

# Haseko Group Code of Conduct

## 1. Purpose of Establishing This Code and Scope of Application

### (1) Purpose

This Code sets forth fundamental norms of conduct for officers and employees affiliated with Haseko Group companies so that Group companies can engage in conscientious corporate activities that contribute to society.

### (2) Scope of application

This Code applies to all officers and employees (including officers and other comparable persons, employees, and seconded employees) of Haseko Group companies. It also applies to other employees including temporary employees and part-time employees.

## 2. Fundamental Stance on Conduct

### (1) Decent and responsible conduct

Officers and employees shall act conscientiously and responsibly in accordance with social decency with an awareness of their status of officers and employees of the Haseko Group in all areas of corporate activities as well as in their private lives.

### (2) Compliance with laws and regulations

Officers and employees shall at all times comply with laws, regulations, internal rules, and so on in all areas of corporate activities. Officers and employees shall endeavor to collect, accumulate, update, and share information relating to laws and regulations required for business.

### (3) Respect for human life

In addition to safety management during new construction and renovation of buildings, officers and employees shall at all times perform corporate activities with respect for the lives of customers, neighboring residents, employees of cooperating companies, officers and employees, and others regarding all risks including earthquake disaster mitigation measures and fire prevention.

### (4) Respect for human rights

Officers and employees shall respect the fundamental human rights of all people in all areas of corporate activities and shall not engage in discrimination on the basis of race, nationality, birth, creed, religion, sexual orientation, gender identity, age, disability, and the like or engage in conduct that offends personal dignity.

### (5) Prevention of the materialization of risks

When conducting business, officers and employees shall at all times be aware of risks that could harm business activities and shall take measures to prevent the materialization of risks. Officers and employees shall promptly report risk information to a supervisor.

### **3. Sound and Good-Faith Business Activities**

#### **(1) Compliance with business laws and regulations**

Officers and employees shall at all times pay due attention, understand, and comply with laws and regulations relating to business including the Construction Business Act and Real Estate Brokerage Act. Officers and employees shall strictly and reliably perform procedures such as acquisition of permits and approvals and submission of notices.

#### **(2) Rigorous quality control**

When designing and constructing buildings, officers and employees shall perform rigorous quality control including quality control of materials provided by trading partners and shall provide buildings that gain the trust of customers. When providing services, officers and employees shall strive to maintain and enhance service quality.

#### **(3) Strict safety management**

Officers and employees shall perform strict safety management during new construction and renovation of buildings and shall strive to prevent accidents. Officers and employees shall take into consideration the severity of accidents involving third parties in particular and must pay meticulous attention to the prevention of such accidents.

#### **(4) Enhancement of customer satisfaction**

Officers and employees shall at all times respond to customers with sincerity, provide accurate explanations and information concerning buildings and services, and respond promptly to questions and requests. Officers and employees shall perform after-sales services in good faith and promptly in accordance with standards.

#### **(5) Compliance with the Antimonopoly Act and other laws**

Officers and employees shall respect the spirit of the Act on Prohibition of Private Monopolization and Maintenance of Fair Trade, which is intended to promote fair economic activity, and shall not engage in unfair trade practices such as conduct that restricts competition (cartels) or abuse of superior bargaining position. Furthermore, officers and employees shall comply with fair competition rules and other rules when conducting advertising and publicity activities.

#### **(6) Prevention of unfair competition**

Officers and employees may not acquire the trade secrets of other companies using improper means. Furthermore, officers and employees shall not acquire such information that is believed to have been acquired by a third party through improper means.

#### **(7) Prohibition of infringement of intellectual property rights**

Officers and employees shall respect the intellectual property rights of legal persons and individuals outside the Haseko Group and shall not infringe upon or improperly use such intellectual property rights.

#### **(8) Prevention of bribery and corruption**

Officers and employees shall not provide improper benefit to public officers and other comparable persons. Furthermore, officers and employees shall not directly or indirectly provide or accept

entertainment, gifts, or other benefit in excess of business practices and social common sense in all areas of corporate activities.

#### **(9) Donations and political contributions**

When making political contributions or donations and the like to various organizations, officers and employees shall comply with the Public Offices Election Act, Political Funds Control Act, and other relevant laws and regulations, adequately consider the necessity and appropriateness of such political contributions or donations, and act in accordance with internal rules and so on.

#### **(10) Proper accounting and tax procedures**

When performing accounting and tax procedures, officers and employees shall make accurate statements in accordance with fair accounting standards and relevant laws and regulations. Furthermore, officers and employees shall strive to maintain and enhance corporate governance relating to accounting and taxation in order to carry out proper accounting and tax procedures.

#### **(11) Disclosure of management information**

Officers and employees shall disclose in a timely manner accurate management information including Haseko Group management policies, financial information, and the status of business activities to shareholders, investors, and other stakeholders.

#### **(12) Severance of relationships with anti-social forces**

If an improper demand is received from anti-social forces, officers and employees shall refuse the demand and shall not engage in any transactions and the like with the relevant companies. Furthermore, officers and employees may not use anti-social forces under any circumstances.

### **4. Business Activities That Contribute to Society**

#### **(1) Development of new technologies, products, and services**

Officers and employees shall at all times maintain an interest in the business conducted by the Haseko Group and strive to contribute to the development of new technologies, products, and services.

#### **(2) Development and improvement of products and services that meet customer needs**

Officers and employees shall at all times listen to the opinions of customers and strive to contribute to the development and improvement of products and services that meet customer needs.

#### **(3) Environmental preservation measures**

Officers and employees shall give consideration to the prevention of global warming, development of a recycling-based society, preservation of biodiversity, and so on in all areas of corporate activities and at all times act with an awareness of preservation and improvement of the global environment. Officers and employees shall strive to save energy and resources, reduce CO<sub>2</sub> emissions, preserve biodiversity, and so on throughout the entire Group. Furthermore, officers and employees shall properly process soil contamination, asbestos, and industrial waste

and strive to preserve the global environment.

#### **(4) Contribution to society**

Officers and employees shall maintain an awareness that corporate development is conducted in tandem with society and shall strive to actively contribute to society through corporate activities such as by developing products that contribute to the prevention of local disasters.

### **5. Proper Use and Management of Company Assets and Information**

#### **(1) Management and proper use of company assets**

Officers and employees shall properly manage company assets to prevent damage, theft, and so on and shall not use company assets for personal use and the like.

#### **(2) Management of company information**

Officers and employees shall properly manage company information in accordance with the Information Management Regulations and other rules and shall prevent improper disclosure and leaks. This shall also apply to external information learned in the course of business. Even after the termination of employment, officers and employees shall not use company information or external information learned while employed.

#### **(3) Management of personal information**

Officers and employees shall strictly manage and protect personal information handled in business in accordance with the Personal Information Protection Regulations.

#### **(4) Preservation of intellectual property rights**

Officers and employees shall promptly file an application in the name of Haseko Corporation or the company with which they are affiliated regarding inventions, development, and so on concerning which they believe it would be beneficial and feasible to obtain intellectual property rights. After obtaining intellectual property rights, officers and employees shall properly perform management.

#### **(5) Operation of information systems**

When operating company information systems, officers and employees shall properly perform management and use in accordance with internal rules, perform strict security management including management of IDs and passwords, and strive to prevent information leaks.

### **6. Beneficial Workplace Environments**

#### **(1) Development of a positive corporate culture**

Officers and employees shall establish workplace environments that emphasize autonomy and creativity and establish environments that enable individuals to demonstrate their maximum capabilities and enhance abilities for the future.

#### **(2) Compliance with labor laws and regulations**

Officers and employees shall comply with labor laws, regulations, and internal rules and maintain good physical and mental health. Furthermore, officers and employees shall at all times strive to

reduce overtime work hours with an awareness of improving productivity.

### **(3) Prevention of occupational accidents and preservation of workplace environments**

Officers and employees shall place the highest priority on respecting human life, shall comply with laws, regulations, and internal rules on occupational safety, and shall strive to create safe and beneficial workplace environments.

### **(4) Prohibition of harassment**

Officers and employees shall strive to respect the personality of all people and shall not engage in speech or conduct that offends personal dignity or harassing speech or conduct that is detrimental or threatening (including power harassment, sexual harassment, and maternity harassment).

### **(5) Prohibition of political and religious activities**

Officers and employees shall not engage in political and religious activities, compulsion of donations, or other conduct unrelated to the company's corporate activities in the workplace.

## **7. Prohibition of Improper Conduct**

### **(1) Prohibition of the provision of benefit in relation to the exercise of shareholder rights**

In accordance with relevant laws, regulations, and internal rules, officers and employees shall not provide any benefit to any person in relation to the exercise of shareholder rights and shall not engage in any conduct that could be mistaken for the provision of such benefit.

### **(2) Prohibition of conflicts of interest**

Officers and employees shall not engage in any conduct that is contrary to the interests of the company or any conduct that provides an advantage to a competitor.

### **(3) Prohibition of insider trading**

In accordance with relevant laws, regulations, and internal rules, officers and employees shall not engage in trading of shares and the like in violation of insider trading regulations.

### **(4) Prohibition of breaches of trust**

Officers and employees shall not engage in any work-related contractual conduct, make external promises, or engage in other comparable conduct with the intention of gaining benefit for oneself or providing benefits to a third party or with a prior awareness that such conduct would be detrimental to the company.

### **(5) Prohibition of other improper conduct**

Officers and employees shall not engage in any improper conduct whatsoever including improper management of money and inventories as well as collusion with trading partners.

## **8. Operational Systems**

### **(1) Strict implementation of this Code within the company**

Officers and employees shall familiarize themselves with the details of this Code and shall act in

accordance with this Code when executing business. Furthermore, officers and employees shall strive to strictly implement this Code within the company.

**(2) Whistleblowing and consultations**

The Haseko Group shall establish a whistleblowing hotline which officers or employees, other employees, or other persons can use to make a report to and consult with if such person discovers a violation of laws and regulations, harassment, or conduct that gives rise to a compliance issue within the scope of the corporate activities of a Group company.

**(3) Protection of whistleblowers**

Except in the case of a report or consultation for an improper purpose, a whistleblower may not be subject to disadvantageous treatment on the grounds of making a report or consulting.

**Supplementary Provisions**

**Revision and revocation of this Code**

This Code is a comprehensive revision of the Code of Conduct that came into effect on April 1, 2003. Such revision and revocation shall be implemented in accordance with the Haseko Group list of decision-making authority and so on.

**Management of this Code**

The Haseko Corporation Risk Management Department will respond to inquiries relating to this Code and perform all management relating to the formulation of educational policies, formulation of proposed revisions, and so on.

**Revision History**

April 1, 2003	Haseko Group Code of Conduct comes into effect
April 1, 2007	First revision
March 22, 2012	Second revision
January 1, 2017	Third revision
April 1, 2017	Fourth revision
May 1, 2018	Fifth revision
April 1, 2020	Sixth revision