

Anti-Bribery and Corruption Policy

Date of Enactment: July 1st, 2024

SEKISUI HOUSE, LTD.

1. Introduction

As a company engaged in business transactions domestically and internationally, Sekisui House, Ltd. (“the Company”) and its group of companies in and outside of Japan (collectively, “we” or “the Group”) pledge to pursue transparency and fairness, and will thoroughly comply with laws and regulations and corporate ethics.

The Company has set forth its basic approach in “Corporate Ethics Guidelines,” and with this Anti-Bribery and Corruption Policy (“the Policy”), it has formulated and declared a more specific behavior policy for the Group’s efforts to comprehensively prevent all acts of bribery and corruption.

2. Scope of Policy Application

The Policy applies to all directors, officers, and employees of the Group, including part-time and contract employees. Furthermore, we ask for the understanding and cooperation of all business partners as well.

3. Adherence to Laws and Regulations

The Group will strictly comply with all laws, regulations, and guidelines of government agencies regarding the matters set forth in the Policy. In the case that some countries have stricter regulations than the Policy, or content not defined in the Policy, we will comply with the regulations of the relevant countries in addition to the Policy.

4. Prohibition of Bribery, Etc.

The Group prohibits bribery and facilitation payments in any form to public officials or their equivalents (collectively, “Public Officials, etc.”), whether in or outside of Japan.

- * A public official refers to all directors, officers, or employees of a public institution and public international organization, a legislator, or a candidate for public office. In addition, those who are equivalent to public employees include those who work for government-affiliated institutions and government-affiliated companies. It is necessary to note that persons who are subject to bribery regulations as persons equivalent to public officials vary from country to country. Furthermore, bribery of foreign public officials is also prohibited by the laws of each country, as well as Japan’s Unfair Competition Prevention Act.
- * Bribery is the offering of something of value or benefit to a public official or other person with the intent to influence his or her official acts in order to obtain or maintain favors or other improper business advantages. Bribery may take the form of any benefit, such as cash, gifts, provision of services, travel, entertainment, donations, loans, preferential treatment, discounts, etc., and may be executed even if the offer or promise of such a benefit is made but the purpose is not actually achieved. In addition, the Group may be held legally liable for bribery not only when it is done directly by the Group, but also when it is done through a third party, such as a business partner.
- * A facilitation payment is a payment made in a small amount to facilitate and expedite non-discretionary and routine administrative services such as the granting of a visa, customs clearance, and license issuance.

(1) Prohibition of entertainment, gift-giving, or other provision of benefits to Public Officials, etc.
for improper purposes

In principle, the Group prohibits the paying of expenses such as travel and meal expenses, provision of entertainment, preferential treatment, gifts, and all other provision of benefits in connection with the duties of Public Officials, etc. for improper purposes. The same applies to entertainment, gifts, and benefits provided to friends, family, and other close relatives of Public Officials, etc.

* Exceptions are permitted for payments in emergency situations, such as when it is necessary to avoid danger to physical liberty or life. However, it is required to promptly report such facts and circumstances and receive approval from the responsible person, the relevant business administrative department, and the Company's Legal Department.

(2) Selection procedures for business partners

When the Group engages a business partner, whether as an agent, consultant, sponsor, intermediary, agency, or any other designation, to perform the Group's business, we will sufficiently investigate to ensure that, firstly, the Group's actions do not constitute bribery, and that also bribery by the business partner will not occur. In line with this, we will select an appropriate business partner, having obtained the approval of the responsible person or the relevant business administrative department.

5. Appropriate Relationships with Business Partners, Etc.

We maintain fair, sound, and transparent relationships with our customers, suppliers, joint venture parties, agents and brokers, and other business partners.

(1) Prohibition of conflicts of interest that arise by not following the prescribed internal procedures

In principle, the Group prohibits the conflicts of interest described below and will tolerate them only in cases where the prescribed internal procedures are followed.

- 1) A director, officer, or employee of the Group is employed by, or works as a consultant, or as an individual for a business partner or other party.
- 2) A director, officer, or employee of the Group conducts business with a company that is managed by either themselves or a family member, friend, or other close relative.
- 3) Any attempt by a director, officer, or employee of the Group to take advantage of the Group's property, information, or position for personal gain.
- 4) Employment of family members, friends, and other close relatives of the Group's directors, officers, and employees, and other business partners.

(2) Entertainment and gift-giving within the scope of general social common sense

In the event of entertaining, giving gifts, or any other form of beneficial treatment to customers or business partners that do not fall under the category of Public Officials, etc., or when directors, officers,

or employees of the Group directly or indirectly receive entertainment, gifts, or any other benefits from business partners, etc., they must carefully consider whether the purpose, necessity, degree, etc. of such entertainment or gifts are within the scope of general social common sense and report to the responsible person or the relevant business administrative department for approval.

6. Making Donations

The Group may make donations of money or goods to charitable organizations only after obtaining prior approval in accordance with the prescribed internal procedures and in compliance with applicable laws and regulations.

In addition, the Group will take care to ensure that donations do not pass through such organizations to Public Officials, etc., by, for example, confirming that the directors/officers of the organization to which the donation is made and their relatives are not Public Officials, etc., involved in the Group's projects.

7. Political Contributions

The Group will make political contributions only after obtaining prior approval in accordance with the prescribed internal procedures and in compliance with applicable laws and regulations.

8. Accounting and Record Keeping

The Group shall make accurate accounting records for all transactions and disposal of assets and keep them together with relevant materials.

9. Internal Training and Communication

The Group will ensure that all directors, officers, and employees are fully aware of and familiar with relevant laws and regulations, the Policy, and separately established guidelines through periodic internal training.

If there is any doubt regarding the interpretation or application of the Policy, the Group encourages you to consult with the person to whom you report, your relevant business administrative department, or the Company's Legal Department.

10. System of Management Supervision

The Risk Management Committee, an advisory body to the Company's Board of Directors, manages and supervises compliance with the Policy, and reports and responds to the Board of Directors as necessary.

11. Detection of Violations through Utilization of the Whistleblowing System, Etc.

The Group will strive for the early and comprehensive detection of any violations of the Policy. Employees may use the whistleblower system (Compliance Helpline, Global Helpline), which can be

used anonymously and provides an alternative to normal reporting lines, if they become aware of or suspect that a violation is taking place. Under the whistleblower system, the confidentiality of persons who report violations or cooperate in investigations is protected, and any retaliation or other disadvantageous treatment of those who report or cooperate is prohibited.

12. Response to Violations and Investigations

The Group will investigate and confirm violations of the Policy, including with the establishment of a third-party committee if necessary, and will deal with such violations in a strict manner.

Moreover, in the event of receiving a request to cooperate with an investigation by relevant authorities, the Group will fully cooperate with such investigations.

13. Responsible Department, Revisions, and Abolition Procedures

The department responsible for the Policy is the Legal Department of the Company. It will periodically review, and if necessary, revise or abolish in line with prescribed internal procedures.