

Chiyoda Group Employee Handbook (10th Edition)



- Corporate Philosophy/
Business Vision/
Revitalization Policy/
CSR Value/
Code of Conduct
- UN Global Compact
- SDGs/Materiality Assessment
- Compliance Consultation
and Reporting System
- BCP
- Crisis Management

Top Message

Realizing a Sustainable Society

Chiyoda Corporation was founded in 1948 with the vision ‘Serving Society through Technology’ and we perpetually strive to resolve global challenges based on our corporate philosophy of ‘Energy and Environment in Harmony’.

In the continuously evolving social environment, enormous expectations are placed upon engineering companies, such as Chiyoda, to provide innovative solutions to conquer society’s challenges.

Climate change is a major external operating factor for our group and, through our mission to realize optimal social implementation of new technology, we embrace the global drive towards carbon neutrality as a business opportunity.

Chiyoda recently established a new goal of reducing medium to long term greenhouse gas (GHG) emissions and link our business pursuits to accomplishing SDGs*¹, expanding disclosure in line with TCFD*².

Through our mission to realize a carbon neutral society by 2050, we will contribute to conquering the challenges of reducing GHG emissions and use technology in response to the social demands of the carbon cycle.

We will continue to meet modern day social demands and actively participate in the development of a sustainable society by leveraging our digital innovation technology with our engineering capabilities.

A Trusted Company because of Fair Corporate Management

Transparent corporate management, based on fair terms and conditions, is essential as we advance our business.

We will always operate with peak business ethics and within strict principles of fairness, while promoting this spirit amongst our business partners and suppliers.

Chiyoda Corporation aims to be an engineering company that shapes the future of energy and the global environment, contributing to solving social issues and earning the trust of our stakeholders, with every employee aligned with our corporate philosophy of ‘Energy and Environment in Harmony’ .



Chairman of the Board, President & CSO
Masakazu Sakakida

*1 SDGs (Sustainable Development Goals): A set of international goals adopted at the UN Summit in September 2015 to be realized by 2030

*2 TCFD (The Task Force on Climate-related Financial Disclosures): An international organization created by the Financial Stability Board (FSB) in 2016 to improve and increase reporting of climate-related financial information

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About the 10th edition revision

The first edition of the Chiyoda Group Employee Handbook, which outlines the basic policies and philosophies that every Group member can refer to as a guide to how to behave in their daily duties, including “Corporate Philosophy”, “CSR Value”, “Code of Conduct” and “Privacy Policy”, was issued in October 2007. The handbook has been revised since then and reached its tenth edition to further enhance its contents.

Chiyoda Group aims to ensure that all its officers and employees practice fairness and dignified behavior, acknowledge and disseminate shared value and its Code of Conduct, and earn the trust of all stakeholders. In addition to specific compliance items, the contact point for compliance issues and the reporting system are specified so that they can be referred to at any time, as well as the items related to safety and risk responses in case of large-scale disasters and business continuity planning. Such information shall be thoroughly disseminated in order to realize corporate sustainability and value enhancement. Ensuring that all officers and employees fully understand and comply with the contents of this handbook is the first step toward sustainable growth and value enhancement of our company.

Second edition (October 2009)	Considering the social requirements, Feedback from the in-house questionnaire
Third edition (November 2012)	Relocation of our main office to Chiyoda Global Headquarters in the Minatomirai area of Yokohama Participation in the United Nations Global Compact (UNGC) which is one of the global guidance on CSR/Streamlining of domestic group companies
Fourth edition (August 2014)	Top Message/ Compliance Promotion Structure
Fifth edition (April 2017)	New group companies/A change of a person in charge of Compliance New Top Message/ A change of Conduct Guidelines A change of Compliance CSR Promotion Structure A change and new basic policy/BCP/Crisis management
Sixth edition (February 2018)	New Top Message/ A change of CSR Vision Workplace Hotline
Seventh edition (May 2018)	An integration of Business Vision and CSR Vision with update of text A change of name from CSR vision to CSR value
Eighth edition (October 2018)	New Top Message/ A change of Conduct Guidelines New Human Rights Policy and Tax Policy Addition of law office as external consultation
Ninth edition (April 2021)	A change of name from “CSR Handbook” to “Employee Handbook” New Top Message/ A change of Human Rights Policy Delete Risk Management Policy /Addition of Materiality Assessment A change of Corporate SQE Policy and Crisis Management
Tenth edition (April 2022)	New Top Message/ Global Norms /A change of Compliance CSR Promotion Structure

Social Issues

Securing
Energy Sources

Hunger

Diversity

Climate
Change

Anti-Corruption

Community
Issues

Fair
Employment

Economic
Disparity

Human
Rights

Global Norms

TCFD

TNFD

ISO26000

SDGs

UN Global
Compact

International
Bill of Human
Rights

Declaration on
Fundamental
Principles and
Rights at Work

United Nations
Guiding Principles
on Business and
Human Rights

CHIYODA GROUP CODE OF CONDUCT • POLICY

Business Vision

Revitalization Policy

CSR Value

Code of Contact

Various policies

**Corporate Governance
Compliance •
Anti-corruption •
Safety • Crisis Management
Legal Liability**

**Corporate
Philosophy**

**Chiyoda Group's
Materiality**

**7 AFFORDABLE AND
CLEAN ENERGY**



**9 INDUSTRY, INNOVATION
AND INFRASTRUCTURE**



**13 CLIMATE
ACTION**



Chiyoda Group Philosophy/Vision/Value/Code of Conduct

Our Mission

Corporate Philosophy

The Aim of Chiyoda

Business Vision

Our Values

Revitalization Policy

Our Values

CSR Value

Basis of Our Actions

**Compliance -Code of Conduct-
(Conduct Guidelines)**

Human Rights Policy

Corporate SQE Policy

**CORPORATE INFORMATION
SECURITY (IS) POLICY**

Privacy Policy

Tax Policy

Various Manuals Regulation

Corporate Philosophy —Our Mission—

Enhance our business in aiming for harmony between energy and the environment and contribute to the sustainable development of a society as an integrated engineering company through the use of our collective wisdom and painstakingly developed technology.

Business Vision —The Aim of Chiyoda—

A Grand Opportunity for the Future

The Chiyoda Group is committed to being an ‘Innovative’ Engineering Company, shaping the future of energy and the global environment with passion and cutting-edge technology.

Revitalization Policy

—Revisit basic principles of work styles and systems for revitalization—

1. Think and act proactively, be responsible
2. Know the “chain of responsibilities”
3. Pursue works with shared value that realize economic and social value simultaneously
4. Understand the importance of risk management that protects the company from “Damages to the Company’s value”
5. Understand the value of human resources

CSR Value -Our Value-

1

A Reliable Company

We strive to be a reliable company to our customers and all our stakeholders by providing world-class technologies and knowledge.

2

Environmental Initiatives

We will work to remain an invaluable company to society by utilizing refined technologies to promote harmony between the global environment and economic and social activities.

3

Social Contributions

Through our engineering business in Japan and overseas, we contribute to local communities and address global issues in ways including human resources development, technology transfer and environmental protection.

4

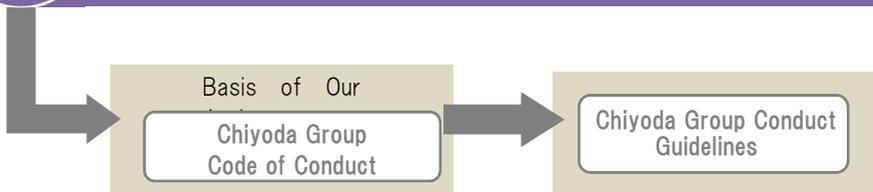
Respect for Human Rights

We are dedicated to respecting the human rights of all people. We will create a corporate culture where the diversity, individuality and character of employees are respected, where people are motivated to do their best, and of which employees and their families are proud.

5

Commitment to Fairness

We are dedicated to achieving even greater transparency and stability by conducting our operations fairly in accordance with the highest ethical standards.



Chiyoda Group Code of Conduct

Chiyoda Group acknowledges that earning the trust and understanding of clients and society forms the basis of our business activities. To ensure that our business activities conform to social standards, we fully comply with all applicable laws and regulations as well as our own rules, and conduct business activities in accordance with the following principles.

1. Commit to excel in achieving the highest standard of quality to best serve our clients and society with reliable services using cutting-edge technologies.
2. Conduct business with transparency, and fair competition, in order to earn the trust and confidence of society, clients, and third parties concerning our corporate activities.
3. Ensure timely and fair disclosure of information which stakeholders have the right to know, and promote constructive dialogues with the wider community.
4. With the understanding that helping to solve environmental issues is an essential part of Chiyoda Group's business activities, contribute to the society by cooperating with government agencies in solving environmental issues.
5. Stand strong against organized crime and never let criminal (or potentially criminal) individuals or groups benefit by their use of extortion or deceit.
6. Protect personal data and client proprietary information, and handle intellectual property with utmost care to avoid infringing on intellectual property rights.
7. Clearly distinguish private life from work, and refrain from any conflicting actions which undermine Chiyoda Group's interests.
8. Respect human rights, diversity of cultures, and individual differences as well as endeavor to ensure every employee's health and safety by providing a suitable working environment.
9. Chiyoda Group's leadership hereby commit themselves to live the spirit and intent of the Code and implement by exercising leadership and setting an example as role models. Leadership shall also be prepared to listen to stakeholders inside and outside of Chiyoda Group, and if anything contrary to the Code is detected, commit themselves to corrective action and to remediate any internal control discrepancies.

Chiyoda Group Conduct Guidelines

All executives and employees of Chiyoda Group shall fully comprehend the spirit of the Code and conduct their activities in compliance with the following:

1. Commit to excel in achieving the highest standard of quality to best serve our clients and society with reliable services using cutting-edge technologies.

- 1 Comply with all applicable laws, regulations and rules in all business activities and undertakings.
- 2 Obtain all licenses, approvals and permits required to carry out business, promptly submit notices and reports to the relevant authorities where necessary, and properly follow appropriate procedures.

2. Conduct business with transparency, and fair competition, in order to earn the trust and confidence of society, clients, and third parties concerning our corporate activities.

- 1 Never improperly restrict business transactions in terms of price, volume, division of market or other agreements with competitors and/or industry organizations.
- 2 Never collaborate with competitors or industry organizations to refuse or terminate business transactions with a new market entrant or a specific targeted company.
- 3 Never suppress subcontractors' legitimate interests and rights.
- 4 Adhere to all international trade treaties, laws and regulations within Chiyoda Group's area of operation.
- 5 Comply with all relevant security trade control laws and regulations, and ensure that the products, technologies, and services to be exported are not restricted or sanctioned.
- 6 Properly follow all necessary procedures required by government regulatory authorities in Chiyoda Group's areas of operation.
- 7 Never offer improper gifts or economic benefits to government officials, employees of de facto governmental organizations of Japan or any other country, or to any other stakeholders.
- 8 Do not offer excessive or extravagant gifts or entertainment to executives and employees of clients/business partners and adhere to internationally acceptable and sound business practices.
- 9 Never offer gifts with value exceeding the legal limitations set by local laws.
- 10 Never accept gifts or entertainment outside of socially acceptable norms.

3. Ensure timely and fair disclosure of information which stakeholders have the right to know, and promote constructive dialogues with the wider community.

- 1 Never trade stocks or securities of the company or other listed companies while possessing material non-public information or induce others to trade by disclosing such information.
 - 2 Promote better understanding with shareholders and investors through proactive and fair disclosure and constructive investor relations.
 - 3 In a timely manner produce accurate records and financial reports in regards to finance, accounting and taxes.
-

4. With the understanding that helping to solve environmental issues is an essential part of Chiyoda Group's business activities, contribute to the society by cooperating with government agencies in solving environmental issues.

- 1 Adhere to all environmental treaties, laws, regulations, and endeavor to protect the environment.
 - 2 Conduct business activities while also taking into consideration the impact they may have on climate change, the natural environment, and ecosystems.
 - 3 Strive to reduce the volume of waste materials by using energy efficient products and take steps to recycle or otherwise use materials effectively to avoid wastage.
-

5. Stand strong against organized crime and never let criminal (or potentially criminal) individuals or groups benefit by their use of extortion or deceit.

- 1 Never resort to compromises when improper demands are made by organized crime by means of extortion or deceit, and swiftly report to and seek advice from the department in charge.
- 2 Be sensitive even in usual business settings as to whether the influence of organized crime could be indirectly involved. Refuse to enter into any transactions if such organizations are involved.

6. Protect personal data and client proprietary information, and handle intellectual property with utmost care to avoid infringing on intellectual property rights.

- 1 Safeguard the proprietary information of Chiyoda Group, clients, and others obtained through business activities, prevent information leakage, and use such information solely for their intended purposes.
- 2 Prevent unauthorized disclosure of confidential information. Before disclosing any Chiyoda Group proprietary information for business purposes, ensure that a confidentiality agreement is duly signed by the other party in accordance with internal rules.
- 3 Be cautious in dealing with external requests and inquiries. Always properly coordinate with the appropriate department.
- 4 Honor and respect confidentiality agreements and never use or disclose confidential information obtained through business activities for an unauthorized purpose (e.g. personal use) even after leaving Chiyoda Group.
- 5 Respect intellectual property rights and never infringe any copyright and/or patent (e.g. do not make unauthorized copies of computer software).

7. Clearly distinguish private life from work, and refrain from any conflicting actions which undermine Chiyoda Group's interests.

- 1 Never misappropriate company resources, assets, or funds for personal use or interests.
- 2 Never use company information systems improperly or for personal purposes.

8. Respect human rights, diversity of cultures, and individual differences as well as endeavor to ensure every employee's health and safety by providing a suitable working environment.

- 1 Respect the Universal Declaration of Human Rights*¹, international labor standards*² and the Guiding Principles on Business and Human Rights*³.
- 2 Respect all human rights. Never discriminate on the basis of race, faith, religion, gender, sexual orientation and/or gender identity, nationality, age, place of birth, disabilities, medical conditions, etc.
- 3 Never engage in or allow any form of harassment, bullying or discrimination pertaining to gender, power, or maternity.
- 4 Respect cultural differences, promote harmony and balance among international communities, regional social standards and local customs.
- 5 Maintain a safe and healthy working environment.
- 6 Disseminate knowledge on safety and advocate the importance of safety.
- 7 Promote Work-Life Balance.

Chiyoda Group

- *1: The Declaration adopted at the United Nations 3rd General Assembly on the 10th December 1948, aiming for every nation and personnel to attain the goals of basic human rights.
- *2: The International Labor Organization (ILO) adopted 188 treaties and 200 recommendations up to June 2010, covering labor social issues including labor conditions, occupational safety and health, labor management relations, employment, vocational training, social security, sailor related matters etc.
- *3: The global standard adopted by the United Nations Human Rights board of directors, for every nation and company to follow.

9. Chiyoda Group's leadership hereby commit themselves to live the spirit and intent of the Code and implement by exercising leadership and setting an example as role models. Leadership shall also be prepared to listen to stakeholders inside and outside of Chiyoda Group, and if anything contrary to the Code is detected, commit themselves to corrective action and to remediate any internal control discrepancies.

Supplementary provisions

- 1 The Code and these Guidelines apply to executives and employees of Chiyoda Group also including executive advisers, temporary staffs, and employees seconded to group companies.
- 2 These Guidelines were prepared to primarily apply within Japan, and therefore shall be adjusted in accordance with local laws and regulations for applications outside of Japan while maintaining the original intent of the Code.
- 3 Violation of these Guidelines may lead to disciplinary action in accordance with company rules taking into account the nature and seriousness of such violation.
- 4 The Code and these Guidelines shall come into effect on April 1, 2006.
- 5 Chiyoda Corporation signed the United Nations Global Compact (UNGC) in November 2012. All executives and employees of Chiyoda Group shall fully understand and respect the spirit of UNGC when carrying out business activities.
- 6 Dates of revision made to these Guidelines:
Final revision April 1, 2021

HUMAN RIGHTS POLICY

The Chiyoda Corporation Group (hereinafter referred to as the “Chiyoda Group”) recognizes the importance of respecting human rights in all its business activities, including domestic and overseas construction site operations and global procurement activities. In order to promote human rights initiatives and meet our responsibilities to respect human rights, the Chiyoda Group has established its Human Rights Policy (hereinafter referred to as the “Policy”) as follows.

The Policy applies to all officers and employees of the Chiyoda Group. We also expect our business partners, including our suppliers, and other related parties involved in the business activities of the Chiyoda Group to understand and follow the Policy.

1. Respect for Human Rights

The Chiyoda Group understands that in the course of its business activities, it may, whether directly or indirectly, have an impact on human rights. As a member of society, we also recognize the importance of respecting human rights in our business activities.

The Chiyoda Group respects internationally recognized human rights as set out in the International Bill of Human Rights(*1) and the core labor standards as set out in the International Labor Organization Declaration on Fundamental Principles and Rights at Work(*2), and implements human rights initiatives in accordance with the United Nations Guiding Principles on Business and Human Rights(*3).

The Chiyoda Group will comply with the applicable laws and regulations of the countries and regions in which it operates. In the event that the domestic laws and regulations of the country or the region conflict with international human rights standards, we will seek ways to honor the principles of internationally recognized human rights to the extent possible without violating the domestic laws and regulations of the country or the region concerned.

- (*1) The International Bill of Human Rights refers to three internationally-recognized human rights documents: the Universal Declaration of Human Rights adopted at the United Nations General Assembly in 1948 aiming for every nation and personnel to attain the goals of basic human rights, and its corresponding two international treaties adopted at the United Nations General Assembly in 1966, namely the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights
- (*2) The International Labor Organization Declaration on Fundamental Principles and Rights at Work adopted at the International Labor Conference in June 1998 sets out principles concerning fundamental rights in four categories as minimum labor standards to be protected: freedom of association and the right to collective bargaining, elimination of all forms of forced or compulsory labor, the effective abolition of child labor, and the elimination of discrimination in respect of employment and occupation
- (*3) The United Nations Guiding Principles on Business and Human Rights, endorsed by the United Nations Human Rights Council in 2011, provide the authoritative global standard for action related to human rights in a business context, clarifying what is expected by governments and companies to address adverse effects on human rights arising from business activity

2. Human Rights Due Diligence

The Chiyoda Group will establish and conduct due diligence to identify any adverse impacts on human rights that may relate to its business activities and seek to prevent or mitigate such impact in accordance with the United Nations Guiding Principles on Business and Human Rights.

If we identify that we have caused or contributed to adverse impacts on human rights, we will make efforts to remediate such impacts. We also provide access to effective remedy for those whose rights have been violated through our grievance system.

3. Priority Human Rights Issues

The Chiyoda Group recognizes the following human rights issues as important elements of our responsibilities to respect human rights.

- Elimination of Discrimination and Harassment: Never engage in, nor tolerate, any form of discrimination or harassment.
- Prohibition of Forced Labor and Child Labor: Never engage in, nor tolerate, any form of forced labor or child labor.
- Respect for Diversity and Work–Life Balance: Respect diversity in the workplace and support the realization of work–life balance.
- Occupational Health and Safety: Endeavor to ensure the health and safety of every employee by providing a suitable working environment.
- Working Hours and Wage: Manage working hours and pay wages appropriately.
- Respect for Basic Labor Rights: Respect basic labor rights including freedom of association and the right to collective bargaining.
- Harmony with Society: Strive for harmony with society and respect the human rights of stakeholders in the local communities

4. Awareness Raising and Education

The Chiyoda Group will continually provide all its officers and employees with appropriate education and training in order to raise their awareness and disseminate and comply with this Policy throughout the Group.

5. Monitoring and Information Disclosure

The Chiyoda Group will regularly monitor its status of compliance with this Policy and make improvements as necessary. At the same time, we will regularly disclose information on our human rights initiatives based on this the Policy on our website and the like.

We will also engage in sincere dialogues and discussions with affected stakeholders or any other relevant parties regarding our response to human rights impacts.

CORPORATE SQE POLICY

Chiyoda Corporation, including its group companies (Chiyoda Group) recognizes that all corporate activities must be performed in a responsible manner, leading to ‘sustainable development’, by balancing the advancement of humankind and conservation of the global environment.

Chiyoda Group will, through cooperation with our customers, concerned companies, governmental authorities and communities, endeavor to satisfy the requirements and needs of our customers and society by applying the following Safety, Quality and Environmental (SQE) policy.

1. Recognize that all personnel have a duty and responsibility to promote SQE activities and enhance SQE awareness, knowledge and competence through continual education and training.
2. Provide products and services that meet the requirements of customers and society related to SQE by utilizing Chiyoda Group’s technology and engineering capabilities for customer facilities and equipment or the Chiyoda Group.
3. Minimize SQE risks, including occupational injuries and ill health throughout the project lifecycle including planning, design, procurement and construction and manage risks to ‘As Low As Reasonably Practicable’ (ALARP) by identifying every potential hazard and implementing proper controls.
4. Optimize the use of natural resources and energy, reduce effluent and waste and recover reusable material to achieve a low-carbon society through carbon management, and apply research and development of technologies to prevent or resolve environmental challenges, spreading such technologies globally.
5. Comply with relevant SQE legislation and regulations and other requirements to which the Chiyoda Group subscribes.
6. Ensure the continual improvements of SQE management systems.

Chiyoda Group personnel, regardless of workplace, will adhere to the directives set forth in this policy.

EVERY INCIDENT IS PREVENTABLE

Through our SQE activities, we will be the most reliable company in the world.

CORPORATE INFORMATION SECURITY (IS) POLICY

The Chiyoda Corporation, including its group companies (“Chiyoda Group”) securely maintain and manage all information assets. We fully recognize that information assets offered by customers and business partners are treated as a top priority as per this policy by all personnel engaged in the duties of our group to promote information security management activities.

1. Observe information security laws, regulations and contract conditions with customers and business partners;
2. Implement an information security management system and corporate regulations to maintain and manage all information assets;
3. Take effective control measures to mitigate the risks associated with any information security incident such as theft, leakage, loss, falsification or misuse;
4. Prevent re-occurrence of an information security incident by review of management systems and corporate regulations as appropriate;
5. Continually increase awareness of the importance of information security to all Chiyoda Group personnel through the implementation of appropriate instructions and edifications.

This policy is applicable to all Chiyoda Group personnel to prevent an information security incident and to maintain and raise the Chiyoda brand status.

Every person in Chiyoda Group is required to follow the policy.

PRIVACY POLICY

The Chiyoda Group recognizes that appropriately protecting and handling personal information is a prerequisite in our activities and endeavors to protect personal information in accordance with the following policy.

1. The acquisition and use of personal information shall be conducted fairly and in compliance with applicable laws and personal information shall be used only for a definitive and legitimate need.
2. Personal information shall not be used or disclosed for other than the originally intended purpose and shall not be used or disclosed for any reason outside the intent and need of the original purpose.
3. Personal information shall be correctly and accurately maintained.
4. Personal information shall not be retained beyond the period required for the original purpose.
5. Personal information shall not be provided or disclosed to a third party without consent from the person concerned, except in cases where the Chiyoda Group is required to supply such information by order of a court, legal authority or other official body. In cases where personal information is made available to a third party, except a court, legal authority or other official body, it is mandatory to conclude binding confidentiality contracts with third parties concerning personal information.
6. The Chiyoda Group shall quickly and sincerely respond to inquiries and requests for modifications, amendments or deletions from individuals regarding their personal information.
7. Appropriate security measures shall be taken to protect personal information from unauthorized access, revisions, disclosure and/or losses due to an accident.
8. A management and operation system shall be established and continuously improved as required to assure implementation of this policy.

All personnel in the Chiyoda Group, regardless of place of work, shall adhere to the directives set forth in this policy.

TAX POLICY

The Chiyoda Group, in recognizing its legal obligations to comply with the tax regulations within its countries of operation, provides its Tax Policy as follows:

1. Compliance with Tax Laws and Regulations

Observe all applicable tax laws and regulations, with the highest integrity and ethics, in countries where it conducts business and submit correct and timely tax declarations.

Duly observe international rules, including the OECD*¹ and the BEPS*² Project, when conducting operations and fulfill its global tax responsibilities.

Never conduct business attempting to avoid paying tax or deviate from the purpose intended by applicable laws and regulations.

2. Monitoring / Review

Periodically review the Group's taxation activities, including compliance with relevant country tax laws and international legislation.

Appoint external accounting or tax advisors for advice, when required, to achieve the highest Group tax compliance record and avoid infringing tax laws and regulations.

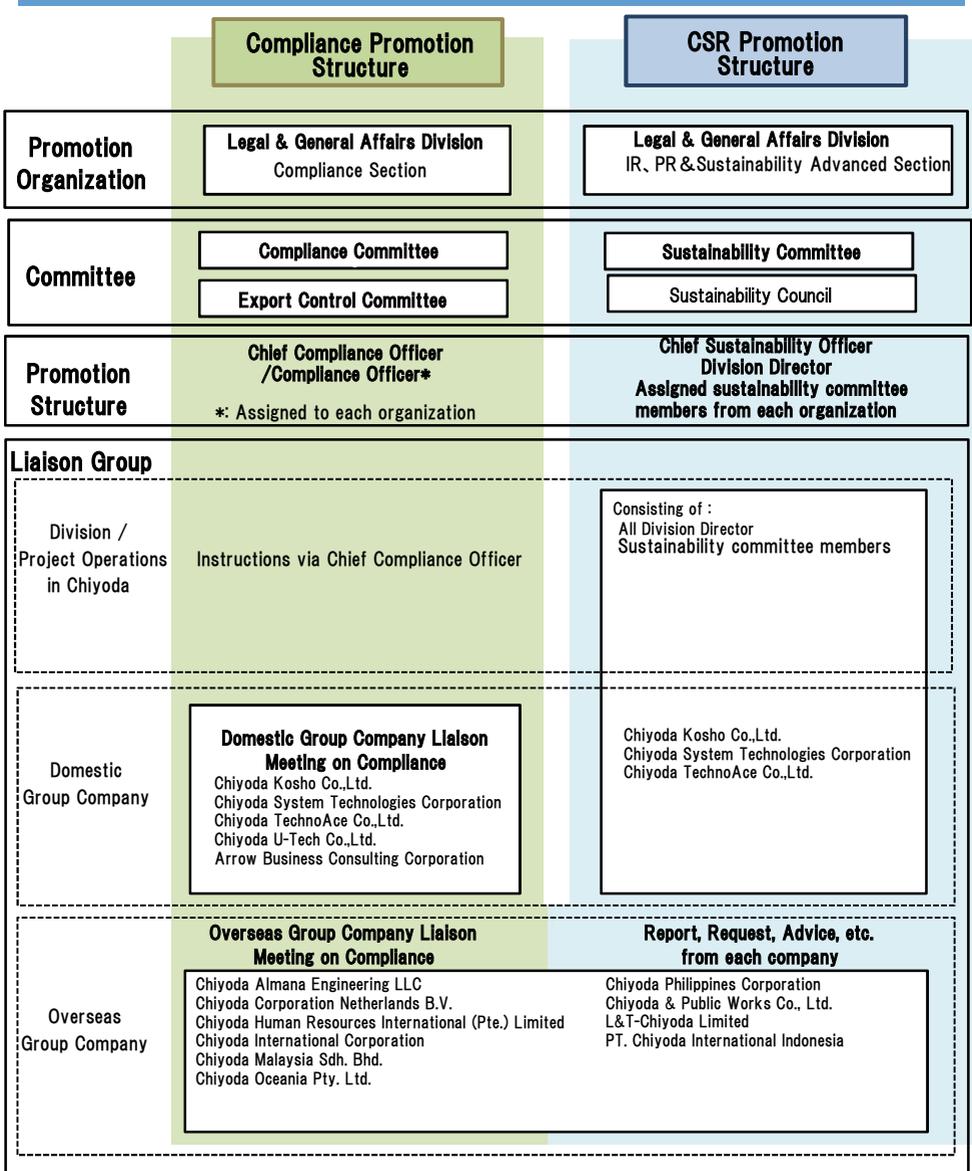
3. Relation with Tax Authorities

Strive to build and maintain trust with tax authorities in countries of operation by ensuring accountability and transparency in tax issues according to relevant laws and regulations.

*1: OECD (Organization for Economic Co-operation and Development): an international institution of 35 developed countries to discuss international business, develop the global economy, promote free trade and aid developing countries to freely exchange opinions and information.

*2: Established by the OECD in June 2012 to counter multinational enterprises attempting to avoid paying taxes globally through Base Erosion and Profit Shifting (BEPS). The Project consists of the three pillars of 'Certainty, Transparency and Predictability'.

Compliance and CSR Promotion Structure



United Nations Global Compact (UNGC)

United Nations Global Compact (UNGC*) is a global action to realize sustainable growth. Each company is required to act as a social member by showing a responsible and creative leadership. We signed UNGC in November, 2012 and continue to make an effort for the realization of the 10 principles.

We ask you to fully understand the spirit of the UNGC, put its principles into concrete form in cooperation with your co-workers, and always strive to practice them, along with the Chiyoda Group Code of Conduct and Conduct Guidelines.

***1: About the UNGC**

UNGC was first proposed at the World Economic Forum (Davos Forum) in 1999 by then U.N. Secretary General Kofi Annan and António Guterres, existing U.N. Secretary General expresses a clear support. More than 10,000 organizations (approximately 7,000 of these organizations are companies.) in 145 countries worldwide have signed and are active focusing on ten principles in four areas of "Human Rights", "Labor", "Environment" " Anti-Corruption".

Ten Principles We Will Strive to Practice in the UNGC

Human Rights

1. Support and respect for the protection of human rights
2. Non-complicity in human rights abuses

The Chiyoda Group's Approach

Provision 8 of our Conduct Guidelines states that we respect the human rights of all people. This principle is the foundation of all our activities.
 Provision 8.2 states that we respect the human rights and will never discriminate for the reasons whatsoever, and Provision 8.3 also states that we never tolerate any harassment including sexual harassment or abuse of power.

Labor

3. Upholding the freedom of association and recognition of the right to collective bargaining
4. Elimination of forced labor
5. Effective abolition of child labor
6. Elimination of discrimination in employment and occupation

Provision 8.5, 8.6 of our Conduct Guidelines state that we 'maintain a safe and healthy working environment' and 'conduct thorough safety education and training'.
 We comply with laws, regulations and customers' requests in management of workplaces, including all construction sites worldwide.

Environment

7. Precautionary approach to environmental challenges
8. Initiatives to promote environmental responsibility
9. Development and diffusion of environmentally friendly technologies

In our corporate philosophy, we declare that we will aim for harmony between energy and the environment and contribute to the sustainable development of society. In addition, we specify relevant activities in our Corporate SQE Policy and present what we should do to realize these objectives in provision 4 of our Conduct Guidelines.

Anti-Corruption

10. Working against corruption, including extortion and bribery

Provisions 2.7, 2.8 and 2.9 of our Conduct Guidelines state that we will never offer improper benefits to any of our stakeholders, never offer excessive gifts or entertainment, and never offer gifts that exceed legal standards. In addition, provision 2.10 states that we will never accept gifts or entertainment that exceed socially acceptable standards.

For details on the UNGC, please refer to the following site:
<http://www.unglobalcompact.org/>

Sustainable Development Goals (SDGs)

The 17 Sustainable Development Goals (SDGs*2) of the 2030 Agenda for Sustainable Development were adopted by world leaders at UN Summit in 2015. Chiyoda Group makes efforts to achieve the 17 SDGs and 169 targets through our business activities to the extent possible.

*2: About the SDGs (Sustainable Development Goals)

Sustainable Development Goals (SDGs) were adopted by more than 150 world leaders at UN Summit in 2015. This shows the 17 SDGs and 169 targets to be achieved for sustainable development by solving the global issues such as poverty, hunger, energy and climate change to create prosperous and peaceful society from 2015 to 2030.

SUSTAINABLE DEVELOPMENT GOALS

17 GOALS TO TRANSFORM OUR WORLD



Materiality Assessment

Chiyoda Corporation was founded in 1948 during the time when Japan was starting to move powerfully toward postwar recovery. With ‘serving society through technology’ as its founding motto, the company has kept moving forward in accordance with the Corporate Philosophy of ‘Energy and Environment in Harmony’ and in unswerving awareness of the requirements of the global community.

In the Paris Agreement adopted by the United Nations in 2015, a consensus was reached by the international community that it aims for a carbon-free society as an approach to climate change. With The Sustainable Development Goals (SDGs) as global common goals, business entities are strongly urged to make efforts to solve global issues through their businesses.

In addition to the initiatives that form the foundation of our CSR, Chiyoda has identified key sustainability issues aiming to simultaneously resolve global issues and achieve economic growth.

In the future, we will integrate the identified issues into our business plan and further strengthen our efforts to achieve the SDGs through our business activities.

7 エネルギーをみんなに
そしてクリーンに



**7: エネルギーをみんなに
そしてクリーンに**
**7: AFFORDABLE AND
CLEAN ENERGY**

9 産業と技術革新の
基盤をつくろう



**9: 産業と技術革新の基盤を
つくろう**
**9: INDUSTRY, INNOVATION
AND INFRASTRUCTURE**

13 気候変動に
具体的な対策を



**13: 気候変動に具体的な
対策を**
13: CLIMATE ACTION

Materiality	Goals	Solutions
<p>7 エネルギーをみんなに そしてクリーンに</p> 	<p>Chiyoda aims to ensure stable energy supply by improving infrastructure and providing all people in the world with access to energy through plant construction. Chiyoda responds to various energy demands providing solutions such as environment-friendly LNG plants, renewable energy supply, and hydrogen supply chains. Chiyoda realizes a sustainable society by enhancing corporate value with harmony between energy and the environment.</p>	<ul style="list-style-type: none"> ・Provision of safe and reliable plants ・Implementation of high-quality engineering services ・Provision of added value through integration with cutting-edge technologies ・Technical proposals responding to various energy requirements
<p>9 産業と技術革新の 進歩をつくらう</p> 	<p>Chiyoda contributes to the establishment of the foundation for technical innovation by integrating AI & innovative digital technologies, increasing the asset value of our customers, and developing global human resources through technology transfer, as well as to the establishment of economic and industrial infrastructure of the countries where we construct plants. Chiyoda also aims to resolve social issues by technologies in pharmaceutical / life-science fields.</p>	<ul style="list-style-type: none"> ・Global human resources development ・Technology transfer and job creation in the countries where we execute projects ・Provision of added value through integration with cutting-edge technologies ・Application of innovative digital technology ・Expansion of business areas through partnerships
<p>13 気候変動に 具体的な対策を</p> 	<p>Ever since its foundation, achieving a balance between industrial development and the global environment has been one of the important missions of Chiyoda. Chiyoda aims to realize a carbon recycling society and respond to climate change through engineering, ensuring the sustainability of the global environment and human society. Chiyoda remains a leading company, taking on challenges of developing new technologies to solve global issues.</p>	<ul style="list-style-type: none"> ・Efforts for environmental conservation through project execution ・Technical proposals for a carbon recycling society ・Development and provision of environmental protection technologies ・Effective energy utilization through efficiency improvement ・Expansion of business areas through partnerships

Guide to Compliance Consultation and Reporting System

Preface:

If you foresee any possibility of a problem taking place or if you actually find a problem, please report such problem to your manager or relevant department(s) for resolution. If you think that such problem cannot be resolved by doing the above for whatever reasons, please refer such problem for resolution in accordance with this Compliance Consultation and Reporting System (“System”).

Purpose:

The purpose of this System is to discover any illegal or unethical act (misconduct), whether actual or suspected, by an individual or organization at an early stage and to prepare and implement appropriate actions, as required, to correct or prevent such misconduct. The ultimate aim is to achieve a system of self-correction.

Consultation and Reporting Definitions:

This system covers misconduct concerning Chiyoda Corporation and Chiyoda Group Companies.

“Consultation” shall mean establishing whether or not a problem falls into the category of a misconduct. “Reporting” shall mean the reporting or disclosing of misconduct (possible, probable or imminent).

Those who can Consult and Report:

All staff (employees, agency personnel, etc.) working for Chiyoda Corporation and Chiyoda Group Companies, their family, retired employees and members in companies having business with Chiyoda Corporation and Chiyoda Group Companies.

Integrity of Reporting:

- (1) Reporting should be carried out objectively and rationally. Reporting to further individual interests, act on grudges, or behave in a slanderous nature is unacceptable. Reporting that may damage the interests of the public or external parties is also unacceptable.
- (2) When reporting, any speculation relating to misconduct must be separated from the facts objectively and rationally. The assertion of speculation and rumors as facts or the use of expressions which might mislead others and/or cause them to misunderstand situations is prohibited.

Protection:

- (1) All consultation and reporting will be kept confidential and individual privacy will be maintained.
- (2) Subject to compliance with the above mentioned “Integrity of Reporting”, anyone experiencing unfavorable treatment as a result of consultation or reporting is requested to report such treatment to the Compliance Section for investigation.

Consulting/Reporting Contact Information (for English)

Chiyoda Corporation

Tel : +81-45-225-7743 (Extension No. 211430)

Email : compliance@chiyodacorp.com

Mail : Chiyoda Corporation Compliance Section, Minatomirai Grand Central Tower,
4-6-2, Minatomirai, Nishi-ku, Yokohama, 220-8765, Japan

Compliance Post Box: Refresh Room (19th Floor) at Chiyoda Global Headquarters or
near the staff canteen at Koyasu Office

External Consultation/Reporting

1) Workplace Hotline

Company: Cuorec3 Co., LTD

Tel : 0120-965-722 (Wed/Sat 18:30~20:30)

(Unavailable on and during National Holidays, Year End and New Year
Holidays (12/30-1/3), Summer Holidays (8/13-8/15))

Remarks : *Consultation/reporting only available by employees (incl. temporary
employees) of Chiyoda Corporation and domestic Chiyoda Group companies.
*Anonymous contact is available, however Company name will be confirmed.
*Consulter/reporter can choose whether the issues need to be reported to
Chiyoda Corporation or not.
*The reporting to Chiyoda Corporation above can be made anonymously.
However Chiyoda Corporation may not be able to resolve the issue without
knowing the consulter/reporter's name.

2) Tokyo Fuji Law Office Kugisawa Lawyer (Japan qualified lawyer)

Tel : +81-3-3265-0691

Email : chiyoda-gaibusodan@law.email.ne.jp

Mail : KDX Koji-machi Building 4th Floor, 3-3, Koji-machi, Chiyoda-ku,
Tokyo 102-0083, Japan

Remarks : *Anonymous contact is available. However the lawyer may not be able to
resolve the issue without knowing the consulter/reporter's name.
*Even if the lawyer knows the consulter/reporter's name, the name will not
be disclosed to Chiyoda Group without the consulter/reporter's consent.

3) Seamless Global Hotline (Law firm in Japan)

Tel : +81-3-5193-2763

Email : externalhotline@chiyodacorp.com

Remarks : *This hotline will only receive your consultation/reporting and transfer it to
Chiyoda Corporation. Upon receipt of the consultation/reporting, Compliance
Section will follow up and take action.
*Anonymous contact is available.
*The reporting to Chiyoda Corporation above can be made anonymously.
However Chiyoda Corporation may not be able to resolve the issue without
knowing the consulter/reporter's name.
*Voice mail service is available.

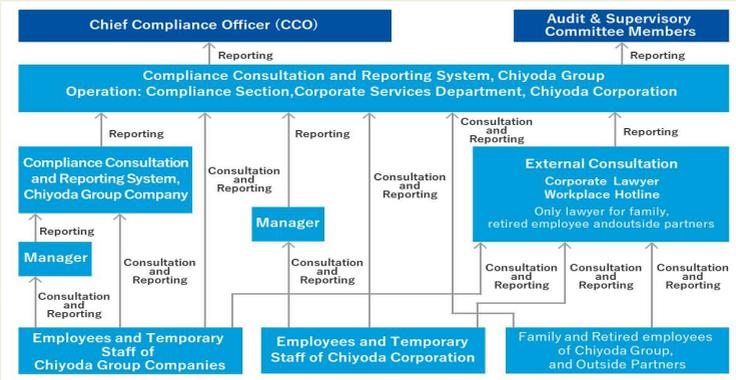
Chiyoda Group

General Inquiries:

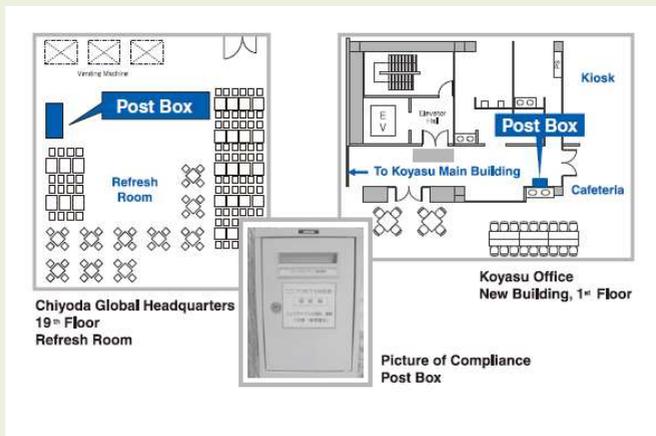
For general inquiries about the Compliance Consultation and Reporting System, please email the Compliance Section: compliance@chiyodacorp.com.

Organization

- Chiyoda Corporation -



- MAP of Compliance Post Box -



Specific actions to be taken by Chiyoda employees in the event of a large earthquake or other disaster

Basics

Life comes first

Ensure your and your family's safety.

Report your status (to Chiyoda)

Report your and your family's status and the status of damage to your residence to Chiyoda using the 'SECOM Safety Confirmation Service'.

Specific actions in the event of a large earthquake

General actions

What should we do?
Ensure your safety.
Confirm the safety of your family and the status of damage to your residence.
Report the above to Chiyoda using the 'SECOM Safety Confirmation Service'.

Actions by location

What should we do?
1. When in the Minato Mirai Grand Central Tower:MMGCT,
Stay in the MMGCT
Follow the instructions of the Crisis Control Center.
2. When at home,
Stay at home.
Watch the Employee Website 'Security & Crisis Guide' –password:chiyoda–
3. When out,
Evacuate to a safe place such as an 'Emergency Evacuation Area'.

In the event of a Fire

Follow the instruction of the building - administration center you stay and evacuate to the designated Emergency Evacuation Area.

You are requested to always keep the "Major Disaster Response Manual" issued by Corporate Service Department in Apr. 2014, at hand and be prepared for contingencies. This manual can also be accessed via EIP.

Major Disaster Response Manual	
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1. Basic Action in Event of Major Disaster	2
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Chiyoda Corporation	
Corporate Service Unit	

BCP (Business Continuity Plan)

Business Continuity Plan (hereinafter referred to as BCP) identifies the risks of business interruption and provides policies and procedures for avoiding those risks and for, in case of interruption, promptly resuming the operations.

Fundamental principle

Life comes first.

Basic policies

- In case of emergency, the top priority action is to confirm or ensure the safety of the employees of Chiyoda Corporation, their families and employees of companies we are working with.
- Also a high priority action is to ensure the safety of our and our affiliates' facilities and construction sites and the facilities we and our affiliates use and their surrounding areas. It includes the efforts to minimize damage and prevent secondary disaster affecting the neighborhoods, for instance, by the collapse of a building under construction.
- We will continue with the operations to fulfil our social responsibility.
- Promptly identify the damage to the facilities we are constructing. Take emergency action to help our customers continue with their operations. Propose the best possible restoration plan and cooperate in the implementation of the plan.
- Help the affected areas with restoration and reconstruction to help the communities.
- To increase the resilience to a disaster and other crises, conduct periodic exams and training sessions on crisis response and BCP and review the plan for improvement.
- Try to provide the right information at the right time inside and outside the company.

Initial response

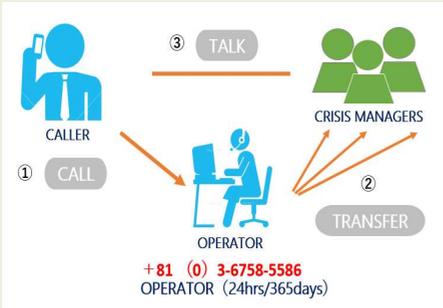
- Setting of Crisis Control Center, Launch of BCP
- Confirmation of the situation
People, Buildings, IT, Social infrastructure, etc.
- Response to primary disaster, Prevention of secondary disaster
Take care of the affected people, the employees unable to return home,
Help the affected customers, etc.
- Provision of information
To our employees, customers, vendors, subcontractors,
outside the company & the media

Prioritized operations

- Refer to “BCP(Business Continuity Plan)Manual” in EIP

Crisis Management

- Emergency Reporting to Crisis Managers -

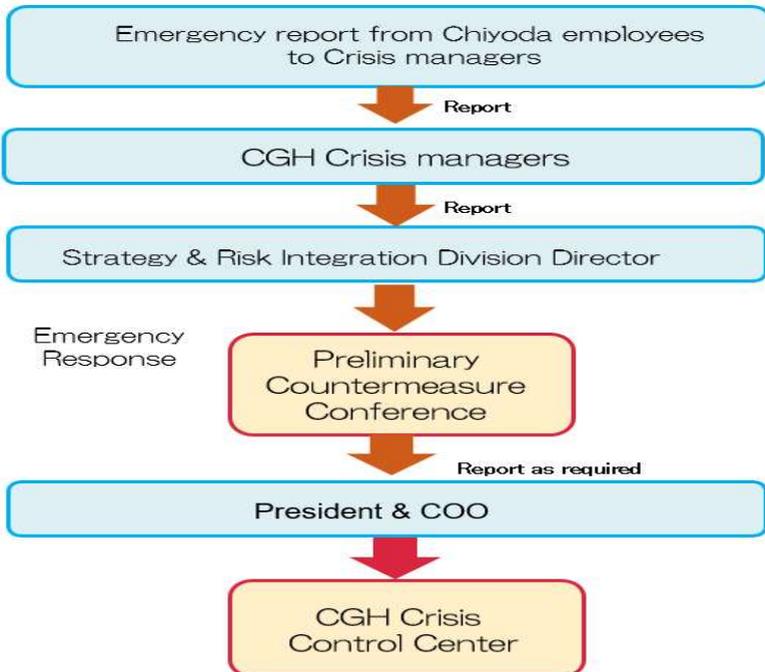


Chiyoda has emergency contact point which is 24/365 accessible.

Examples of emergency is as below:

- **Serious incident which is assumed to be life-threatening.**
- **Cases that seriously damage company operations**

Emergency Reporting Flow



- The Employee Website to receive company message in case of emergency -

In the emergency, company will send message through the employee website.

This employee website is accessible via internet when you cannot access to company EIP.



The Employee Website of Chiyoda Corporation

How to install on your smart phone:

- Access from Chiyoda Corporation HP
- Access to Chiyoda EIP Crisis Management (Overseas Security)Page
- Access Directly to the below URL

<https://www.employee.chiyodacorp.com/>





Chiyoda Group
Employee Handbook
10th Edition, Apr 2022

(Translation of the 10th Edition of April 2022 Japanese Version)

Publisher :
Legal & General Affairs Division
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Dept./Section	Name

The photo of the cover : the Chiyoda Global Headquarters

Please always carry this handbook, and do actions being aware of “Code of Conduct.”