

## Mitsubishi Estate Group Supplier Code of Conduct

Based on the Spirit of Mitsubishi: The Three Principles, which is positioned as the common guiding principles for the Mitsubishi Group, the Mitsubishi Estate Group has set out its mission to contribute to creating a truly meaningful society through urban development. In order to put this mission into practice, we have established the Mitsubishi Estate Group Code of Conduct to put this basic mission into practice. Moreover, we have also implemented the Mitsubishi Estate Group Guidelines for Conduct, which set out the specific standards of conduct to realize “who we aspire to be, how we aspire to be perceived, and what we should do in order to achieve these aspirations,” the spirit epitomized by the Code of Conduct. We have been working steadily to live up to these guidelines.

In addition, in recent years, the severity of issues such as human rights, labor, and climate change has been increasing. In order to help create a sustainable, meaningful society, we believe that it is important to promote responsible initiatives throughout the supply chain, in addition to our own efforts, in cooperation with our suppliers.

In light of this background, we have established Mitsubishi Estate Group Supplier Code of Conduct (“Supplier Code of Conduct”) which sets forth the matters which we require our suppliers and their suppliers (collectively “Suppliers”) to comply with and what we expect from them. We kindly seek your consideration of such actions.

This Supplier Code of Conduct refers to international standards such as the International Finance Corporation (IFC) Environmental and Social Performance Standards, the Responsible Business Alliance Code of Conduct, and the Building Responsibly Principles.

We may conduct written surveys of Suppliers, audit the status of compliance with this policy, and ask for corrective actions to be made to address issues identified.

In effect as of April 1, 2022

**Mitsubishi Estate Group Supplier Code of Conduct**

Category	Sub-category	Compliance Items	Expectation Items
1) Compliance with laws and regulations	1)-1. Thorough compliance with various laws and regulations	Suppliers shall observe and comply with all applicable laws and regulations in their respective countries of operation and where the standard of the code differs, they shall comply with the stricter requirements.	
2) Respecting human rights	2)-1. Respect of and compliance with international human rights standards	Suppliers shall support and respect human rights as stated in the Universal Declaration of Human Rights, the International Bill of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.	
	2)-2. Prohibition of forced or debt-bonded labor	The use of forced, debt-bonded or indentured labor, slavery, or trafficking of persons is prohibited. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.	Suppliers shall not impose unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, workers' dormitories or living quarters.  As part of the hiring process, a written employment agreement (including a description of terms and conditions of employment) shall be provided in the worker's native language or in a language that is easily understood by the worker, prior to the worker departing from his or her country of origin. No substitutions or changes are allowed in the employment agreement upon arrival in the receiving country, unless such changes are made to meet local law and provide equal or better terms. Workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract.  Employers, agents, and sub-agents' may not hold, destroy, conceal, confiscate, or prevent the use by workers of government-issued identification, passports, work permits, or other forms of employee identification or immigration documents; however, employers may hold such documentation if such holding is required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, employers shall repay such fees to the worker.
	2) -3. Prohibition of child labor	Suppliers shall comply with the age limits set by local laws and regulations. Child labor is prohibited at any stage of operation.	Any person under the age of 15, or under the age for completing compulsory education or the minimum age for employment in the country, whichever is the greatest, shall be regarded as a "child," and suppliers shall not use the labor of any person fitting this definition. Suppliers shall not place workers under the age of 18 (young workers) in jobs that may jeopardize their health or safety, including night shifts and overtime.
	2) -4. Non-discrimination	Discrimination based on any grounds such as nationality, race, color, language, religion, gender, sexual orientation, gender identity and expression, age, political or other opinions, ethnicity, national or social origin, property, marital status, pregnancy, disability, physical characteristics, protected genetic information, place of birth, class, union membership, or covered veteran status is prohibited. In addition, workers or potential workers shall not be subjected to medical tests, including pregnancy tests, or physical exams that could be used in a discriminatory way.	
	2)-5. Humane treatment	There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.	
	2) -6. Working hours	Suppliers shall comply with the working hour limitations established under local laws and regulations.	Suppliers shall strive to monitor weekly working hours and limiting their weekly working hours to less than 60 hours, including overtime referring to the ILO standards, except in emergencies or unusual situations. All overtime must be voluntary. Workers shall be allowed to take at least one day off every seven days.
	2) -7. Wages and benefits	Suppliers shall comply with all applicable local wage laws, including laws related to minimum wages, overtime hours and legally mandated benefit, and workers' wages shall be paid without delay, on the scheduled payment date. In compliance with local laws, workers shall be paid at a rate higher than the regular hourly rate for overtime work. Excessive wage deductions are not allowed as a disciplinary measure.	Suppliers shall provide workers with understandable wage statement that contains sufficient information to verify that workers have been accurately compensated for the work they performed during each payment period.
	2) -8. Freedom of association	Suppliers shall respect workers' rights to freedom of association and collective bargaining, in compliance with applicable local laws regarding freedom of association and the right to collective bargaining of workers.	Suppliers shall provide an environment in which workers, or their representatives, can openly communicate with management about their views and concerns regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

3) Local communities, Indigenous Peoples' rights, and cultural heritage	3) -1. Involuntary resettlement	Involuntary resettlement shall be avoided to the greatest extent possible, and if it cannot be avoided, measures shall be taken to minimize adverse impacts it causes to residents and local communities.	
	3) -2. Indigenous Peoples' rights	Suppliers shall respect the dignity, human rights, aspirations, culture, and natural resource-based livelihoods of Indigenous Peoples. Suppliers shall evaluate in advance the potential impact on Indigenous Peoples and their indigenous cultures when developing land or utilizing natural resources traditionally owned or customarily used by Indigenous Peoples. Negative impacts on indigenous communities shall be avoided, and where avoidance is difficult, measures shall be taken to minimize the impacts. When using land traditionally or customarily owned or used by Indigenous Peoples, Suppliers shall strive to obtain their free, prior, and informed consent (FPIC) through sincere consultation with the Indigenous Peoples affected.	
	3) -3. Cultural heritage	In accordance with the Convention for the Protection of the World Cultural and Natural Heritage, Suppliers shall implement measures to protect and preserve cultural heritage in order to avoid adverse impacts caused by business activities.	
	3) -4. Community health and safety and protection of the local environment	If business activities are expected to have an impact on the safety or health of the local environment or neighboring residents, Suppliers shall assess the impacts in advance and consider technically and economically feasible measures to reduce the impact.	
4) Occupational health and safety	4) -1. Compliance with laws and regulations related to occupational health and safety	Suppliers shall make all occupational health and safety notifications and applications required by local laws and regulations; obtain, maintain, and keep current required licenses, certifications, permits, or registrations; and comply with requirements for their operation and reporting.	
	4) -2. Occupational safety	Suppliers shall identify and evaluate potential sources of health and safety hazards to workers (e.g., potential fires, falls, tripping hazards; handling of chemicals, electricity and other energy sources, vehicles, heavy machinery) and implement necessary measures. This includes eliminating the sources of hazards, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures, implementing emergency action plans and response procedures, and providing well-maintained, personal protective equipment and continuing education and training on health and safety.	
	4) -3. Occupational Injury and Illnesses	In the event of an occupational accident, Suppliers shall assess the situation, analyze the cause, and record the results, and then take remedial measures to prevent recurrence. In addition, to ensure that these management procedures are properly implemented, Suppliers shall post notices and inform workers of the reporting line and reporting flow in the event of an occupational accident.	These management procedures shall be clearly defined through internal regulations and manuals.
	4) -4. Sanitation, food, and housing	Workers shall be provided with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage and eating facilities.	Worker dormitories shall be maintained to be clean and safe and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, air-conditioning and ventilation, private rooms or individually secured accommodations for storing personal and valuable items, reasonable personal space along with reasonable entry and exit privileges.
	4) -5. Health and safety communication	Suppliers shall provide appropriate workplace health and safety information and training on all identified sources of workplace hazards in the workers' native language or a language they can understand. Occupational health and safety information shall be clearly posted in the facility or in locations identifiable and accessible by workers. Suppliers shall encourage workers to raise health and safety concerns without retaliation.	

5) Establishment of corporate ethics	5) -1. Fair business practices	Suppliers shall promote fair business practices by not engaging in unfair competition or any other conduct that impedes free competition, including unilateral coercion of business conditions on their suppliers. Suppliers shall not entertain or give gifts with the intention of expecting favors or gratuities for favors. Suppliers shall not accept any gift or entertainment that raises doubts about the neutrality of decisions.	
	5) -2. Elimination of corruption	Suppliers shall eliminate corruption, whether direct or indirect, in the form of any act that constitutes or can be suspected of constituting bribery. Corruption includes the promise, offer, permission, provision, or receipt of anything of value, directly or indirectly, through a third party, in order to obtain or retain business, assign business to someone, or otherwise obtain an improper advantage.	In order to ensure compliance with anti-corruption laws and regulations, Suppliers shall strive to establish internal rules and regulations and monitor their enforcement.
	5) -3. Elimination of anti-social forces	Suppliers shall not have any relationship with groups or individuals, so-called "anti-social forces," that pursue economic benefit by making use of violence, force and fraudulent means.	
	5) -4. Prohibition of conflicts of interest	Suppliers shall respond appropriately to any potential conflicts of interest that may arise in their overall transactions with business partners, customers, etc.	
	5) -5. Grievance mechanism and prohibition of retaliation	Suppliers shall establish a reporting system of concern, complaints, and grievances for the prevention and early detection of problems, and ensure the confidentiality of informants and protect them from retaliation and other disadvantages.	
	5) -6. Disclosure of information	All business transactions shall be conducted transparently and accurately reflected in accounting books and records. Suppliers shall not falsify records or disclose false information.	Suppliers shall strive to disclose corporate information in a timely and appropriate manner to ensure transparency. Information on labor, health and safety, the environment, business activities, corporate structure, financial condition, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices.
6) Environmental conservation and reduction of environmental impact	6) -1. Mitigation of environmental impact in products and services	Suppliers shall reduce the environmental impact of their products and services in accordance with local laws and regulations. Suppliers shall obtain environmental licenses and permits required by local laws and regulations.	Suppliers shall prioritize the procurement and adoption of materials that reduce environmental impact.
	6)-2. Recycling and resource reduction	Suppliers shall implement 3R (Reduce, Reuse, Recycle) activities throughout the life cycle of their products and services and their business activities in accordance with local laws and regulations.	Suppliers shall improve the efficiency of resource use and substitute materials where appropriate.
	6) -3. Conservation of biodiversity, appropriate use of forest resources, and no deforestation	In order to conserve biodiversity, Suppliers shall assess the impact of development on the ecosystem in the surrounding environment and work to mitigate it as required by local laws and regulations.	In the procurement of materials, Suppliers shall use sustainable materials such as certified products and materials in order to conserve ecosystem functions, work toward no deforestation, respect the rights of Indigenous Peoples, and prohibit child labor and forced labor.
	6) -4. Addressing climate change	Suppliers shall collect data on climate change, implement mitigation measures, and disclose information in accordance with local laws and regulations.	Suppliers shall track and compile data on the energy consumption and all relevant Scope 1 and 2 greenhouse gas emissions. Suppliers shall also reduce greenhouse gas emissions by improving energy efficiency and promoting the use of renewable energy.
	6) -5. Pollution prevention	Suppliers shall avoid or reduce the emission of pollutants into the atmosphere, water systems, and soil that may occur in the course of their business activities, as required by local laws and regulations.	Suppliers shall establish an appropriate management and monitoring system for pollution prevention, including identification and understanding of emission sources and implementation of countermeasures.
	6) -6. Reduction and responsible disposal of waste	Throughout the lifecycle of products and services and in business activities, Suppliers shall reduce the amount of waste generated and recycle it, and implement appropriate disposal in accordance with local laws and regulations. In particular, Suppliers shall appropriately store, transport, and dispose of hazardous waste.	
	6) -7. Water management and proper use	Suppliers shall use and discharge water in accordance with local laws and regulations.	Suppliers shall identify and manage water sources, water consumption, and discharge. Suppliers shall reduce water consumption through water conservation and efficient water use. Particularly in regions where water shortages are serious or of concern, Suppliers shall assess the impact of water use through their business activities and strive to manage water use sustainably.

7) Ensuring information security	7) -1. Appropriate information management	Suppliers shall establish and maintain a management system for information assets (confidential information, personal information, privacy information, etc.) entrusted to them by their customers and suppliers as well as any they have in their own possession. Suppliers shall manage and protect such information in an appropriate manner to prevent improper, unfair use, or leakage.	
	7) -2. Protection of intellectual property	Suppliers shall take every effort to protect intellectual property rights owned by them or that belongs to them from being infringed by third parties. Suppliers shall not infringe the intellectual property rights of third parties.	
8) Establishment of a risk management system	8) -1. Risk assessment and management	Suppliers shall give due consideration to risks related to human rights, corporate ethics, and the environment, and work to reduce and manage these risks.	Suppliers shall establish a process to identify risks related to human rights, corporate ethics, the environment, etc., assess the importance of identified risks, and manage them using appropriate procedures.
	8) -2. Establishment of business continuity plan (BCP)	Suppliers shall proactively work to build a BCP in preparation for disasters and other unforeseen circumstances.	