

Basic Policy on Customer Harassment

1. Introduction

The PARK24 GROUP's states "We create new forms of comfort and convenience by responding to the needs of today and anticipating the needs of tomorrow." as our group philosophy and we are working daily to improve our services to realize this philosophy. We also consider it essential to respect the basic human rights of all those involved in our business, as well as to ensure the physical and mental health and safety of each and every employee and to create a safe working environment.

Based on this approach, the PARK24 GROUP has established the PARK24 GROUP Human-rights Policy in accordance with the United Nations guidance principles on business and human-rights and other international standards, and is promoting initiatives to respect the human rights of all stakeholders. In this context, the GROUP has formulated a basic policy against customer harassment based on the Human-rights Policy, in order to respect the human rights of customers and employees and to live up to the trust and expectations of customers.

2. Conducts considered to be Customer Harassment

Customer harassment is defined as any request or behaviour from customers (not only direct users of our services, but also those who are broadly involved in our business activities) that lacks validity in the content of the request or, even if the content of the request is valid, the means and manner of achieving the request are socially unjustifiable and may harm the working environment of the employee.

The following descriptions are examples based on the Company Manual on Customer Harassment Countermeasures published by Japan's Ministry of Health, Labour and Welfare, and are not intended to be limited to these. These conducts may be committed by any means, including in person, over the phone, by email and on social networking services.

Physical and psychological aggression

- Physical violence or injury
- Slander, defamation, insult, verbal abuse, denial of character or defamation

Intimidating language or behaviour

- Threats and intimidation by means of threats, abuse, verbal abuse, destruction of property, etc.
- Threats implying exposure on social networking services or in the media

Continuous (repeated) and persistent (insistent) behaviour

- Repeated demands for similar content
- Tone policing, faultfinding and relentlessly accusing language and behaviour

Restrictive behaviour

- Prolonged unreasonable detention, detention outside work hours
- Calls and demands for response at unreasonable times and places

Excessive demands without justifiable reasons

- Demands for apologies without rationality
- Abusive language taking advantage of a superior position, demand for special treatment
- Demands for internal penalties such as dismissal or transfer concerning PARK24 GROUP employees
- Unreasonable demands for money, refunds, price reductions, services that are not provided or that the system cannot accommodate

Any other conduct that constitutes discrimination or harassment

- Acts of invasion of privacy
- Various types of harassment, including sexual harassment
- Trespassing into business premises, business space, etc.
- Any other acts that the GROUP deems to constitute customer harassment

3. Measures to deal with customer harassment

Firstly, the PARK24 GROUP will endeavour to deal with customers in a courteous manner and build good relationships with them to prevent customer harassment from occurring. The GROUP will then take the following actions.

Internal measures

- We will provide our employees with training on knowledge of customer harassment and how to deal with such occasion
- We will take appropriate action in the event of customer harassment and utilise employee care consultation services as necessary
- We will cooperate with external experts such as the police and lawyers for a more appropriate responses

External responses

- As stated above, we will strive to prevent the occurrence of customer harassment, and if a case should arise that falls under this category, we will take a firm stand. We will also endeavour to hold rational discussions to reach a reasonable solution and seek the understanding of our customers
- If we consider a case to be malicious customer harassment, we may stop responding or conducting business with the customer without notice

4. Requests to customers

Most of our customers have used our services without any incidents falling under 2. above, but we ask for your continued understanding and cooperation as we will strive to build better relationships with our customers and provide high quality services by complying with the preceding paragraph. We ask for your continued understanding and cooperation.

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