▶ Activity Report by Materiality Items

Compliance

Framework

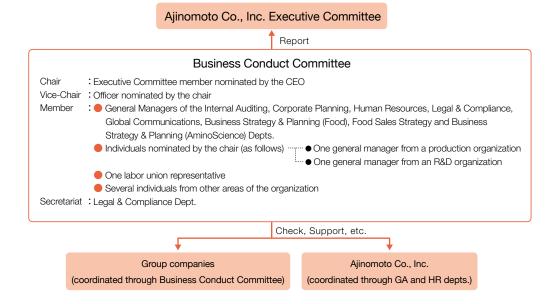
GRI205-DMA GRI205-2 GRI206-DMA GRI307-DMA GRI419-DMA

▶ Ajinomoto Group Policies (AGP)

Compliance framework

The Ajinomoto Group cultivates an open culture and maintains a crisis-resistant corporate structure by building an awareness of compliance and organization-wide commitment to the Ajinomoto Group Policies (AGP). In so doing, we create a stronger management foundation and enhance corporate

Ajinomoto Co., Inc. established the Business Conduct Committee, which meets once every three months to monitor compliance with AGP and whether the Group conducts corporate activities in line with AGP. Major group companies also have their own business conduct committees that engage in raising awareness of AGP and addressing issues unique to each country, region, and company.



Raising awareness of compliance

Compliance education for employees

The following activities were part of our fiscal 2019 efforts to raise awareness and understanding of AGP and our internal whistle-blowing system.

- · Compliance training (for Group company managers in Japan; held five times with 312 participants)
- · Educational posters (produced in 12 languages)
- · Compliance education message (flashed on-screen every time an employee starts their computer)

Worksite AGP meetings

Members of the Business Conduct Committee at Ajinomoto Co., Inc. hold worksite AGP meetings, soliciting direct feedback from employees about issues concerning compliance in the workplace. During fiscal 2019, 41 meetings were held (26 for regular employees, and 15 for part-time and temporary employees), attended by 519 individuals. Summaries of AGP worksite meeting discussions are provided to organizational heads, each worksite, and posted on the corporate intranet to share with all employees. Any compliance issues raised that warrant corporate-level attention are discussed within the Business Conduct Committee. Decisions within the committee are then incorporated into AGP communication measures and compliance promotion activities.

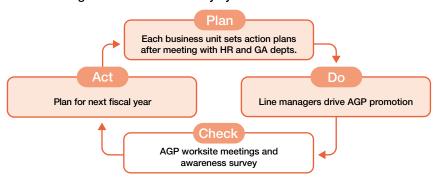
Performance GRI205-2

Activity Report by Materiality Items

AGP awareness survey

Each November, Ajinomoto Co., Inc. and Group companies in Japan ask all employees to respond to an AGP awareness questionnaire. The goal of this survey is to monitor awareness and understanding of AGP and identify any potential compliance issues. A total of 12,633 employees responded to the fiscal 2019 survey. We coordinated with individual worksites to resolve any compliance issues that emerged.

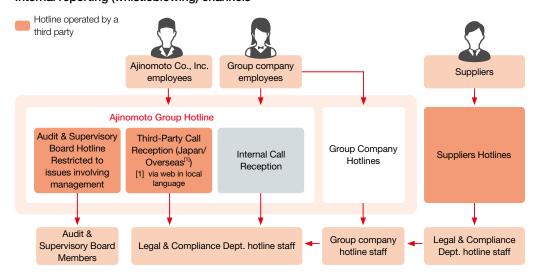
AGP worksite meetings and awareness survey cycle



Bolstering our internal reporting hotline (whistleblowing)

The Ajinomoto Group established a hotline as an anonymous internal reporting system that enables executive officers and employees, including part-time and temporary workers, to make reports or seek advice by phone, e-mail, fax, letter, or other means. During fiscal 2019, we expanded our web-based third-party reporting system from three countries to 13. In addition, we actively communicate our approach and framework related to our whistleblower system, striving to strengthen this program.

Internal reporting (whistleblowing) channels



Labor-Related

Performance

GRI205-2

GRI406-1

GRI419-DMA ▶ Group Shared

Policy on Whistle-Blowing

Number of hotline reports[2]

	Human rights, harassment	Hiring, working conditions	Quality, environment	Fraud	Social manners, ethics	Proper job performance	Other	Total
FY2018	47	21	1	1	6	20	2	98
FY2019	45	19	1	4	10	8	6	93

^[2] Multiple issues reported in some cases

Activity Report by Materiality Items

Approach

GRI205-DMA GRI205-2 GRI206-DMA GRI419-DMA

▶ Group Shared Policy on Bribery

Performance

GRI205-2

Approach

GRI204-DMA GRI205-DMA GRI205-2 GRI206-DMA GRI419-DMA

- ▶ Group Shared Policy on Procurement
- ▶ Group Shared Policy for Suppliers

Performance

GRI205-2

Preventing corruption

Basic policy

The Ajinomoto Group Policies (AGP) requires employees to maintain sound and healthy relationships with politicians and government officials. The AGP also states that giving favors to public officials or any person equivalent in Japan or in foreign countries, in the form of gifts, entertainment, money, or other bribery in any manner is prohibited. The Group Shared Policy on Bribery Prevention includes the following rules, which require officers and employees of Group companies to comply with this policy and the related bribery prohibition laws of other countries and regions.

- · Maintain accounting books and records for all company transactions in reasonable detail
- · Confirm the appropriate treatment of expenses related to public officials, etc.
- · Monitor compliance and conduct under this policy via audits

Education for employees

In Japan, the Ajinomoto Group holds regular training for officers and employees involved in line management of Group companies. This training covers proper relationships with public officials, including public officials in foreign countries. A total of 312 people attended this training during fiscal 2019. In addition, we conduct bribery prevention training courses for officers and managers of overseas Group companies. A total of 227 people attended this training in Brazil and Peru during fiscal 2019.

Further, we introduced e-learning training during fiscal 2019 as another means to communicate the Group Shared Policy on Bribery Prevention. Approximately 7,300 group officers and employees in Japan took the training, as did approximately 1,600 line management-level employees at overseas Group companies.

Transparent and fair business practices

Basic policy

The AGP requires that officers and employees fully understand and comply with laws and regulations concerning competition in all countries and regions in which we operate. In this way, we strive to ensure fair and transparent business transactions. The Ajinomoto Group has also established Guidelines for Antitrust Laws (Japan), Guidelines for Antitrust Laws in the United States, and Guidelines for Competition Laws in Europe. We ask that our business partners understand the purposes behind the Group Shared Policy on Procurement, the Group Shared Policy for Suppliers, and other related guidelines. We also ask business partners to refrain from behavior that hinders fair, transparent and open competition.

Education for employees

In Japan, the Ajinomoto Group holds regular training on antitrust for officers and employees involved in line management of Group companies. A total of 312 people attended this training during fiscal 2019. In addition, we conduct antitrust law training courses for officers and managers of overseas Group companies. A total of 227 people attended this training in Brazil and Peru during fiscal 2019.

These trainings highlight the prohibition on cartels, which have an especially large impact on fair competition.

▶ Activity Report by Materiality Items

Framework

GRI201-1 GRI205-DMA GRI205-2 GRI206-DMA

▶ Group Shared Policy on Global

GRI419-DMA

Performance

Appropriate competitive behavior

Framework for global tax strategy

The Ajinomoto Group established the Group Shared Policy on Global Tax and encourages Group companies to conduct business in compliance with the tax laws of their respective countries. At the same time, we ask Group companies to minimize tax risks.

To ensure operations match this policy, we identify appropriate tax practices by collecting selfassessments from Group companies and meeting regularly with each company.

In addition, we communicate tax payment and tax audit information across the Group to achieve greater tax administration efficiencies.

Corporate tax paid by region

