

# Sumitomo Forestry Group Code of Conduct

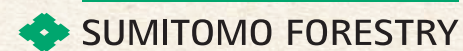


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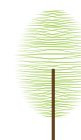
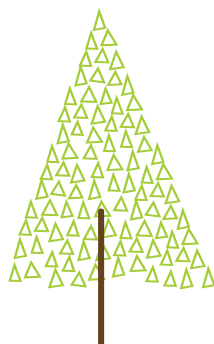
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Happiness Grows from Trees



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## About the Sumitomo Forestry Group Code of Conduct Guidebook

The Sumitomo Forestry Group Code of Conduct (hereinafter, the Code of Conduct) sets out the fundamental thinking behind our operations. This guidebook aims to promote an accurate understanding and embracement of the Code of Conduct through examples and explanations and is distributed to each and every Sumitomo Forestry Group employee. In your day-to-day work, if you are uncertain about what to do, please check that your actions abide by all laws and company regulations. To further understanding of the Code of Conduct, we suggest each division hold study sessions, such as gathering to read aloud the Code.

The Code of Conduct applies to the entire Sumitomo Forestry Group supply chain. On occasion, please share this with your suppliers, subcontractors and other related companies and encourage them to follow suit.

The Code of Conduct is available on the company website.

[http://sfc.jp/information/company/keiei\\_rinen/rinri\\_kihan/](http://sfc.jp/information/company/keiei_rinen/rinri_kihan/) (Japanese)

<http://sfc.jp/english/corporate/policies/code.html> (English)

The Code of Conduct Guidebook has been written on a level considered standard for a global company. Please also refer to laws and regulations of specific countries and regions as necessary. In addition, in the event that there are distinct national or regional circumstances, such as culture, practices or customs, please apply the Code of Conduct in an appropriate manner with an understanding of its basic premise. The company regulations outlined in this Code of Conduct Guidebook are those of Sumitomo Forestry Co., Ltd. In the event that your company has its own regulations, please refer to them.

In your day-to-day duties, if you have any questions or problems with the Code of Conduct or the Guidebook, please consult your supervisor. If the issue remains unresolved, please talk with the appropriate division or person, such as the manager of the organization you represent, the headquarters control division of the company you belong to, Sumitomo Forestry's supervising department, Sumitomo Forestry's headquarters division in charge, the compliance counter, or other, according to the nature of your concern.





## To all Sumitomo Forestry Group employees



Akira Ichikawa

President and Representative Director  
Sumitomo Forestry

The Sumitomo Forestry Group was established almost 330 years ago in 1691. With a sense of gratitude to our forefathers who built our history and our company as it is today, we are committed to creating a path of sustainable growth for the future generations to come.

In recent years, a number of venerable companies with long histories and brand recognition have been tarnished by scandals involving data manipulation, fraudulent accounting of subsidiary operations and other incidents that are endangering their existence.

For our company to survive and thrive, first and foremost, we must follow the rules of society. Furthermore, as the Sumitomo Forestry Group continues to expand, becoming more globalized and diversified, we must become more attuned to international rules, as well.

With these factors in mind, in July 2017, we set forth the Sumitomo Forestry Group Code of Conduct. This Code of Conduct reflects the Sumitomo Spirit, which has been passed down since our establishment, and combines them with our commitment to comply with global, shared rules. Each and every employee in the Sumitomo Forestry Group must share these Group values to promote businesses that resolve societal challenges and satisfy our customers so that we can grow and expand as a company. In addition, because our activities do not begin and end with us alone, we must work with our direct partners, such as suppliers and subcontractors, as well as other parties in the supply chain to ensure that the Sumitomo Forestry Group Code of Conduct is embraced and utilized throughout the Group as a shared global standard.

As a member of the Sumitomo Forestry Group, let us continue creating businesses that help build a sustainable, circular society and become a leading global company with the technology to enhance the potential of wood.



## Corporate Philosophy • Our Values

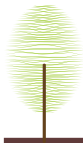
### Corporate Philosophy

**The Sumitomo Forestry Group utilizes wood as a healthy and environmentally friendly natural resource to provide a diverse range of life-style-related services that contribute to the realization of a sustainable and prosperous society. All our efforts are based on Sumitomo's Business Spirit, which places prime importance on fairness and integrity for the good of society.**

### Our Values

- We provide high-quality products and services that bring joy to our customers.
- We create new businesses that lead to happiness for generations to come with a fresh perspective.
- We promote a free and open-minded corporate culture that respects diversity.
- We set and strive to achieve ambitious goals through ongoing effort.
- We do work that wins us the trust of society with fair and honest conduct.





# Sumitomo Forestry Group Code of Conduct

## Purpose and scope of application

Based on its corporate philosophy and action guidelines, the Sumitomo Forestry Group shall manage its operations, including the supply chain, in accordance with this Code of Conduct.

## Fair and transparent corporate activities

- 1. Strict adherence to laws and regulations**  
We shall adhere to all domestic and overseas laws and company regulations and respect international norms of behavior.
- 2. Prevention of corruption**  
We shall have absolutely no involvement in corrupt practices, including bribery, embezzlement and money laundering.
- 3. Fair business transactions**  
We shall pursue fair business transactions and refrain from any involvement in cartels, bid rigging or other such activities.
- 4. Fair accounting procedures**  
We shall conduct fair accounting and tax practices based on accurate records.
- 5. Communication with stakeholders**  
In consideration of the interests of our shareholders and other stakeholders, we shall disclose necessary information in a timely and fair manner and promote dialogue.
- 6. Maintaining confidentiality**  
We shall ensure the protection of confidential information, both our own and that of third parties.
- 7. Information security**  
We shall install appropriate information security measures to prevent information leaks and other breaches.
- 8. Relationships with companies we do business with**  
We shall build and maintain constructive relationships with the parties we do business with and refrain from inappropriate behaviors, such as the abuse of power.
- 9. Protection of intellectual property rights**  
In addition to protecting our own Company's intellectual property rights, we shall not infringe on the intellectual property rights of others.
- 10. Protection of personal information**  
We shall appropriately manage personal information, use it only for authorized purposes and prevent leaks.
- 11. Responsible advertising/promotional efforts**  
We shall engage in accurate and appropriate advertising and promotional efforts that do not cause misunderstanding or offense.
- 12. Healthy relationship with the government**  
We shall maintain a healthy and transparent relationship with the government that is in conformance with all laws.
- 13. Stance on organized crime**  
We shall have absolutely no involvement in organized crime.
- 14. Establishment of a whistleblowing mechanism**  
We shall establish a mechanism for people to report any suspicions of breaches to any laws or this Code of Conduct. By allowing reports to be made anonymously and strictly prohibiting retaliation against informants and other measures, we will actively promote its use.

## Ethical conduct

- 15. Avoidance of a conflict of interest**  
We shall make a clear distinction between professional and personal matters and refrain from activities that may constitute a conflict of interest with the company.
- 16. Prohibition of misappropriation of company assets**  
We shall not use company funds or assets for personal purposes.
- 17. Prohibition of insider trading**  
We shall take no part in insider trading, including being complicit with others.
- 18. Appropriate gift giving and entertainment**  
We shall neither accept nor offer gifts or entertainment that would be considered inappropriate according to socially accepted norms.
- 19. Prohibition of political or religious activities**  
During work hours, we shall not recruit or otherwise promote political, religious or other activities based on personal ideology.

## A respectful, healthy workplace

- 20. Respect for human rights**  
According to internationally accepted human rights norms, we shall respect the human rights of all individuals, including women, children, indigenous people, minorities and vulnerable people.
- 21. Prohibition of discrimination and the promotion of diversity**  
We shall not discriminate on the basis of race, ethnicity, nationality, gender, religion, ideology, disability, sexual orientation, gender identity or other. In addition, we shall work to secure and promote diversity.
- 22. Prohibition of forced labor and child labor**  
We shall not tolerate forced labor or child labor in any form.
- 23. Freedom of association and collective bargaining rights**  
In accordance with laws, we shall secure workers' rights for freedom of association and collective bargaining.
- 24. Appropriate working hours and wages**  
In accordance with laws, we shall ensure that working hours and wages are appropriate.
- 25. Work/life balance**  
We shall secure the appropriate balance between work and individual commitments, such as caring for children and the elderly.
- 26. Occupational health and safety**  
We shall strive to maintain a safe and healthy work environment. In addition, we shall implement regular educational and training programs to prepare for disasters, accidents and other.
- 27. Human resources development**  
We shall strive to nurture human resources by providing skill enhancement opportunities, such as training seminars.
- 28. Prohibition of harassment**  
We shall not commit or tolerate acts of sexual harassment, power harassment, inhumane punishment or other.
- 29. Protection of privacy**  
We shall respect and protect the individual's right to privacy.

## Business activities that respect society and the environment

- 30. Customer satisfaction and safety**  
We shall secure the safety and security of our customers and at the same time, sincerely engage with them and work to improve quality and customer satisfaction.
- 31. Co-existence with the environment**  
We shall strive to reduce the environmental impact of our products and services throughout their entire lifecycle, prevent global warming, recycle resources, prevent pollution and maintain biodiversity.
- 32. Contribution to the local community**  
We shall respect the local region's culture and customs and through dialogue, shall seek to contribute to their sustainable development.



## Sumitomo Forestry Group Environmental Policy

Through our experience nurturing forests since our founding, Sumitomo Forestry Group has learned to appreciate the wonders of wood and the importance of nature. As a corporate entity with a close affinity to nature, we will pursue business activities that balance both environmental and economic interests and contribute to a sustainable society.

### 1 Develop business operations centered on wood and forests

We will cultivate forests and their ability to preserve and enhance the rich ecosystem to protect biodiversity, actively utilize timber resources and create new corporate value.

### 2 Develop and offer environmentally conscious products and services

We will develop and sell products and services that are environmentally conscious throughout the entire product lifecycle.

### 3 Minimize and improve environmental impact

To minimize and improve environmental impact, we will employ procurement practices that prevent environmental pollution and climate change and promote the effective utilization of natural resources.

### 4 Ensure strict legal compliance

We will adhere to all environmental laws, rules and regulations, global standards, voluntary standards and accords with stakeholders.

### 5 Make continual improvements to our environmental management system

We will accurately assess environment-related risks associated with our business activities and with a mid-to-long-term outlook, set and work to fulfill yearly environment goals. In addition, we will regularly evaluate our environmental management system and make continual improvements.

### 6 Promote environmental education

We will provide environmental education for all parties involved in Sumitomo Forestry Group's business operations and encourage voluntary environmental efforts.

### 7 Pursue active communication

We will actively disclose information about our environmental policies and initiatives and pursue activities that convey the wonders of trees and forests and the importance of nature.

Revised July 23, 2015

Akira Ichikawa

President and Representative Director



## Sumitomo Forestry Group Procurement Policy

The Sumitomo Forestry Group utilizes wood as a renewable natural resource in its business operations. To contribute to a sustainable society, we are committed to procurement activities that take into account economic, environmental and societal interests and comply with the following policy:

### 1 Procurement based on legal and highly reliable supply chains

Our procurement activities will strictly adhere to all relevant laws, regulations and societal norms, and be built on mutual understanding and trust with our business partners. Furthermore, to provide the highest quality products and services, we will work with our business partners to ensure that our procurement takes place within a sound and fair supply chain.

### 2 Procurement based on fair opportunity and competition

We will provide all our suppliers, both Japanese and foreign, a fair opportunity for business. Selection of our business partners will be based on a comprehensive evaluation of the company's reliability and technological expertise, the product's quality, economic efficiency, delivery date and environmental performance, and the company's CSR (Corporate Social Responsibility) initiatives, such as advocacy of basic human and worker rights, anticorruption efforts and so on.

### 3 Procurement of sustainable timber and wood products

Wood is a renewable natural resource. To actively utilize it, we will work with our business partners on the following initiatives related to the procurement of timber and wood products:

- Procure timber from forests that are sustainably managed
- Work to improve the traceability of procured timber and wood products
- Strictly adhere to the laws and regulations of the countries and regions of harvest, protect biodiversity and forests with high conservation value, and respect the cultures, traditions and economies of regions that coexist in harmony with forests.

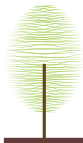
### 4 Pursue active communication

To ensure the transparency of our procurement efforts, we will disclose information appropriately. In addition, we will communicate with our stakeholders to further improve our procurement activities.

Revised July 23, 2015

Akira Ichikawa

President and Representative Director



## Sumitomo Forestry Group Declaration on Empowering Women

Sumitomo Forestry Group is committed to creating “an open and inclusive corporate culture that values diversity,” as set out in its Action Guidelines. We believe a diverse workforce and a business strategy developed from a wide range of ideas is important for the Group. As part of this effort, we are striving to promote the participation of women in the belief that this will meet social needs and significantly contribute to increased corporate value.

By expanding opportunities for women and by leveraging the creative power of women, we will integrate a diverse range of values that will spur innovation and enhance corporate value.

### 1 We will create a positive work environment for women

In Japan, with a falling birthrate and aging population, worker population is projected to decline. By utilizing a workforce made up of individuals without regard to values, age, gender, nationality or disability, and by respecting the individual lifestyles of each and every female employee, we are working to create an open corporate culture and positive working environment where everyone can gain a sense of fulfillment in their work.

### 2 We will leverage women's unique creative powers

Women's success in business is gaining prominence, such as with companies that utilize the perspective and creative powers of women to develop new products and services. In all business sectors, Sumitomo Forestry Group is striving to nurture the culture and processes that will harness women's unique creative powers and create new value.

### 3 We will spur innovation through the participation of women

Lively interaction among employees of different values, ages, gender, nationalities and other qualities leads to new ideas. Expanding work opportunities for women employees, in particular, spurs innovation in all areas, from sales and marketing to product development, business strategy and operational efficiencies.

December 24, 2013

Akira Ichikawa

President and Representative Director



## About the United Nations Global Compact

In December 2008, Sumitomo Forestry formally signed the United Nations (UN) Global Compact to declare our support for its principles. The ten principles of the UN Global Compact are based on globally established agreements, including the Universal Declaration of Human Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. They incorporate support of and respect for the protection of human rights and the eradication of forced and child labor.

### The Ten Principles of the UN Global Compact

#### Human Rights

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses.

#### Labor

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and compulsory labour;

**Principle 5:** the effective abolition of child labor; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

#### Environment

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

#### Anti-Corruption

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

# Part 1

## Fair and transparent corporate activities



# 1

## Strict adherence to laws and regulations

**We shall adhere to all domestic and overseas laws and company regulations and respect international norms of behavior.**

### All divisions

Strict adherence to all domestic and overseas laws and company regulations (hereinafter, laws and regulations) is a major premise of our business. Make compliance with laws and regulations the first and foremost priority even if it may result in added expenses or affect a transaction.

Any illegal or other act resulting from the lack of full compliance to laws and regulations may result in punishment, dismissal, loss of reputation or other damage to the company and/or the individual, and may even directly impact the company's financial performance. It is important that each and every individual have a heightened awareness and take caution in strictly abiding by laws and regulations.

In addition to laws and regulations, we must also respect international norms of behavior. International norms of behavior can include a number of different things, for example, ISO26000, the OECD (Organisation for Economic Co-operation and Development) Guidelines and several other regulations. All important elements of these rules are reflected in the Sumitomo Forestry Group Code of Conduct so that following this Code of Conduct will provide assurance that we are respecting international norms of behavior as well.



## 2 Prevention of corruption

**We shall have absolutely no involvement in corrupt practices, including bribery, embezzlement and money laundering.**

### All divisions

Bribery and embezzlement are not permitted under any circumstances. Entertainment and gift giving are to be conducted within the limits of common sense. Carefully follow all company regulations regarding obtaining approvals, reporting and record keeping. Entertainment and/or gifts from business partners must also be within the realm considered acceptable by social norms. (Please refer to Codes 8 and 18).

Embezzlement will be subject to both company and external regulations. Under no circumstances is it permitted.

Refrain from monetary transactions that lack transparency. In addition to not engaging in money laundering, take adequate precaution so that your own transactions are not utilized for money laundering purposes.

### Comment

Money laundering is the act of hiding the original source of funds acquired through such crimes as tax evasion, accounting fraud, and other (dirty money) through repeated transfers using bank accounts that are fictitious or in another person's name, the purchase of stocks or bonds, or large-scale contributions.

Sumitomo Forestry is a signatory of the United Nations Global Compact.

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

## 3 Fair business transactions

**We shall pursue fair business transactions and refrain from any involvement in cartels, bid rigging or other such activities.**

### All divisions, in particular, business divisions

Competition laws of individual countries are designed to protect consumer interests and must be strictly adhered to. In an environment of free competition, always conduct business in a manner considered fair in each country we operate in.

Taking part in activities prohibited by competition laws, such as cartels, bid rigging and other activities deemed suspicious, including setting prices of products or services in consultation with competitor companies, is not permitted.

In recent years, there have been incidents of bid rigging in the Japanese construction industry. Any involvement in bid rigging will result in severe penalties, such as the suspension of business, the suspension in the right to bid, a fine or other, by the relevant authorities. Please do not get involved in such activities whatsoever.

Depending on the country or region, even the mere exchange of information about sales prices and other with another company is illegal. In such countries or regions, as a general rule, do not participate in meetings with competitor companies (however, this excludes cases where it has been confirmed beforehand that the nature of the meeting does not infringe on any competition laws in the individual country and is approved within your organization).





# 4

## Fair accounting procedures

**We shall conduct fair accounting and tax practices based on accurate records.**

### Those in charge of accounting and treasury divisions

In addition to following accurate accounting procedures in accordance with generally accepted accounting standards and relevant laws and regulations, keep accurate records and preserve evidence documents for an appropriate period of time. Misrepresenting or falsifying statements related to accounting procedures is prohibited, as is tampering or concealing statements afterwards.

Companies involved in fraudulent accounting procedures will lose the trust of society, even possibly endangering their continued existence. On a day-to-day basis, take adequate precaution to prevent even minor irregularities or mistakes.

The same applies to the handling of tax matters. In compliance with relevant laws and regulations, pay taxes with the filing of appropriate tax returns.

Support internal audits, accounting audits, tax investigations and other by submitting records and providing full, sincere cooperation.

On an ongoing basis, consider the validity and effectiveness of internal control systems and strive to improve them.

### All employees

Accurately process the accounting of personal reimbursements for travel and other expenses, payment of invoices and so on by following company procedures regarding time frame, vouchers, approval authority and other, and take adequate precaution to prevent even minor irregularities or mistakes.

# 5

## Communication with stakeholders

**In consideration of the interests of our shareholders and other stakeholders, we shall disclose necessary information in a timely and fair manner and promote dialogue.**

### All divisions

In addition to our customers whom we meet on a regular basis, our Group has many stakeholders. Communicate in an appropriate manner and build good relationships with the many stakeholders who support us, including our customers, business partners, shareholders, investors, local communities, government, NGO/NPO, colleagues and families.

### Mainly IR and other divisions that deal with shareholders

To shareholders and investors, disclose in a timely, fair and equitable manner financial information, the state of our business operations and other information necessary to make investment decisions. In addition, actively engage and utilize the diverse range of opinions in management. Willingly disclose information even if it may be detrimental and strive to be a highly transparent and open company.

### Mainly marketing divisions

In our communication with customers, seek to give accurate and easy-to-understand explanations. Furthermore, do not conduct dishonest acts, such as deliberately hiding information that may be detrimental to the customer.



# 6

## Maintaining confidentiality

**We shall ensure the protection of confidential information, both our own and that of third parties.**

### All divisions

Properly manage confidential company information and do not leak it to outside parties. Furthermore, do not acquire confidential information of another division without authorization.

In the performance of your duties, if you must share confidential information with business partners or other parties, enter a non-disclosure or similar agreement and call their attention to this matter.

Furthermore, under no circumstances are you permitted to leak confidential information of third parties or conduct other activities that would betray the trust that business partners place in us.

In addition to deliberate acts, there have been many incidents where a company's strategically important information was leaked through conversations or telephone calls in public areas, private SNS and other casual actions. On a routine basis, make sure this does not take place.

Take adequate caution in monitoring personal computers, mobile phones, bags and other items that contain confidential information.

Even after resigning from a Sumitomo Forestry Group company, you are required to protect the confidentiality of this type of information.

### Group companies in Japan

Submit a confidentiality pledge upon your resignation and do not leak classified information even after you leave the company. Return all classified information that you managed or held by the time you resign.

# 7

## Information security

**We shall install appropriate information security measures to prevent information leaks and other breaches.**

### All divisions

The company's information systems are to be utilized only to perform company duties. Hence, personal or unauthorized use is prohibited. Also, transmitting or storing information onto a private computer or other device is not permitted even if it is for business purposes.

Do not take protected data outside the company, such as in storage media, through mail transmissions and other, without the authorization of the relevant supervisor. Except with proper authorization, do not disclose or provide protected data to outside third parties.

In handling information, take all necessary precautions to prevent incidents, accidents and other trouble.

Individuals who use the company's information systems must make sure not to leak their personal ID and password nor obtain another person's ID or password.

### Information systems divisions

In preparation for possible attacks from outside, always have appropriate defense measures and countermeasures in place and work to enhance employee awareness.

# 8 Relationships with companies we do business with

**We shall build and maintain constructive relationships with the parties we do business with and refrain from inappropriate behaviors, such as the abuse of power.**

## All divisions

The parties we do business with are our important partners. We work together to improve the quality of our products and services, we help each other, we provide advice as necessary for mutual growth and development, and through a friendly sense of rivalry, we enhance our competitiveness. Strive to build a relationship based on mutual trust, such as by not making unfair demands.

In regards to subcontractors in particular, do not forcefully impose unfavorable conditions, such as a postponement of payment or unfair prices. Ensure that transactions are fair and work to protect the interests of subcontractors.

Do not use your job or position to obtain personal entertainment or other benefits or provide favors to third parties. You are also not allowed to receive personal compensation nor lend or borrow money.



# 9 Protection of intellectual property rights

**In addition to protecting our own company's intellectual property rights, we shall not infringe on the intellectual property rights of others.**

## All divisions

Intellectual property is an important company asset. Protect intellectual property, such as results from your own research and development, and do not allow other parties to infringe these rights. In addition, strive to utilize these rights effectively.

The company owns the intellectual property rights to any discoveries made as part of the company's business. When you have made a discovery related to business, submit a report immediately. The company will apply and register the discovery, and then depending on the situation, provide an appropriate award.

Respect the intellectual property rights of others, and at the research and development stage, confirm that there is no potential infringement by evaluating the intellectual property rights of other parties. Do not use the intellectual property rights of other companies obtained through fraudulent means.



# 10 Protection of personal information

**We shall appropriately manage personal information, use it only for authorized purposes and prevent leaks.**

## Mainly business and HR divisions

All personal information obtained from customers, business partners, employees and other must be properly and strictly managed. Do not needlessly remove such information from the premises or carelessly transmit it to a wrong party. In particular, be sure to retain and store all information devices (personal computers, mobile phones and other) in a manner set forth by company regulations and prevent loss or information leaks.

When acquiring personal information, express, notify or disclose to the individual involved how that information will be used, and use it appropriately for that purpose only. Also, do not provide such information to third parties except in cases specified in the privacy policy.

## Japan

Strictly control the handling of specific personal information, including My Number, according to legal regulations and limit its use to only the relevant divisions or individuals.

## Comment

Personal information is information about a living individual and includes name, birthdate and other details that identify a specific person (as well as information that does not identify by itself but can be easily checked against other data to identify a person). (Personal Information Protection Law of Japan.)

# 11 Responsible advertising/ promotional efforts

**We shall engage in accurate and appropriate advertising and promotional efforts that do not cause misunderstanding or offense.**

## Mainly corporate communications, advertising and marketing divisions

In television commercials, newspaper advertisements, fliers, campaign notices and other forms of advertising and promotion, do not use expressions that may be misunderstood by the audience and always make sure that the content is fair and truthful. Avoid content that may cause displeasure, such as slandering another company or its products, discriminatory language that violates human rights or other expressions contrary to public order and morals.

Implement advertising and promotion only after adequately studying relevant laws and making certain that no expressions infringe the rights of others.

The above guidelines apply not only to advertising and promotion in newspaper, magazine and television media, but also web pages, social media, catalogs, pamphlets, videos, marketing tools and all other forms of communication.

Giveaways to customers should be conducted within the limits stipulated by law.





# 12

## Healthy relationship with the government

**We shall maintain a healthy and transparent relationship with the government that is in conformance with all laws.**

### All divisions

As a general rule and in accordance with relevant laws and company regulations, only the division in charge is permitted to make political contributions. If circumstances require another division to make a political contribution, make sure that there is adequate prior consultation with the division in charge or top management. Political contributions are to be made only for the purpose of supporting smooth business and operations. Be careful that they do not significantly distort the structure of society or the economy.

Maintain a healthy and transparent relationship with the government, and in all your actions, be careful not to invite suspicions of collusion or mistrust.

# 13

## Stance on organized crime

**We shall have absolutely no involvement in organized crime.**

### All divisions

On a routine basis, be ethical and behave sensibly. Do not get involved whatsoever with antisocial forces. In the event that you come into contact with or are at risk of coming into contact with antisocial forces, handle the situation with a firm attitude and strong resolution, by no means alone but by consulting and working with your supervisor and relevant divisions. Under no circumstances should you try to resolve the situation by giving monetary or other resources.

### Group companies in Japan

All contracts with business partners must include a representation and warranty that the business partner as well as its parent company, subsidiaries, subcontractors and other are not antisocial forces.



# 14

## Establishment of a whistleblowing mechanism

**We shall establish a mechanism for people to report any suspicions of breaches to any laws or this Sumitomo Forestry Group Code of Conduct. By allowing reports to be made anonymously and strictly prohibiting retaliation against informants and other measures, we will actively promote its use.**

### Group companies in Japan

Report any suspicious situation that you believe may be illegal or any employee action that you think may be unlawful, criminal or infringe this Code of Conduct to the company or external Compliance Counter. The Human Resources Division can also serve as a point of contact to discuss HR-related issues, such as sexual harassment, power harassment and prolonged working hours.

As a general rule, you should provide your real name when making a report to the Compliance Counter so that the company can accurately assess the situation. However, if you wish to make a report anonymously, please consult the external Compliance Counter, provide your name and division, and express your desire to keep your name undisclosed to the company. The Compliance Counter will maintain confidentiality regarding the informant. Furthermore, the person providing the information will not be subject to any personnel-related punishment or dismissal (however, any action that constitutes an abuse of this whistleblowing mechanism, such as libeling or disparaging a particular individual, may be subject to punishment).

### Group companies outside Japan

Report any suspicious situation that you believe may be illegal or any employee action that you think may be unlawful, criminal or infringe this Code of Conduct to the highest-ranking management representative of the company you belong to. Confidentiality regarding the informant will be maintained. Furthermore, the person providing the information will not be subject to any personnel-related punishment or dismissal (however, any action that constitutes an abuse of this whistleblowing mechanism, such as libeling or disparaging a particular individual, may be subject to punishment).

## Part 2

### Ethical conduct



# 15

## Avoidance of a conflict of interest

**We shall make a clear distinction between professional and personal matters and refrain from activities that may constitute a conflict of interest with the company.**

### All divisions

Employees must always make a clear distinction between professional and personal matters and refrain from activities that may harm the company. For example, using company funds or assets for personal use (see item 16), granting favors to a particular business partner for personal reasons, providing information about customers or employees to an outside party, competing with a Group company, acting in a manner that would be advantageous to a competitor, damaging the company's trust, conducting business without company permission, or acting as a business partner in transactions with the company all constitute a conflict of interest with the company and are prohibited.

An employee may build and purchase a house made by a Group company so long as it is done so in line with the company's standards. However, if an employee tries to sign a contract with favorable conditions that go beyond the company's standards, this would constitute a conflict of interest and is not permitted.

### Board of Directors (Japan)

When the company and a director enter a business transaction, such as when a director purchases a house built by the company, as this is deemed a conflict of interest under the Companies Act of Japan, board approval must be obtained in accordance with this law.

# 16

## Prohibition of misappropriation of company assets

**We shall not use company funds or assets for personal purposes.**

### All divisions

Using company funds, tangible assets or intangible assets for personal use is not permitted under any circumstances.

Do not use the company's photocopiers, personal computers or office supplies for personal use. Do not commingle professional and personal matters, such as using for personal reasons company cars or other assets entrusted to you for business purposes. An accumulation of even minor indiscretions may negatively affect judgment and lead to major mistakes. These same rules prohibit using company expenses to cover costs for personal dining, taxi and other travel, books and so on. Report immediately any lost or stolen company assets so as not to be suspected of misappropriation.

Any activity during work hours that is not related to work is considered personal. In unavoidable situations such as hospital visits, obtain approval from your supervisor, act within reasonable limits and if necessary, take vacation time or use other measures.



# 17

## Prohibition of insider trading

**We shall take no part in insider trading, including being complicit with others.**

### All divisions

Strictly protect undisclosed company information that may have a significant impact on stock markets, in other words, insider information, as stipulated by laws in each country. Have a heightened awareness of insider trading regulations so as not to infringe them. If you have even minor doubts or questions, consult the legal division to resolve the issue.

If you acquire insider information, you are not allowed to sell or buy shares or bonds of the company until that information is made public.

You are not permitted to communicate insider information to family, acquaintances, business partners or other third parties. In addition, you are not allowed to use accounts held by such third parties to buy or sell company shares or bonds.

Please exercise caution as these rules apply not only to information about our own company, but also, insider information about another company acquired in the course of your work.

Please refer to the laws of individual countries and the regulations of each company to determine what constitutes insider information.

### Specific divisions and other

If you are a member of the board of directors (including that of a subsidiary company), supervisor, employee of specific divisions or other, please submit a prescribed written form to the general manager of the General Affairs Department of Sumitomo Forestry prior to buying or selling shares of the company. Specific divisions include head office departments, head office departments of individual companies (however, in some cases, other departments as well), and other departments designated by the person in charge of handling the information (for further details, please refer to the company regulations).

# 18

## Appropriate gift giving and entertainment

**We shall neither accept nor offer gifts or entertainment that would be considered inappropriate according to socially accepted norms.**

### All divisions

Trying to obtain unfair favors when conducting business with lawmakers, civil servants, other government officials and their families, business partners and others, or exceeding the appropriate limits as dictated by socially accepted norms or regulations, may constitute an infringement of individual country laws and regulations. You are not permitted to offer, promise or give money, gifts or other favors. In addition, you are not permitted to accept nor demand money, gifts or other favors.

Money, gifts or other favors refer to money, property or property benefits, gifts, invitations for travel, entertainment, services as well as the promise to act or fail to act in a manner that the counterparty wishes.

To ensure that gift giving or entertainment is lawful and within the realm considered acceptable by social norms, follow all company regulations regarding obtaining approvals, reporting and record keeping. If you have difficulties judging a particular situation, consult your supervisor.





# 19

## Prohibition of political or religious activities

**During work hours, we shall not recruit or otherwise promote political, religious or other activities based on personal ideology.**

### All divisions

Political or religious activities based on personal ideology are considered personal activities. During work hours or inside the company's facilities, soliciting, asking for votes or donations, distributing pamphlets or other such activities are not permitted. This rule prohibits the lobbying of others. In the interests of respecting the culture and customs of individual countries and religions, prayer and other such activities as required by an individual's faith are permitted during work hours within reasonable limits.



## Part 3

**A respectful,  
healthy workplace**



## 20 Respect for human rights

**According to internationally accepted human rights norms, we shall respect the human rights of all individuals, including women, children, indigenous people, minorities and vulnerable people.**

### All divisions

All human beings have fundamental, eternal, inalienable human rights from the day they are born.

Respect the human rights and individuality of all stakeholders. In particular, be mindful of the human rights of women, children, indigenous people, minorities and socially vulnerable people.

Both inside and outside the workplace, strictly refrain from any act that may infringe the human rights of employees, such as violence, abuse, bullying or afflicting other forms of physical or psychological pain.

Sumitomo Forestry is a signatory of the United Nations Global Compact.

United Nations Global Compact

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.



## 21 Prohibition of discrimination and the promotion of diversity

**We shall not discriminate on the basis of race, ethnicity, nationality, gender, religion, ideology, disability, sexual orientation, gender identity or other. In addition, we shall work to secure and promote diversity.**

### All divisions

Securing and promoting employee diversity is an important initiative that helps lead to a vibrant company.

When hiring or determining work conditions, promotions or transfers, respect diversity and do not discriminate on the basis of nationality, gender, age or other individual differences.

Eliminate all forms of prejudice and discrimination based on stereotyped perceptions regarding gender roles, physical or mental disabilities and ailments, family situations and other circumstances, and seek to create a workplace environment where all employees can draw on their diversity and work with enthusiasm.

Not just employees but for all stakeholders, apply the same rules and do not conduct any discriminatory acts.

In regards to female employees, the company has set numerical targets for the ratio of female employees to total employees as well as the ratio of women in managerial positions, and will promote initiatives to enable both men and women to participate actively. (The Act on Promotion of Women's Participation and Advancement in the Workplace, Sumitomo Forestry First Term Action Plan.)

Sumitomo Forestry is a signatory of the United Nations Global Compact.

United Nations Global Compact

Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

## 22 Prohibition of forced labor and child labor.

**We shall not tolerate forced labor or child labor in any form.**

### All divisions

In compliance with international treaties and the laws of each country, work by children who have not reached the minimum working age is not permitted because it may hinder social or education development or force children to do hazardous work not appropriate for their stage of development.

Human trafficking and all other forms of forced labor that violate human rights are also prohibited.

### Procurement divisions

Have a zero-tolerance policy when procuring products, materials and raw materials and confirm that there has been no forced labor or child labor at all stages of production.

Sumitomo Forestry is a signatory of the United Nations Global Compact.

United Nations Global Compact

Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour.

## 23 Freedom of association and collective bargaining rights

**In accordance with laws, we shall secure workers' rights for freedom of association and collective bargaining.**

### All divisions

The “freedom of association and the effective recognition of the right to collective bargaining” is one of the Fundamental Principles and Rights at Work set out by the International Labour Organization, along with “the elimination of all forms of forced or compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation.” (Workers’ rights to freedom of association, collective bargaining and other forms of collective activities are also protected under the Japanese Constitution).

Do not hinder workers’ rights of freedom of association and collective bargaining.

Sumitomo Forestry is a signatory of the United Nations Global Compact.

United Nations Global Compact

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.



# 24 Appropriate working hours and wages

**In accordance with laws, we shall ensure that working hours and wages are appropriate.**

## All divisions

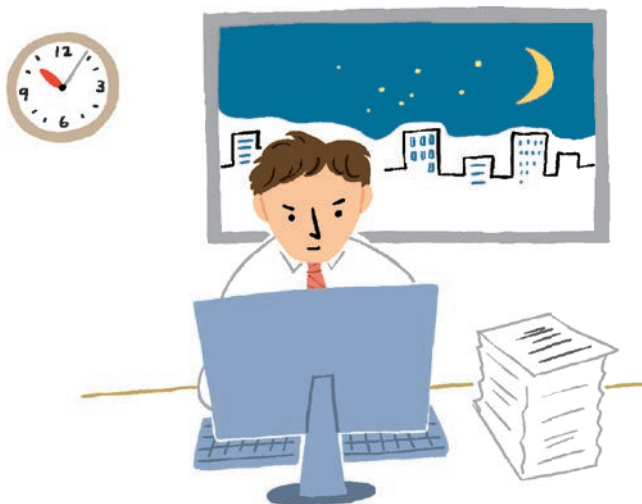
Strictly comply with the Labour Standards Act and other applicable laws and make sure that working hours are within the limits set out by law.

Appropriately monitor the work hours of subordinates and do not allow false reporting.

When assigning staff, give adequate consideration to ensure that no one is forced to work excessively.

For the healthy and sustainable growth of business, it is important that working conditions be improved in a manner that leads to more stable and higher quality employee lives. Take particular consideration of wages and confirm that the minimum wages set out by the Minimum Wage Act and other laws are guaranteed, even for business partners.

These rules apply to all employees, including short-term part-time workers and other types of workers.



# 25 Work/life balance

**We shall secure the appropriate balance between work and individual commitments, such as caring for children and the elderly.**

## All divisions

Create a workplace where everyone can work in a lively, healthy fashion and fulfill their potential by realizing the balance that each and every individual desires between work and life outside of work (family life, community activities, personal development, hobbies and a variety of other activities).

Our Group's mission is to provide a diverse range of lifestyle-enhancing services. Precisely for this reason, we need to have an understanding of the importance of watching children grow and spending time with family. Strive to create an environment where people can work while raising children or caring for family members and try to draw on these experiences for business.

To achieve a work/life balance, implement ongoing operational reforms and productivity improvements that reduce working hours while raising financial performance and operational efficiency.

## Primarily human resources divisions

Lifestyles and values are becoming more diversified, and so are working styles. Put into place internal systems that respect flexible working styles to meet individual needs, and create an environment where employees feel free to use these systems.



# 26 Occupational health and safety

**We shall strive to maintain a safe and healthy work environment. In addition, we shall implement regular educational and training programs to prepare for disasters, accidents and other.**

## All divisions

Health and safety are the first and foremost priorities in the workplace. Employees should take care of their own health and safety. At the same time, managers should be attentive about the mental and physical health of their subordinates and take appropriate safety considerations.

Strictly abide by relevant laws and regulations to ensure health and hygiene, and work to implement ongoing improvements in the workplace environment.

## Safety

For dangerous work, define procedures in a response guideline or manual and thoroughly follow them. Furthermore, as a fundamental rule, always have in place risk management measures and be orderly and clean.

At least once a year, conduct periodic educational sessions and training to prepare for disasters and accidents, identify shortcomings and work to improve them.

In the event of a disaster or accident, ensure everyone's safety, prevent escalation of the problem and manage the situation based on the two-hour rule. In addition, follow the Emergency Situation Checklist and other procedures prescribed by each company.

## Health

Employees must undergo physical and mental checkups as stipulated by each company. Furthermore, employees should strive to be healthy by refraining from excessive alcohol consumption, smoking and other unhealthy habits.

# 27 Human resources development

**We shall strive to nurture human resources by providing skill enhancement opportunities, such as training seminars.**

## All divisions

The company will conduct necessary training seminars to elevate employee ethics, knowledge and skills.

In addition to becoming actively involved in learning opportunities provided by the company, employees should voluntarily seek training for skill enhancement and career development.

All employees should invest in their own growth through education and should also consider themselves in the position to guide, educate and advise subordinates, younger associates and colleagues to encourage growth.

Having each and every employee interested and involved in human resources development leads to personal growth, and by extension, organizational growth.

Create a workplace culture where people can learn from one another to nurture high ethical standards and to acquire the knowledge and skills needed for the performance of duties.



# 28 Prohibition of harassment

**We shall not commit or tolerate acts of sexual harassment, power harassment, inhumane punishment or other.**

## All divisions

All employees are equal and valuable work partners. Any workplace where there is harassment, such as abuse related to responsibilities or rank, has lower morale and cannot function vibrantly. Harassment is the act of harming a person's character or dignity. Under no circumstances should you tolerate harassment taking place around you.

The way people interpret and react to harassment may vary from person to person. Think carefully and behave in a manner that would not be considered harassment. Harassment is subject to disciplinary action. After conducting an objective evaluation and investigation of the facts and degree of harassment, the company will take decisive measures against anyone who conducts harassment, such as a substantive demotion, transfer or other disciplinary action.

## Comment

Harassment is defined as words or actions that make a person uncomfortable, harm a person's dignity, put a person at a disadvantage or pose a threat to a person, regardless of intent. In addition to sexual harassment and power harassment, there are more than 30 forms of harassment in Japan, such as maternity harassment (harassment of women who are pregnant, on childcare leave or have returned to work after giving birth), gender harassment, moral harassment and paternity harassment (harassment of men who take paternity leave).

# 29 Protection of privacy

**We shall respect and protect the individual's right to privacy.**

## All divisions

People have the right to have personal information related to their private lives kept confidential. Protect the privacy of personal information you acquire regarding a customer, employee, business partner or other related party.

Through our custom-built housing business and other operations, our Group frequently obtains a variety of personal customer information. Share personal customer information only with the relevant parties who need it.

Information that is reported to the designated company division, in particular information related to discrimination or harassment, must be handled in a manner that protects the privacy of the victims and related parties.



## Part4

### Business activities that respect society and the environment



# 30

## Customer satisfaction and safety

**We shall secure the safety and security of our customers and at the same time, sincerely engage with them and work to improve quality and customer satisfaction.**

### All divisions

At all times, engage with customers with sincerity, try to understand their values and desires, and work to provide helpful suggestions. Always have a customer perspective and strive to do work that impresses.

Use expressions and displays that are accurate and easy-to-understand. Communicate in advance any considerations that may be risky or disadvantageous to the customer. Take adequate care to prevent misunderstandings or discrepancies, in particular when explaining contract conditions.

When handling complaints due to mistakes or misunderstandings, first, listen to the customer carefully and sincerely and then work quickly to resolve the complaint or concern. Be aware that an inappropriate response may not only result in a loss of credibility with the customer, but may also negatively impact the overall company's reputation in society.

Always be attuned to customers' opinions, and strive to use those opinions to raise quality, improve products and spur new product development. In addition, work to provide products and improve services with primary consideration of customer safety and security.

In regards to product safety, strictly comply with all laws and regulations and provide the customer explanations and guidance as appropriate.

In the event of an issue involving customer safety, handle the matter with priority in securing safety, including contacting the customer(s) and posting alerts on the company website. After that, work to eliminate the fundamental causes.

Set standards for raw materials, manufacturing, logistics and other processes so that we can deliver products of reliable quality. Conduct quality control measures, such as quality inspections, and strive for ongoing improvement.

### Primarily manufacturing divisions

Work to implement ISO9001 and other international standards of quality control in manufacturing and other operations to raise quality.

# 31

## Co-existence with the environment

**We shall strive to reduce the environmental burden of our products and services throughout their entire lifecycle, prevent global warming, recycle resources, prevent pollution and maintain biodiversity.**

### All divisions

Forest management is the foundation of Sumitomo Forestry Group's operations, and because of this, the environment plays an integral role in our business. To maintain the long-term stability of our business, environmental sustainability is key. Recognize our company's relationship with the environment, and in accordance with the Sumitomo Forestry Group Environmental Policy, pursue environmentally friendly initiatives.

Our operations nurture and utilize renewable wood resources and in doing so, we maintain and enhance the diverse functions of forests and the environment. Contribute to the earth's environment by actively developing new technologies and approaches.

Accurately evaluate the environmental impact on our businesses and products and proactively utilize renewable resources and natural energies. In addition, promote energy saving and resource saving (the 3Rs: reduce, reuse, recycle).

### Divisions involved in ISO14001 certification

To fulfill our societal responsibilities in accordance with the Sumitomo Forestry Group Environmental Policy, each division should set out a basic strategy and priority measures, and as a daily task, ensure full compliance, conduct environmental education and make note of the effects and results of these efforts. In addition, each division must comply with the international standard ISO14001 in terms of environmental management.

# 32

## Contribution to the local community

**We shall respect the local region's culture and customs and through dialogue, shall seek to contribute to their sustainable development.**

### All divisions

Companies are members of the local community. In each country and region we operate, it is important that we conduct business with respect for culture and customs and with consideration of particular circumstances.

Work to build better relationships of mutual trust and create a foundation based on smooth operations and business expansion in line with the growth of the local community. Conduct activities that emphasize dialogue and coordination with the local community. In addition, interact and talk with wide segments of society and promote alliances with a diverse range of stakeholders.

To become involved in the local community, actively support social contribution programs by participating in, volunteering or supporting environmental, social welfare, children's educational, cultural, artistic and other activities.

