

OPEN HOUSE Group's Employee Code of Conduct

Revision History

Established October 16, 2012

Revised November 14, 2019

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To realize the basic philosophy of Open House Co., Ltd. and its subsidiaries and affiliates (hereinafter, collectively known as the "OPEN HOUSE Group"), the "OPEN HOUSE Group's Employee Code of Conduct" (hereinafter, the "Code of Conduct") establishes behavioral guidelines that all OPEN HOUSE Group's employees (including permanent employees, part-time employees, temporary staff and all other workers regardless of employment type who perform work for the OPEN HOUSE Group) should follow and clarifies the principles of conduct that the OPEN HOUSE Group demands of its employees.

Basic Philosophy

1. OPEN HOUSE Group's Corporate Philosophy

- The OPEN HOUSE Group will pursue "Houses that customers want" honestly and constantly.
- The OPEN HOUSE Group will attract a wide range of motivated people and create an organization that rewards results.
- The OPEN HOUSE Group will increase performance and expand the scale of our business, and be a real estate company needed by society.

2. OPEN HOUSE Group's Corporate Principles

- All decisions are made by customers
- Satisfy ever-changing needs
- Work with integrity and passion
- Work quickly while remaining agile
- Provide many opportunities for highly motivated employees
- Create a bright and positive organization
- Earn profits through fair means and contribute to society by paying taxes
- Aim to be an innovative and comprehensive real estate company

Code of Conduct

1. Legal and regulatory compliance

As a member of society, we comply with and respect all legal norms starting with laws. We are strongly aware that industry group guidelines, social morality, and corporate ethics are included in the broad definition of laws and regulations, and we engage in honest and fair corporate activities.

1) Lawful execution of duties

We operate our businesses with permits and licenses based on certain industry acts including the Real Estate Brokerage Act, the Construction Business Act, the Financial Instruments and Exchange Act, and the Money Lending Business Act. In addition to complying with the Real Estate Brokerage Act, the Construction Business Act, and other laws and regulations, we observe social morality and corporate ethics in conducting our operations.

2) Fair transaction activities

We do not engage in activities that violate fair competitive principles, such as influence peddling and actions that violate the Antimonopoly Act or the Act against Delay in Payment of Subcontract Proceeds,

Etc. to Subcontractors, instead working to maintain good relationships with our business partners and conducting fair and just transactions.

To prevent corrupt transactions, in addition to implementing regular employee education, we establish an anonymous reporting line that all officers and employees can use.

Officers are responsible for managing and overseeing the prevention of all corrupt actions including bribery.

3) Prohibition of competition and conflicts of interest

We do not conduct transactions for personal gain that undermine OPEN HOUSE's earnings in the operations of our core businesses.

4) Compliance with approval procedures

Rather than acting unilaterally, we engage in orderly, organized actions with the necessary approvals based on the scope of administrative authority defined in the regulations.

5) Appropriate expense processing

Items necessary for business are invoiced appropriately, and we do not invoice for items purchased or used for personal reasons or pad invoices for items purchased or used for business.

6) Accurate and timely recording and reporting

Important items are accurately recorded, and we appropriately report to, communicate, and consult with superiors and colleagues. Regarding the recording method, we select the appropriate method based on the importance of the item to be recorded. For particularly important items, we use a set format and style for recording.

7) Maintaining the good name and trust of OPEN HOUSE

We do not engage in behavior that damages the good name or trust of OPEN HOUSE, regardless of whether the behavior is related to work or whether public or private.

8) Prohibition of bribery, excessive entertainment, and gift-giving

In principle, employees must not accept entertainment, dining and alcohol, recreation, gift-giving, etc. Even in cases where employees have no choice but to accept entertainment, dining and alcohol, recreation, gift-giving, etc. due to business customs or other reasons, it must be within the scope of common sense and be reported appropriately to superiors. Furthermore, we do not engage in bribery of public officials with money or goods for business or personal benefit.

9) Internal reporting system

If a violation of laws or regulations is discovered, or if there is suspicion that a violation has occurred, employees report the matter to superiors. If it is deemed that it is improper to report to superiors, employees contact the "OHG Compliance Hotline" (dedicated reporting line telephone number and email address) and illegal actions are not permitted. Unfavorable treatment of employees for making reports is strictly prohibited.

10) Engaging in safe driving

When driving a car or riding a bicycle, etc., whether for business or personal reasons, we strictly observe traffic rules including the Road Traffic Act and engage in safe driving and riding that does not endanger third parties. In the event that a traffic accident has occurred, we respond appropriately and honestly.

2. Relationships of trust with customers

In addition to providing the properties and services demanded by our customers, we live up to the trust of our customers by promptly responding to issues including changes in the market environment and customer needs.

1) Improving customer satisfaction

In all business activities of the OPEN HOUSE Group including not only direct sales interactions with customers and after-sales service, but also land procurement, design, construction, and real estate management, we place our customers first and work to improve customer satisfaction.

2) Fair public relations and advertising activities

When engaging in public relations or advertising related to business activities, we pay the utmost care to the truth and suitability of the contents and the suitability of the methods, and do not use exaggerations or make false statements. When communicating product information, etc., we use fair and appropriate information so as not to create misunderstanding with our customers.

3. The understanding and support of our shareholders, creditors, etc.

To earn the understanding and support of our shareholders, creditors, etc., we proactively engage in fair and transparent corporate management.

1) Maintaining appropriate relationships with our business partners

So as not to damage our own integrity or that of our business partners and so as not to neglect appropriate oversight and instructions, we work to build positive relationships based on the spirit of “mutual concessions and prosperity.”

2) Appropriate disclosure of company information

Disclosure of company information is made in an accurate and timely manner based on the approval of the parties concerned. We do not disclose inaccurate information or disclose information without authorization.

3) Prohibition of insider trading

Stock trading based on knowledge of important, undisclosed information about OPEN HOUSE received through special channels is prohibited.

4. Information management

We manage customers’ personal information and confidential information created or received in our operations (hereinafter, “Confidential Information”) in an appropriate and strict manner, as well as Confidential Information provided by third parties.

1) Appropriate use of Confidential Information

Confidential Information must not be disclosed to third parties without authorization or used for purposes outside of business. Confidential Information is handled appropriately according to internal rules and following the directions of the person responsible for it.

2) Appropriate management of Confidential Information

Confidential Information is strictly managed to ensure that it is not leaked externally.

3) Social Media Guidelines

The behavior of employees, whether related to their work or not, could be construed by society as the behavior of the OPEN HOUSE Group. Particularly when using social media to express ourselves, we appropriately follow the OPEN HOUSE Group’s “Social Media Guidelines.”

5. Creating an environment for employee solidarity and personal growth

We create an environment in which employees engage in friendly competition while having a feeling of solidarity as individual members of OPEN HOUSE and which draws out the potential of individual employees.

1) Encouraging greetings

Officers and employees greet both each other and customers, business partners, etc. in a bright, enthusiastic manner.

2) Respecting human rights

We do not engage in discrimination or disdainful behavior based on nationality, race, gender, religion, faith, age, sexual preference, physical disability, or any other reason. We also do not enact measures that create disadvantageous treatment in hiring, promotion, etc. based on any of these reasons.

3) Power harassment and sexual harassment

The use of one's position at work to treat subordinates in an unfair, intimidating manner as well as actions that create discomfort among the opposite sex are prohibited.

4) Prohibition of political and religious activities within OPEN HOUSE

We strictly separate public and private life and prohibit political and religious activities within OPEN HOUSE.

5) Health management

Based on a thorough understanding of labor-related laws and regulations such as the Labor Standards Act, we work to understand the work conditions and the conditions of individual employees. While properly securing days off and breaks, we make sure to care for the physical and psychological health of employees.

6. Care for the global environment

In conducting our business activities, we do not only pursue commercial gains. We are also aware of the demand to choose actions that care for the global environment. As such, we work to conduct environmentally conscious corporate activities including reducing energy and resource consumption, reducing waste, and recycling resources.

7. Prohibition of involvement with antisocial forces

We take a firm stance on antisocial forces that threaten social order and safety, and do not involve ourselves with them in any way.

8. Social contribution activities

We are aware that companies are public institutions, and work to make proactive contributions to society through our business activities.