

**Chiyoda U-Tech Co., Ltd.**

# **Anti-harassment Regulations**

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**Dated on April 1, 2019**

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## Chapter 1 General provisions

### Article 1 (Purpose)

1. These rules are stipulated for employees to comply with to prevent harassment related to pregnancy, childbirth, childcare leave, etc., power harassment, and sexual harassment.

### Article 2 (Definitions)

1. The definitions of terms used in these rules are as follows.

#### (1) Harassment related to pregnancy, childbirth, childcare leave, etc.

Words or actions (words and actions concerning pregnancy, childbirth, and the use of systems and measures stipulated in the Child Care and Family Care Leave Regulations (hereinafter referred to as "Child Care Leave, etc.") of a supervisor or coworker(s) in the workplace which harm working environment of an employee who is pregnant or has given birth, or who has applied for or obtained childcare leave, etc.

From the perspective of work assignment, safety considerations, etc., if the words or actions are objectively based on business necessity, they do not constitute harassment related to pregnancy, childbirth, or childcare leave, etc.

#### (2) Power harassment

An act of inflicting mental or physical pain beyond the proper scope of work or aggravating the work environment against a person who works in the same workplace, based on the background of superiority in the workplace such as job status or human relations.

#### (3) Sexual harassment

Disadvantage to the employee in terms and conditions of employment as a result of the employee's response against unwanted sexual behavior or harm work environment because of sexual behavior at the work place.

It does not matter what the sexual orientation or gender identity of the other party nor limited to words or actions directed toward the opposite sex.

2. The "workplace" includes all places where employees perform their work, even if they are not at their usual place of employment. The workplace also includes "banquets" outside of working hours that are considered to be an extension of the employee's work in effect.
3. The "employee" means all employees employed by the CUC, including regular employees and contract employees, temporary employees, clients, and employees of business partners.

## Chapter 2 Prohibited Acts

### Article 3. (Prohibited acts)

#### 1. Employees shall not engage in any of the following types of harassment.

##### (1) Harassment related to pregnancy, childbirth, childcare leave, etc.

- ① Suggestion of dismissal or other disadvantageous treatment with respect to a subordinate's use Child Care Leave, etc.
- ② Obstruct a subordinate or colleague from utilizing Child Care Leave, etc.
- ③ Harassing a subordinate or colleague for using Child Care Leave, etc.
- ④ Suggestion of dismissal or other disadvantageous treatment due to the pregnancy or childbirth of a subordinate.
- ⑤ Harassing a subordinate or colleague for being pregnant or giving birth.

##### (2) Power harassment

- ① Assault, injury, or other physical attack
- ② Mental attacks such as threats, defamation, insults, and abusive language
- ③ Isolation, ostracism, neglect, or other forms of separation from human relationships
- ④ Forcing the employee to do things that are clearly unnecessary or impossible to do in the course of work, or interfering with the employee's work
- ⑤ Ordering or refusing to give work to employees which is unreasonable considering abilities or experience of employees.
- ⑥ Excessive intrusion into private matters
- ⑦ Other words or deeds similar to those in the above clauses

##### (3) Sexual harassment

- ① Asking unnecessary questions or making unnecessary remarks concerning sexual or physical matters
- ② Viewing, distributing, or posting obscene pictures
- ③ Spreading sexual rumors
- ④ Unnecessary physical contact
- ⑤ Sexual language or behavior that discourages other employees from working and prevents them from exercising their abilities
- ⑥ Forcing employees to engage in dating or sexual relations
- ⑦ Dismissing an employee who protests or refuses to engage in sexual conduct or behavior, or inflicting disadvantages such as dismissal, unfair personnel evaluations, or reassignment of employees
- ⑧ To engage in any other sexual conduct or behavior that makes the other party or the employee feel uncomfortable.

2. A supervisor shall not tolerate acknowledge fact that the subordinate employee is being harassed under the preceding paragraph.

### Chapter 3 Handling of Consultations and Complaints

#### Article 4 (Establishment of Consultation Desk)

1. The Company shall establish a consultation desk in the Corporate Management Department to handle consultations and complaints regarding harassment.
2. The Consultation Desk shall be in charge of the following duties.
  - (1) Accepting consultations and complaints about harassment
  - (2) Confirming the facts of the case in which consultation or complaint has been made
  - (3) Take appropriate measures based on the facts for cases where consultation or complaints have been received.
  - (4) Handle other matters related to harassment prevention

#### Article 5. (Consultation and filing of complaints)

1. Any employee who has been harassed or witnessed harassment may submit a consultation or complaint concerning the harassment to the consultation service.
2. Consultation and complaints regarding harassment may be made not only in cases of actual harassment, but also in cases where there is a threat of harassment.

#### Article 6 (Protection of Privacy)

1. Appropriate measures will be taken to respond to consultations and complaints, taking into consideration the privacy of the persons concerned.

#### Article 7 (Prohibition of Disadvantageous Treatment)

1. The Company shall not treat an employee in any disadvantageous manner by reason of the employee's filing of a consultation or complaint regarding harassment.

### Chapter 4: Response to Harassment

#### Article 8 (Disciplinary Action)

1. The Company shall take disciplinary action against an employee who is found to have engaged in harassment in accordance with the "Employment Regulations".

#### Article 9 (Guidance and Enlightenment)

1. The Company and the managers and supervisors in the workplace shall ensure that harassment by employees does not occur.

#### Article 10 (Prevention of Recurrence)

1 . The Company shall take appropriate measures to prevent recurrence of harassment if it occurs.

#### Article 11 ((Amendment and Repeal))

1. The revision or abolishment of regulations shall be resolved by the Board of Directors. However, minor revisions or abolition of regulations, such as changes in the name of the organization, shall be resolved at a meeting of the Board of Directors. However, minor changes, such as a change in the name of the organization, shall be decided by the General Manager of the Corporate Management Division.

#### Supplementary Provisions

These Rules and Regulations shall come into effect as of April 1, 2019.