

## Code of Corporate Ethics and Conduct

The Analects and the Abacus, which contains the teachings of Eiichi Shibusawa, is Shimizu's corporate credo. It means that we conduct business activities with the conviction that the company's business will always prosper if we pursue both ethical conduct and business profit simultaneously, or in other words, if we maintain a strict sense of ethics in doing good work that will please society and our customers.

This is an enduring concept that holds true no matter which era it is. In an era that makes strong demands for corporate social responsibility, we have formulated the Code of Corporate Ethics and Conduct, and will make sure that it is instilled in all officers and employees so that they have a clear understanding of our corporate credo from the perspective of their daily work and can take concrete action in line with the spirit of the corporate credo.

Executive management will naturally take the initiative and set a good example, but I ask all employees always to strive to act in accordance with the Code of Corporate Ethics and Conduct, as well as to regulate their own actions.

Kazuyuki Inoue,  
President

### I. Fulfilling Our Mission in Society

#### 1. A Company That Values People

As a company that values people, Shimizu has been working proactively to improve employment and labor conditions and ensure a rewarding, comfortable workplace environment for employees. We not only implement strong safety measures; we also seek to eliminate both discrimination and sexual harassment from the workplace, and encourage respect for employee diversity and the personality and individuality of each of our employees.

#### 2. Pursuing Business Activities that Meet the Needs of the Community

In addition to delivering safe, high-quality construction projects and services at fair prices, we carefully consider the needs of the community, protect personal and customer information, and earn the satisfaction and trust of our customers by establishing and enhancing the system for follow-up support after such projects and services are delivered.

3. Creating and Protecting a Better Global Environment

To create a better global environment, we make sure our business activities demonstrate sufficient consideration for protecting the environment. We make every effort to recycle and ensure proper processing and disposal of construction by-products.

4. Coexisting with Local Communities

In addition to building and maintaining ties to local communities, we actively pursue activities that contribute to society with the goal of coexisting harmoniously in the community. When engaging in business activities overseas, we work to contribute to regional development and respect local customs and practices, in addition to complying with international regulations and local laws. Moreover, when a natural disaster such as a large earthquake occurs, we carry out our social mission and role and contribute to society by initiating a rapid and systematic response to the disaster.

5. Fair Disclosure of Corporate Information

We earn the trust of society as an open and transparent company through proactive and fair disclosure of corporate information. We also comply with internal rules and guidelines on management of insider information and have zero tolerance for insider trading.

6. Promoting Fair Competition

We engage in fair and free competition and enhance corporate competitiveness by improving productivity, developing advanced technical skills, and reducing operating costs.

7. Maintaining Partnerships with Companies We Do Business With

To maintain strong partnerships with specialty contractors, building materials suppliers, and other companies we do business with, we mutually respect one another's views, conclude fair contracts with our partners and establish efficient production systems that clearly define the roles of each party.

## II. Compliance with Laws, Regulations, and Standards

### 1. Compliance with Laws, Regulations, and Standards

In addition to complying with all applicable domestic and foreign laws, regulations, and standards, we do not engage in actions that might appear suspicious to the public or that depart from customary business practices.

### 2. Fair Bidding Practices

When bidding on public or private construction projects, we refrain from any action that could inhibit a fair bidding process, including violations of criminal law, antitrust law, and other laws or regulations.

### 3. Establishing Transparent Relations with Government, Administrative, and Political Entities

We are committed to maintain fair, transparent relationship with government, administrative, and political parties in compliance with the spirit of all applicable laws and regulations, including the Political Funds Control Law, Public Offices Election Law, and the Construction Business Act.

We do not condone any illicit acts of bribery or provision of illegal gains to civil servants, etc.

Furthermore, even where such payments are permitted by law, we do not make facilitation payments to secure smooth government services in any jurisdiction.

We maintain fair and transparent relationships with government and administrative agencies, and political entities, and comply with the spirit of all applicable laws and regulations, including the Political Funds Control Law, Public Offices Election Law, and the Construction Business Act.

We do not engage in illicit acts of bribery or provision of illegal gains to civil servants, etc. either in Japan or overseas.

### 4. Elimination of Antisocial Behavior

In compliance with the spirit of the Act on Prevention of Unjust Acts by Organized Crime Group Members and other related laws and regulations, we do not comply with inappropriate demands from antisocial forces or groups that threaten the

public, such as organized crime groups or corporate racketeers. We also do not enlist such forces or groups in committing antisocial actions.

5. Transparency in Corporate Accounting

We do not permit unlawful expenditures and other improper accounting practices, and work to maintain transparency and soundness in corporate accounting.

III. Measures to be Implemented

1. Education and Training

The company provides the education and training necessary to ensure adequate understanding of the Code of Corporate Ethics and Conduct among management and employees.

2. Design of Internal Structures

The company has established the Committee on Corporate Ethics and sections responsible for promoting corporate ethics to help management and employees comply with the Code of Corporate Ethics and Conduct.

3. Corrective Action in the Event of Compliance Failures

The company will take strict disciplinary action for failure to comply with the Code of Corporate Ethics and Conduct. Members of management who fail to comply face disciplinary action by the relevant management boards (the Board of Directors or the Audit & Supervisory Board). Employees face disciplinary actions specified in the employment rules. Executive management also works to identify the cause and implement measures to prevent recurrence.