

# Anti-Corruption Policy

## (Purpose)

Article 1. Keihanshin Building Co., Ltd. (hereinafter, "the Company") promotes its business activities based on its corporate philosophy, "To earn and value our customers', shareholders' and employees' trust by operating our company according to quality-first values."

The Company has established this Anti-Corruption Policy (hereinafter "the Policy") as a set of guidelines to ensure that we thoroughly prevent corruption and activities that facilitate corruption by continuing to uphold the highest ethical standards, and build fair and sound relationships with all stakeholders, including our business partners.

## (Compliance with Laws and Regulations)

Article 2. The Company complies with applicable laws and regulations and international treaties regarding the prevention of corruption in the countries and regions in which we operate.

## (Prohibited Conduct)

Article 3. The Company prohibits our officers and employees, etc., from engaging in corruption or any activities that facilitate corruption, whether directly or indirectly, both in Japan and overseas, regardless of whether the other party is a public official, a person equivalent thereto, or a private individual.

For the purpose of the Policy, "corruption" refers to acts that involve the abuse of one's own or a third party's power or position in the course of duties, such as bribery, embezzlement, extortion of benefits, insider trading, fraudulent bidding, fraudulent accounting, obstruction of justice, and money laundering.

## (Management of Payment Records)

Article 4. When the Company provides money or other benefits to a third party in the course of conducting its business, we record the details accurately and without omission in our accounting books and appropriately retain the supporting documents that substantiate such transactions.

## (Training)

Article 5. To ensure that the Policy is effectively implemented across all business activities, the Company regularly provides education and training to all officers and employees (including contract, part-time, and temporary employees) on corruption prevention, including the prohibition of bribery and the dissemination of our internal whistleblowing system.

## (Actions for Breaches, etc.)

Article 6. If an officer or employee, etc., breaches the Policy, they will be subject to strict disciplinary action in accordance with internal rules and regulations.

**(Compliance System)**

Article 7. The President is responsible for ensuring that all officers and employees, etc., comply with the Policy.

Furthermore, if an officer or employee, etc., discovers any conduct that breaches or is likely to breach the Policy, they promptly report to the General Manager of the Personnel & General Affairs Department.

**(Scope of Application)**

Article 8. The Policy applies to all officers and employees, etc., of the Company. The Company also requests all stakeholders involved in its business activities to understand and cooperate with the Policy.

**(Positioning)**

Article 9. The Policy serves to supplement the Company's corporate philosophy and Code of Conduct.

**Supplementary Provisions**

**(Revisions and Abolition)**

Article 10. The President decides on any revisions or the abolition of the Policy and its contents, subject to the approval of the Company's Compliance Committee.

**(Date of Implementation)**

Article 11. The Policy shall take effect on November 1, 2024.

The Policy has been partially revised as of November 1, 2025.

End