

# **NIPPON KANZAI Group Basic Policy on Handling Customer Harassment**

## **■ Purpose of establishing policy**

A fact-finding survey of employees of the NIPPON KANZAI Group ("the Group") found that there are some customers and facility users who engage in nuisance behavior toward our employees, so-called "customer harassment." This is a serious problem that deteriorates the workplace environment.

Following the survey, we established the NIPPON KANZAI Group Basic Policy on Handling Customer Harassment as follows based on the belief that creating an environment where employees can work comfortably is essential for us to continue providing quality services.

## **■ NIPPON KANZAI Group Basic Policy on Handling Customer Harassment**

The Group sets out in its Group Code of Corporate Ethics and Conduct that we will sincerely engage with Customers and meet their trust and expectations to provide quality services. Meanwhile, we recognize that behavior that impairs the dignity of employees, such as demands, language, and acts beyond the bounds of common sense; remarks that deny the personalities of employees; violence; and sexual harassment is a serious problem that deteriorates the workplace environment. Since the Group considers respecting our employees' human rights to be our important responsibility, it is our policy to deal decisively with such behavior, while engaging sincerely with Customers. Additionally, our employees are encouraged to report to or consult with their supervisors or other appropriate persons promptly if they face such behavior, and when a report is made, the issue will be addressed and appropriate action will be taken systematically by the organization.

\* For "Customers," please refer to the definition of customer harassment below.

## **■ Definition of customer harassment**

Customer harassment is defined as any complaint, language, or behavior of a business partner of the Group, user of properties under our management, or other person (collectively "Customers") whose manner or means exceeds the bounds of socially accepted limits in light of the nature and purpose of the work engaged in by our employees, thereby harming their working environment.

## **■ Examples of behavior constituting customer harassment**

- Prolonged or repeated phone calls.
- Persistent complaints to multiple departments.
- Prolonged detention or staying put for over an hour.

- Repeated use of loud voice, verbal abuse, yelling, intimidation, defamation, personal attacks, discriminatory remarks, and similar behavior.
- Threats implying exposure to social networking services, news media, or other sources.
- Posting on the internet that discredits our employees or the Group.
- Unjustifiable demands for money, apologies, or special treatment.
- Excessive demands beyond contract terms.
- Stalking, indecent behavior, secret photography, and similar behavior directed at specific employees.

\* The above definition and examples of behavior are by reference to the Corporate Manual on Measures against Customer Harassment issued by the Ministry of Health, Labour and Welfare and based on the findings from the Group's fact-finding survey. The examples of behavior shown here are only some examples and actual cases are not limited to them.

## ■ Our initiatives for customer harassment handling

The Group has conducted education and training for our employees to clarify our stance under this Policy and outlined responses when receiving customer harassment from Customers. The latter covered: (1) what actions the organization should take, (2) what kind of support system should be established, and (3) the necessity of establishing a system to seek consultation from the consultation desk.

We will continue to implement the following initiatives to ensure that employees correctly understand customer harassment and can address it appropriately, while striving to create a workplace environment where employees can work comfortably.

- Development of an organizational handling manual including accurate confirmation of facts.
- Making the consultation services to care for employees known to everybody.
- Continuous implementation of employee education for familiarization, enlightenment, and recurrence prevention.
- Establishment of consultation systems with the police, lawyers, or others.

## ■ Response when customer harassment occurs

If any incident that appears to be customer harassment occurs, we will evaluate whether it falls under harassment based on the facts and handle it as an organization. Our employees may refuse to attend or provide services to Customers whose demands or behavior are determined by the Group to be customer harassment. Additionally, any acts that violate the law will be strictly addressed upon consultation with the police, lawyers, or others.

December 1, 2025  
 NIPPON KANZAI HOLDINGS Co., Ltd.  
 Compliance Committee