



KAYAKU ADVANCED MATERIALS, INC.

PRIVACY GUIDANCE FOR EMPLOYEES AND CONTRACTORS

Introduction

As the world has become increasingly connected, there has been a growing concern about safeguarding the privacy of each individual's personal information such as Social Security Numbers, credit card information, and bank accounts. In order to address these concerns, various jurisdictions have enacted protective laws.

As a general matter, all personal information about employees, contractors, customers, suppliers, and all other individuals with whom we deal is to be (a) kept strictly confidential and secured and (b) used and disclosed only as required in order to complete business activities such as, for example, processing orders and hiring personnel, paying and providing benefits to personnel. If ever in doubt, do not use or disclose the personal information and seek advice from the company's Privacy Manager.

In particular, as electronic mail is not secure, electronic mail should not be used to convey or transmit the personal information of individuals whether in the body of an email message or in an attachment. Secure alternative means should be used to convey such information such as facsimile machines or telephone. If electronic mail is the only viable means of communicating such information, any materials containing Personal Information must be password-encrypted with a strong password and with the password sent only by facsimile, phone, or some means other secure means.

Massachusetts

General

Massachusetts has strict laws regarding the protection of personal information. All company employees and contractors are required to comply at all times with the company's Written Information Security Policy ("WISP") which may be updated by the Company from time to time and at any time.

Privacy Manager

As the person responsible for applying and answering questions about the WISP, the Privacy Manager must, as part of your responsibilities, be familiar with the WISP. If ever in doubt, do not use, disclose, or destroy the personal information and seek advice from the company's President or corporate legal counsel. The Privacy Manager is also responsible for providing training to the Company's employees and consultants about the WISP, its requirements, and the proper collection, handling, use, and disclosure of Personal Information.

The Privacy Manager is responsible for updating the WISP not later than the anniversary date of the last time the WISP was updated.

The Privacy Manager is responsible for ensuring that the WISP is available or accessible to all company employees.

California

General

California has strict laws regarding the protection of personal information and the rights of individuals to control their personal information.

Before soliciting, requesting, collecting, or receiving personal information from a California resident, you must provide such resident with the most recent form of either (a) an Employee Privacy Notice for California Residents (“CA Employee Notice”) if the individual is a current, prospective, or former employee or contractor of the company or (b) in any other case, a Consumer Privacy Notice for California Residents (CA Consumer Notice”). The requirement to provide the notice includes the collecting or receiving of personal information through the Website or otherwise online.

With respect to the personal information of individuals resident in California, all queries about such personal information must be referred to the Privacy Manager.

Privacy Manager

There are detailed laws applicable to the personal information about individuals resident in California. These laws govern the use, protection, disclosure, and deletion of such personal information. The California laws apply only to residents of California.

As part of your responsibilities, you are required to familiarize yourself with the California laws applicable to the residents of California and the exceptions to those laws. If ever in doubt, do not use, disclose, or destroy the personal information and seek advice from the company’s President or corporate legal counsel. The personal information of any individual resident in California should not be destroyed without first checking with the company’s President and corporate legal counsel to ensure that such information is not required for permissible purposes.

The Privacy Manager is responsible for updating each of the following documents not later than the one-year anniversary of the last update of each document: the CA Nippon Kayaku America, Inc. Notice, the CA Consumer Notice, the Website Privacy Policy, and this Policy Guidance.

The Privacy Manager is responsible of ensuring that the most recent versions of the CA Consumer Notice and Website Privacy Policy are accessible by links on the Website at all times and that the date of update is not more than one year old.

The Privacy Manager is responsible for ensuring that the reporting number and email address referenced in the CA Employee Notice and CA Consumer Notice are operational.

The Privacy Manager is responsible for investigating the legitimacy of any verifiable request made pursuant to the CA Employee Notice or CA Consumer Notice, for conducting a thorough investigation required in connection with responding to such verifiable request, and for responding to such verifiable request.

END OF GUIDANCE