



Corporate Philosophy, Corporate Data,  
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# Compliance

## Policy and Concept

The Tokyo Tatemono Group defines compliance as complying not only with laws and regulations, but also with social norms and corporate ethics. This approach builds a long-lasting relationship of trust with society and allows us to continue sound corporate activities.

We believe that, as a company, we must respond sincerely to the needs of people in our surrounding environment, including our customers, local communities, employees, shareholders and investors, and business partners. In June 2009, the group established a shared Compliance Charter for group companies. This charter is our pledge to society to promote corporate activities that are committed to unwavering compliance.

Alongside other initiatives, we are using compliance education and training as we work to build organizational and educational systems that enable our employees to maintain a high level of compliance awareness at all times.

### Compliance Charter

As we engage in corporate activities, we observe the Compliance Charter below:

- We adhere to laws, regulations, and other rules and engage in fair, sound corporate activities.
- We act faithfully by thinking from the customers' standpoint.
- We contribute to making society better through corporate activities.
- We respect the personalities and values of each other and maintain a comfortable working environment.

Established June 2009

## Adherence to the Compliance Code of Conduct

To ensure adherence to our Compliance Charter, the Tokyo Tatemono Group has created the Compliance Code of Conduct and the Tokyo Tatemono Group Compliance Manual ("Compliance Manual").

The Compliance Manual contains explanations of compliance items and related policies and guidelines, including the Group Environmental Policy and the Tokyo Tatemono Group Anti-Bribery Policy.

The Compliance Code of Conduct set forth 15 guidelines for conduct that each individual is required to follow and are intended for all officers and employees of the Tokyo Tatemono Group (including contract employees, temporary and part-time employees), and we work to ensure a common understanding among them of the Compliance Manual through training and the posting of notifications at our offices, and other means.

The effectiveness of the guidelines and manual is regularly reviewed by the Compliance Subcommittee, which conducts specialized deliberations on compliance. Revisions are made as necessary, with reports submitted to the Board of Directors via the Risk Management Committee.

### Compliance Code of Conduct

- |   |  |
|---|--|
| 1. Comply with laws and regulations                                   | 9. Respond sincerely to customers  |
| 2. Maintain proper relationships with partners                        | 10. Exercise consideration for the environment   |
| 3. Engage in fair competition   | 11. Engage in timely and appropriate disclosure, and conduct appropriate tax reporting |
| 4. Maintain proper relationships with governments and administrations | 12. Practice co-existence with local communities                                       |
| 5. Reject relationships with anti-social forces                       | 13. Respect human rights and prohibit discrimination                                   |
| 6. Engage in proper management of information                         | 14. Prohibit harassment  |
| 7. Prohibit dishonest behavior  | 15. Provide a comfortable work environment   |
| 8. Respect corporate assets   |  |

Compliance Code of Conduct

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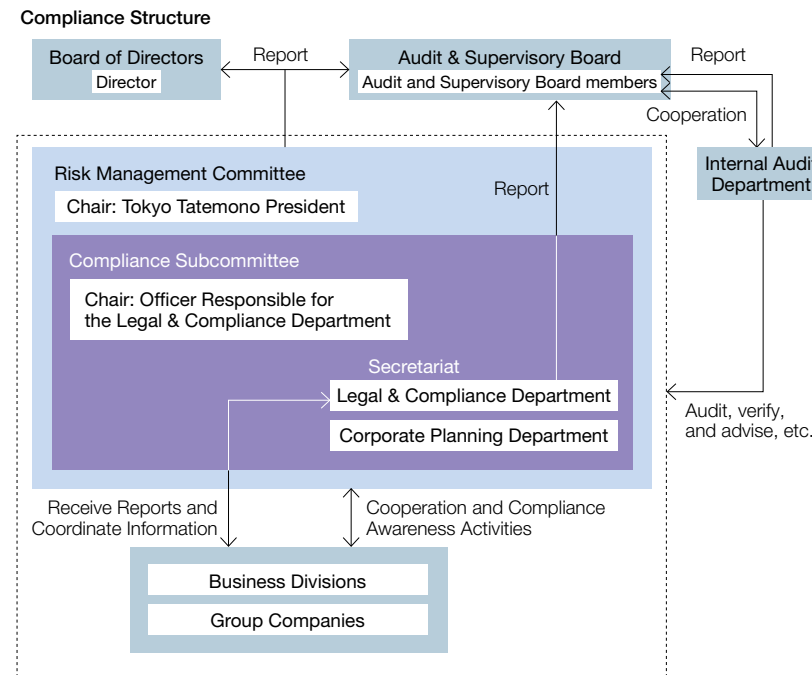
## Compliance

### Structure

To promote compliance, the Tokyo Tatemono Group has established the Risk Management Committee to oversee the Group's risk management and compliance, and the Compliance Subcommittee as a subordinate organization of the Risk Management Committee.

The Risk Management Committee reports to the Board of Directors on important matters regarding compliance measures and the status of compliance risk handling, and the Board of Directors supervises compliance with the Compliance Charter and the Compliance Code of Conduct. The Compliance Subcommittee reviews compliance measures, monitors progress, and addresses compliance risks.

Additionally, with the aim of improving the compliance of the Group as a whole, a compliance information liaison meeting attended by compliance officers of the Company and each Group company is held regularly to share information on the status of compliance measures taken by each company and to enable Tokyo Tatemono to support Group companies' efforts. We also provide support and guidance to Group companies in their compliance-related operations, and we take the lead in encouraging collaboration among Group companies.



### Internal Audits for Legal Compliance

Tokyo Tatemono has established an Internal Audit Department independent of any division or Group company that audits the operations of all divisions and Group companies. Audits are conducted based on the internal audit plan established each fiscal year, with risk assessments conducted by subject or by division or Group company.

We believe that internal audits help us achieve our management objectives by evaluating the appropriateness and effectiveness of the internal control systems of each department and Group company and recommending ways to improve them.

In accordance with the Internal Control Rules, when a division or Group company being audited receives opinions or recommendations for improvement based on the internal audit, that division or Group company prepares a policy for corrective measures and undergoes follow-up audits by the Internal Audit Department regarding the status of implementation within one year. The Internal Audit Department's Audit Report is reported to the President and the officers of the divisions to be audited, as well as regularly to the Board of Directors and the Audit and Supervisory Board.

In addition, we are working to improve the quality of internal audits for the Group as a whole by making proposals to Group companies for improving the quality of internal audits in tandem with the actual conditions of each company. We also undergo internal audit quality assessments by external experts as required.



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### Helpline (Anonymous Whistleblower System)

Tokyo Tatemono and the Group companies have introduced whistleblower systems with the aim of the prevention and early detection of incidents of non-compliance. The helplines available to the Tokyo Tatemono Group support multiple languages, including the “Tokyo Tatemono Group Helpline,” which is available in Japanese, and the “TOKYO TATEMONO GROUP HELPLINE,” which is available in foreign languages (English, Chinese, Thai, and Indonesian). Both helplines accept inquiries 24 hours a day, 365 days a year.

Internal complaints, reports, or consultations received by the Helpline will be reported to the Legal & Compliance Department. Depending on the nature of the complaint, the facts will be investigated and confirmed either by this or a related department, by the reporting division of each Group company, or by the harassment response division of each company. Based on the investigations, we take prompt action for acts of non-compliance, including putting in place corrective measures and measures to prevent recurrence. The Risk Management Committee (Compliance Subcommittee) monitors all whistleblowing, reporting, consultation, and other similar activities.

This system is being made known to those to whom it is available by putting up posters in the workplace, posting on the company intranet, conducting compliance training and other means. In addition, in keeping with the spirit of the Whistleblower Protection Act, whistleblowers will not be treated disadvantageously because of their internal complaints, reporting, or consultation, and their privacy will be protected, with whistleblowers being able to submit reports either using their real names or anonymously.

### Helpline Overview

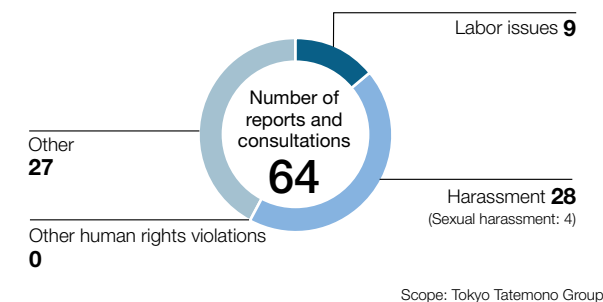
#### Reportable acts

Violations of laws and regulations and compliance violations such as bribery, fraud, human rights violations, labor issues, and harassment committed by or within Tokyo Tatemono Group

#### Helplines and Scope

|   | Established location                                | Contact methods                   | Scope   |
|---|---|-----------------------------------|---|
| Internal helplines                                | Tokyo Tatemono and domestic Group companies         | —                                 | • Officers and employees (including contract employees and part-time employees) of Group companies  |
| Tokyo Tatemono Group Helpline (Japanese)          | External outsourced agency (Dial Service Co., Ltd.) | • Dedicated hotline<br>• Web form | • Temporary employees and other contractor employees, etc. engaged in work at Group company business sites<br><br>* All of the above also include former employees. |
| TOKYO TATEMONO GROUP HELPLINE (foreign languages) |   | • Web form                        |   |

### Number of Reports and Consultations Handled by the Helpline (FY2025)



[\(Data\) Violation of Laws or Regulations in the Field of Socioeconomic Activities \(p. 113\)](#)

### Responding to Compliance Violations

To ensure adherence to the Compliance Code of Conduct, the Tokyo Tatemono Group has established an anonymous whistleblowing mechanism to identify events that raise concerns about widespread incidents of non-compliance.

In the event that a matter that may be deemed to pose a compliance problem (including labor issues) is discovered, the matter is reported to the president, Audit and Supervisory Board members, and other relevant parties, and an investigation, factfinding review, or other similar process is conducted as appropriate. If, as a result of the investigation, an incident of non-compliance is identified, it is reported to the Risk Management Committee (Compliance Subcommittee). If the event is particularly serious, the Committee reports it to the Board of Directors, and we promptly take corrective measures and preventive measures. In addition, the Committee will monitor the status of the situation and other matters to ensure appropriate management until the response has been completed.

There were zero major incidents of non-compliance (violations of laws and regulations and incidents which would be subject to sanctions) and no fines, penalties, or settlements in fiscal 2025.

[\(Data\) Violation of Laws or Regulations and Related Sanctions \(p. 113\)](#)  
[\(Data\) Violations Related to Product and Service Information and Labeling \(p. 113\)](#)

[\(Data\) Violations Related to Marketing Communications \(p. 113\)](#)  
[\(Data\) Reports and Consultations to the Helpline \(p. 113\)](#)

#### ● Provisions for Violations of Laws and Regulations, Lawsuits, etc., Including ESG-related Issues

An amount is estimated at the end of the fiscal year for fines and settlements that are likely to arise from events that occurred prior to the current fiscal year, and provisions are made accordingly. At the end of fiscal 2025, there were no violations of laws or regulations or lawsuits, including any involving ESG-related issues, and as a result, there are no material provisions for them.

[\(Data\) Violation of Laws or Regulations in the Field of Socioeconomic Activities \(p. 113\)](#)



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### Initiatives to Prevent Bribery and Corruption

We formulated the Tokyo Tatemono Group Anti-Bribery Policy to fulfill the commitments of our Compliance Charter. We prohibit the provision of economic benefits (including facilitation payments) to public officials or deemed public officials that would infringe upon local laws or regulations in Japan or in any of the countries where we conduct business. We publish this policy both within and outside the company, on our corporate intranet and our corporate website. To ensure that we establish proper relationships with our business partners, the Compliance Code of Conduct also prohibit giving or receiving excessive gifts, entertainment, or other benefits, or engaging in anti-competitive behavior such as bid rigging or price cartels. Additionally, the Tokyo Tatemono Group Compliance Manual, which incorporates the subject of preventing corruption of all kinds, is fully communicated to all officers, employees (including contract employees and part-time employees), and temporary employees of the Group through training and other means. Further, we are working to ensure that our business partners, including agents and brokers, are fully aware of and familiarize themselves with our Sustainable Procurement Standards and Sustainable Procurement Standards Guidelines by distributing them and conducting surveys. In addition, Tokyo Tatemono and some Group companies obtain anti-bribery pledges from employees (including contract and temporary employees) to raise awareness of bribery prevention.

[Tokyo Tatemono Group Anti-bribery Policy](#)

[Supply Chain Management \(p. 59\)](#)

### Evaluation of Corruption Risks Including Bribery

Whenever we conclude a contract with a new agent (including brokers) or renew a contract with an existing agent, we engage in comprehensive checks and risk assessment. We do so by collecting credit information using public agencies, private investigation companies, and the Internet, and use a business partner check sheet that includes items such as reputation for corruption and termination of past transactions due to inappropriate behavior to check for suspicious signs. We also recognize that countries and regions whose Corruption Perceptions Index is less than 50, as

defined by the international NGO Transparency International, pose a high risk and require caution.

When contracting with agents in such countries, we take thorough measures to prevent the risk of bribery by inserting an antibribery clause in the contract or by receiving an anti-bribery pledge.

### Responding to and Monitoring Corruption Risks

We comprehensively assess and strive to prevent corruption risks in all of our activities, including prohibiting the provision of economic benefits which violate applicable laws and regulations to public officials with whom we have particularly close relationships due to the nature of our business. Of particular note is our approach to bribery. We evaluate bribery risks based on our Anti-Bribery Regulations and Anti-Bribery Manual and identify certain high-risk activities (including the use of agents to provide services on an intermediary, agency, or mediation basis in addition to direct transactions). To deter such activities, in the Anti-Bribery Regulations and Anti-Bribery Manual, the Company has established approval and reporting processes for entertainment, gifts, donations, etc. We consider entertainment and gifts to public officials in foreign countries to be of particularly high risk, and have set the bar for our internal approval process with respect to these activities higher than in Japan. With regard to bribery, the Risk Management Committee (Compliance Subcommittee) conducts risk assessment and monitoring. Internal audits are conducted periodically to evaluate and review the anti-bribery control system.

### Political Donations

We do not make donations related to political activities to individual politicians or organizations other than political parties or political fund organizations, and our record of such donations in fiscal 2025 was 0 yen. When making donations related to political activities to political parties and political fund organizations, we comply with the Political Funds Control Act, the Public Offices Election Act, and other related laws and regulations.

### Preventing Anti-Competitive Practices

The Tokyo Tatemono Group upholds fair competition in its Compliance Code of Conduct, and in conjunction with the Compliance Manual, we are working to eliminate anti-competitive practices such as bid-rigging and price cartels, as well as unfair competitive practices including improper acquisition of confidential information and dumping, through training and other means to ensure a common understanding among all officers and employees of the importance of compliance. The Tokyo Tatemono Group did not incur any fines or other penalties related to anti-competitive practices in fiscal 2025.

### Responsible Marketing

The Tokyo Tatemono Group conducts responsible marketing based on the Compliance Charter and Compliance Code of Conduct.

#### Relevant Items of the Compliance Code of Conduct

- 2. We act faithfully by thinking from the customers' standpoint
  - (1) Sincere responses to customers and disclosure of accurate, non-misleading information regarding the products and services provided

We strive to provide accurate and honest information, conduct fair business activities, and build our brand image. To this end, we have established a system in which, whenever we offer new premiums or engage in representation through advertisements, etc., a staff member in charge of representation management reviews them in accordance with related laws and regulations such as the Act against Unjustifiable Premiums and Misleading Representations, the Real Estate Brokerage Act, and the Fair Competition Code for Real Estate Representation (Representation Code), internal rules, etc. We also work to ensure that employees fully understand and adhere to compliance standards through the Compliance Manual and training programs. In particular, we adhere to the Compliance



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Manual with regard to expressions used in advertising. We carefully examine advertising content for slanderous, discriminatory, or exaggerated expressions; religious or political beliefs; environmental concerns; the privacy of third parties; personal information; and intellectual property rights.

### Response to Anti-Social Forces

The Tokyo Tatemono Group created the Exclusion of Anti-Social Forces Rules, which detail our rules to exclude any and all relationships with anti-social forces and establish specific methods for conducting due diligence on organizations referencing the Anti-Social Forces Check Manual. Additionally, the contract clauses and templates that we use in our business activities contain clauses regarding the elimination of relationships with antisocial forces (clauses that require the counterparty in the contract to pledge that it does not correspond to an antisocial force or does not have relationships with antisocial forces, and that allow the contract to be terminated if the counterparty violates such pledge, etc.). We cooperate with external expert organizations as part of our resolute response to anti-social forces.

### Transparency on Taxes

In accordance with the Compliance Charter, the Tokyo Tatemono Group pays taxes appropriately, in accordance with international standards as well as the laws, regulations, and social norms of each country and region. We respond conscientiously to the tax authorities and strive to maintain good relationships with them. In all of our responses to questions from tax authorities, we have provided honest and accurate explanations of the facts as we understand them.

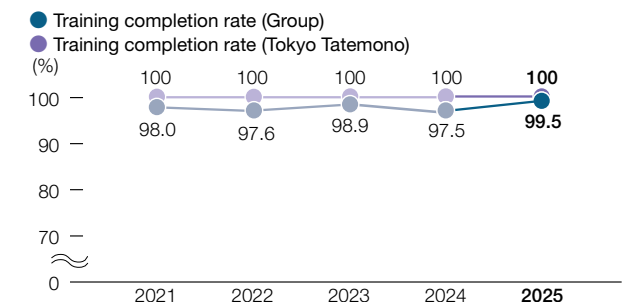
### Compliance Training

Every year, the Tokyo Tatemono Group conducts compliance training via e-learning. These programs apply to all employees, regardless of employee division or position, including contract employees, temporary employees, and part-time employees. In FY2025, the completion rate was 100% for Tokyo Tatemono and 99.5% for the Group overall. In addition, overseas Group companies conducted compliance training tailored to local conditions for all employees (including locally hired staff and others) from February to March, achieving a completion rate of 100%.

#### Program for FY2025 Compliance Training (e-Learning)

|   |  |
|---|--|
| Group-wide courses  | <ul style="list-style-type: none"> <li>Compliance Code of Conduct (including prohibition of discrimination and harassment and prevention of bribery)</li> <li>Confidential Information Management</li> <li>Prevention of Insider Trading</li> <li>Personal Information</li> <li>National Identification Number</li> <li>Real Estate Brokerage Act</li> <li>Criminal Proceeds Transfer Prevention Act</li> <li>Act for Eliminating Discrimination against Persons with Disabilities</li> <li>Social media literacy</li> </ul> |
| Separate modules implemented by each company to strengthen specific areas | <ul style="list-style-type: none"> <li>Information security</li> <li>Act on Ensuring Proper Transactions Involving Specified Entrusted Business Operators</li> <li>Compliance management training</li> <li>Personal information protection training</li> </ul>   |

#### Status of Compliance Training (e-Learning: Compliance Code of Conduct)



Scope: Tokyo Tatemono Group (including contract employees, temporary and part-time employees, etc.)

#### Other Training and Awareness-Raising Programs Related to Compliance (FY2025)

| Details   | Scope   | Frequency       |
|---|---|-----------------|
| Training on preventing workplace bullying   | Supervisors, senior employees, etc.                         | Once a year     |
| Compliance risk management Training   | Officers and general managers (including external officers) | Once a year     |
| Compliance Training   | New supervisors   | Once a year     |
| Basic Compliance Training   | New employees   | Once a year     |
| Seminars (laws and regulations of high business importance, taxation, etc.) with outside experts as lecturers   | Officers and employees                                      | As needed       |
| Posting of Compliance News on the intranet (bribery and other misconduct, as well as harassment and other violations related to occupational safety and health) | Officers and employees                                      | Updated monthly |
| Posting of compliance awareness content on the intranet (bribery cases, LGBTQ case studies)   | Officers and employees                                      | Updated monthly |

Scope: Tokyo Tatemono (including contract employees, temporary and part-time employees, etc.)

### Compliance Surveys

Since 2009, the Tokyo Tatemono Group has conducted an annual compliance survey to understand and verify the degree of compliance awareness and acceptance among employees. In fiscal 2025, 9,273 employees from 17 group companies were surveyed—a response rate of 80.1%. The results of the survey are analyzed to understand responses by group companies and for the Group as a whole, and important matters are reported to the Risk Management Committee (Compliance Subcommittee). We also share the survey results on the intranet and provide feedback to group companies as an aid in early problem resolution, reflecting on compliance structure, and engaging in awareness activities.

[\(Data\) Compliance Training \(e-Learning: Compliance Code of Conduct\) and Return Rate of Compliance Surveys \(p. 113\)](#)