

# **Kumagai Gumi Code of Conduct**

## **-Corporate Citizenship Declaration-**

Our Management Philosophy states, “We strive to be a responsible corporate citizen, recognized for our business integrity and social awareness.” We aim to be a company that is truly appreciated for our existence. To achieve this goal, we, as a company, must regulate ourselves more strictly than individuals. We also must uphold a high standard of ethics. We aspire to be a company that is highly valuable not only to our customers, shareholders, and local communities, but also to everyone involved in our business operations. This aspiration will always be the foundation of our actions.

As a corporate citizen, we have established the Kumagai Gumi Code of Conduct. We believe that adhering to this code is the most important responsibility of management. We declare our commitment to making every effort to ensure that we comply with it at all times.

### **Philosophy of practice**

Our purpose is to deliver excellent value to society through our business operations, both in Japan and internationally, while meeting an absolute requirement: compliance with laws and the norms of society. We must fulfill our mission as a corporate citizen by carefully considering our impact on society and the natural environment and by providing comfortable and safe comprehensive services while striving for harmony with society.

#### **1. Compliance with laws and societal norms**

##### **(1) Fair activities**

All our business operations begin with the understanding that we are a corporate citizen. We aim to be a corporate group in which each individual is engaged in their activities fairly, guided by a high ethical standard rooted in respect for the law and social decency.

We oppose anti-social forces threatening social order.

##### **(2) Open and transparent company**

In addition to complying with laws related to information disclosure, we will disclose corporate information as necessary to society at large, including our shareholders and customers and the general public, in a timely manner. We aim to be an open company.

##### **(3) Transaction transparency**

As a company participating in the market economy, we are committed to being transparent in our transactions and conducting business in an open and above-board way. We base our operations on free and fair competition under the principle of personal responsibility.

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#### **(4) Consistency with international standards**

We are active in both domestic and international markets. We aim to adhere to international standards where applicable, without being restricted by traditional Japanese business practices and systems.

### **2. Harmony with society**

#### **(1) Environmental conservation**

As inhabitants of the Earth, we need to better understand our relationship with this planet. While we have the right to enjoy prosperity as human beings, we also have an obligation to think carefully about and take action for the preservation of the global environment, so that we can all share the beauty of nature, which nurtures our spiritual well-being, with future generations.

As good citizens, we will therefore dedicate our skills and passion to ensure a comfortable and prosperous environment for our descendants, in harmony with the rich and beautiful Earth

#### **(2) Social contribution**

Our corporate activities are deeply connected to local communities. We are committed to fulfilling our role in a spirit of coexistence from a citizen's perspective and will conduct our corporate activities with respect for the lifestyles and culture of the local areas in which we are active to contribute to the overall development of regions.

We recognize that social contribution activities are an important responsibility that we bear as a corporate citizen. As a company, we will actively support employees who voluntarily engage in these activities.

### **3. Respect for human rights, fairness, and equity**

We aim to be a creative corporate group that respects individuality and human rights, conducts business activities based on the principles of fairness and equity, and encourages every employee to express their individuality freely.

### **Standards of practice**

Each of us must consistently self-regulate and follow strict ethical standards, acting from the perspective of a corporate citizen in all circumstances, to be a company earning the genuine trust of society at large. This is our obligation to society, and it is the foundation of all actions.

#### **1. Actions that build trust**

##### **(1) Professional pride**

Each of us will constantly refine our highly specialized expertise and skills, adhere to laws, regulations and company rules, and proudly act as professionals grounded in social decency.

##### **(2) Strict maintenance of confidentiality**

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We will ensure the confidentiality of any sensitive information learned through our business activities, both within and outside the company.

#### **(3) Actions that do not cause distrust**

Actions that foster distrust or misunderstanding in society will lead to a decline in trust. We will take responsibility for all our actions and will act in an open and above-board way to avoid criticism from society.

#### **(4) Judgment criteria**

We will always be mindful of our responsibilities as a good citizen in all of the business activities we undertake. When making decisions, we will prioritize following the law and maintaining social decency in any situation.

## **2. Responsibility**

Each of us must recognize that ethical behavior is the core of our value. We are determined to adhere to this Code of Conduct as our responsibility. We will not accept officers or employees violating this Code of Conduct for any reason.

In the event of a situation in violation of this Code of Conduct, management will proactively address the issue and prevent its recurrence. We will clarify responsibilities and take strict disciplinary actions.