managers and use our whistle-blowing system to bring to light concerns and problems.

Group Shared Policies

- 1. Group Shared Policy on Governance
- 2. Group Shared Policy on Risk Management
- 3. Group Shared Policy on Accounting
- 4. Group Shared Policy on Fraud and Defalcation Prevention
- 5. Group Shared Policy on Whistle-blowing

Address any enquiries about the Ajinomoto Group Policies (AGP):

Business Conduct Committee Secretariat's Office Legal & Compliance Department Ajinomoto Co., Inc. Address: 15-1, Kyobashi 1-chome, Chuo-ku, Tokyo 104-8315 Japan

Reporting

 In addition to the hotlines established at individual companies, reports may also be made through the channels below.

External hotline for Japan

TEL: 0120-783-805 (free dial) 9:00-21:00 available Code: 332 Name: Ajinomoto Group

WEB: https://ml.helpline.jp/a-hotline ID: hotline PW: ajinomoto



Audit Committee Hotline

WEB: https://i365.helpline.jp/ajinomoto/k-hotline

Code: 332 Name: Ajinomoto Group ID: hotline PW: ajinomoto

The Audit Committee Hotline is operated by an auditing body and is limited to reports involving the execution of officer duties. Depending on the report content, the secretariat of the Business Conduct Committee may take responsibility for responses.



External hotline for outside Japan

WEB: https://ml.helpline.jp/g-hotline

ID: hotline PW: ajinomoto



Internal hotline for Japan: Secretariat of the Business Conduct Committee, AJICO

TEL/FAX: +81-3-5250-8244 E-mail: hotline@asv.ajinomoto.com

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