

TOA CORPORATION “CODE OF CONDUCT”

After reflection upon the misconduct related to the execution of soil improvement work and other issues, and to prevent the lessons that were learned from being forgotten, TOA CORPORATION has revised the “TOA CORPORATION CODE OF CONDUCT.”

Going forward, we shall thoroughly instill this conduct in all executives and employees, and carrying forward

our business activities with this as the foundation, we shall engage in efforts to realize our corporate philosophy of “developing the company’s business with high-level technology and fulfilling our social responsibilities through sound management.”

Article 1 Carry out fair and sincere corporate activities

1. Observe Laws and Regulations, and carry out fair and sincere corporate activities

We shall observe Laws and Regulations as well as the spirit of Laws and Regulations without exception, refrain from putting priority on our own reasons or circumstances, and follow social decency, in carrying out fair and sincere corporate activities.

2. Fair competition and proper transactions

We shall promote fair and transparent free competition, and proper transactions.

3. Shut off any relationships with anti-social

forces

We shall shut off any and all relationships with anti-social forces that pose a threat to the order and safety of society.

4. Protect intellectual property

We shall respect the intellectual property rights of others, and properly manage and protect information, including personal information, utilized in the course of conducting business activities.

5. Ensure proper disclosure of corporate information and the transparency of

management

We shall endeavor to ensure the transparency of management as an “Open Company” through the disclosure of corporate information in the proper manner and at the right time.

6. Maintain proper relationships with political and government bodies

With regard to our relationship with political and government bodies, we shall observe all relevant Laws and Regulations, and maintain a transparent and proper relationship.

Article 2 Execution of social responsibilities

1. Provide high-quality construction and services

We shall thoroughly implement measures, including the reliable sharing of information, to prevent the recurrence of misconduct related to the execution of work, and provide high-quality construction and services, by scrupulously executing work, in order to prove worthy of the client’s trust.

2. Improve construction technologies

We shall endeavor to develop technologies

and improve technologies in order to respond to the various needs of the client. Moreover, we shall, without fail, conduct inspections and other actions on technologies provided to the client, in order to prove worthy of trust.

3. Make every possible effort to prevent disasters to the public

We shall never forget the lessons learned from the incident of the disaster to the public, and every possible effort shall be made to prevent disasters to the public.

4. Response to natural disasters

When a natural disaster strikes, we shall promptly and systematically carry out disaster response actions, such as rescue of inhabitants of the devastated area and secure their safety, and emergency repairs on disaster-stricken structures.

Article 3 Respect for humans

1. Realize a good working environment and enrichment for workers

We shall respect “people,” who are the pillar of our corporate activities, and endeavor to establish a good working environment that is rewarding and that they can take pride in, and realize enrichment for the working people.

2. Strengthen and enhance measures for occupational safety and health

We shall promote strengthening and enhancing our occupational safety and health

measures in order to prevent work-related accidents and work-related illnesses, and ensure the safety and good health of people involved in construction work.

3. Prohibit discrimination and unfair treatment

We shall prohibit any form of discrimination and unfair treatment of employees with regard to hiring and how they are dealt with, because of nationality, gender, beliefs, or other reasons.

4. Human resources development

We shall nurture employees who are capable of taking action by becoming aware of on their own and thinking for themselves about what action needs to be taken, by not only raising the capabilities of each individual through education and training and self-enlightenment, but also by promoting a climate that enhances dialog with superiors and subordinates.

Article 4 Coexistence with society

1. Carry out widespread communication

We shall enhance communications with our stakeholders, including stockholders, clients, and business partners, and promote mutual understanding with regard to corporate activities, with the aim of becoming a trusted “Open Company.”

2. Promote CSR activities

We shall always have an awareness that we are a company involved in improving social infrastructure, and endeavor as a “good corporate citizen” to make contributions to

society.

3. Efforts to preserve the environment and other initiatives

We shall endeavor to coexist with the environment in all areas of corporate activities, and proactively carry out efforts in the preservation of the environment, renewable energy, and saving energy, in response to demands from society.

4. Be in harmony with and contribute to the international community

In the international community, it goes

without saying that we shall observe international rules as well as local Laws and Regulations, and respect the culture and customs of local communities, and promote business activities that contribute to their development.

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