

KOA Group's Corporate Code of Conduct (Revised)

Issued March 12, 2018

A company is born, bred and will continue to grow as a member of the society it belongs. Companies are part of society and cannot survive on their own.

With this in mind, it is necessary for us to continue to contribute to society and dedicate ourselves to building a healthy and sustainable society.

Our mission in society is defined by the following corporate philosophy:

“As a group of individuals working together as one, we pursue creative progress and development founded on both rational, scientific principles and a humanitarian outlook, through which we strive to continually advance our business operations and contribute to society.”

With the combined effort of the entire KOA Group, we will strive to fulfill this mission while complying fully with all of society's rules and regulations.

It is vital that all of us, as individual members of the KOA Group, follow the highest standards of ethical conduct in our corporate activities.

We have established the following codes in order for KOA Group to be accepted and trusted by the society, to win the hearts of the society, and to be a company we could feel proud of and confident to work for.

I. Fair and honest code of conduct**(1) Legal compliance and sensible behavior**

1. Comply with all laws, international rules and their spirit.

2. Sensible behavior

Maintain adequate corporate ethics and morals to behave sensibly and responsibly as conscious members of a global society. Do not engage in any conduct that incurs suspicion. Act with common sense.

(2) Place importance on social needs and customer's satisfaction

Adopting a rationalized corporate management, developing innovative technologies and raising productivity to provide high quality construction products, goods and services, at reasonable price to meet the needs, satisfaction and assurance of the society.

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(3) Fair, transparent, free competition and legitimate business activities

1. Fair, transparent and free competition

Respect the international rules that protect a free, fair and transparent competition. Exercise fair, transparent, free competition during tenders and avoid behavior that hampers. At the same time, never conduct unlawful acts of bid rigging wherever you are or fall into dumping strategy that is detrimental to the industry as a whole.

2. Maintain relationship with sub-contractors as equals

Be fair in entering into contracts with suppliers and sub-contractors and maintain excellent relationship based on mutual respect.

(4) Protection of intellectual property, rights and assets

1. Respect for rights and assets of others

Do not unlawfully or wrongfully harm intellectual property, trade secrets, rights, assets, reputation, and trust of other individuals or companies. Do not unlawfully or wrongfully interfere with the operations of others. In the course of conducting business activities, apply the strictest precautions and devise systems for thoroughly controlling all processes related to the collection, management, use, disclosure, safekeeping, and disposal of private and client information.

2. Protection of rights and assets of the KOA Group

Safeguard the intellectual property, trade secrets, rights, assets, reputation, and trust of the KOA Group. Prohibit conduct that harms any of the rights, assets, etc., or may otherwise be detrimental to the KOA Group. Prevent unintended leaks of technological properties.

(5) Transparent relationship with politics and the authorities

Maintain a transparent, fair, normal and healthy relationship with politics and the authorities.

(6) Root out conduct that is against the society

Never associate and never be involved with groups which are considered as a menace to society. Reject empty and false claims from organized criminal factions and the like, play no part in whatsoever in antisocial activities in which such factions are involved, and staunchly resist organized criminal forces and organizations that threaten the public welfare. Endeavour to improve employees' security against risks such as terrorism, abduction and blackmailing.

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(7) Transparency of corporate accounting

With zero tolerance for illicit procedures such as illegal disbursements, ensure the accuracy, transparency, and prudence of accounting by maintaining financial accounts, records, and reports of transactions and conditions of assets accurately in accordance with generally accepted accounting principles.

(8) Prevention of incidences of fraud

Instill and inculcate awareness and a sense of vigilance. Be aware and vigilant to guard against circumstances when the KOA Group may be subject to fraud perpetuated by external parties and adhere to all appropriate measures and protocols implemented by the KOA Group to this effect from time to time.

II. Harmony with Society

(1) Build excellent relationship with society

Build and maintain excellent relationship with society as well as promote harmony as a good corporate citizen.

(2) Respect for local culture and customs

Propel business activities and contribute to the cultural and economical development of the country or region based on mutual trust by respecting local history, culture, customs and religion.

(3) Timely and appropriate disclosure and communication

Promote open communication with shareholders, investors, clients, business partners, local communities, and all other stakeholders. Disclose information related to the KOA Group business activities and performance in a timely, appropriate, and fair manner. Do not engage in insider transactions.

III. Respect for the People

(1) Prohibit discrimination and unfair treatment

As an enterprise emplacing on importance of individuals, should respect all mankind, and should not discriminate on the basis of race, belief, gender, social status, religion, nationality, age, physical and mental impairment in hiring practices and the workplace.

(2) Maintain safe and comfortable working environment

Maintain a safe and comfortable working environment so that the employees can feel at ease and enriching.

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- (3) Respect individual ability and personality, and nurture talents
Respect the unique characteristics of each employee and provide a workplace environment that allows all employees to develop their abilities to the fullest.
- (4) Ban child labor or forced labor
Do not allow child labour or forced labour of any kind.

IV. Responsibility for the Environment

- (1) Approach for the Environment
Environmental problems are commonly faced by humans whether it is regionally or globally, as such, efforts should be made to preserve and to create a better environment. Act in accordance with local environmental protection laws and promote its conservation activities and the awareness campaigns.
- (2) Establishment of an Effective Internal Monitoring Structure
To help ensure that the Code of Conduct is adhered to in all business activities, the top management will establish an effective system such as an introduction of an internal monitoring and reporting structure with a designated point of contact.

V. Implementation of the Code of Conduct

- (1) Education and awareness
The KOA group shall promote awareness repeatedly by educating managements and employees of the KOA group in order for them to fully understand this code of conduct and to be consistent with corporate ethic.
- (2) Establishment of an effective internal monitoring structure
To help ensure that the Code of Conduct is adhered to in all business activities, the top management will establish an effective system such as an introduction of an internal monitoring and reporting structure with a designated point of contact.

VI. In the case of breach of the Code of Conduct

- (1) Prevention of reoccurrence and accountability
Top management should positively investigate the violations and solve them, locating the cause and preventing future occurrence.

Upon solving the problem, protect the privacy and rights of those involved, ensure full accountability and disclose necessary information to the society.

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(2) Disciplinary Action

Upon identifying any individuals responsible for violating the Code of Conduct, each top management of the Group Company will apply appropriate disciplinary measures to the violators in accordance with any applicable company rules and regulations.

EOD

(By-law)

1. Application of the Code of Conduct

This Code of Conduct shall apply to all of directors and employees of the KOA Group. Employees shall be the following:

- Kajima Corporation staff,
- Locally employed staff,
- Locally contracted staff (Supervisors, Specialists, inclusive of non-Japanese)

2. Effective date and amendment of the Code of Conduct

This Code of Conduct was resolved at KOA Resident Directors Meeting held on 20th October 2008, and shall become effective on 1st November 2008.

This Code of Conduct has been established relating to Kajima Corporation's "Kajima Group's Code of Conduct" amended on 1st April 2007.

This Code of Conduct can be revised under the social circumstance.

Original issue: 14 March 2007
Revision: 12 March 2018