

Chiyoda Group CSR Handbook (6th Edition)



- Corporate Philosophy
/CSR Vision
- Code of Conduct
- UN Global Compact
- Compliance Consultation
and Reporting System
- BCP
- Crisis Management

Top Message

The Chiyoda Group's Backgrounds as a Social Entity

Chiyoda Corporation was founded in 1948 for the purpose of contributing to society through engineering, making excellent use of its sophisticated technologies. It has since been engaged in the engineering and construction of plants and facilities such as in petroleum refining, gas processing and petrochemicals, contributing to the development of industry in Japan. We have also made forays into countries in the Middle East and Asia, where we have also been striving to contribute to the development of society with our refined technical capabilities by providing each region with infrastructure tailored to the needs of the times and the regions. In those backgrounds, we have consistently continued engineering operation based on the core of our corporate philosophy of “harmony between energy and the environment.”

The Chiyoda Group's Corporate Social Responsibility (CSR)

Recently, the global requirements for corporate social responsibility (CSR) have changed significantly. As corporate activities become increasingly globalized, new demands are emerging for the resolution of social issues such as respect for human rights, the correction of inequality, environmental preservation and anti-corruption. To address these issues, expectations are growing for the business sector and its resources. The goals and directions to be followed by companies are shown through the Sustainable Development Goals (SDGs)*1, adopted by the United Nations in the year 2015, and the Paris Climate Agreement, in which the international community agreed to aim for a carbon-free world as a measure to combat climate change. As shown in our corporate philosophy and CSR visions, commitment to UN Global Compact*2 joined in 2012, there are many areas in which our technologies and human resources could resolve these issues.

We believe that we can satisfy these requirements through the Chiyoda Group's CSR activities to contribute to the creation of a better society by having a correct understanding of the requirements of the times and our stakeholders and making efforts to solve social issues through engineering.

To Achieve Our Ultimate Goal of Becoming a Reliable Company

As our corporate activities have been increasingly global in scope, we are dedicated to developing the circumstance in which employees as well as other stakeholders such as customers, business partner and local communities can participate and play an active role, regardless of their gender, nationality, age or religion in a spirit of respecting human rights, above all.

In addition, Chiyoda Corporation made the transition to a “company with the audit and supervisory committee” in June 2016 based on the Corporate Governance Policy, seeking to increase the fairness and transparency of business management and make decisions more promptly. Through this action, we have further enhanced our corporate governance system by appointing three independent outside directors. As a group, we will solidify the foundations for our operations and work on the medium-term management plan starting on the fiscal year 2017 to contribute to a sustainable society.

August 2017

Chairman of the Board **Katsuo Nagasaka**
President and CEO **Masaji Santo**

- *1: SDGs are a set of global goals to be achieved by 2030, adopted at the UN Sustainable Development Summit in September 2015. They are common goals for the international community, consisting of 17 goals and 169 targets, for both developed and developing countries to tackle to eradicate poverty and realize a sustainable world.
- *2: UN Global Compact was announced by then UN Secretary-General Kofi Annan in an address to the World Economic Forum held in 1999. It is a principle-based framework for businesses, stating ten principles in the areas of human rights, labor, the environment and anti-corruption. Chiyoda has signed up in UN Global Compact in 2012.

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Chiyoda Group Philosophy/Vision/Code of Conduct

Our Mission

Corporate Philosophy

The Aim of Chiyoda *目指す姿*

Business Vision

Our Values

CSR Vision

Basis of Our Actions

Code of Conduct
(Employee's Practical Guide)

Corporate Risk Management Policy

CORPORATE INFORMATION SECURITY
(IS) POLICY

Privacy Policy

Policy of Chiyoda Corporation

Corporate SQE Policy

Chiyoda Group Corporate Philosophy-Our Mission-

CSR Vision -Our Values-

One of our primary aims in the Chiyoda Group, as an integrated engineering company, is to contribute to the sustainable development of society through our business activities. By furthering the below activities in a sustained manner, we strive constantly to enhance our corporate value and to be a corporation that earns the trust and affinity of all our stakeholders.

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.

Basis of Our Actions

Code of Conduct of the
Chiyoda Group

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-

The aim of the Chiyoda Group is to respond to the requirement of the times, to create value and open up new frontiers, and become the "Reliability No. 1" Project Engineering Company by establishing ourselves as the world's most dependable project engineering company. We will continue to develop and produce sustained growth by implementing our cutting-edge engineering in various fields.

ISO 26000
Core Subjects

UN Global Compact

Action Policies

Consumer
(customer)
issues

—

- Provide industrial plants that earn customer trust through engineering of outstanding quality
- Share our CSR principles with suppliers and other business partners

The
environment

Principle7: Businesses should support a precautionary approach to environmental challenges;
Principle8: undertake initiatives to promote greater environmental responsibility; and
Principle9: encourage the development and diffusion of environmentally friendly technologies.

- Develop and provide environmentally friendly energy and conservation technologies
- Conduct business activities that contribute to environmental conservation

Community
involvement
and
development

—

- Contribute to society through integrated engineering business activities
- Enhance social contribution activities by providing knowledge and labor

Human rights
Labor
practices

Principle1: Businesses should support and respect the protection of internationally proclaimed human rights; and make sure that they are not complicit in human rights abuses.
Principle2: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
Principle3: the elimination of all forms of forced and compulsory labor;
Principle4: the effective abolition of child labor; and
Principle5: the elimination of discrimination in respect of employment and occupation.
Principle6

- Create a lively and energetic working environment and help employees develop their talents
- Instill in everyone involved that safety is a core value

Organizational
governance
Fair operating
practices

Principle10: Businesses should work against corruption in all its forms, including extortion and bribery.

- Conduct business activities based on strict compliance and a high degree of transparency
- Conduct a thorough risk management program

Chiyoda Group
Employee's Practical Guide

December 6, 2017 (Rev.2)
April 1, 2009(Rev.1)
April 1, 2006

Code of Conduct of the Chiyoda Group

We, Chiyoda Group, recognize that all business activities are based on earning the trust and understanding of society and clients. To ensure that our business activities conform to social standards, we fully comply with all applicable domestic and international laws and regulations as well as our own rules, and conduct business activities in accordance with the following principles.

1. To earn the trust of clients by constantly improving quality in order to supply useful facilities and services.
2. To do business with transparency, free competition and fairness in order to earn the trust and understanding of society and clients concerning our corporate activities.
3. To maintain strong lines of communication not only with shareholders and other stakeholders but also with society at large, and to disclose corporate information willingly and fairly.
4. To recognize that helping to solve environmental issues is an essential part of our business activities as an engineering company, and to contribute to society while cooperating with governments and their agencies.
5. To reject all contact with anti-social organizations and never offer these organizations any benefits.
6. To handle personal information and client information with utmost care and attention and use intellectual property in an appropriate manner without infringing on the owner's intellectual property rights.
7. To draw a line between official company activities and private activities, and never take any action that would be detrimental to the company.
8. To respect the human rights of all people. Also, to respect the diversity, individuality and character of employees and endeavor to ensure employees' health and safety by providing a suitable working environment.
9. Senior management shall recognize that implementing the spirit of this code is their responsibility, and shall make related parties aware of this code by setting an example through their leadership. Senior management shall also heed the voice of stakeholders, both internally and externally, and take initiatives to solve the issues violating the Code of Conduct and strive to establish an effective framework for implementing these principles.

Chiyoda Group Employee's Practical Guide

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

1. To earn the trust of clients by constantly improving quality in order to supply useful facilities and services.

- 1 Observe all laws, regulations and standards applicable to respective business activities.
- 2 Ensure to receive permits, submit notices and reports, and perform other procedures associated with respective business activities in an appropriate manner.

Applicable laws and regulations : Construction Industry Law, all applicable industry codes

2. To do business with transparency, free competition and fairness in order to earn the trust and understanding of society and clients 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 specific company.
- 3 Never act in a manner that is improperly harmful to the interests of a subcontractor.
- 4 Strictly observe all treaties and national laws and regulations concerning international trade.
- 5 Observe all laws and regulations and carefully study the business propriety of exporting strategic materials, certain other materials and technologies, and providing certain services.
- 6 Perform all procedures required by governmental agencies in a righteous manner.
- 7 Never offer improper gifts, benefits or other economic benefits to government employees, or employees in quasi government organizations in Japan or any other country, or to all the other stakeholders.
- 8 Do not offer excessive gifts or entertainment to the executives and employees of clients/business partners and always observe accepted international standards for business activities.
- 9 Never offer gifts that exceed the legal standards in each country or region.
- 10 Never accept gifts or entertainments that exceed socially acceptable standards for such courtesies.

Applicable laws and regulations : Construction Industry Law, Anti-Monopoly Law, Unfair Competition Prevention Law, Subcontractor Payment Delay Prevention Law, National Government Employee Ethics Law, Foreign Exchange and Foreign Trade Law

3. To maintain strong lines of communication not only with shareholders and other stakeholders but also with society at large, and to disclose corporate information willingly and fairly.

- 1 Never participate in insider trading.
- 2 Work to give shareholders and investors a good understanding of our company through IR activities including information disclosure.
- 3 Make a timely and correct record and report on finance and accounting, and tax.

Applicable laws and regulations : Financial Instruments and Exchange Law, Corporation Tax Act, Consumption Tax Act

4. To recognize that helping to solve environmental issues is an essential part of our business activities as an engineering company, and to contribute to society while cooperating with governments and their agencies.

- 1 Endeavor to protect the environment while observing treaties, laws, regulations and other rules concerning the environment.
- 2 Conduct business activities while taking into consideration the effect on the climate change, natural environment and ecosystems.
- 3 Use natural resources and energy efficiently while at the same time striving to reduce the volume of waste materials and taking steps to recycle or otherwise use these materials effectively

Applicable laws and regulations : Environment Basic Law and related laws and regulations(Air Pollution Control Law, Water Pollution Control Law, Waste Management Law, Effective Natural Resource Use Promotion Law, Construction Material Recycling Law, others)

5. To reject all contact with anti-social organizations and never offer these organizations any benefits.

- 1 Never seek for easy solutions when receiving an improper demand from an anti-social organization. Always report such demands quickly to the organization concerned.
- 2 Take due care of even ordinary business transactions as to whether anti-social organizations are involved. Refuse to conduct the transactions if such organizations should be involved.

Applicable laws and regulations : Corporate Law, Commercial Code

6. To handle personal information and client information with utmost care and attention and use intellectual property in an appropriate manner without infringing on the owner's intellectual property rights.

- 1 Strictly manage to handle information concerning clients, other companies and individuals as well as confidential corporate information obtained through business activities. Prevent leaks and use this information solely for business purposes.
- 2 When required to disclose any confidential information in possession of the company to others for business purposes, have the parties sign a confidentiality agreement and observe other internal rules to prevent leaks.
- 3 Do not rely solely on your own judgment when responding to external inquiries. When a particular department is designated to respond to a certain type of request, always have the inquiry passed on to the proper department.
- 4 Employees must protect confidential information obtained through business activities even after they no longer work at Chiyoda Group.
- 5 Take due care to avoid infringement on the intellectual property rights of other companies and individuals, such as by making copies of computer software without approval, and never perform any such act.

Applicable laws and regulations : Patent Law, New Utility Model Law, Copyright Law, Improper Access Prevention Law, Unfair Competition Prevention Law

7. To draw a line between official company activities and private activities, and never take any action that would be detrimental to the company.

- 1 Never use company resources improperly or use company funds or expenses for personal reasons.
- 2 Never use the company information system or related systems improperly or for personal reasons.

Applicable laws and regulations : Criminal Code, Corporate Law

8. To respect the human rights of all people. Also, to respect the diversity, individuality and character of employees and endeavor to ensure employees' health and safety by providing a suitable working environment.

- 1 Respect the Universal Declaration of Human Rights.
- 2 Respect the human rights. Never discriminate for the reasons whatsoever such as race, creed, religion, gender, sexual orientation and gender identity, nationality, age, origin, disabilities, disease etc.
- 3 Never do or allow any harassment such as sexual harassment, abuse of power, pregnancy discrimination etc.

Chiyoda Group

- 4 Respect the culture, customs, languages and other characteristics of countries and regions. Take due care to behave in line with international and regional social standards.
- 5 Maintain a safe and healthy working environment.
- 6 Conduct thorough safety education and training and enlighten everyone to be well aware of the importance of safety and of safety-related knowledge.
- 7 Promote Work Life Balance

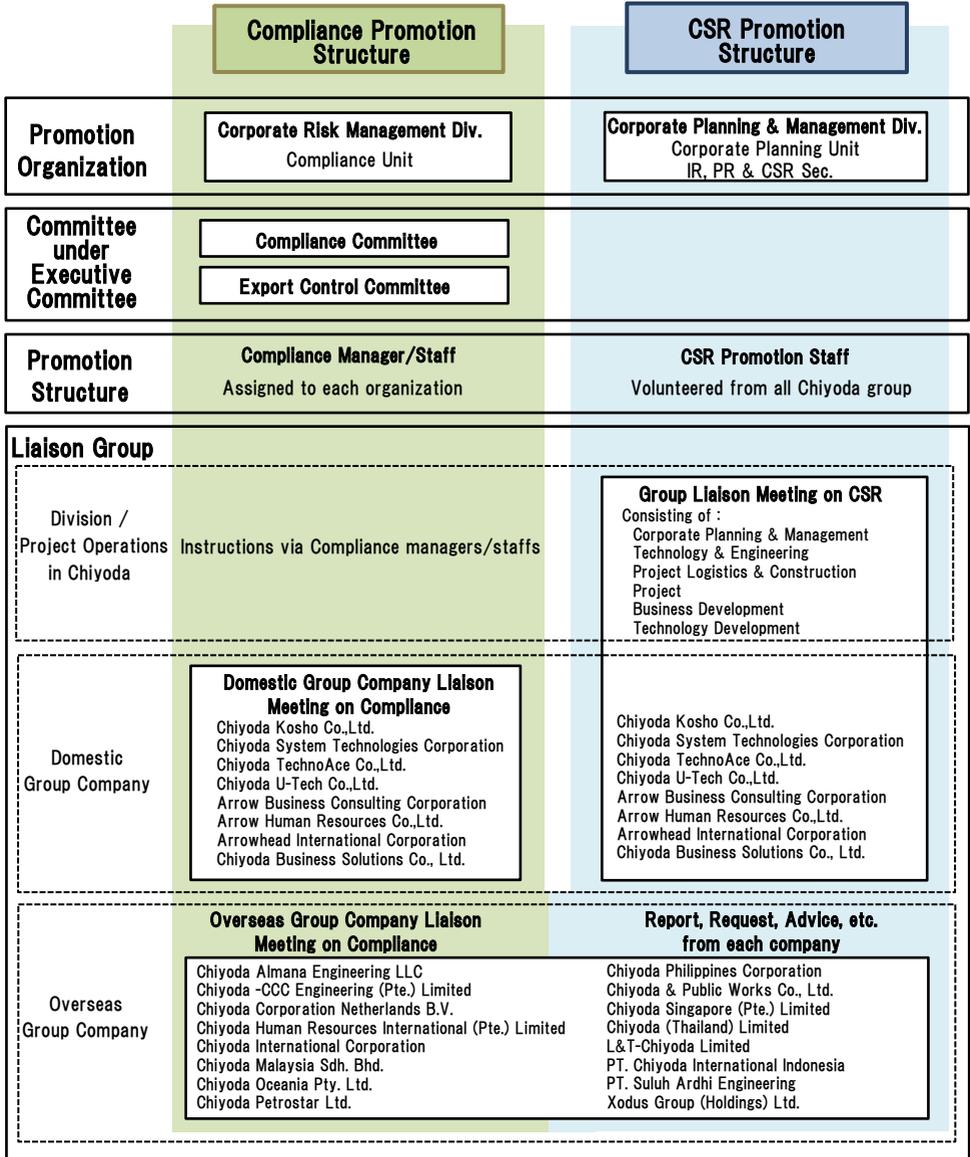
Applicable laws and regulations : ILO International Labor Standards, International Covenant on Economic, Social and Cultural Rights, International Covenants on Civil and Political Rights, Labor Standards Law and related laws (Occupational Health and Safety Law, Law for Equal Employment Opportunity of Men and Women, Child Care and Family Care Leave Law, others) Worker Dispatching Act, Disabled Persons Employment Promotion Law, Labor Contract Act

9. Senior management shall recognize that implementing the spirit of the Code of Conduct is their responsibility, and shall make related parties aware of the Code of Conduct by setting an example through their leadership. Senior management shall also heed the voice of stakeholders, both internally and externally, and take initiatives to solve the issues violating this Code of Conduct and strive to establish an effective framework for implementing these principles.

Supplementary provisions

- 1 The term all executives and employees of Chiyoda Group includes advisers, contract workers and individuals on loan to or employees of group companies in Japan and overseas.
- 2 The Employee's Practical Guide was prepared for use within Japan. In other countries, the Employee's Practical Guide will be adjusted as required to reflect the laws, regulations and rules of particular countries and regions while preserving the original spirit of the Code of Conduct.
- 3 Note that the applicable laws and regulations listed above only refer to the major applicable items and do not cover the complete set of all relevant laws and regulations. Applicable laws and regulations show the ones applicable in Japan. In other countries, employees should observe the laws, regulations and rules of their home country and region, as well as international standards.
- 4 Violations of these rules of behavior will be punished based on employment regulations and/or other provisions according to the nature and seriousness of the violation.
- 5 Transaction to handle the Code of Conduct, the Employee's Practical Guide and related documents and procedures is the responsibility of the General Manager of the Compliance Unit. Significant revisions to the Code of Conduct and the Employee's Practical Guide must be submitted to the Executive Committee for approval through the deliberation of the Compliance Committee.
- 6 The Code of Conduct and the Employee's Practical Guide shall become effective on April 1, 2006.
- 7 In November 2012, Chiyoda Corporation participated in the United Nations Global Compact (UNGC). All executives and employees of Chiyoda Group shall conduct their activities fully comprehending the spirit of the UNGC.
- 8 Revision made on the Employee's Practical Guide: April 1, 2008 / April 1, 2009 / November, 2012 / September 1, 2016 / April 1, 2017 / July 1, 2017

Compliance and CSR Promotion Structure



United Nations Global Compact (UNGC)

United Nations Global Compact (UNGC*¹) 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.

Further, UNGC supports the principles of the 17 Sustainable Development Goals (SDGs*²) of the 2030 Agenda for Sustainable Development 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.

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 Employee's Code of Conduct and Practical Guide.

Ten Principles We Will Strive to Practice in the UNGC

	The Chiyoda Group's Approach
Human Rights <ol style="list-style-type: none"> 1. Support and respect for the protection of human rights 2. Non-complicity in human rights abuses 	Provision 8 of our Employee's Practical Guide 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 <ol style="list-style-type: none"> 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 Employee's Practical Guide 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 <ol style="list-style-type: none"> 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 Employee's Practical Guide.
Anti-Corruption <ol style="list-style-type: none"> 10. Working against corruption, including extortion and bribery 	Provisions 2.7, 2.8 and 2.9 of our Employee's Practical Guide 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/>

***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".

***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



CORPORATE RISK MANAGEMENT POLICY

The world energy business field, where Chiyoda plays its major roles, is in the midst of drastic structural changes. Not only ourselves, the members of Chiyoda Corporation including its group companies (hereinafter collectively called “Chiyoda Group”) but also regions we do business in, and partners we deal with, have been more and more diversified than ever before. According to such changes in the business circumstances, risks Chiyoda Group faces have also grown diversified, complicated and extensive.

Chiyoda Group promotes the risk management activities and planning/ implementing Corporate Strategy as the robust wheels to support and drive maintaining/creating Corporate Value. Chiyoda Group ensures to properly disclose its business risk information to the stakeholders so as to increase transparency, to mitigate those risks by taking proactive countermeasures, then to achieve the business target. That is exactly the aim of CORPORATE RISK MANAGEMENT POLICY. The purposes and action guidelines are defined as follows.

1. Purposes

- To maximize corporate value
- To maintain corporate assets
- To secure business continuity
- To gain confidence of all the stakeholders including shareholders, clients, employees
- To promote a preventive Safety and Health Culture, in which safety comes first

2. Action guidelines

- To report risk information immediately and share the information among the parties concerned.
- To ensure that all the directors and employees must well understand the importance of risk management and to make their best efforts in managing risks.
- To believe that every accident is preventable and conduct daily activities with this consciousness.
- To remember that the risks are defined as uncertainties which might affect the company’s interests and that we must manage risks in a rational and an optimal method from an overall perspective so as to maximize corporate value.

Every personnel in Chiyoda Group, regardless of where the one works, is required to follow the above.

CORPORATE SQE POLICY

Chiyoda fully 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 global environment.

Chiyoda shall through cooperation with our customers as well as other concerned companies, governmental authorities and communities endeavor to satisfy the requirements and needs of customers and society in general by means of the following Safety, Quality and Environmental (“SQE”) policy.

1. Recognize the each individual person has duty and responsibility to promote SQE activities and enhance SQE awareness, knowledge and competence through continual education and training.
2. Provide high quality products and services which meet the requirements of customers and society related to Health, Safety and Environment(HSE)by utilizing Chiyoda’s technology and engineering capabilities for facilities and equipment for customers or to Chiyoda.
3. Minimize SQE risks, including injuries and occupational disease during the planning, design, procurement and construction and through the lifetime of a project, to a level As Low As Reasonably Practicable(ALARP)by identifying every potential hazard and implementing proper controls.
4. Optimize the usage of natural resources and energy, reduce effluent and waste produced and recover usable material to achieve a low-carbon society through carbon management, including research and development of technologies to prevent or to resolve environmental problems; and transfer and spread such technologies globally.
5. Comply with relevant SQE legislation and regulations, and with such other requirements to which Chiyoda subscribes.
6. Ensure the continual improvements of SQE management systems.

Each individual staff member shall follow the directives set forth in this policy.

EVERY INCIDENT IS PREVENTABLE

We will be the most reliable Project Company in the world through SQE activities.

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

In view of the importance of protecting the privacy of individuals and personally identifiable information (“personal information”), the Chiyoda Group takes appropriate measures when handling this information in compliance with the Chiyoda Information Security Management System and all applicable laws and guidelines.

All Chiyoda Group personnel, in cooperation with vendors, subcontractors and other business partners, are dedicated to preserving privacy and protecting personal information in accordance with the following guidelines.

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 a 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 an individual regarding his/her personal information.
7. Appropriate security measures should be taken to protect personal information from unauthorized access, revisions, disclosure and/or losses due to an accident.
8. The Chiyoda Group compliance program, including this privacy policy, shall be reviewed from time to time, and shall be revised as necessary.

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

Guide to Compliance Consultation and Reporting System

(Welcome to All about Compliance)

Preface:

If you foresee any possibility of a problem taking place or if you find any problem, it is our normal procedure for you to report such problem to your manager for resolution. If you think that such problem cannot be resolved by the above normal procedure for whatever reasons, you are requested to 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 Unit for investigation.

The Contact in English:

Contact can be made in English by any of the following methods:

- 1) Email : compliance@chiyodacorp.com
- 2) Telephone : +81-45-225-7743 (Extension No. 211430)
- 3) Mail : Chiyoda Corporation
Compliance Unit
Minatomirai Grand Central Tower, 4-6-2, Minatomirai,
Nishi-ku, Yokohama, 220-8765, Japan
- 4) In-house mail: Send to Compliance Unit (CGH)
- 5) “Meyasu Bako” (Compliance Post Box):
Chiyoda Global Headquarters – Refresh Room on 19th Floor
Koyasu Office – Near the staff canteen
- 6) In person : Contact to Compliance Unit (CGH)

The following External Consultation Centers (Workplace Hotline and law firm in Japan) are also available.

- 7) Workplace Hotline
 - Company name : Cuorec3 Co., LTD
 - Detail of Consultation : Compliance, Harassment, Human Relations in the office
 - Telephone : 0120-965-722
 - Operating Hours : Every Wednesday and Saturday,
18:30-20:30 (Japan Local time)
(Except: National Holiday,
Year End and New Year Holiday (12/30-1/3),
Summer Holiday (8/13-8/15))
 - Applicants : Members (employees, agency personnel, etc.) of Chiyoda corporation
and Domestic Chiyoda Group companies
Family and retired employee is not included.
 - Others : - Anonymous contact is available, however Company name will be
confirmed.
- According to the express of the caller, either report to CGH
Compliance Unit as group's common window or not.
- In case of a caller wishes to report to CGH Compliance Unit as
group's common window, caller can chose anonymous reporting
or use the caller's real name.
- 8) O'Melveny & Myers LLP
 - Telephone : +81-3-5193-2763
 - Email : chiyoda_hotline@omm.com
 - Mail : O'Melveny & Myers LLP (Chiyoda Group Hotline)
Meiji Yasuda Seimei Building, 11th Floor
1-1, Marunouchi 2-chome, Chiyoda-ku, Tokyo 100-0005, Japan
 - Note : - This office will handle your consultation and reporting and will
transfer it to Chiyoda Corporation. Upon receipt of the
consultation and reporting, the Compliance Unit will take prompt
action according to the Compliance Consultation and Reporting
System.
- Anonymous contact is accepted with certain limitations due to
difficulty in following up or providing feedback.
- A voice mail service is available.

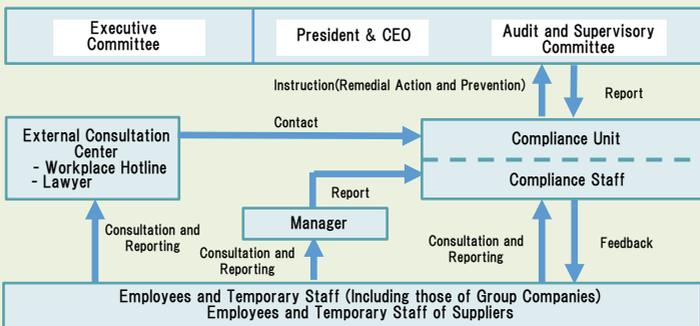
Chiyoda Group

General Inquiries:

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

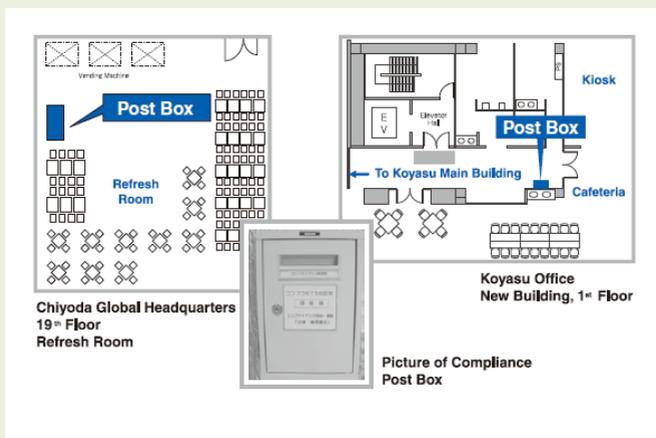
Organization

- Chiyoda Corporation -



Each domestic/overseas Group Companies has its own organization. Please check before making contact.

- MAP of Compliance Post Box “Meyasu-Bako”



(MEMO)

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 Unit in Apr. 2014, at hand and be prepared for contingencies. This manual can also be accessed via EIP.

Major Disaster Response Manual	
CONTENTS	
1. Basic Action in Event of Major Disaster	2
(1) Self-protecting Measures (at Company Premises)	
(2) Initial Response to the Company	
2. Responding to Major Disaster	3
(1) During Work Hours	
(2) At the workplace (including night-time and holidays)	
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(1) Personnel Contact Information	
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(1) At Residence	
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(1) Safety Confirmation Service	
(2) V.I. (Voice/Video) Message Dial Service	
(3) Disaster Message Dial Service/Short Message/Phone Operations	
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

- The Employee Website of Chiyoda Corporation -

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

- Providing/sharing the latest information
- Messages from Crisis Control Center



The site is available in Internet environments.

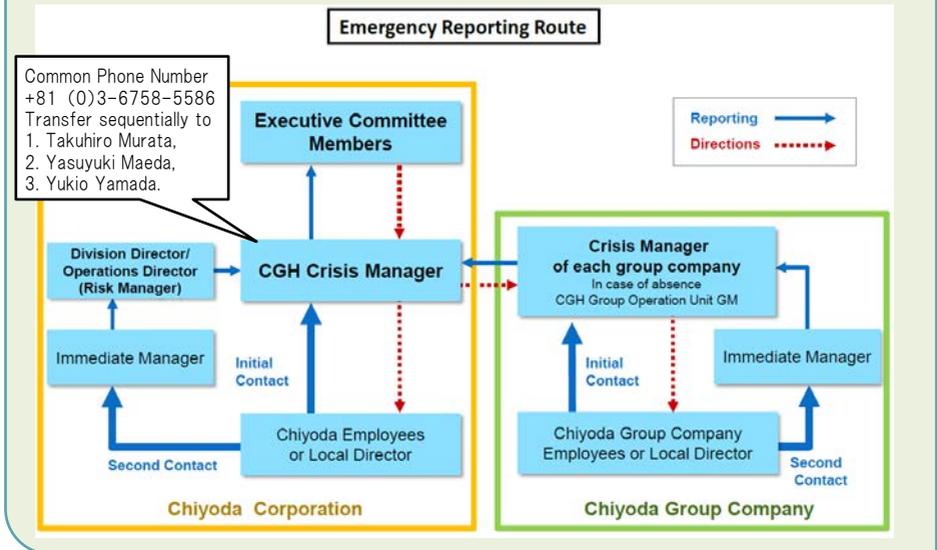
During normal times

The site provides regional / country-based security information for personnel travelling or staying abroad.

In the event of a crisis

Should a crisis such as earthquake, fire, epidemic, etc. occur in and around Yokohama area and may disrupt our business at CGH, the site will switch to a message board from the Crisis Control Center which is to be set up in the event of a crisis

- Emergency Reporting Route -



- Emergency Call Card -

- Download from 'Crisis Management Unit' in EIP or Employee Website of Chiyoda Corporation.
- Fill in the necessary contact information on the form and make sure you carry it at all times.
http://eipspapl.srv.chiyoda.local/EN/CYO_CRMU_EN/Pages/emergency_call_card.aspx

Chiyoda Corp. (CP/AP)	Emergency Call Card
<p>1 Initial Contact CGH Crisis(3) Managers</p> <p>Phone (common): +81 (0) 3-6758-5586</p> <p>Next Report to ↓</p> <p>E-mail (common): chiyoda.crisis@icloud.com</p>	<p>2 Second Contact Your Immediate Manager (SL, GM etc. / Rep. of Site Office)</p> <p>A. Name: _____ Mobile: Phone Number _____ E-mail: E-mail Address _____</p> <p>↓ or ↓</p> <p>B. Name: _____ Mobile: Phone Number _____ E-mail: E-mail Address _____</p> <p>C. Rep. of Site Office (*for employees at project site)</p> <p>Name: _____ Mobile: Phone Number _____ E-mail: E-mail Address _____</p> <p><small>*Please fill in all the necessary contact information and carry this card with you at all times in case of emergency.</small></p>

You have to contact the Crisis Manager when you face the following situation;

- Life-threatening accidents
- Accidents of serious damage to our company operation

About the fifth edition revision

The first issue of the Chiyoda Group CSR Handbook, which contains the basic policies and philosophies for every Group member to refer to as the guide to judge how to behave in her or his daily duties, such as “Corporate Philosophy”, “CSR Vision”, “Code of Conduct” and “Privacy Policy”, was edited in October 2007.

The later revision content is as follows.

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 New group companies A change of a person in charge of Compliance Consultation and Reporting System
Fifth edition (April 2017)	New Top Message A change of Employee’s Practical guide 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

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

February, 2018

Corporate Planning & Management Division
/ Corporate Risk management Division
Chiyoda Corporation

(MEMO)



**Chiyoda Group
CSR Handbook**
6th Edition, February 2018

(Translation of the 6th Edition of February 2018 Japanese Version)

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The photo of the cover: the Chiyoda Global Headquarters