

## **Japan Airport Terminal Co., Ltd. Basic Compliance Guidelines**

The purpose of these Guidelines is to establish a compliance regime at Japan Airport Terminal by prescribing a code of conduct, etc. pertaining to compliance and having all officers and employees thoroughly implement these Guidelines, thereby establishing credibility of this Company in society and aiming towards its continuous growth

All officers and employees will comply with laws and regulations and social rules as well as put in practice the customer first principle by engaging in behavior pursuant to the code of conduct prescribed in these Guidelines and acting in line with this Company's Articles of Incorporation, management philosophy and management policy.

### **I Management Philosophy**

"Harmony between the Business and the Society"

The Company's public mission is achieved by private sector management techniques.

While providing high-quality passenger terminal services, this Company will maximize profits, prepare for future investment and also engage in management balancing its corporate nature and public nature that aims to pass-on appropriate benefits to airline companies, airport users, shareholders and employees.

### **II Management Policy**

- 1 Establish absolute safety in passenger terminal buildings
- 2 Operate passenger terminals for the benefit of customers (for convenience, comfort and functionality)
- 3 Operate passenger terminal stably and efficiently
- 4 Reinforcement of the corporate structure and improvement of the combined competence of group companies

### **III Code of Conduct**

The code of conduct should be a shared vision in order to realize the management philosophy and management policy and it denotes the standard that will be the basis of the behavior when all officers and employees act.

#### **1. To the society**

Being conscious of obligations as corporate citizens and recognizing that all officers and employees are the entities that realize the policy of the Company, we will actively fulfill our responsibilities as an entity to the

country and the community.

(1) Contribution to the society

We will actively perform social contribution activities as a good corporate citizen and contribute to the vitalization of the community, and the development of safe, comfortable and sustainable airport infrastructure through the construction, management and operation, etc. of passenger terminals that are of highly public nature, and the realization of a barrier-free society, etc.

(2) Respect for human rights

We will respect human rights throughout its business activities, including prohibition of discrimination based on gender, age, nationality, race, ethnicity, religion, social status, disability, sexual orientation and gender identity, etc., prohibition of forced labor and child labor, prohibition of harassment, and ensuring an appropriate working environment.

(3) Consideration for global environment

We will comply with the environment-related laws and actively work on the conservation and protection of the global environment through the measures against climate change, effective use of limited resources, prevention of environmental pollution and consideration for biodiversity, etc.

(4) Co-existence and co-prosperity with community

We will strive to be in harmony with the community for their development and achieve mutual development of us and the community.

(5) Disclosure of corporate information

We will ensure active communication with the society and disclose the corporate information timely in an active and fair manner.

## **2. To our customers**

We will work on the improvement of customer satisfaction at all times in order to realize “Customer First” as our business policy.

(1) Pursuit of customer satisfaction

We will aim at the maximum level of satisfaction at all times so that customers who use the airport terminal buildings will use them again.

(2) Compliance with consumer-related laws

When entering into contracts with customers, we will conduct transactions in a clear and fair manner. We will not induce customers

using a deceptive method or unreasonably expensive giveaways in the course of conducting representations, advertisements, or campaigns.

(3) Management of customer information

We will strictly manage the personal information of customers. We will not use it for any purpose other than intended purposes or cause leakage or unauthorized use of the information in accordance with the laws related to personal information protection and the privacy policy.

(4) Handling of complaints

We will strive to deal with consultations and complaints by customers in a prompt and sincere manner.

**3. To our regular clients, business partners, and competitors**

We will abolish empty formalities with regular clients, subcontractor companies or competitors and devote ourselves to the development of fair transactions and competitions.

(1) Relations with regular clients and subcontractor companies

(i) We will comply with all relevant laws and codes and sound business practice and act based on a high standard of ethics.

(ii) We will provide entertainment or gifts appropriately in accordance with the prescribed standards for approval and expense processing procedures and to the extent deemed reasonable in light of social norms only in cases where necessary for corporate activities.

(iii) We will strive to establish a sustainable value chain together with regular clients and subcontractor companies.

(2) Relations with competitors

We will ensure fair transactions and will not engage in unfair acts, such as defamation of competitors and inappropriate comparative advertising. If such act of any other company occurs, we will take resolute measures and responses.

(3) Management of customer or industry information

We will exercise due care in handling any confidential information of regular clients and industry members that is obtained in the course of our duties (including personal information) and maintain such information in confidence. We will not obtain such information by fraudulent means or use such information for any purpose other than intended purposes.

**4. To our shareholders and investors**

We will strive to earn an appropriate evaluation in capital markets and maximize the interests of shareholders through timely and highly transparent information disclosure and active IR activities.

(1) Fair and transparent accounting reporting

We will make fair and transparent report on business results by way of accounting processing in compliance with accounting principles and companies act, etc. as well as ensure the reliability of accounting audit.

(2) Information disclosure

We will comply with the relevant laws and standards, etc. and disclose the corporate information appropriately.

(3) Active IR activities

We will provide, in an active and fair manner, not only the information required to be disclosed under the laws and regulations but also the information necessary and sufficient for gaining appropriate evaluation in capital markets and for enabling shareholders and investors to make adequate judgment.

## **5. To politics and administration**

We will maintain sound and normal relations with political groups and public officials and will not engage in any illegal acts or even misleading acts.

(1) Maintenance of sound and normal relations with politics

(i) We will make a judgment, on a case by case basis, about the propriety of the request for donation to or purchase of party tickets of political parties or political fund organizations in accordance with the relevant laws and internal rules, and take appropriate actions.

(ii) In the course of election campaigns, we will neither commit illegal acts, such as provision of money, articles, or wining or dining, nor cooperate with political candidates in illegal acts.

(iii) In order to ensure the freedom of thought and belief, we will not engage in any act of forcing, as an organization, individuals to express their support for a specific candidate in election.

(2) Prohibition of giving of bribe to public officials

(i) We will not engage in any act of giving a bribe to public officials or deemed public officials, etc. or any act that may be misleading as such.

(ii) We will not engage in any act of giving a bribe to public officials of

foreign countries or any act that may be misleading as such.

(3) Accurate and transparent tax reporting

- (i) We will comply with the tax-related laws and contribute to the sound development of society through adequate tax reporting and payment.
- (ii) In compliance with the tax-related laws, we will utilize the preferential taxation system, etc. appropriately and strive to make taxation costs more proper. In addition, we will not engage in any act that is deemed, in light of social norms, to constitute a tax avoidance that is contrary to the purport of tax-related laws.

**6. To antisocial forces**

We will ban any relations with antisocial forces that threaten the civil society.

(1) Refusal of grant of benefits

We will not grant any benefits to antisocial forces.

(2) Sharing of information

We will share information about antisocial forces within the group and develop the system for reporting and taking actions.

(3) Cooperation with relevant bodies

We will strive to eliminate antisocial forces in cooperation with the industry members and the society and in close collaboration with police and other relevant administrative bodies.

**7. Relations between the Company and its officers and employees**

The Company and its officers and employees will establish a relationship of mutual trust through sincerely fulfilling their mutual obligations and responsibilities.

(1) Obligations of the Company toward its officers and employees

(i) Elimination of discrimination and harassment

- We will eliminate discrimination based on gender, age, nationality, race, ethnicity, religion, social status, disability, sexual orientation, gender identity, etc. We will never allow workplace bullying, sexual harassment, pregnancy discrimination or any other harassment.

(ii) Improvement of wellbeing

- We will strive to maintain and improve an employee-friendly work environment, taking the safety, health, and mental health into account.

- We will strive to establish the environment that provides job satisfaction to various human capital.
  - We will provide the opportunity for skill development so that various human capital can make full use of their abilities and cultivate their potentials.
  - We will strive to enhance various welfare benefit systems.
  - We will take and support measures necessary for the maintenance and promotion of health of officers and employees.
- (iii) Confidentiality of personal information of officers and employees
- Taking privacy of officers and employees into consideration, we will disclose the personal information of officers and employees only to the departments and management staff on a need to know basis and will not engage in any act of providing such information unnecessarily outside the Company as well as within the Company.
  - We ensure that we will protect whistleblowers who report to the compliance information desk and that whistleblowers will not be treated disadvantageously on grounds of whistleblowing.

## (2) Obligations of officers and employees toward the Company

### (i) Duty of loyalty

- In order to realize the management philosophy, we will fulfill our obligations faithfully in compliance with not only laws but also the Rules of Employment, this Code of Conduct and other internal rules. We will not abuse the authority given to us.
- Except in cases where required for business activities and approved by the Company, we will not engage in political and religious activities in the capacity of a position at the Company or of an employee of the Company.

### (ii) Prohibition of acts of conflict of interest and mixing of business and personal affairs

- We will not engage in any act of conflict of interest with the Company or act of mixing business and personal affairs, such as personal use of company assets

### (iii) Appropriate procedures for application and approval of expenses

- We will appropriately disburse investments or expenses in accordance with the prescribed standards for internal approval and expense processing procedures and appropriately perform accounting and tax processing in accordance with the relevant laws, accounting

standards, and internal rules.

(iv) Information management (confidential information and insider information)

- Whether during the period of employment or after retirement, we will exercise due care in managing any confidential information of the Company or any third party that we have learned in the course of our duties and will not use such information without due authorization or leak such information to any third party.
- We will comply with the regulation on insider trading and will not engage in unjust transactions of shares, etc. utilizing insider information that we have learned in the course of our duties or leak such information to any third party.

(v) Compliance with laws and regulations and prohibition of acts that damage the honor or credibility of the Company

- In our private life, we will maintain the dignity as sound working members of society and behave in a moderate manner. Not to mention compliance with laws, we will not engage in any speech or behavior that results in damaging the honor or credibility of the Company.

#### **IV Compliance Promotion System**

##### **1. Establishment of a Compliance Promotion Committee**

We have established a "Compliance Promotion Committee", chaired by the President and Representative Director, as the organization that oversees and supports reliable practices of compliance-oriented management and grant it the authority to investigate and supervise matters relating to compliance.

(Duties)

- (i) Determine Policies relating to Compliance Promotion
- (ii) Consider Concrete Measures relating to Compliance Promotion
- (iii) Monitor the Status of Compliance Promotion

##### **2. Establishment of a Compliance Information Desk**

A compliance information desk have been established to prevent the occurrence of illegal, fraudulent and unethical acts as well as to minimize the impact on the Company by promptly grasping the relevant facts in the event that these acts should occur.

##### **3. Implementation of Compliance Education and Training**

The department in charge of Legal affairs will conduct education and training necessary for compliance with respect to officers and employees to promote an understanding of the importance of compliance. Officers and employees must attend

education and training sessions and must seek to diligently educate themselves.

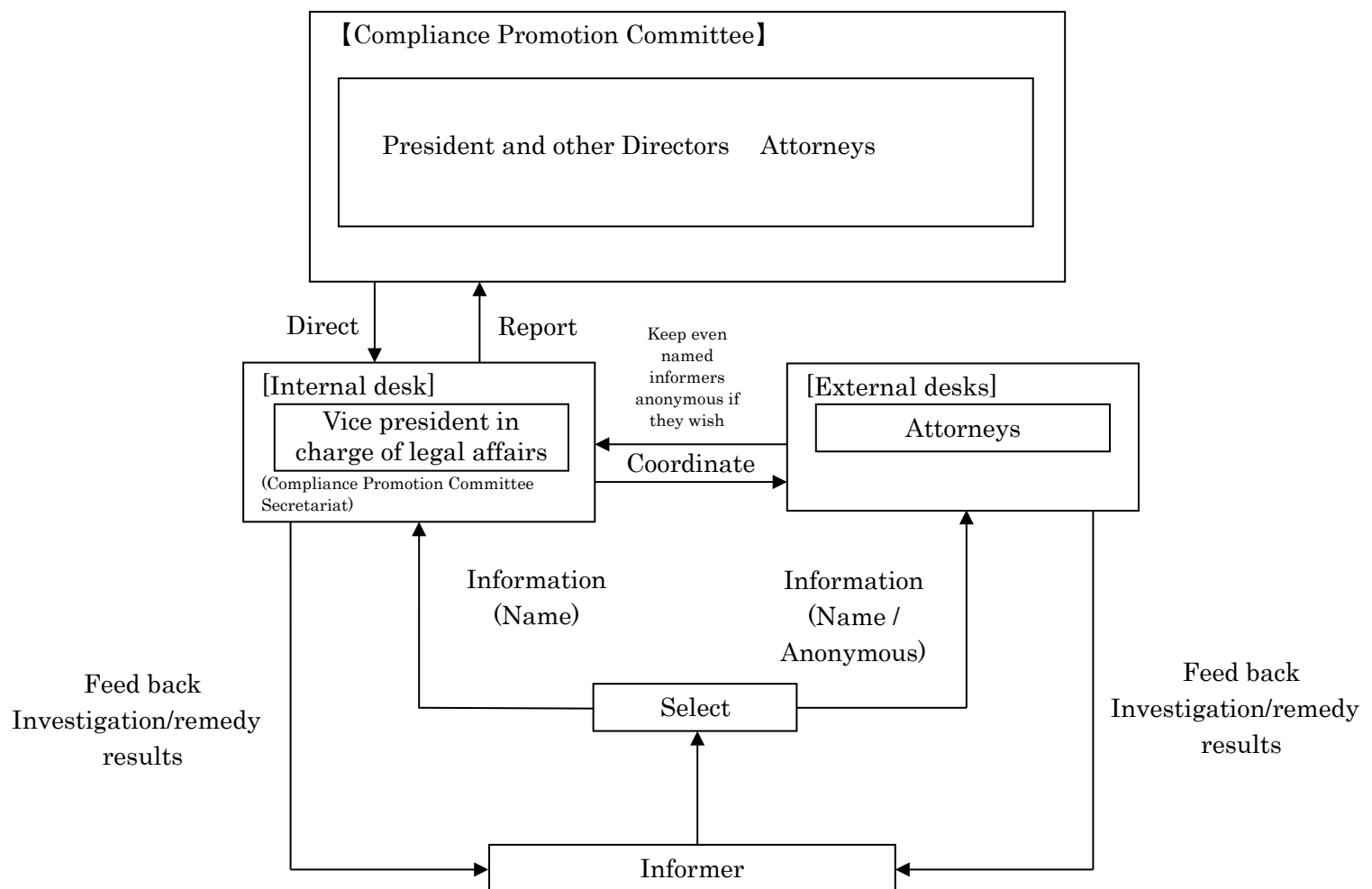
**4. Disciplinary Action against Offenders**

In the event of breach of these Guidelines, officers and employees will be subject to disciplinary action pursuant to the provisions of the employment rules etc. even if the Company does not suffer damage.

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## Concerning the Use of the "Compliance Information Desk" (Notification System)



### **[Informer]**

Information will be transmitted to either the internal or external desk when judging whether one's own actions are in compliance with these Basic Compliance Guidelines, when judging that there are points to be improved in the Company regarding compliance, or when judging that other officers and employees have engaged in actions in breach of these Basic Compliance Guidelines.

### **[Desk]**

For information provision, primarily action will be taken at the desk that received the information. With respect to the provision of information to the external desk, the external desk will, if necessary, work in cooperation with the internal desk. The internal desk will confer as required with the Compliance Promotion Committee.

### **[Protection of Informer]**

The information desks will not disclose the name of the informer or the contents of the information provided to persons other than required relevant persons. Furthermore, the informer will not suffer disadvantages for appropriately using this system.