

Basic Policy for Eliminating Harassment

1. Leoplace21 Group's position

Harassment not only harms the dignity of individuals and prevents them from exercising their abilities, but also deteriorates the workplace environment. For the company, it is also a problem that hinders the order of the entire workplace and the execution of work, and can have a grave impact on social valuation.

The elimination of such harassment is the foundation for the Leoplace21 Group to restore trust by the society.

The Leoplace21 Group shall not tolerate harassment in the workplace and shall not overlook any forms of harassment.

This Basic Policy describes the content of comprehensive harassment in the workplace, measures to prevent harassment, and appropriate responses in the event of harassment, in order to deepen the understanding of each officer and employee regarding harassment, build good relationships based on mutual respect among all individuals, and create a safe, comfortable and lively work environment in which they fully exercise their abilities.

2. Definitions

(1) Workplace

"Workplace" refers to all places where officers and employees perform their duties, not limited to regular workplaces, but also includes places where officers and employees perform duties, such as the office of a business partner, the home of a customer, the transportation during a business trip, or the place they visit on business.

In addition, even if a drinking party is held outside working hours, a place that is considered to be effectively an extension of workplace shall be considered as a "workplace".

(2) Officers and employees

Everyone who works in our group, such as regular employees, short-term contract employees, and part-time employees.

(3) Harassment

① Acts concerning workplace bullying

Against the backdrop of hierarchical superiority in the workplace, such as job status or personal relationships, someone gives another person(s) in the same workplace a mental or physical distress or someone deteriorates the work environment beyond the adequate scope of work.

However, any act objectively conducted within the proper scope of business operations shall not be deemed to constitute harassment, even if a target person may

feel uncomfortable with the work orders or guidance.

② Acts concerning sexual harassment

Acts that are disadvantageous or harmful for a person's (persons') work conditions due to sexual words or actions that are displayed against the will of the target person(s) in the workplace. The act could not be only for the opposite sex but the same sex.

③ Acts concerning harassment related to pregnancy, childbirth, childcare leave, nursing care leave, etc.

Acts that harm the work environment for female workers who have become pregnant or gave birth or who use childcare leave or nursing care leave, or for both female and male who have applied for or taken childcare leave, nursing care leave and so on through words and deeds by superiors or colleagues in the workplace.

However, if they are objectively necessary for the superiors or colleagues to perform their duties or for the safety reasons, such acts will not constitute harassment.

④ Acts concerning discrimination on the grounds of sexual orientation or gender identity

Acts of committing mental or physical harassment such as making discriminatory words and deeds, casting ridicules, or using violence toward a person(s) in the workplace on the grounds of their sexual orientation or gender identity. The same applies to the divulgence without their consent.

3. Stricter disciplinary actions against harassment offenders

Even if an offender's job responsibility has a significant impact on the company management, he or she cannot escape from disciplinary actions.

- An employee's case is handled for decision by a committee of rewarding or penalizing employees with the Chief of Corporate Management Headquarters as chair.
- A director's case is handled for decision by the Board of Directors after the case is deliberated at the nomination and compensation committee chaired by an outside director.

4. Increase effectiveness of consultation desk

We will respond to a wide range of consultations and deal with cases, including cases where harassment has actually occurred, there is a possibility of harassment, the work environment may deteriorate if the situation left unattended, or there is a delicate case as described in 2 (3) above. We will fairly protect the privacy for both the person who consulted the case and the person who committed an alleged harassment.

5. Prohibition of adverse treatment

We will do our utmost not to adversely handle the victim and the person who consulted, but

also the person who cooperated in confirming the facts.

6. Response to consultations

Upon holding a consultation, we will promptly and accurately confirm the facts, and immediately take measures to give consideration to the victim and the offender if the facts are confirmed. We will also take appropriate measures, such as recurrence prevention.

7. Promotion of awareness among officers and employees

In order to ensure that all officers and employees understand harassment correctly, create a workplace environment free from harassment, and to prevent harassment, we will make efforts to disseminate the Basic Policy and grasp the awareness of officers and employees and the actual situation of the workplace, as well as provide training.

8. Revision of the basic policy

If the necessity arises due to changes in the situation regarding harassment, etc., we will review the basic policy.

Leopalace21 Corporation

Adopted on April 1, 2020