

ORIX Group Real Estate segment Supplier Code of Conduct

Purpose of this Code of Conduct:

ORIX Real Estate Corporation and its affiliates are committed to conducting our business with the highest importance placed on safety, security, and comfort, along with consideration for the environment, including decarbonization, and achieving harmony with local communities. We seek to contribute to achieving a sustainable society by providing real estate products and services that incorporate a sustainability perspective.

As social and environmental issues such as human rights violations and the impacts of climate change become more severe globally, in order to work toward a more sustainable society, in addition to our own efforts, it is essential we take action throughout our supply chain through cooperation with our suppliers. This Code of Conduct lays out the matters that we ask all of our suppliers to understand and implement.

Matters to be understood and practiced by suppliers:

1. Compliance with laws and regulations

- Comply with all applicable laws and regulations and respect the social norms of all countries and regions where you conduct business.

2. Respect for human rights

- Respect international standards relating to human rights and labor and comply with relevant laws and regulations.
- Prohibit discrimination on the basis of race, nationality, religion, creed, gender, age, sexual orientation, gender identity, family background, disability or illness.
- Do not engage in or tolerate any inhumane treatment whatsoever, including violence, verbal abuse, or harassment.
- Prohibit forced labor.
- Prohibit child labor.
- Pay appropriate wages at or above the minimum wage to employees.
- Comply with statutory working hours and appropriately manage employee working hours and days off.
- Respect the freedom of association and right of collective bargaining.
- Conduct employee health and safety management, prevent occupational accidents, and establish physically and mentally safe and healthy working environments and conditions.
- Respect and give due consideration to the lives and cultures of local communities and indigenous peoples.

3. Fair corporate practices

- Maintain sound relationships with public officials and do not engage in corrupt conduct including bribery and improper bidding.
- Do not give or accept inappropriate benefits to or from customers and business partners.
- Do not engage in unfair transactions including abuse of dominant bargaining position.
- Eliminate all relationships with criminal organizations or anti-social forces.
- Protect third-party intellectual property rights and refrain from unauthorized use and illegal reproduction of copyrighted works.
- Appropriately disclose and explain financial and non-financial information as well as information relating to products and services; do not disclose fabricated or false information.
- Establish a consultation desk to address complaints and inquiries from inside and outside your company and protect reporting parties.

4. Consideration for the environment

- Strive for continuous improvement to protect the environment and reduce environmental impact.
- Strive to reduce greenhouse gas emissions.
- Strive for sustainable and efficient use of resources including energy, water, and raw materials.
- Reduce and properly dispose of waste.
- Prevent air, water, soil, and other pollution and reduce releases of pollutants; appropriately manage harmful chemicals.
- Take action to conserve biodiversity.

5. Ensuring quality

- Ensure the safety of provided products and services and give consideration to the peace of mind of users.
- Ensure the safety of employees in the provision of products and services.
- Create quality control systems, comply with all applicable laws and regulations, internal quality standards, and customer requirements, and strive for continuous improvement in quality control.

6. Ensuring information security

- Appropriately manage personal information.
- Appropriately manage confidential information received from customers and third parties.

7. Establishing risk management systems in preparation for disasters

- Formulate business continuity plans (BCPs) and establish risk management systems in preparation for disasters.

8. Implementation

- Implement this Code of Conduct inside your own organization and throughout your supply chain.

Established March 19, 2025.