

Tohoku Electric Power Group Code of Conduct

Established in January 2017

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Under the management philosophy of “Coexistence with local community” and group slogan of “Yori, Sou, Chikara”, we grow with sustainable development of society by making efforts to the realization of smart society through the provision of energy-centered service while committing ourselves to customers and local community.

For that purpose, each and every employee will have a strong sense of mission as a public service provider and a consciousness of being creator of a smart society, and will take on unprecedented challenges and push for change while thinking of customers and communities beyond our own operations.

Also, we are strongly aware that the foundation of business operation is based on the trust of our customers and society, and each and every employee will have unwavering sense of ethics and a firm awareness and knowledge of corporate ethics and laws and regulations with which they comply, but also work as one as the Tohoku Electric Power Group, and will further strengthen our corporate culture of not allowing inappropriate events to occur, not overlooking them, and disclosing appropriate information.

Based on the above recognition, we will act in accordance with the following “Principles of Conduct” and “Code of Conduct”, and create “Yorisou” value that only Tohoku Electric Power Group can do, while building strong trusting relationships with customers, local people, shareholders and investors, business partners, and employees.

Principles of Conduct

1. Provision of service contributing to the realization of a smart society

While placing the highest priority on ensuring safety, we provide the services contributing to the realization of smart society that customers can get a comfortable, safe and secure living space by focusing on stable supply of low-cost energy that satisfying customers' livelihoods and supporting business activities.

2. With local community

By promoting the efforts that contribute to solving local issues while staying close to the community, we will contribute to the sustainable development of the community and cooperate with local community as a member of community.

3. Ensuring compliance with corporate ethics and laws and regulations

In all our business activities, we will not only ensure compliance with all relevant laws and regulations and the spirit of the law, but also ensure that corporate ethics are upheld at all times.

4. Environmental considerations

Recognizing that the business activities of the corporate group are deeply involved in the formation of a sustainable society, we will proactively address the global warming issues and environmental preservation.

5. Promotion of transparent business activities

We will make broad and smooth communication and information disclosure with members of the community to promote highly transparent and open business activities.

6. Respect for the individuals and creation of an open and energetic corporate culture

We will respect the personality and individuality of each employee, and promote the creation of open and energetic corporate culture in which employee can cooperate with each other and exchange their opinions freely and actively.

Code of Conduct

1. Provision of the service that contributes to the realization of smart society

(1) Provision of the service that contributes to the realization of smart society

By collaborating with a wide range of partners, we will provide services that contribute to the realization of a smart society in which customers can enjoy comfortable, safe, and secure living space, and aim to maximize the wealth of our customers.

(2) Stable supply of low-cost energy that supports customers' daily lives and business activities

As a corporate group work responsible for public utility services, we are aware of our mission, and make a full effort to stable supply of low-cost and environmentally friendly energy that supports customers' living and business activities and improve the service so that we can earn trust and satisfaction from customers.

(3) Ensuring safety

Based on the recognition that ensuring safety is the top priority in all our business activities, we will not only comply with the safety-related laws and regulations, but also thoroughly implement the following.

- As for nuclear power and other facilities owned and operated by the corporate group, we will ensure that necessary measures are always taken to ensure safety.
- As for the work procedure and environment at the work site, we will place top priority on safety of the public and workers.
- As for important safety-related information on work site, we will share and utilize it among the parties concerned.

2. With local community

By promoting the efforts that contribute to solving local issues and the efforts that truly beneficial to the community through our business activities while staying close to the community, we will contribute to the sustainable development of the community and cooperate and collaborate with the community as a member of community, and build trust based on mutual understanding.

3. Ensuring compliance with corporate ethics and laws and regulations

(1) Compliance with laws and regulations

We will ensure compliance with all laws and regulations and the spirit of the laws related to the business activities of the corporate group. In particular, we will ensure the following.

➤ **Handling of procedures, records, and management in accordance with laws and regulations**

We will ensure that the procedures including the acquisition of permits and approvals, notification, and report, etc. in accordance with relevant laws and regulations including the Electricity Business Act, and records and management of the data related to business activities and operations should be appropriately followed.

➤ **Ensure compliance with the regulations of conduct and secure fair competition**

We will ensure the compliance with the regulations of conduct defined in the Electricity Business Act, as well as striving to ensure fair competition among businesses.

➤ **Secure fair transaction**

We will ensure to comply with transaction-related laws and regulations including the Antitrust Law, and conduct the business on the basis of fair and free competition.

➤ **Protection of intellectual property**

We will protect and utilize the intellectual property rights of the corporate group and respect the intellectual property rights of others.

➤ **Prohibition of insider transaction**

Directors and employees who are in a position to obtain important information about the company will not trade in shares or other securities of the corporate group or other listed companies for personal gain prior to the release of such information.

➤ **Protection of personal information**

In handling personal information, we will be fully aware of its importance and ensure compliance with the Personal Information Protection Law and other relevant laws and regulations. Specifically, personal information including customer information and shareholder information required in the

course of business will be collected in an appropriate manner after the purpose of use is clearly stated. In addition, personal information obtained in the course of business will be thoroughly managed to prevent leakage, etc.

➤ **Thorough information management**

We will not disclose or divulge any undisclosed information regarding corporate management, information regarding customers, information regarding shareholders and investors, information regarding business partners, or information regarding directors, officers, and employees, including postings on social media, etc., that we become aware of in the course of performing our duties, whether during our tenure of office or after retirement.

(2) Strict adherence to corporate ethics

We will always ensure corporate ethics in deciding how to proceed with management, handle business and other corporate activities. In particular, we will ensure the following.

➤ **Resolute response to antisocial forces**

We will take a firm stand against antisocial forces and groups that threaten social order and safety.

➤ **Healthy relationship with politics and government**

As a company that provides public service, we will keep in mind the spirit of the law and corporate ethics, and maintain sound and normal relationships with politics and government.

➤ **Cooperation with the international community**

In our international business activities, we will not only comply with international rules and local laws, but also respect human rights, local cultures and customs, and conduct management that contributes to their development.

➤ **Gifts and entertainment**

Directors and employees will not accept gifts or entertainment from business partners that exceed the bounds of socially accepted norms, whether in the form of gifts or entertainment.

➤ **Distinction between public and private matters**

We will act with attention to the distinction between public and private matters. In particular, we will not engage in personal conduct during

working hours or use company property for personal purposes.

➤ **Act honestly in non-work activities**

In our private activities, we will act honestly based on social common sense and an awareness of our role as a public service provider. In particular, we will never engage in any conduct, such as driving under the influence of alcohol, that would endanger society or bring the company's reputation into disrepute.

4. Environmental considerations

(1) Efforts to address global warming issues, etc.

We will actively work to mitigate climate change, including global warming, by reducing greenhouse gas emissions from our business activities, and promote climate change adaptation efforts.

(2) Environmental conservation activities

We will manage and dispose of waste properly and reliably, promote waste reduction, reuse, and recycling, and steadily implement environmental preservation activities.

(3) Environmental communication

We will engage in environmental activities in cooperation with local communities and strive to disclose environmental information appropriately and proactively.

5. Promoting transparent business activities

(1) Ensure communication

In implementing our corporate activities, we will engage in wide-range and smooth communication with customers, local residents, shareholders, investors, business partners, employees, and others.

(2) Sincere public relations and public outreach activities

When conducting public relations and public hearing activities, we will be factual and sincere. In addition, we will not advertise in a manner that is defamatory of others or injurious to personal dignity.

(3) Disclosure of information

We will proactively disclose information to our customers, local residents, shareholders, investors, business partners, employees, and others.

6. Respect for the individual and creation of an open and energetic corporate culture

(1) Respect for the individual

We respect the human rights, personality, individuality, and privacy of each employee. Personal information of employees held by the corporate group will not be disclosed without the consent of the individual, unless required by law or by legitimate business necessity.

(2) Prohibition of discrimination on the basis of sex, etc.

We do not discriminate against employees based on gender, age, disability, race, nationality, place of birth, ideology, creed, or religion. In addition, we do not tolerate violent behavior, verbal abuse, sexual harassment, or any other similar behavior in the workplace.

(3) Creating an open and energetic corporate culture and fostering an organizational culture of improvement

We will deepen cooperation among companies, divisions, and related parties, both inside and outside the company, and promote the creation of an open and energetic corporate culture in which opinions are freely and actively exchanged in the workplace, and diverse human resources can demonstrate their individuality and abilities and boldly take on new challenges. When inappropriate events are identified, we will foster an organizational culture that proactively accepts and remedies them. In this way, we will strive to prevent the occurrence of situations in which legality and ethics are questioned.

7. Response from top management and managers

(1) Ensuring the spirit of this guideline

Directors and managers will demonstrate leadership in following this guideline and make every effort to ensure the spirit of this guideline in their own roles. Also, they will strive to constantly monitor internal and external opinions to ensure thorough compliance with corporate ethics and laws and regulations.

(2) Top management responsibility

In the event of a serious violation of this guideline, top management will declare its intention to solve the problem itself internally and externally, investigate the cause, and take measures to prevent recurrence. Also, top management will promptly and accurately disclose the information and fulfill its accountability, clarify its authority and responsibility, and punish those involved including its own.