

Compliance Declaration

March 24, 2023

ES-CON JAPAN Ltd.

Takatoshi Ito, President &
Representative Director

The ES-CON JAPAN Group has made compliance management a top priority and is committed to corporate activities rooted in compliance through honest, fair, and highly transparent behavior in accordance with social norms. Under these circumstances, we deeply regret and accept with great seriousness the administrative disposition taken by the Financial Services Agency in July of last year due to inappropriate behavior at ES-CON ASSET MANAGEMENT Ltd.

Based on this administrative disposition, the ES-CON JAPAN Group will continue to be an enterprise that respects compliance management with utmost importance, and we declare that we will observe the following Compliance Code of Conduct in order to fulfill our corporate social responsibility to practice Compliance Management.

Compliance Code of Conduct

- 1 We are aware of our corporate social responsibility and will contribute to the realization of an affluent and comfortable society and earn the trust of society by providing safe, high-quality products based on the diverse knowledge we have cultivated in the real estate field and other areas.
- 2 We will actively work to protect the global environment and strive to reduce the environmental impact of all of our business activities, including the promotion of resource and energy conservation, the reduction, reuse, and recycling of waste materials, and the prevention of global warming.
- 3 We will be conscious that ensuring safety and health is an important corporate social responsibility, and we will always act with safety and health as the top priority in all processes related to our business activities, including ensuring safety during construction and maintaining the health of our employees.
- 4 We will respect the human rights and personalities of individuals and strive to create a fair and healthy work environment, both inside and outside the company, free from discrimination and harassment on the basis of race, ethnicity, origin, religion, creed, gender, disability, disease, or other factors. In particular, we will take a strict stance toward harassment in order to eliminate it.

- 5 We will respect the diverse personalities of the members of our group, and through the formation of a free and open-hearted workplace where each individual can make full use of his or her abilities and the fair treatment of our personnel, we will cultivate a sense of mutual trust among our members and strive to create a workplace that is rewarding to work in.
- 6 We will always listen to the opinions of users and other customers, think from the customer's perspective, respond sincerely, and strive to provide safe, high-quality products.
- 7 Based on the basic understanding that all of our business partners are partners in the execution of our business, we will foster relationships of mutual trust through fair and equitable transactions.
- 8 We will never make illegal political contributions, offer or receive benefits, or bribe politicians or public officials, and will always maintain sound and transparent relationships with politicians and government administrations.
- 9 We will take a firm stand against antisocial forces that threaten social order and sound corporate activities. We will not engage in any illegal or antisocial activities, and will not provide or accept benefits of any type, including economic benefits, to or from antisocial forces.
- 10 We will always perform our duties with the highest ethical standards and social good sense, and will comply with all applicable laws and regulations, socially recognized standards and rules, contracts and promises exchanged with customers, business partners, local communities, etc., company rules, and manuals related to our business activities, both domestic and overseas.
- 11 We will strive to develop innovative technologies, products, and services and to obtain rights for and commercialize such technologies, products, and services, and in the process, we will not infringe on intellectual property rights, such as patents, utility models, designs, trademarks, and copyrights owned by third parties
- 12 Personal information concerning employees, business partners, and other third parties obtained in the course of business will be kept under strict control and will not be disclosed or divulged to third parties or to any person within the company who does not need such information to perform their duties, except with the prior consent of the person concerned, nor will such information be used for purposes other than those for which it was originally intended.

- 13 Trade secrets, technical know-how and other confidential information concerning companies or third parties obtained in the course of business will be kept under strict control, and will not be disclosed or divulged to third parties or to any person within the company who does not need such information to perform their duties without permission, nor will such information be used for any purpose other than its original purpose.
- 14 In our relationships with business partners and affiliated companies, we will not engage in any conduct that might cause misunderstandings, such as offering or receiving entertainment, gifts, or other favors beyond what is customary in social interaction or that are considered excessive under socially accepted norms.
- 15 We have to use company assets or expenses, whether tangible or intangible, in order to accomplish our business purposes, and will not use them for private purposes.
- 16 We will use the company's computer systems only for business purposes approved by the company in accordance with relevant internal regulations, and will not commit any unlawful acts such as unauthorized intrusion into computer systems, damage, falsification, or alteration of data, or unauthorized use of computer software.
- 17 We will not use our position or authority in the course of our duties, or information obtained in the course of our duties, to improperly benefit ourselves or third parties, and will not engage in any activities that may compete with the Company's business without the Company's permission.
- 18 We will not engage in canvassing for political or religious organizations, election voting requests, or any other political or religious activities in the workplace without the Company's permission.
- 19 In order to abolish empty formalities, we will not give or receive gifts or other communications to or from individuals within the Company or among Group companies, except for those that are socially acceptable.
- 20 We will deepen our understanding of the cultures and customs of the countries and regions where we conduct our business activities, respect their social norms, and as good corporate citizens, strive to live in harmony with local communities by participating in activities that contribute to society.
- 21 As a corporate group that is open to society, we will maintain transparency in our business activities, disclose information appropriately, and strive to promote public understanding of our corporate activities. Furthermore, we will accurately and appropriately disclose management information, including the status of the Company's financial position and business activities, to shareholders, investors, and other stakeholders in accordance with applicable laws and regulations.

22 We will maintain a work environment in which all issues can be openly discussed, and if we become aware of any conduct or potential conduct within the Company that violates laws and regulations or this Code of Conduct, we will not conceal or overlook such conduct, but will report it to the Company via the compliance hotline or through the management system, in order to resolve the issue.