

Compliance

Corporate Code of Ethical Conduct (Excerpt)

The Toho Gas Group aims to maintain the trust of its customers, shareholders, local communities, business partners, and other stakeholders, and we comply with both the letter and spirit of the law while respecting social norms and ethics to conduct honest and fair business activities, thereby contributing to the local community. We also disclose information in a timely and appropriate manner and promote proactive dialogue with relevant parties while striving for mutual coexistence and prosperity.

Compliance Code of Conduct (Excerpt from “Establishing a Relationship of Trust with Society”)

• Social Contribution Activities

We actively contribute to projects that support regional development as a company closely connected with the local community. We also support social contribution activities such as volunteer activities involving our employees.

• Initiatives Against Anti-Social Forces

We sever all ties with anti-social forces that threaten public order and safety and disrupt healthy business activities, and firmly reject demands made by such forces.

• Association with Related Parties and Anti-Corruption Initiatives

We will not provide entertainment or gifts to related parties that may distort the fairness of business operations, such as actions aimed at obtaining or maintaining undue benefits or preferential treatment, or that exceed socially accepted standards.

We do not permit exchanges with public officials, including foreign public officials, that go against the spirit of the National Public Service Ethics Act, Unfair Competition Prevention Act (Prohibition against the Provision of Wrongful Gains to Foreign Public Officials), or relevant laws and regulations of other countries. This also applies to exchanges with people treated as public officials and officers of organizations subject to regulations concerning bribery and corruption under special laws.

Business Improvement Plan for Compliance with Antitrust Laws and Regulations

- 1) Strengthen internal audit functions
- 2) Externally verify business improvement plan implementation status and efficacy
- 3) Establish and implement a pre-approval and post-reporting system for contact with competitors
- 4) Monitor compliance with laws and regulations in internal meetings
- 5) Conduct multi-layered and focused education related to the Antimonopoly Act, the Gas Business Act, and other regulations
- 6) Establish internal leniency system and strengthen internal reporting system
- 7) Issue message from senior management
- 8) Declare compliance with the Antimonopoly Act by resolution of the Board of Directors
- 9) Submit pledge regarding compliance with the Antimonopoly Act
- 10) Prevent employees from long-term stagnation in one post
- 11) Monitor contact opportunities
- 12) Strengthen legal consultation functions related to the Antimonopoly Act and other regulations
- 13) Impose severe penalties for new violations, etc.

• Compliance Activities

• Education and Awareness Activities

We provide a wide variety of rank-specific compliance training. In FY2024, approximately 720 officers and management-level personnel attended three seminars on Antimonopoly Act compliance, some 300 management-level personnel attended a compliance seminar, about 60 managers at subsidiaries attended labor

management training, and a total of approximately 12,500 employees participated in five online training sessions organized by level (management and all employees) according to theme and content. We also hold compliance meetings at each workplace and regularly publish a compliance newsletter for all employees.

• Inspection and Survey Activities

We conduct regular inspections of all Group workplaces to ensure compliance with laws and regulations. Additionally, we conduct annual surveys for all Group employees to assess their awareness of compliance and workplace culture issues, and the results are reflected in our action plans. In FY2024, we received 6,595 survey responses for a response rate of 91%.