

Compliance Action Guidelines

Based on the Tokyo Tatemono Group Compliance Charter with emphasis on our relationships with customers/business partners, society, shareholders/investors, and companies/executives/employees, the Tokyo Tatemono Group has formulated the following 15-item Action Guidelines that form our standards of conduct.

1. We will engage in fair and sound corporate activities in compliance with laws and regulations

(1) Observance of Laws and Regulations

- We will engage in fair and sound corporate activities based on social norms and high corporate ethics, in compliance with laws and regulations.
- We will understand and respect national and regional laws and regulations, as well as cultures and customs.

(2) Proper Relationships with Partners

- We will respect the rights, obligations, standpoints, etc. of our business partners and will engage in sound transactions grounded in economic rationality.
- We will not engage in gift exchanges, entertaining, or the offer or receipt of other benefits beyond the extent deemed to fall under proper social norms.

(3) Fair Competition

- We will not permit anti-competitive practices such as collusion and price cartels.
- We will not engage in acts of unfair competition such as improper acquisition of confidential information or dumping.

(4) Proper Relationships with Politics and Government

- We will maintain transparent and sound relationships with politics and government.
- Based on the Policy on the Prevention of Bribery at Tokyo Tatemono Group, we will not offer economic advantage to persons who are or who are deemed to be civil servants.

(5) Ban on Relationships with Antisocial Forces

- We will take a firm stance against antisocial forces and will never respond to improper demands, etc.
- We will take constant care to avoid participation in money laundering (actions to disguise funds obtained through criminal acts as funds earned through legitimate economic activities), etc.

(6) Proper Management of Information

- We will protect the privacy of individuals, will properly manage personal information obtained in the workplace, and will not use information for purposes other than its original purpose. We will also take due care to avoid externally disclosing personal information in the absence of valid reason, without the consent of the persons involved.
- We will not unreasonably infringe on the interests of customers, business partners, other companies, etc. by leaking confidential information obtained in the course of work.
- We will make proper use of the Company's information systems and will enact proper safety management measures with sufficient care given to information management. We will not improperly access or obtain information from information systems owned or managed by other companies or other persons.

(7) Prohibition of Improper Activities, etc.

- We will execute the business of the Company in good faith and will not take actions that damage the reputation or credibility of the Company or take actions that are contrary to the interests of the Company.
- Upon becoming aware of improper activities, etc., we will make use of the Tokyo Tatemono Group Helpline.
- In cases of becoming aware of undisclosed important information about a company, until said information is publicly announced, we will not engage in purchase or sale of shares of the said company or encourage others to do so, and will not engage in actions that may cause suspicions.

- We will properly manage information to ensure that undisclosed important information is not leaked to third parties through carelessness, etc.
- (8) Respect for Company Assets
- We will maintain full awareness that all Company assets are lent or provided for the purpose of executing the business of the Company, and will not make use of these for private purposes.
 - We will not provide or disclose intellectual property held by the Company to third parties without the approval of the Company.
 - We will respect intellectual property held by other companies or other persons, and will not duplicate said property without permission or otherwise use it improperly.
2. We will think from customers' point of view and act in good faith
- (1) Sincere Response to Customers
- We will disclose truthful and accurate information about the products and services that we provide to customers.
 - Putting customers' point of view first, we will respond in good faith to requests and complaints concerning our products and services.
3. We will contribute to the achievement of a better society through our corporate activities
- (1) Environmental Considerations
- We will conduct business activities with consideration of the global environment, on the basis of the Tokyo Tatemono Group Environmental Policy.
 - In the supply chain as well, we will work toward co-existence and joint flourishing with the natural environment by practicing procurement activities that take the global environment into consideration.
- (2) Timely and Appropriate Information Disclosure, Financial Reporting and Appropriate Tax Reporting
- We will disclose Company information that significantly affects investment decisions to shareholders and investors in a timely and appropriate manner.
 - We will engage in reliable financial reporting and proper tax reporting in accordance with accounting- and taxation-related laws and regulation and with other generally accepted accounting standards.
- (3) Co-existing with Local Communities
- We will strive to build and maintain good relationships with local communities.
 - We will seek co-existence and co-prosperity with local communities through fully understanding the communities and engaging in corporate activities grounded in those communities.
4. We will respect each others' personalities and values and will ensure a comfortable working environment.
- (1) Respect for Human Rights and Prohibition of Discrimination
- We will respect human rights and will not engage in discrimination on the basis of race, nationality, creed, gender, sexual orientation, age, social status, origin, etc.
- (2) Prohibition of Harassment
- We will not engage in acts of harassment that cause distress or discomfort to others or those around them.
 - We will strive to maintain workplace environments free of harassment.
- (3) Guarantee of a Comfortable Working Environment
- We will assure open workplace environments through the formation of relationships of trust that enable all persons to speak freely and through fair treatment of personnel.
 - We will seek to maintain harmony between work and private life, such as childrearing, and to engage in efficient work that is healthy in mind and body.

Established on July 1, 2020