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Sustained Growth and Reinforcing Our Reputation for Reliability

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Commitment to CSR

The Chiyoda Group’s CSR activities and CSR promotion structure.

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Chiyoda Group CSR Vision

The Chiyoda Group’s CSR Vision, to earn the trust and understanding of all stakeholders.

- ▶ [Our Values - Chiyoda Group CSR Visions -](#)

A Reliable Company - CSR Vision 1 -

The Chiyoda Group strives to be a reliable company to our customers and other business partners by providing world-class technologies and knowledge.

- ▶ [Quality Management Initiatives](#)
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Environmental Initiatives - CSR Vision 2 -

The Chiyoda Group promotes harmony between the global environment and economic and social activities and remains an invaluable company to society.

- ▶ [Environmental Management System \(EMS\)](#)
- ▶ [Environmental Conservation Activities](#)
- ▶ [Low Carbon Society](#)
- ▶ [Chiyoda Group Companies Activities](#)
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Social Contributions through Business Activities - CSR Vision 3 -

The Chiyoda Group contribute to local communities through our engineering activities.

- ▶ [Contribution to Local Communities](#)
- ▶ [Human Resources](#)
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Respect for Human Rights - CSR Vision 4 -

The Chiyoda Group respects the human rights and creates a corporate culture where people are motivated, and of which employees and their families are proud.

- ▶ [Employee Skill Development and Work Environment](#)

- ▶ [Occupational Health and Safety](#)
- ▶ [Crisis Management Initiatives](#)

Commitment to Fairness - CSR Vision 5

The Chiyoda Group is dedicated to achieving greater transparency and stability by conducting our operations fairly in accordance with the highest ethical standards.

- ▶ [Compliance Initiatives](#)
- ▶ [Risk Management](#)
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Message from the President



The Chiyoda Group's Corporate Social Responsibility (CSR)

[Corporate philosophy]

Enhance our business in aiming for harmony between energy and the environment and contribute to the sustainable development of a society as an integrated engineering company through the use of our collective wisdom and painstakingly developed technology.

The Chiyoda Group's Corporate Social Responsibility (CSR)

Since its founding 65 years ago, the Chiyoda Group has worked to contribute to the advancement of society with the aim of realizing its corporate philosophy centered on "Energy and Environment in Harmony." As an engineering company, we build infrastructure that requires state-of-the-art technologies in various countries. The energy industry has recently undergone structural changes such as the shift to natural gas and renewable energy. Rapid changes have also taken place in the industry environment, notably the shale revolution that has revitalized the North American market. The demands of society are becoming more diverse as well.

In this context, I believe the Chiyoda Group's corporate social responsibility is to accurately assess current demands and deploy engineering to provide the value that society requires for addressing global challenges such as poverty, environmental issues and securing resources, consistent with our Corporate Philosophy.

Sustained Growth and Reinforcing Our Reputation for Reliability

In November 2012, the Chiyoda Group joined the United Nations Global Compact (UNGC), the first company to do so in the Japanese construction industry. Our objective in joining the UNGC is to advance our CSR efforts on a global basis and firmly establish CSR as a unifying force of the Chiyoda Group. We will align the Chiyoda Group CSR Vision with the Ten Principles of the UNGC to further raise awareness of CSR among all Group employees and ensure that it is reflected in their behavior.

Respecting the Global Code and Ensuring Complete Compliance

The energy-related industries, where Chiyoda plays its major roles, are amid the structural changes in not only Chiyoda but also their business regions and partners which are to diversify more than ever.

A fair code that can be understood by one and all is essential. In that sense, we have continuously supported and will continue to support the spirit of the UNGC for human rights, labor standards, environment and anti-corruption. We will continue to address employees the importance of showing this spirit in day-to-day business and other activities. We will also work on our business partners and other parties concerned to

understand and comply with the Chiyoda Group Code of Conduct, which reflects the spirit of the UNGC.

We are particularly endeavoring to improve transparency in all Group business activities in connection with adhering to Japanese and overseas laws and regulations, international agreements, and respect for human rights, compliance with harassment prevention, anti-corruption, information security and the like. We have newly established the Compliance Committee under the direct control of the Executive Committee and the Group Company Liaison Meeting on Compliance.



June 2015

A handwritten signature in black ink that reads "Shogo Shibuya". The signature is fluid and cursive, with the first name "Shogo" and last name "Shibuya" clearly distinguishable.

Shogo Shibuya

President & CEO
Chiyoda Corporation

* The UNGC is a voluntary global initiative that encourages businesses to act as good corporate citizens and achieve sustainable growth by exercising responsible, creative leadership. It is centered on ten principles concerning human rights, labor, the environment and anti-corruption.

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The Chiyoda Group's CSR

Society has become increasingly interested in CSR (Corporate Social Responsibility). Very early in its history, Chiyoda Corporation realized that its corporate activities serve as an effective means of fulfilling its obligations to society.

Since its foundation in 1948, Chiyoda Corporation's founder, Akiyoshi Tamaki, stated from the beginning that "corporations traditionally contribute to society by improving people's standard of living by providing them with services and property. However, we are now at a point where corporations have become a permanent fixture in society, and as their role in and influence on society increase, the more socially responsible they are expected to be. If corporations do not contribute to the welfare of society as expected, or have its trust, their very existence is at risk." Thus, the Chiyoda Group has incorporated the principles of CSR in its business activities and continued to earn the trust and understanding of every stakeholder since its foundation, and has also established its [CSR Visions](#). Each employee is to reflect the visions in their activities and the processes and achievements are publicly introduced in this website.

- Ongoing Initiatives based on United Nation's Global Compact**

In November 2012, the Chiyoda Group joined the United Nations Global Compact (UNGC*) to advance our CSR efforts on a global basis including addressing the issues of human rights, labor, the environment, anti-corruption etc. in line with the UNGC principles as the global codes understood by one and all, and to firmly establish CSR as a unifying force of the Group. In order to effectively promote CSR, Chiyoda has further been participating in the study groups of the Global Compact Network Japan on SRI(Socially Responsible Investment)/ESG(Environmental, Social & Governance), Human Rights, Anti-corruption and Supply Chain Management.

* The United Nation's Global Compact (UNGC) :
Note: The UNGC is a voluntary global initiative that encourages businesses to act as good corporate citizens and achieve sustainable growth by exercising responsible, creative leadership. It is centered on ten principles concerning human rights, labor, the environment and anti-corruption.

- Group CSR Reports**

The Group has published Corporate Social Responsibility (CSR) Report by introducing our activities relating to the aspects of "economy", "society" and "energy" in addition to "environment" .

- [Group CSR Report 2014 \(PDF/3.49MB\)](#)
- [Group CSR Report 2013 \(PDF/1.8MB\)](#)
- [Group CSR Report 2012 \(PDF/2.61MB\)](#)
- [Group CSR Report 2011 \(PDF/4.1MB\)](#)
- [Group CSR Report 2010 \(PDF/2.73MB\)](#)
- [Group CSR Report 2009 \(PDF/3.16MB\)](#)
- [Group CSR Report 2008 \(PDF/3.36MB\)](#)



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Commitment to CSR

As an integrated engineering company, the Chiyoda Group pledges to contribute to the sustainable development of society through its business activities, and to constantly strive to increase corporate value and earn the trust and understanding of all stake holders by adhering to the principles shown in following our CSR Visions.

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- [CSR Report 2007_\(PDF/1.00MB\)](#)
- [CSR Report 2013_\(PDF/2.05MB\)](#)

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CSR Promotion Structure

Sustainable Initiatives for the Future

Taking all the above into account, Chiyoda Group has been making every effort to enhance its CSR activities to date. In April 2015, Chiyoda reorganized CSR into IR, PR & CSR Section under Corporate Planning Unit in Corporate Planning & Management Division and Compliance Unit under Risk Management Division. This reorganization aims to grasp the exact requirements of society expected of the Chiyoda Group and effectively proceed with living up to such expectations so that Chiyoda can reinforce CSR including compliance in collaboration with its domestic and overseas group companies, Group Company Liaison Meeting on CSR^{*1}, Compliance Committee, Group Liaison Meeting on Compliance and Export Control Committee. Besides, the CSR promotion staff^{*2} system has been adopted to further advance CSR activities. We will also continue to support the recovery from the Great East Japan Earthquake through our business and by supporting employee volunteers in the affected areas.



^{*1} Group Liaison Meeting on CSR

"Group Liaison Meeting on CSR" means an organization that deliberates CSR report/establishes annual program on CSR activities, compiles business achievements/social contribution activities, activation of environment-related and CSR activities/promotion of United Nations Global Compact among the Chiyoda Group. (Conducted domestically, conduct information exchange with group corporations abroad regularly.)

^{*2} CSR promotion staff

"CSR promotion staff" are volunteer members who will take the lead in CSR activities consisting of employees in all Chiyoda group companies.

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CSR Policy - A Legacy for the 21st Century -



In 1972, Chiyoda issued a booklet entitled Legacy for the 21st Century that described the need for harmony between the advancement of humankind and conservation of the natural environment. The booklet declared that Chiyoda would always work to develop technologies that help solve problems involving energy and the environment. This spirit is passed on to the new generation of Chiyoda people so that our DNA remains the nucleus of all our technologies.

[Legacy for the 21st Century \(PDF1.7MB\)](#) Japanese Only

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21世紀への遺産

エコロジー・バランスの回復による人類の発展と自然環境の調和



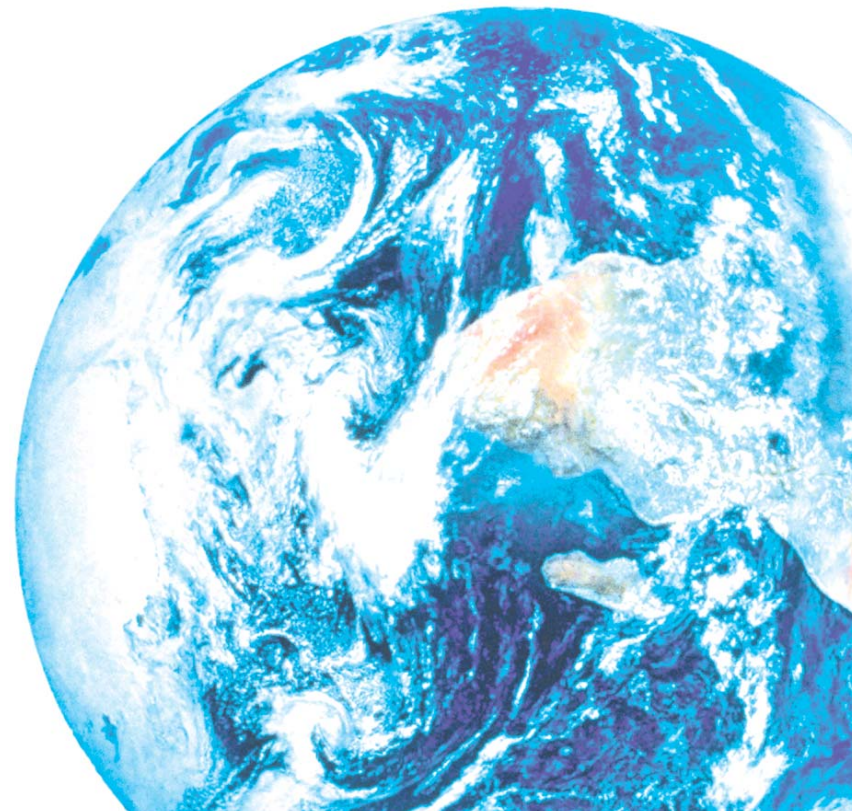
復刻版



はしがき

過去数十億年の間、地球上の生命は気候の変化、大気の組成、海洋・地表の生命維持の特性・自然の蓄積、自然の循環という、いくつかの変数が比較的安定した相互関係のなかでのみ、生きることが可能でした。そして生命をもつすべての有機体は、この惑星をとりまく大気圏、地上圏、それに水圏といわれる薄く広がった生物層の内部で、各種の微妙に均衡のとれた共生関係という体系のなかに生存していたのです。

1957年 スプートニクの打ち上げによって物理的な世界観が拡大した結果、地球という人類の住む場所の限界が明確にされました。そしてその限界内で生命を維持するいくつかの力が不安定な均衡を保っていることも明かとなりました。更に私達は、その不安定な均衡の破壊を通じて、一般的にこれら体系の関係の多くが狭い許容度しかもっていないことを最近になって知るようになったのです。



21世紀への遺産

美しい自然の回復

私達がふだん考えてもみない大気中の酸素は、植物が20数億年もかかって光合成した結果、産み出され、蓄積された貴重な財産です。そして崇高なる自然。満々と水をたたえた湖、精澄な川の流れ、うつそうと樹木の茂る山々、香わしき潮風をのせて寄せくる波、波... 紺青の海。しかし私達は、「文明の発達」の名のもとに、産業革命から現代の技術革新に至るまで、このいくたの生命を生み出し、詩人の心をときめかせてきた崇高な自然を破壊し、その美しさを略奪してきました。しかしその結果として、人類はいま自然からの報復におののいているともい

えましょう。大気は汚れ、川はよどみ、海はヘドロで臭い、植物は枯れ、自然はその本来の自律作用を失い、まさに死に瀕しています。公害は自然のみでなく、私達の生活の中に至るまで深く静かにまんえんして止まる所をしりません。悪因子が悪因子を呼び、相乗効果によって近年その加速度は増すばかりです。

私達はいま、大きな「決断」を迫られています。それは自然から何を略奪するかではなく、すでに破壊された自然の自律の原理をいかにして回復するかを問われているからです。

自然と人間の調和、相補の原理に

立つ共存関係、則ち植物系、動物系、鉱物系、細菌系をも含めた、いわゆるエコロジカル・バランスを図り、新しいヒューマンイズムの哲学を再建しなければなりません。

この広大無辺な宇宙の中で、最も特別な存在であるこの美しい地球を、全人類の共通財産として“21世紀への遺産”としようではありませんか。





エコロジー

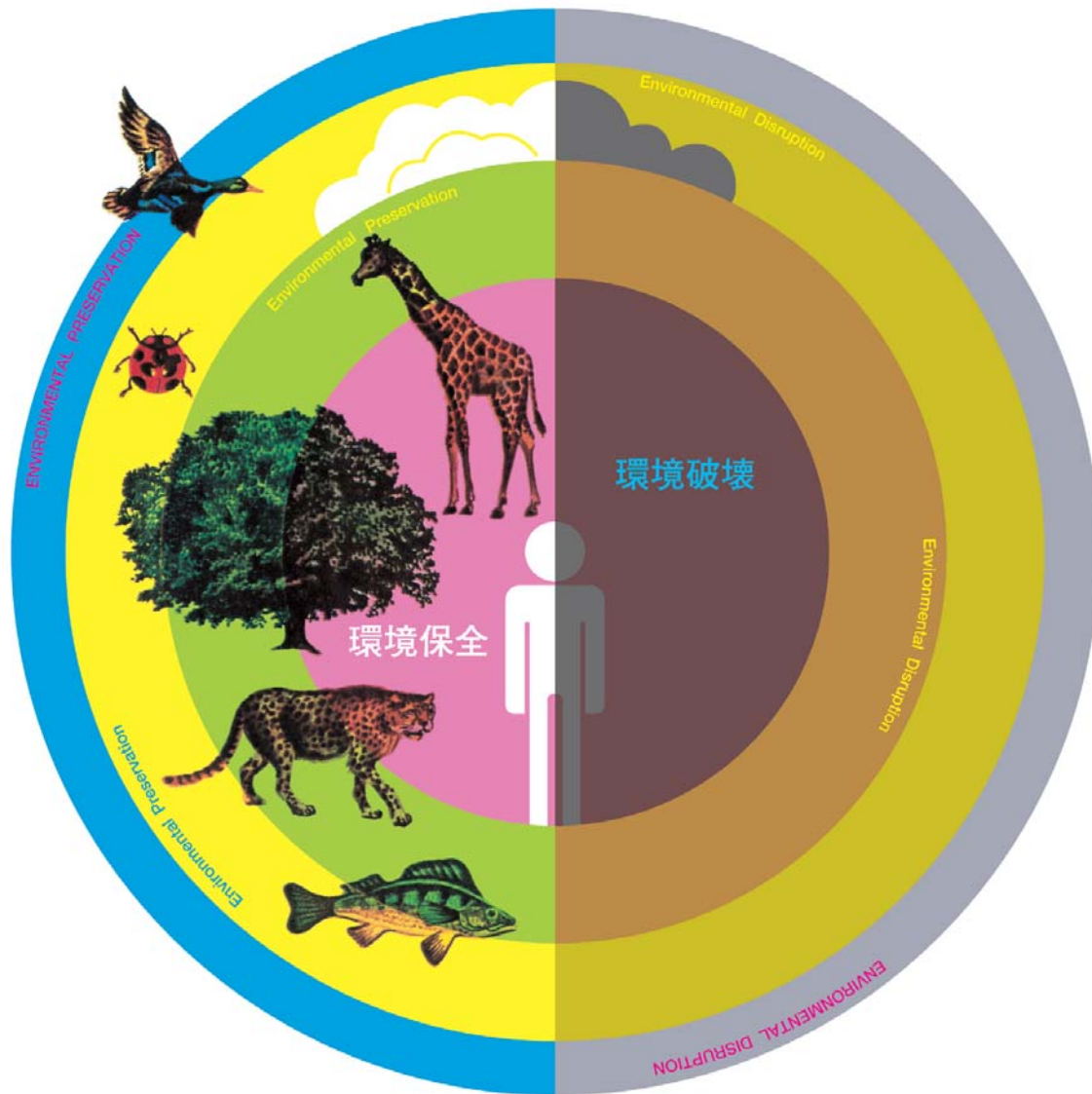
よりよい環境を作るために

先に開催された「公害問題国際シンポジウム」で、「公害」の英訳として環境破壊ともいうべき "Environmental Disruption" という用語が採用されています。これは公害の人災性を強調したものに他なりません。

文明が高度に発達し、各産業が技術革新による新方法や新製品を開発するに伴い、人類にとって好ましくない物質もまた大量に副生されてきました。これらの有害な物質は空気を汚し、河川を濁し、時と共に人間の生活環境を悪化させています。こうした環境の汚染は、一口に言えば自然環境がもつ自律、自浄作用を上回る汚染物質の負荷がある場合にみられる現象で、換言すれば、汚染物質を受入れる環境の容量に限度があったということです。即ち、この場合がエコロジカル・バランスの欠除の状態になっているわけです。このようなエコロジカル・アンバランスの状態を正常な状態に回復させるためには、個々の個別対策ではなく、少数特定の私企業による特定地域の局地的な公害対策はもち論のこと更に、都市公害も含め、国土全般、ひいては大陸規模や地球全体をカバーするグローバルな視野からの対策も考慮しなければなりません。何故ならば、公害問題は「ゴムまり理論」のようなもので、ゴムまりのある一点を押すと、どこかわからないとんでもないところがふくらむといったように、公害問題も科学技術の本質、或は宿命、矛盾ともいえるものにその根源を発しているからです。

このような立場に立って、環境問題をより科学的に、体系的に取り上げようというのが、総合科学としてのエコロジーです。そもそもエコロジーとはギリシャ語の「家」を意味する「Oikos」から生まれた言葉で、家、更に広くは環境についての学問を意味し、初期のエコロジーは植物を対象にした植物生態学でした。

後に対象は動物、更に人類までも含む生物全体に



拡大し、20世紀初頭には生物学の総合分野としてエコロジーの基礎ができたのです。最近では環境問題の深刻化と共に特に米国を中心としてエコロジーが脚光を浴び、その対策も生物学の研究室を離れて全人类的な自然環境、社会環境の問題にまで拡大してきています。

人間と自然との調和

産業と自然の均衡を保つために

それでは具体的に環境問題をエコロジカルに把握するとはどういうことなのでしょう。

それは

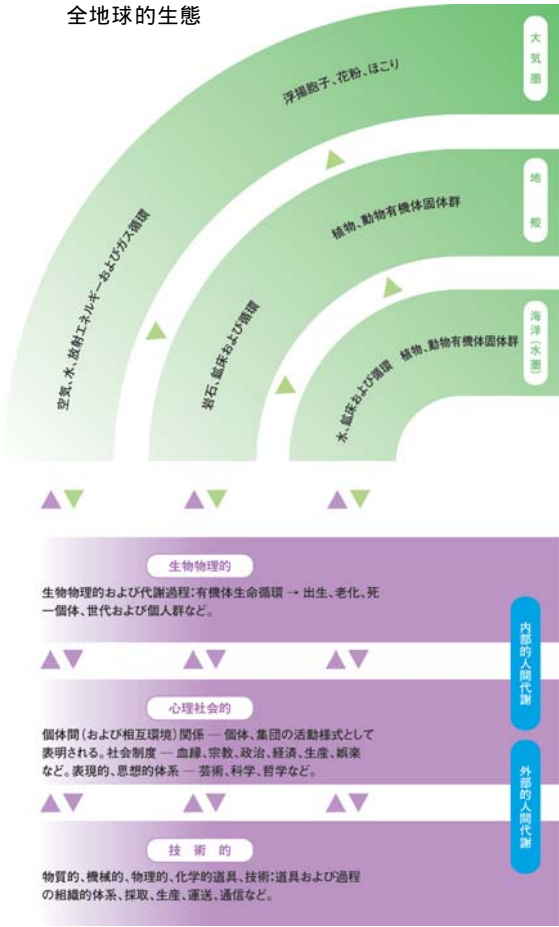
- 1 水、酸素などの無生物系
- 2 草木、森林などの植物系
- 3 肉食動物、草食動物、昆虫などの動物系
- 4 バクテリアなどの分解体系など、それぞれの要素によって自然環境の調和が保たれているのです。このバランスが何等かの汚染物質などによりくずされた場合に公害問題が発生する このメカニズムを解明することが公害問題解決の核心に迫るものであるという考え方です。

例えば、無制限に港に製紙産業の廃棄物を投棄しつづければその結果ヘドロ公害をひき起こします。その場合、港だけを局地的に考えれば、ヘドロ問題は殆ど解決されます。しかし、海洋に投棄されたヘドロをプランクトンが食べ、そのプランクトンを魚がエサにし、その魚を人間が口にすれば、ヘドロの中に含まれる有害物質は結局人間の体内に入り、人間の健康をそこなう結果になります。このように自然環境を生態学的にとらえると、ヘドロ問題ひとつにしても、海洋

投棄という方法は極めて問題が多いということがうなずけます。産業、消費活動と自然循環の関係を明確に把握することによって、どのような対策が自然循環活動の均衡を保たせるか　その解決策の解明が最大の目的になっています。

従ってこのエコロジーを環境問題に応用する場合には、いわゆるゼネラル・システムズの解析が不可欠となります。このゼネラル・システムズの解析というのは、産業や消費活動を中心とした人間活動のシステムと、水、熱、空気、動物、植物など自然の要素をシステムティックに総合してとらえようというものです。従って、この解析のためには、生物学、化学、地球物理学、医学、人類学、経済学、システム工学など、広範なあらゆる専門分野の知識、技術を結集しなければなりません。つまり、産業や消費活動と自然との調和をシステムティックに解明し、産業活動が自然の循環活動の均衡にどのような影響を与えているかを把握することです。そして同時に、経済性を十分考慮した上でシステム・アナライズし、自然条件に適した産業配置や産業構造を考えていかなければなりません。

こうして、自然と人間の関係を徹底的に究明、分析し、合理的に総合して、科学技術の矛盾を克服していこうとするものです。



石油精製

- 蒸留
- 常圧原油蒸留
- 減圧蒸留及バキューム・フラッシュャー
- 再蒸留
- ガス回収
- LPG精製
- 熱転化
- 熱分解
- ヴィスブレ・キング
- フルイッド・コーキング
- ディレイド・コーキング
- 接触分解
- 流動床式接触分解
- 移動床式接触分解
- 改質
- 接触改質
- 水素化分解
- 留出油水素化分解
- 残渣油水素化分解
- 水素化脱硫及水素化脱窒素
- ナフサ水素化脱硫及水素化脱窒素
- 灯油水素化脱硫
- 軽油水素化脱硫
- 減圧軽油水素化脱硫
- 残渣油水素化脱硫
- 水素化精製
- バイロリシス熱分解ナフサ水素化精製
- 灯油煙点向上
- 高滑油水素化仕上
- 高滑油水素化分解
- 異性化
- ナフサ低温異性化
- ナフサ高温異性化
- アルキル化
- 硫酸アルキル化
- ふっ化水素アルキル化
- 重合
- 溶剤抽出
- SO₂抽出
- プロパン脱臭
- フルフラ・ル抽出
- フェノール抽出
- 芳香族回収
- 脱臭
- MEK脱臭
- プロパン脱臭
- 発汗
- 凝縮
- スプレー抽出油
- MEK脱油
- スイートニング
- 酸化スイートニング
- 抽出スイートニング
- 抽出、酸化スイートニング
- 化学処理及白土処理
- 酸処理
- 苛性処理
- 白土処理
- パラフィン分解
- モレキュラ・シーブ
- 尿素付加
- その他
- 硫酸回収
- 水酸化ソーダ製造
- 電気式脱塩
- 電気式処理
- 化学的脱塩
- ガソリン混合
- 高滑油混合
- 凝成型
- アスファルト製造
- グリース製造
- 廃油処理
- 廃水処理

石油化学及化学

- カーボン・ブラック
- 一酸化炭素、フォスゲン
- メタン
- 塩素化メタン
- メチルクロライド
- クロロホルム
- 四塩化炭素
- アセチレン
- メタノール
- ホルムアルデヒド
- ポリアセタール樹脂
- メチル・アミン
- ジメチル・ホルムアミド
- ハイドロジェン・シアンアミド
- ポリカーボネイト樹脂
- エチレン
- ポリエチレン
- 高密度
- 低密度
- アセトアルデヒド
- 酢酸
- 過酢酸
- ビニル・アセテート
- ポリビニル・アセテート
- 酢酸エステル
- エチル・アルコール
- エチレン・オキサライド
- エチレン・グリコール
- エタノール・アミン
- エチレン・デイクロライド
- 塩化ビニル
- ポリビニル
- トリクロロエチレン
- パークロロエチレン
- エチル・ベンゼン
- ステレン
- ポリステレン
- 四塩化鉛
- プロピレン
- プロピレン四量体
- ポリプロピレン
- プロピレン・オキサライド
- プロピレン・グリコール
- アクリル酸
- アクリル酸エステル
- アクリロニトリル
- ポリアクリロニトリル繊維
- アクリルアミド
- アセトン・シアンヒドリン
- メチル・メタアクリレート・モノマー
- アリル・クロライド
- エビクロロヒドリン
- エボキシ樹脂
- グリセリン
- インブレン・アルコール
- エチルヘキサノール
- エチレンプロピレン・ラバー
- ブタジエン
- ポリブタジエン
- ABラバー
- SBラバー
- ABS樹脂
- n-ブテン
- メチル・エチルケトン
- ポリブテン
- イソブテン
- ブチル・ラバー
- ポリブチル・フェノール
- イソブタノール
- クロロブレン
- インブレン
- ポリインブレン
- ベンゼン
- アルキルベンゼン
- フェノール
- シクロヘキサン

- カプロラクタム
- アジピン酸
- ナイロン-6
- ナイロン-66
- ペンタエリ・スリートール
- ポリエステル繊維及樹脂
- フェノール樹脂
- ニトロベンゼン
- アニリン
- BHC-DDT
- 無水マレイン酸
- テトラヒドロフラン
- キシレン
- オルキシレン
- メタキシレン
- パラキシレン
- 異性化
- 無水フタル酸
- フタル酸エステル
- テレフタル酸
- ジメチル・テレフタル酸
- イソフタル酸
- トルエン
- ナフタリン
- ノルマル・パラフィン
- 石油タンパク
- 高級アルコール
- 尿素樹脂
- ソルビット
- シュガー・エステル
- グルタミン酸ソーダ
- アミノ酸
- グルコース
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- 蔗糖
- プロセス
- オキシクロロネーション
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- LPG
- 超低温ガス精製
- 合成ガス及ガス処理
- 水素
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- メタノール用
- オキシ合成用
- 都市ガス
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- 天然ガス蒸気改質
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- 部分酸化法による合成ガス及水素
- 炭酸ガス除去
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- 一酸化炭素変性
- メタン化
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- 一酸化炭素除去
- 化学肥料
- アンモニア
- 硝酸安
- 燐安
- 硫酸アンモニュ・ム
- 燐硝安
- 硝酸塩塩
- NPK肥料
- 尿素
- 無機
- 硝酸
- 燐酸
- 硫酸

将来への展望

無公害による美しい国土の再開発

公害は世界各国にとっても新しい問題であるため、既存の法体系や制度では必ずしも適切に対処し得なくなっています。特にわが国の場合、高度経済成長による国民総生産世界第二位とはうらはらに、公害は世界のどの国よりも多種にして多様、そして深刻であるのも事実です。

このような情勢から公害へのアプローチとして、エコロジーによる分析は科学的対処法のひとつとして重

要視されています。また一方産業部門別に公害の発生額とその防止費用等を数量化することにより、公害防止対策がそれぞれの産業に与える費用と効果を分析し、同時に公害防止のための設備投資が諸物価にどのようにハネ返るか等の経済問題についても、十分究明されなければなりません。

そして世界各国の産業界から「公害ダンピング」などという非難を受

けることのないよう公害と産業経済の関係を明確にして、公害のない望ましい経済成長のあり方を追求することが必要となります。また技術上の問題からみると、あらゆる製造プロセスは無公害プロセスの開発を目標にしなければなりません。即ち、今後新設されるプラントは、エコロジーを基礎とした無公害プラントを指向しなければならないということです。具体的にいいますと、プラン

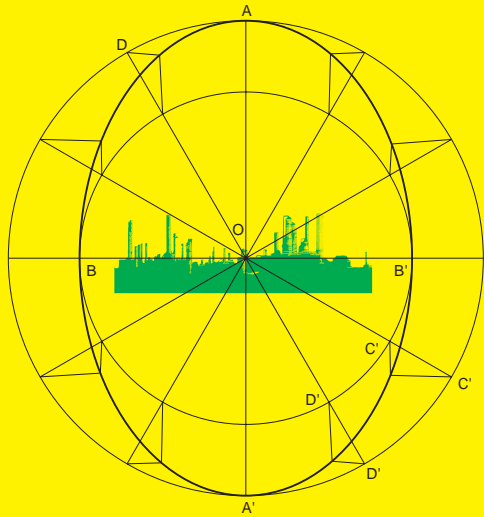
トを計画する場合、どのようなプロセスをどのように組合わせると、どういう排出物がどこへ出て、どのように変化するかという、いわゆる廃棄物のプロセス・フロー・シート、マテリアル・バランスの作成が必要となります。これは生産工程と同様に、廃棄物が全く安全に消滅するまで徹底的にその経路を追跡するもので、二次公害、三次公害を未然に防ぐための方策でもあります。この場合、

どのような方法が合理的で最も環境に適合するかを具体的に考える、いわゆるシステム・アナリシスを行い、同時に前述のエコロジーの立場も十分に検討しなければなりません。

しかし、要はこのような科学的方法を如何に具体的な政策に反映していくかが最大の課題といえましょう。

エコロジーによって、単に人間活動を自然活動の相互関係を解明するだけでは十分とはいえません。その成

果を崇高な理念のもとに勇断をもって実行することです。そして、日本列島に於ける産業の配置を如何にするか、また産業構造をどのようにすべきかなどの長期計画に拡大し、新しい国土再開発計画にまで発展させなければなりません。





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Chiyoda Group CSR Vision

Our Values - Chiyoda Group CSR Vision -

Our corporate social responsibility is to fulfill the Chiyoda Group Corporate Philosophy.
The Group corporate philosophy shows the mission that we should fulfill. The CSR Visions are values that all Chiyoda Group members should share in order to achieve this mission.
The Group have also established the Code of Conduct of the Chiyoda Group and the Compliance Manual (Employee’s Practical Guide) as guides to rely on when acting according to our mission and values.

<div><div>Our Mission</div><div>Chiyoda Group Corporate Philosophy</div><div>Enhance our business in aiming for harmony between energy and the environment and contribute to the sustainable development of a society as an integrated engineering company through the use of our collective wisdom and painstakingly developed technology.</div><div>Our Values Chiyoda Group CSR Visions</div><div>As an integrated engineering company, the Chiyoda Group pledges to contribute to the sustainable development of society through its business activities, and to constantly strive to increase corporate value and earn the trust and understanding of all stakeholders by adhering to the following principles.</div></div>	Compliance with International Guidelines		
	ISO 26000 Core Subjects	UN Global Compact	Action Policies
	Consumer (customer) issues	—	●Provide industrial plants that earn customer trust through engineering of outstanding quality ●Share our CSR principles with suppliers and other business partners
<div><div>CSR vision 1 A Reliable Company</div><div>We strive to be a reliable company to our customers and other business partners by providing world-class technologies and knowledge.</div></div>			
<div><div>CSR vision 2 Environmental Initiatives</div><div>We will work to remain an invaluable company to society by utilizing refined technologies to promote harmony between the global environment and economic and social activities.</div></div>	The environment	Principle 7: Businesses should support a precautionary approach to environmental challenges; Principle 8: undertake initiatives to promote greater environmental responsibility; and Principle 9: encourage the development and diffusion of environmentally friendly technologies.	●Develop and provide environmentally friendly energy and conservation technologies ●Conduct business activities that contribute to environmental conservation
<div><div>CSR vision 3 Social Contributions through Business Activities</div><div>Through our engineering business in Japan and overseas, we contribute to local communities in ways including human resources development, technology transfer and environmental protection.</div></div>	Community involvement and development	—	●Contribute to society through integrated engineering business activities ●Enhance social contribution activities by providing knowledge and labor
<div><div>CSR vision 4 Respect for Human Rights</div><div>We are dedicated to respecting the human rights of all people. We will create a corporate culture where the diversity, individuality and character of employees are respected, where people are motivated to do their best, and of which employees and their families are proud.</div></div>	Human rights Labor practices	Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and Principle 2: make sure that they are not complicit in human rights abuses. Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; Principle 4: the elimination of all forms of forced and compulsory labour; Principle 5: the effective abolition of child labour; and Principle 6: the elimination of discrimination in respect of employment and occupation.	●Create a lively and energetic working environment and help employees develop their talents ●Instill in everyone involved that safety is a core value
<div><div>CSR vision 5 Commitment to Fairness</div><div>We are dedicated to achieving even greater transparency and stability by conducting our operations fairly in accordance with the highest ethical standards.</div></div>	Organizational governance Fair operating practices	Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	●Conduct business activities based on strict compliance and a high degree of transparency ●Conduct a thorough risk management program

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A Reliable Company - CSR Vision 1 -

The Chiyoda Group strive to be a reliable company to our customers and other business partners by providing world-class technologies and knowledge.

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QMS (ISO9001)
Customer Satisfaction Survey
Technical Dialogue with Customers and Partners
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Quality Management Initiatives

Our primary mission is to supply products and services that meet customers' requirements by integrating a wide range of technologies.

Quality Management System (ISO 9001)

Chiyoda was certified for its Quality Assurance System for Project Management in compliance with ISO 9001:1994, and maintains and implements Quality Management System (QMS) in compliance with ISO 9001:2008. We improve our QMS aiming "Customer Satisfaction Enhancement" complying with the [Corporate SQE Policy](#) to ensure attaining quality targets as well as overall company management plan.

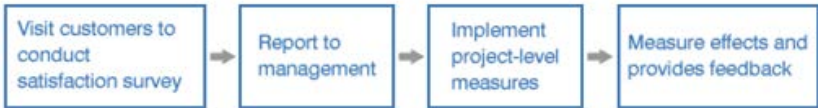
Customer Satisfaction Survey

Since 2002, Chiyoda Corporation has conducted regular interview surveys of domestic and overseas customers from project implementation to completion, regarding aspects such as safety and environmental response, our project organization and personnel system, and our technical competence as an engineering and construction company.

Using the results of these surveys, we have been continuing to make steady improvements.

The Customer Satisfaction Survey Process


We conduct regular interview surveys of domestic and overseas customers from project implementation to completion, regarding issues such as site safety and environmental response, our project organization and personnel system, and our technological competence as an engineering and construction company.



Technical Dialogue with Customers and Partners

The Chiyoda Group holds annual dialogues (conferences) with its customers and business partners (including machinery and equipment manufacturers, construction companies, inspection companies) in order to present and discuss the most up-to-date technologies, and to reflect the results of discussion in its work.

Event	Key Agenda	Organizer	Month / year	Participating Companies
	CTA exhibited at Interphex Japan2015			

Exhibition At Interphex Japan2014	the exhibition for the display of various kinds of equipment, systems and technology for the production and research and development of pharmaceuticals, cosmetics and the like .”	Chiyoda and Chiyoda TechnoAce Co., Ltd.	July 2014	Pharmaceutical companies (approx. 800 attendees)
Seminar for improving skills of Quality Management System Internal Auditors	Education of “Internal Auditor” is the one of the key factors of successful Quality Management System. CUC runs the annual seminar to support continual improvement of the System.	CUC*1 & Client	July 2014	Chemical Company Machinery/ Equipment Engineering Company (30)
North America CT-121 Users Group Conference	Technology Exchange with The North American CT-121 Users Group	PowerSouth Energy Cooperative	Jun. 2014	North America CT-121 User companies. (approx. 50 attendees)
CST*2 EPM*3 User Seminar 2014 ~Approach toward project management infrastructure construction among global enterprises in the innovation age~	CST EPM User Seminar 2014 focused on “Develop a competitive system in the midst of globalization”. It has been held annually since 2002 for Primavera users. Following opportunities were provided for the users: Hearing users’ requests and solving the problems, and communicating with the other users. The system construction and solutions using a package which leads the international community was introduced to each industry relating to EPC*4, ETO*5, and O&M*6. CST issued the message that CST would like to support global companies and become their strategic partner by following ways (1) Pursuing a global best practice within the industry, (2) Innovating solution which has not introduced in Japan and so forth.	Chiyoda System Technologies Co.	Jan.2014	Engineering companies and construction companies. (Approx 50 attendees)
ChAS Forum 2014	Technology Exchange with The theme of “ Visualization of Asset Integrity Management for Preventive	 Chiyoda Corporation ChAS Project Operations	Sep. 2014	More than 30 businesses and organizations and Chiyoda Group companies. (Over 200 attendees)
INCHEM TOKYO 2013	INCHEM TOKYO is the Japan's only exhibition specialized in chemical/process industries and environment/engineering. Since its first opening in 1966, this exhibition has a long history and it has been contributing to the development of these industries as much as of the Japanese economy growth.	Chiyoda Corporation	Oct. 2013	Chemical Company Machinery/ Equipment Engineering Company (approx. over 1,000 attendees)
PM*7 Symposium	Project Management Association of Japan (PMAJ) has held a symposium specialized for project management since 1997.In the symposium, CST	Chiyoda System	Sep.	Engineering companies and construction

2014	has set up booth since 1999, packaging case examples of EPM system construction, and providing an explanation about Primavera, PRISM and Aconex.	Technologies Co.	2014	companies. (Approx 30 attendees)
MES ^{*8} DAY	The theme of this seminar was "Regulatory compliance and the use of MES solutions". CST caught a trend of the industry by inviting the ex-FDA inspector as a keynote speaker. MES DAY provided the pharmaceutical companies with interesting and important information about "Investigating the trend and compliance of the laws and regulations".	Co-hosted by Werum Software& System and Chiyoda System Technologies Co.	Dec. 2014	40 pharmaceutical companies. 60 attendees
World Gas Conference 2012	World Gas Conference (WGC) is international conference pecialized in Gas industries. This conference is one of the largest energy related events in the world, which brings together the key persons from global players in energy resource development, particularly in the LNG sector. It is accredited as one of significant conferences for exchanging views on energy industry's future and current technological trend.	International Gas Union (IGU)	June 2012	More than 200 international Gas and Energy industries

- *1CUC : Chiyoda U-Tech Co., Ltd.
- *2 CST : Chiyoda System Technologies Corporation
- *3 EPM : Enterprise Project Management
- *4 EPC : Engineering/Procurement/Construction
- *5 ETO : Engineering to Order
- *6 O&M : Operation and Maintenance
- *7 PM : Project Management
- *8 MES : Manufacturing Execution System

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Corporate SQE Policy

April 1, 2013

Chiyoda fully recognizes that all corporate activities must be performed in a responsible manner leading to “sustainable development” by balancing the advancement of humankind and conservation of global environment.

Chiyoda shall, through cooperation with our customers as well as other concerned companies, governmental authorities and communities endeavor to satisfy the requirements and needs of customers and society in general by means of the following Safety, Quality and Environmental (“SQE”) policy.

1. Recognize the each individual person has duty and responsibility to promote SQE activities and enhance SQE awareness, knowledge and competence through continual education and training.
2. Provide high quality products and services which meet the requirements of customers and society related to Health, Safety and Environment (HSE) by utilizing Chiyoda’s technology and engineering capabilities for facilities and equipment for customers or to Chiyoda.
3. Minimize SQE risks, including injuries and occupational disease during the planning, design, procurement and construction and through the lifetime of a project, to a level As Low As Reasonably Practicable (ALARP) by identifying every potential hazard and implementing proper controls.
4. Optimize the usage of natural resources and energy, reduce effluent and waste produced and recover usable material to achieve a low-carbon society through carbon management, including research and development of technologies to prevent or to resolve environmental problems; and transfer and spread such technologies globally.
5. Comply with relevant SQE legislation and regulations, and with such other requirements to which Chiyoda subscribes.
6. Ensure the continual improvements of SQE management systems.

Each individual staff member shall follow the directives set forth in this policy.

EVERY INCIDENT IS PREVENTABLE

We will be the most reliable Project Company in the world through SQE activities.

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Information Security Management

As computerization and the growth of networks progress in our advanced information society, the threats of illegal/unauthorized access to our computer systems increase, requiring a well-organized, comprehensive management system for information security.

The Chiyoda Group's Information Security System

The Chiyoda Group believes that the maintaining confidentiality and integrity of and maximizing the use of its own business and technical information resources entrusted to Chiyoda by its business partners such as clients, licensors and joint venture partners are fundamental to the Company's reliability since its founding. Chiyoda has established its Information Security Management System (ISMS) based on the British Standards Institution (BSI) of the United Kingdom for BS7799:1999, since 2001, and has been certified by the world-renowned certification body for ISO/IEC 27001:2005, since 2007, and for ISO/IEC 27001:2013, since 2014. Chiyoda Group companies have also established and implemented ISMS based on ISO/IEC 27001:2013 according to their respective business types. One company in Japan (Chiyoda System Technologies Corporation) and four overseas (L&T-Chiyoda Limited, Chiyoda Philippines Corporation, Chiyoda Alman Engineering LLC, and Chiyoda Singapore(Pte)Limited)) that handle highly confidential technical information have acquired ISO/IEC 27001:2013 certification.

Protecting Personal Information

The Chiyoda Group has established [the Privacy Policy](#) and personal information protection management systems (personal information protection compliance programs) at each Group company to comply with the Personal Information Protection Law enforced in April 2005. Protection of personal information is promoted effectively together with the implementation of ISMS.

Operation of Information Security System

The Chiyoda Group continuously implements, maintains and improves ISMS to enhance its effectiveness in accordance with [the Corporate Information Security Policy](#).

Information Security Training

The Chiyoda Group conducts ISMS group lectures twice a year for all employees to improve ISMS operation such as execution of establishment for ISMS and learning of ISMS incident prevention. Totally 558 employees attended in FY2014.

Improvement of Information Security

The Chiyoda Group has designated every February as Information Security Months, when several programs are promoted for improvement of information security.
ISMS brief correspondence is issued for attention, in case that Information Security incident occurred and Information Security risk was discovered.

ISMS Certification

The following Chiyoda Group companies have acquired ISO/IEC 27001:2013 certification of their ISMS and/or the Privacy Mark as evidence of their promotion of information security and protection of personal information, respectively.

[ISO/IEC 27001/2013]

• Chiyoda Corporation	: certified in 2007
• Chiyoda System Technologies Corporation	: certified in 2009
• L&T-Chiyoda Limited	: certified in 2005
• Chiyoda Philippines Corp.	: certified in 2010
• Chiyoda Almana Engineering LLC	: certified in 2012
• Chiyoda Singapore (Pte) limited	: certified in 2012

[Privacy Mark]

• Arrow Human Resources Co., Ltd.	: certified in 2005
• Chiyoda System Technologies Corporation	: certified in 2014

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4-6-2, Minatomirai, Nishi-ku,
Yokohama 220-8765, Japan
Tel: (81)45-225-7777 (voice guidance)



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- Message from Management
- Corporate Profile
- Philosophy / Vision / Policies**
- Philosophy / Vision
- Corporate SQE Policy
- Corporate Information Security Policy
- Code of Conduct of the Chiyoda Group
- Privacy Policy**
- CSR Vision
- Chiyoda Group Compliance Manual
- History
- Organization
- Corporate Governance
- Board of Directors
- Access to CHIYODA

Privacy Policy

April 1, 2013

In view of the importance of protecting the privacy of individuals and personally identifiable information ("personal information"), the Chiyoda Group takes appropriate measures when handling this information in compliance with the Chiyoda Information Security Management System and all applicable laws and guidelines.

All Chiyoda Group personnel, in cooperation with vendors, subcontractors and other business partners, are dedicated to preserving privacy and protecting personal information in accordance with the following guidelines.

1. The acquisition and use of personal information shall be conducted fairly and in compliance with applicable laws, and personal information shall be used only for a definitive and legitimate need.
2. Personal information shall not be used or disclosed for other than the originally intended purpose, and shall not be used or disclosed for a reason outside the intent and need of the original purpose.
3. Personal information shall be correctly and accurately maintained.
4. Personal information shall not be retained beyond the period required for the original purpose.
5. Personal information shall not be provided or disclosed to a third party without consent from the person concerned, except in cases where the Chiyoda Group is required to supply such information by order of a court, legal authority or other official body. In cases where personal information is made available to a third party, except a court, legal authority or other official body, it is mandatory to conclude binding confidentiality contracts with third parties concerning personal information.
6. The Chiyoda Group shall quickly and sincerely respond to inquiries and requests for modifications, amendments or deletions from an individual regarding his/her personal information.
7. Appropriate security measures shall be taken to protect personal information from unauthorized access, revisions, disclosure and/or losses due to an accident.
8. The Chiyoda Group compliance program, including this privacy policy, shall be reviewed from time to time, and shall be revised as necessary.

All personnel at the Chiyoda Group, regardless of where they work, shall adhere to the directives set forth in this policy.


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Corporate Information Security Policy

April 1, 2013

In the highly computerized society by continuous and rapid growth of IT and its network technologies, the threats of illegal/unauthorized access to the computer system become larger and larger, requiring a well-organized comprehensive management system of information Security.

Chiyoda bellies that the maintaining the confidentiality and integrity of and maximizing the use of its own business and technical information resources developed through its years of experience as well as the confidential information entrusted to Chiyoda from time to time by its business partners such as clients, licensors and joint venture partners are fundamental to the company's engineering ability. All company personnel, in cooperation with its clients, vendors, subcontractors and other business partners, shall advance the information security in accordance with the following basic policy:

1. Recognition of Information Assets as Management Resources
All directors, officers and employees of Chiyoda recognize that information is Chiyoda's important asset, and protection thereof, as well as its effective utilization, should be the base of reputation and credit.
2. Protection of information Resources
 - All directors, officers and employees of Chiyoda shall not disclose any information assets inside and outside of Chiyoda, nor use the same for any other purpose than originally intended.
 - All directors, officers and employees shall not make access to any information assets which are not relating to their own business.
 - It is further understood that any access, transfer, revision and carrying in/out of any information assets shall be made with approval of the relevant managers.
 - For potential of anticipated violation in the information security management system, a report shall be made to the responsible person and countermeasures shall be taken to secure the information.
 - For actual violation or the symptom of violation in the information security management system, remedies for such breach shall be immediately reported to the responsible person.
3. Integrity of Information Resources
 - Information shall be maintained in accordance with the rules.
 - Information shall be updated with the latest changes and status.
 - Damaged Information shall be returned to the original condition.
4. Readiness of Information Resources for Use
 - Method for use of information assets shall be correctly understood.
 - Threats and risks for information assets shall be analyzed, and proper countermeasures shall be considered for its use.
 - Computer information systems and application software shall be used proficiently.

The company's all directors to office staff, regardless of working places, shall proceed with the directives set forth in this policy.



Japanese

English

Commitment to CSR TOP

Commitment to CSR

Chiyoda Group CSR Vision

A Reliable Company - CSR Vision 1 -

Quality Management Initiatives

Information Security Management

Collaboration with Clients

Working with Business Partners

Environmental Initiatives - CSR Vision 2 -

Social Contributions through Business Activities - CSR Vision 3 -

Respect for Human Rights - CSR Vision 4 -

Commitment to Fairness - CSR Vision 5 -

Collaboration with Clients

Amid the ongoing changes in the business environment, including the growing size of plants, the increasing sophistication in equipment and demands for earlier project completion, the Chiyoda Group has been continuously work to fulfill customer satisfaction through engineering of outstanding quality.

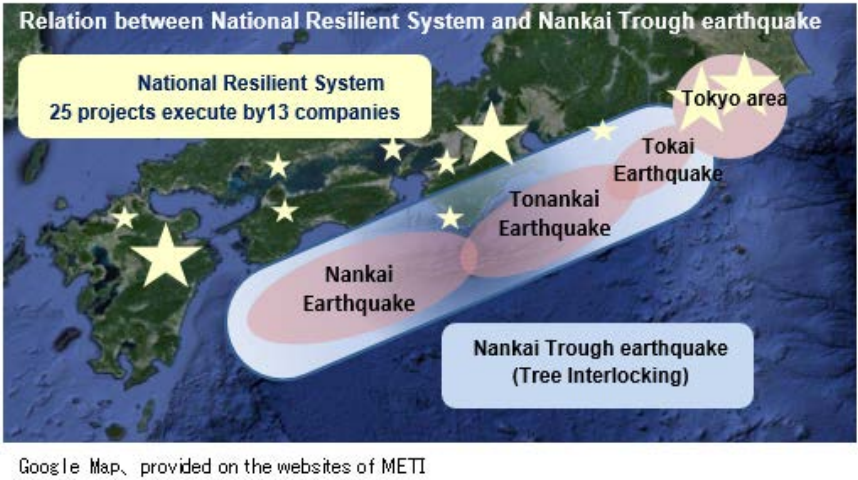
National Resilient System : Structuring to EPC

The Great East Japan Earthquake caused the unprecedentedly tremendous damages to the Tohoku district (the Northeast district) in Japan in the year 2011. Particularly, the energy supply facilities were damaged so severely that the energy supply was adversely affected not only in the Tohoku district but also nationwide, which resulted in disrupting the means of transportations and communications to take recovery measures for the disaster. People in the disaster-hit areas and refuge shelters were forced to endure much inconvenient lives. The damages on food processing / pharmaceutical manufacturing facilities and further the disruption of supply chain caused such grave social and economic problems as worsening health conditions of people in the disaster-hit areas and disturbing business activities.



Taking these experiences as lessons learned, the Government of Japan enacted the National Resilience Law in the year 2014. In order to ensure Energy Supply as one of the purposes of the Law, the Ministry of Economy, Trade and Industry (METI) has been undertaking to study the following measures for industrial facilities including the quake-proof investigation of all the petroleum refineries nationwide, particularly considering the possibilities of Nankai Trough Quake and Earthquake that directly hits Tokyo area:

1. To shut down safely
2. To prevent tremendous secondary disasters
3. To attain a stable energy supply



Once, Japan reviewed various quake-proof standards due to the fact that a lot of buildings and facilities fell down and caused a large number of casualties in the Hanshin-Awaji Earthquake. The lawwww laws are applied to buildings and facilities to be newly constructed, while the existing ones are not required to undergo quake-proof analysis. Further, the existing facilities in particular are required to take the measures during their operations so it has been considered difficult to revamp them in view of the relevant costs and technical aspects.

The Group supports companies having the above issues. As part of this, the Group has undertaken the study on business continuity plan, securing of local residents' safe and sound environments, and has undertaken the quake-proof analysis to further contribute to developing the Japanese economy so that it may provide the countermeasures for early recovery from damages due to earthquakes and tunami. Based on such experiences, Chiyoda cooperated with METI in the above METI's quake-proof investigation from its planning stage and prepared the manuals and scheme on quake-proof analysis and measures with METI and experts.

Now, The Group has been continuously undertaking quake-proof investigations on energy-supply facilities for companies with subsidies granted, and further performing the revamping works. The Group will continue to proceed with engineering the resilient infrastructure to realize the stable energy supply.

Project for Establishing a New Production Line —Challenge to the First in the World—

In August 2014, the new production line of fluid infusion was completed in the Oigawa plant, AY Pharmaceuticals Co. Ltd's main production base in Shizuoka Prefecture. The line is the first of its kind in the world engineered and built adopting the standing bag system.



This system received the prestigious industrial award in Japan "Good-design Award 2015 ". Chiyoda concentrated its various engineering expertise in pharmaceutical facilities on collaborating with AY Pharmaceuticals in their new challenge of pursuing a high-quality and easy-to-use Fluid Infusion to realize their corporate philosophy "One drop of thought flows to you all the time." The Group will continue to make every effort to become such a company as being recognized No.1 in reliability

and safety and contribute to the society through its high quality engineering in pharmaceutical facilities

Comments from the Client

Osamu Ishihara
General Manager, Shizuoka Factory of AY Pharmaceuticals Co. Ltd.



AY Pharmaceuticals Co., Ltd. has contributed to societies through the stable supply of high quality fluid infusion product. Fluid infusion used to be filled initially in a glass bin and then on plastic bottles or bags. This time, we have developed the first standing bag system in the world to meet with the practical needs in the medical fields; accuracy and quickness.


Further, we have established a comprehensive production line from the materials for fluid infusion bag to the final products to strive for the stable operation through sophisticated production control as well as intensive quality control. We requested Chiyoda to follow up various changes during the engineering and construction and received quick and flexible response.

It is the very essence of engineering that designing facilities is carried out not only from hardware aspects, but also manufacturer’s human-friendly viewpoint with a good imagination.

My opinion is that the facilities designed and build based on a good relationship between both sides of a facility owner and an engineering company will be evolved in the course of operating the facility, because both sides’ ideas are shared to be incorporated therein. We have been able to gather both sides’ technological expertise by forming mutually reliable relationships.


Thanks to the Chiyoda’s engineers, we are able to stably deliver the first standing bag in the world to patients. We appreciate the strong will of all the Chiyoda members. They are the group of engineers with whom we would like to work together again. Thank you.

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Japanese

English

Commitment to CSR TOP

Commitment to CSR

Chiyoda Group CSR Vision

A Reliable Company - CSR Vision 1 -

Quality Management Initiatives

Information Security Management

Collaboration with Clients

Working with Business Partners

Environmental Initiatives - CSR Vision 2 -

Social Contributions through Business Activities - CSR Vision 3 -

Respect for Human Rights - CSR Vision 4 -

Commitment to Fairness - CSR Vision 5 -

Working with Business Partners

With a view to building mutually beneficial relationships with our business partners, the Chiyoda Group work together as a group to fulfill social responsibility through various projects execution.

Recently, companies are being requested to promote strict compliance to their business partners as well and to share significance of compliance and CSR with them. For the further promotion of our CSR with the business partners including supply chain management, we have been making efforts to familiarize them with our Corporate Philosophy, CSR Visions and various rules. For this purpose, we have delivered "CORPORATE SOCIAL RESPONSIBILITY POLICY" to business partners thorough supply chain, and requested them to follow our CSR policy and rules.



Addressing the attendees on business activities based on strict compliance

[CORPORATE SOCIAL RESPONSIBILITY POLICY](#)

Standard business agreement with business partners specifies compliance with construction law, labor standard law, employment security law, industrial safety and health law, workmen's accident compensation insurance law, and other applicable laws and regulations. In addition, in order to exclude anti-social forces, anti-social exclusion clauses are incorporated to promote CSR procurement in the entire supply chain including business partners. Also at the annual meeting of the sub-contractors, "[Chiyoda Group CSR Handbook](#)" were handed them.

Strengthening Cooperation with Partners

Amid the ongoing changes in the business environment, including the growing size of plants, the increasing sophistication in equipment and demands for earlier project completion, it is becoming increasingly important to select the best suppliers and supervise their work by using our quality management systems.

To maintain mutually beneficial relationships in procurement, the Chiyoda Group requests business partners to cooperate in the following areas.

1. Compliance with laws, regulations and ethical guidelines (strict compliance)
2. Environmental conservation
 - Establishment of ISO14001-compliant environmental management systems
 - Acquisition of external certifications
 - Reduction of hazardous chemicals use
 - Promotion of Green Procurement*
3. On-schedule delivery
4. Continuous sound management of business operations
5. Technological improvements

6. Appropriate quality management
- We take special care in promoting the following
- Education on the necessity of strict compliance with relevant laws and regulations, including the Antimonopoly Act and the Subcontractor Act regarding fair transactions with subcontractors.
- Create and nurture better partnerships with business partners, based on mutual understanding and trust.

Green Procurement

The Chiyoda Group's Corporate Environmental Policy is to optimize the consumption of resources and energy so as to provide customers with facilities, machinery, equipment and processes that have the least possible environmental impact. As part of this policy, we promote Green Procurement, and we have established Green Procurement promotion guidelines based on the policies endorsed by the Ministry of Environment regarding the promotion of procurement activities of environmentally friendly items, and have been making efforts to familiarize personnel inside and outside our organization with these guidelines since 2006.



Training in welding a reactor vessel

The following are examples of our activities:

- Green Procurement questionnaires to suppliers/manufacturers**
In connection with the "Green Procurement Promotion Guidelines", we have been conducting surveys periodically since 2008. We have analyzed those responses in order to incorporate them in our procurement activities, covering in this manner this aspect of social responsibility pertaining the field of procurement.

* Green Procurement: The procurement activities in which ecologically correct equipment and materials are prioritized.
- Thorough energy conservation efforts in logistics**
During the construction period of the ultra-large scale LNG plants in Qatar (3 years and 3 months), we have procured 2.5 million freight tons (equivalent to the volume of two Tokyo Domes) of equipment and materials from over 20 countries, and transported them to the construction sites.

We shared the logistics information among these projects and ensured that the cargoes were consolidated and the vessels were shared. As a result, we could successfully minimize the number of vessels, not only reducing the transportation costs, but also greatly contributing to the reduction of CO₂ emission by cutting down the amount of energy consumed. In the same way, we make efforts in energy saving by efficient and optimized transportation for projects in these years.
- Environment survey**
We ask equipment and materials suppliers and manufacturers who wish to start business with our group to submit environmental survey questionnaire and then we conduct an assessment for environmental preservation activities, green procurement, pollution and waste treatment approach.

Procurement & Logistics Management Unit

CORPORATE SOCIAL RESPONSIBILITY POLICY

Our Corporate Social Responsibility is the pillar on which our group's philosophy stands: we at Chiyoda promise to make use of our engineering expertise to contribute to the sustainable development of society while abiding by the policies envisioned to attain harmony between energy uses and the environment.

Our Corporate Social Responsibility policies have been compiled into a handbook summarizing the ethical manner in which our business must be carried out. These guidelines clearly define the code of conduct Chiyoda expects each and every employee, and collaborator, to respect and follow.

As a member of the Global Compact Agreement Chiyoda is bound to work under the standards defined by the United Nations, and that ensure the implementation of working policies designed to protect human, labor and environmental rights. For more information on The Global Compact guidelines, please visit the link listed at the end of the page.

Chiyoda Corporation thus declares its corporate policy, and in order to promote effective business practices, we encourage business partners to observe and carry out the following principles so as to develop mutually beneficial relationships:

1. To take constant actions toward quality improvement.
2. To observe and comply with the laws and ordinances defined.
3. To conduct business in an honest and transparent manner.
4. To carry out engineering practices with the environment in mind.
5. To reject anti-social organizations.
6. To offer a secure information management system.
7. To respect intellectual property rights.
8. To implement thorough labor, safety and health policies.
9. To respect and protect human rights, and abide by fair labor laws and work practices.
10. To contribute to the ethical, economical and sustainable development of local communities.
11. To prevent and work against corruption.

Chiyoda Corporation will conduct business following these guidelines and will incorporate this philosophy to each and every project, while working together with you toward a fair and more sustainable environment. For more information regarding our Corporate Social Responsibility program and company policies, we invite you to visit our website.

Global Compact and Chiyoda policies can be found at:

Global compact: <http://www.unglobalcompact.org/>

Commitment to CSR: <http://www.chiyoda-corp.com/csr/en/index.html>

Code of Conduct of the Chiyoda Group: <http://www.chiyoda-corp.com/company/en/policy/behavior.html>

Chiyoda Group Compliance Manual: <http://www.chiyoda-corp.com/company/en/policy/compliance.html>

CSR Handbook & CSR Report: <http://www.chiyoda-corp.com/csr/en/csr-report.html>

Chiyoda Group CSR Handbook (4th Edition)

August 2014

- **Corporate Philosophy / CSR Vision**
- **Code of Conduct / Employee's Practical Guide**
- **UN Global Compact**
- **Compliance Consultation and Reporting System**



Top Message

The Chiyoda Group's Corporate Social Responsibility (CSR)

Since its founding 65 years ago, the Chiyoda Group has worked to contribute to the advancement of society with the aim of realizing its corporate philosophy centered on “Energy and Environment in Harmony.” As an engineering company, we build infrastructure that requires state-of-the-art technologies in various countries.

The energy industry has recently undergone structural changes such as the shift to natural gas and renewable energy. Rapid changes have also taken place in the industry environment, notably the shale revolution that has revitalized the North American market. The demands of society are becoming more diverse as well.

In this context, I believe the Chiyoda Group's corporate social responsibility is to accurately assess current demands and deploy engineering to provide the value that society requires for addressing global challenges such as poverty, environmental issues and securing resources, consistent with our Corporate Philosophy.

Sustained Growth and Reinforcing Our Reputation for Reliability

In November 2012, the Chiyoda Group joined the United Nations Global Compact (UNGC), the first company to do so in the Japanese construction industry. Our objective in joining the UNGC is to advance our CSR efforts on a global basis and firmly establish CSR as a unifying force of the Chiyoda Group. We will align the Chiyoda Group CSR Vision with the Ten Principles of the UNGC to further raise awareness of CSR among all Group employees and ensure that it is reflected in their behavior.

Respecting the Global Code and Ensuring Complete Compliance

The energy-related industries, where Chiyoda plays its major roles, are amid the structural changes in not only Chiyoda but also their business regions and partners which are to diversify more than ever.

A fair code that can be understood by one and all is essential. In that sense, we have continuously supported and will continue to support the spirit of the UNGC for human rights, labor standards, environment and anti-corruption. We will continue to address employees the importance of showing this spirit in day-to-day business and other activities. We will also work on our business partners and other parties concerned to understand and comply with the Chiyoda Group Code of Conduct, which reflects the spirit of the UNGC.

We are particularly endeavoring to improve transparency in all Group business activities in connection with adhering to Japanese and overseas laws and regulations, international agreements, and respect for human rights, compliance with harassment prevention, anti-corruption, information security and the like. We have newly established the Compliance Committee under the direct control of the Executive Committee and the Group Company Liaison Meeting on Compliance.

August 2014



Shogo Shibuya
President & CEO
Chiyoda Corporation

About the fourth edition revision

The first issue of the Chiyoda Group CSR Handbook, which contains the basic policies and philosophies for every Group member to refer to as the guide to judge how to behave in her or his daily duties, such as “Corporate Philosophy”, “CSR Vision”, ”Code of Conduct” and “Privacy Policy”, was edited in October 2007.

The later revision content is as follows.

Second edition (October 2009)	Considering the social requirements, Feedback from the in-house questionnaire
Third edition (November 2012)	Relocation of our main office to Chiyoda Global Headquarters in the Minatomirai area of Yokohama Participation in the United Nations Global Compact (UNGC) which is one of the global guidance on CSR Streamlining of domestic group companies
Fourth edition (August 2014)	Top Message Compliance Promotion Structure New group companies A change of a person in charge of Compliance Consultation and Reporting System

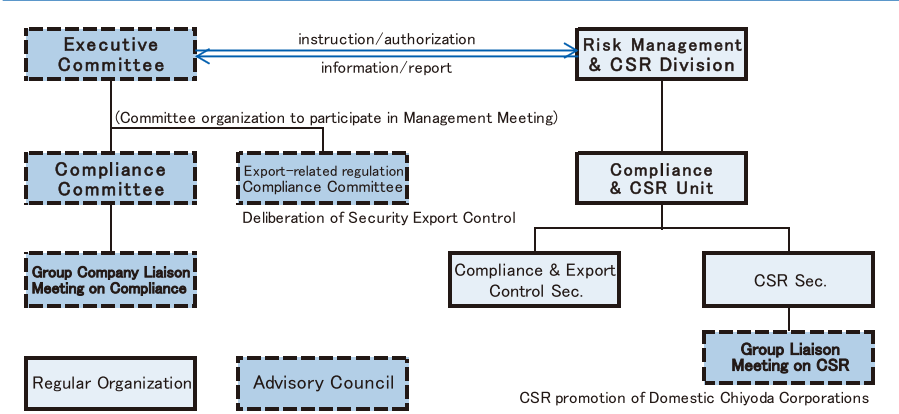
Please always carry this handbook, and do actions being aware of
“Code of Conduct.”

August, 2014
Compliance & CSR Unit
Chiyoda Corporation

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Compliance CSR Promotion Structure in the Chiyoda Group



Each Headquarters
Corporate Planning, Management & Finance Division
Business Department Division
Global Project Management Division
Technology & Engineering Division
Project Logistics & Construction Division
Offshore & Upstream Project Operations
Gas & LNG Project Operations No.1
Gas & LNG Project Operations No.2
Downstream & Non Hydrocarbon Project Operations
Infrastructure Project Operations
ChAS Project Operations
Global Project Management-Asia (GPM-A) Operations

Domestic Chiyoda Group
Chiyoda Kosho Co., Ltd. Chiyoda System Technologies Corporation Chiyoda TechnoAce Co., Ltd. Chiyoda U-Tech Co., Ltd. Arrow Business Consulting Corporation Arrow Human Resources Co., Ltd. Arrowhead International Corporation Chiyoda Business Solutions Co., Ltd.
Members of Group Company Liaison Meeting on Compliance Members of Group Liaison Meeting on CSR

International Chiyoda Group
Chiyoda Almanca Engineering LLC
Chiyoda-CCC Engineering (Pte.)Limited
Chiyoda Corporation Netherlands B.V.
Chiyoda International Corporation
Chiyoda Malaysia Sdn. Bhd.
Chiyoda Oceania Pty Limited
Chiyoda Petrostar Ltd.
Chiyoda Philippines Corporation
Chiyoda & Public Works Co., Ltd.
Chiyoda Sarawak Sdn. Bhd.
Chiyoda Singapore (Pte) Limited
Chiyoda (Thailand) Limited
L&T-Chiyoda Limited
PT. Chiyoda International Indonesia
PT. Suluh Ardhi Engineering
Chiyoda Human Resources International (Pte.)Limited
Members of Group Company Liaison Meeting on Compliance

[Regular Organization]

1. Risk Management & CSR Division

“Risk Management & CSR Division” means a regular organization that exercises control over risk management (crisis management included) of the Company and the Chiyoda Group, and operations in connection with CSR.

2. Compliance & CSR Unit

“Compliance & CSR Unit” means a regular organization that establishes and conducts policies on compliance and CSR. Secretariat that organizes Compliance Committee, Group Company Liaison Meeting on Compliance, Group Liaison Meeting on CSR, etc.

[Meeting Structure]

3. Compliance Committee

“Compliance Committee” means an advisory council that provides further insights into the matters to be reported to the Executive Committee, and examination of related matters, and comprehensively controls the Company and Chiyoda Group both domestically and internationally.

4. Group Company Liaison Meeting on Compliance

“Group Company Liaison Meeting on Compliance” means an organization that establishes a compliance framework of the Company and Chiyoda Group, and is comprised of the Chiyoda Group both domestically and internationally.
(Conducted both domestically and internationally)

5. Group Liaison Meeting on CSR

“Group Liaison Meeting on CSR” means an organization that deliberates CSR report/establishes annual program on CSR activities, compiles business achievements/social contribution activities, activation of environment-related and CSR activities/promotion of United Nations Global Compact among the Chiyoda Group.

(Conducted domestically, conduct information exchange with group corporations abroad regularly.)

Chiyoda Group Corporate Philosophy

Enhance our business
the sustainable devel
our collective wisdom

in aiming for harmony between energy and the environment and contribute to
opment of a society as an integrated engineering company through the use of
and painstakingly developed technology.

Our Values Chiyoda Group CSR Visions

As an integrated engineering company, the Chiyoda Group pledges to contribute to the sustainable development of society through its business activities, and to constantly strive to increase corporate value and earn the trust and understanding of all stakeholders by adhering to the following principles.

	ISO 26000 Core Subjects		UN Global Compact	Action Policies
1 A Reliable Company We strive to be a reliable company to our customers and other business partners by providing world-class technologies and knowledge.	Consumer (customer) issues		—	<ul style="list-style-type: none"> • Provide industrial plants that earn customer trust through engineering of outstanding quality • Share our CSR principles with suppliers and other business partners
2 Environmental Initiatives We will work to remain an invaluable company to society by utilizing refined technologies to promote harmony between the global environment and economic and social activities.	The environment		Principle 7 : Businesses should support a precautionary approach to environmental challenges; Principle 8 : undertake initiatives to promote greater environmental responsibility; and Principle 9 : encourage the development and diffusion of environmentally friendly technologies.	<ul style="list-style-type: none"> • Develop and provide environmentally friendly energy and conservation technologies • Conduct business activities that contribute to environmental conservation
3 Social Contributions through Business Activities Through our engineering business in Japan and overseas, we contribute to local communities in ways including human resources development, technology transfer and environmental protection.	Community involvement and development		—	<ul style="list-style-type: none"> • Contribute to society through integrated engineering business activities • Enhance social contribution activities by providing knowledge and labor
4 Respect for Human Rights We are dedicated to respecting the human rights of all people. We will create a corporate culture where the diversity, individuality and character of employees are respected, where people are motivated to do their best, and of which employees and their families are proud.	Human rights Labor practices		Principle 1 : Businesses should support and respect the protection of internationally proclaimed human rights; and Principle 2 : make sure that they are not complicit in human rights abuses. Principle 3 : Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; Principle 4 : the elimination of all forms of forced and compulsory labour; Principle 5 : the effective abolition of child labour; and Principle 6 : the elimination of discrimination in respect of employment and occupation.	<ul style="list-style-type: none"> • Create a lively and energetic working environment and help employees develop their talents • Instill in everyone involved that safety is a core value
5 Commitment to Fairness We are dedicated to achieving even greater transparency and stability by conducting our operations fairly in accordance with the highest ethical standards.	Organizational governance Fair operating practices		Principle 10 : Businesses should work against corruption in all its forms, including extortion and bribery.	<ul style="list-style-type: none"> • Conduct business activities based on strict compliance and a high degree of transparency • Conduct a thorough risk management program

Basis of Our Actions

Code of Conduct of the
Chiyoda Group

Chiyoda Group
Employee's Practical Guide

Code of Conduct of the Chiyoda Group

We, Chiyoda Group, recognize that all business activities are based on earning the trust and understanding of society and clients. To ensure that our business activities conform to social standards, we fully comply with all applicable domestic and international laws and regulations as well as our own rules, and conduct business activities in accordance with the following principles.

1. To earn the trust of clients by constantly improving quality in order to supply useful facilities and services.
2. To do business with transparency, free competition and fairness in order to earn the trust and understanding of society and clients concerning our corporate activities.
3. To maintain strong lines of communication not only with shareholders and other stakeholders but also with society at large, and to disclose corporate information willingly and fairly.
4. To recognize that helping to solve environmental issues is an essential part of our business activities as an engineering company, and to contribute to society while cooperating with governments and their agencies.
5. To reject all contact with anti-social organizations and never offer these organizations any benefits.
6. To handle personal information and client information with utmost care and attention and use intellectual property in an appropriate manner without infringing on the owner's intellectual property rights.
7. To draw a line between official company activities and private activities, and never take any action that would be detrimental to the company.
8. To respect the human rights of all people. Also, to respect the diversity, individuality and character of employees and endeavor to ensure employees' health and safety by providing a suitable working environment.
9. Senior management shall recognize that implementing the spirit of this code is their responsibility, and shall make related parties aware of this code by setting an example through their leadership. Senior management shall also heed the voice of stakeholders, both internally and externally, and take initiatives to solve the issues violating the Code of Conduct and strive to establish an effective framework for implementing these principles.

Chiyoda Group Employee's Practical Guide

All executives and employees of Chiyoda Group Companies shall fully comprehend the spirit of the Code of Conduct of Chiyoda Group and conduct their activities in strict compliance with the following provisions:

1. To earn the trust of clients by constantly improving quality in order to supply useful facilities and services.

- 1 Observe all laws, regulations and standards applicable to respective business activities.
- 2 Ensure to receive permits, submit notices and reports, and perform other procedures associated with respective business activities in an appropriate manner.

Applicable laws and regulations:

Construction Industry Law, all applicable industry codes

2. To do business with transparency, free competition and fairness in order to earn the trust and understanding of society and clients concerning our corporate activities.

- 1 Never improperly restrict business transactions in terms of price, volume, division of market or other agreements with competitors and/or industry organizations.
- 2 Never collaborate with competitors or industry organizations to refuse or terminate business transactions with a new market entrant or specific company.
- 3 Never act in a manner that is improperly harmful to the interests of a subcontractor.
- 4 Strictly observe all treaties and national laws and regulations concerning international trade.
- 5 Observe all laws and regulations and carefully study the business propriety of exporting strategic materials, certain other materials and technologies, and providing certain services.
- 6 Perform all procedures required by governmental agencies in a righteous manner.
- 7 Never offer improper gifts, benefits or other economic benefits to government employees, or employees in quasi government organizations in Japan or any other country, or to all the other stakeholders.
- 8 Do not offer excessive gifts or entertainment to the executives and employees of clients/business partners and always observe accepted international standards for business activities.
- 9 Never offer gifts that exceed the legal standards in each country or region.
- 10 Never accept gifts or entertainments that exceed socially acceptable standards for such courtesies.

Applicable laws and regulations:

Construction Industry Law, Anti-Monopoly Law, Unfair Competition Prevention Law, Subcontractor Payment Delay Prevention Law, National Government Employee Ethics Law, Foreign Exchange and Foreign Trade Law

3. To maintain strong lines of communication not only with shareholders and other stakeholders but also with society at large, and to disclose corporate information willingly and fairly.

- 1 Never participate in insider trading.

- 2 Work to give shareholders and investors a good understanding of our company through IR activities including information disclosure.
- 3 Make a timely and correct record and report on finance and accounting.

Applicable laws and regulations:

Financial Instruments and Exchange Law

.....

4. To recognize that helping to solve environmental issues is an essential part of our business activities as an engineering company, and to contribute to society while cooperating with governments and their agencies.

- 1 Endeavor to protect the environment while observing treaties, laws, regulations and other rules concerning the environment.
- 2 Conduct business activities while taking into consideration the effect on the climate change, natural environment and ecosystems.
- 3 Use natural resources and energy efficiently while at the same time striving to reduce the volume of waste materials and taking steps to recycle or otherwise use these materials effectively

Applicable laws and regulations:

Environment Basic Law and related laws and regulations
(Air Pollution Control Law, Water Pollution Control Law, Waste Management Law,
Effective Natural Resource Use Promotion Law, Construction Material Recycling Law, others)

.....

5. To reject all contact with anti-social organizations and never offer these organizations any benefits.

- 1 Never seek for easy solutions when receiving an improper demand from an anti-social organization. Always report such demands quickly to the organization concerned.
- 2 Take due care of even ordinary business transactions as to whether anti-social organizations are involved. Refuse to conduct the transactions if such organizations should be involved.

Applicable laws and regulations:

Corporate Law, Commercial Code

.....

6. To handle personal information and client information with utmost care and attention and use intellectual property in an appropriate manner without infringing on the owner's intellectual property rights.

- 1 Strictly manage to handle information concerning clients, other companies and individuals as well as confidential corporate information obtained through business activities. Prevent leaks and use this information solely for business purposes.
- 2 When required to disclose any confidential information in possession of the company to others for business purposes, have the parties sign a confidentiality agreement and observe other internal rules to prevent leaks.
- 3 Do not rely solely on your own judgment when responding to external inquiries. When a particular department is designated to respond to a certain type of request, always have the inquiry passed on to the proper department.
- 4 Employees must protect confidential information obtained through business activities even after they no longer work at Chiyoda Group.

- 5 Take due care to avoid infringement on the intellectual property rights of other companies and individuals, such as by making copies of computer software without approval, and never perform any such act.

Applicable laws and regulations:

Patent Law, New Utility Model Law, Copyright Law, Improper Access Prevention Law,
Unfair Competition Prevention Law

.....

7. To draw a line between official company activities and private activities, and never take any action that would be detrimental to the company.

- 1 Never use company resources improperly or use company funds or expenses for personal reasons.
- 2 Never use the company information system or related systems improperly or for personal reasons.

Applicable laws and regulations:

Criminal Code, Corporate Law

.....

8. To respect the human rights of all people. Also, to respect the diversity, individuality and character of employees and endeavor to ensure employees' health and safety by providing a suitable working environment.

- 1 Respect the Universal Declaration of Human Rights.
- 2 Respect the human rights. Never discriminate for the reasons whatsoever such as race, creed, religion, gender, nationality, age, origin, disabilities, disease etc.
- 3 Never do or allow any harassment such as sexual harassment, abuse of power etc.
- 4 Respect the culture, customs, languages and other characteristics of countries and regions. Take due care to behave in line with international and regional social standards.
- 5 Maintain a safe and healthy working environment.
- 6 Conduct thorough safety education and training and enlighten everyone to be well aware of the importance of safety and of safety-related knowledge.
- 7 Promote Work Life Balance

Applicable laws and regulations:

ILO International Labor Standards, International Covenant on Economic, Social and Cultural Rights,
International Covenants on Civil and Political Rights,
Labor Standards Law and related laws
(Occupational Health and Safety Law, Law for Equal Employment Opportunity of Men and Women, others)
Worker Dispatching Act, Disabled Persons Employment Promotion Law, Labor Contract Act

.....

9. Senior management shall recognize that implementing the spirit of the Code of Conduct is their responsibility, and shall make related parties aware of the Code of Conduct by setting an example through their leadership. Senior management shall also heed the voice of stakeholders, both internally and externally, and take initiatives to solve the issues violating this Code of Conduct and strive to establish an effective framework for implementing these principles.

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Supplementary provisions

1. The term Chiyoda executives and employees includes advisers, contract workers and individuals on loan to group companies in Japan and overseas.
2. The Employee's Practical Guide was prepared for use within Japan. In other countries, the Employee's Practical Guide will be revised as required to reflect the laws, regulations and rules of particular countries and regions while preserving the original spirit of the Code of Conduct.
3. Note that the applicable laws and regulations listed above only refer to the major applicable items and do not cover the complete set of all relevant laws and regulations. Applicable laws and regulations show the ones applicable in Japan. In other countries, employees should observe the laws, regulations and rules of their home country and region, as well as international standards.
4. Violations of these rules of behavior will be punished based on employment regulations and/or other provisions according to the nature and seriousness of the violation.
5. Management to handle the Code of Conduct, the Employee's Practical Guide and related documents and procedures is the responsibility of the Section Leader of the Compliance & Export Control Section. Significant revisions to the Code of Conduct and the Employee's Practical Guide must be submitted to the Executive Committee for approval.
6. The Code of Conduct and the Employee's Practical Guide shall become effective on April 1, 2006.
7. In November 2012, Chiyoda Corporation participated in the United Nations Global Compact (UNGC). All executives and employees of Chiyoda Group Companies shall conduct their activities fully comprehending the spirit of the UNGC.

8. Revision made on the Employee's Practical Guide: April 1, 2008 / April 1, 2009 / November, 2012

United Nations Global Compact (UNGC)

United Nations Global Compact (UNGC) is a global action to realize sustainable growth. Each company is required to act as a social member by showing a responsible and creative leadership. We signed UNGC in November, 2012 and continue to make an effort for the realization of 10 principles.

We ask you to fully understand the spirit of the UNGC, put its principles into concrete form in cooperation with your co-workers, and always strive to practice them, along with the Code of Conduct of the Chiyoda Group Employee's Practical Guide.

About the UNGC

UNGC was first proposed at the World Economic Forum (Davos Forum) in 1999 by then U.N. Secretary General Kofi Annan and Ban Ki Moon, existing U.N. Secretary General expresses a clear support. More than 10,000 organizations (approximately 7,000 of these organizations are companies.) in 145 countries worldwide have signed and are active focusing on ten principles in four areas of "Human Rights", "Labor", "Environment" "Anti-Corruption".

Ten Principles We Will Strive to Practice in the UNGC

Human Rights

1. Support and respect for the protection of human rights
2. Non-complicity in human rights abuses

Labor

3. Upholding the freedom of association and recognition of the right to collective bargaining
4. Elimination of forced labor
5. Effective abolition of child labor
6. Elimination of discrimination in employment and occupation

Environment

7. Precautionary approach to environmental challenges
8. Initiatives to promote environmental responsibility
9. Development and diffusion of environmentally friendly technologies

Anti-Corruption

10. Working against corruption, including extortion and bribery

The Chiyoda Group's Approach

Sexual harassment and abuse of power are familiar workplace issues. Provision 8 of the Code of Conduct of the Chiyoda Group states that we respect the human rights of all people. This principle is the foundation of all our activities.

We comply with laws, regulations and customer requests in management of workplaces, including all construction sites worldwide. In addition, provision 8.2 of our Employee's Practical Guide states that we will never discriminate for any reason whatsoever.

In our corporate philosophy, we declare that we will aim for harmony between energy and the environment and contribute to the sustainable development of society. In addition, we specify relevant activities in our Corporate SQE Policy and present what we should do to realize these objectives in provision 4 of our Employee's Practical Guide.

Provisions 2.7, 2.8 and 2.9 of our Employee's Practical Guide state that we will never offer improper benefits to any of our stakeholders, never offer excessive gifts or entertainment, and never offer gifts that exceed legal standards. In addition, provision 2.10 states that we will never accept gifts or entertainment that exceed socially acceptable standards.

For details on the UNGC, please refer to the following site: <http://www.unglobalcompact.org/>

Guide to Compliance Consultation and Reporting System

(Welcome to All about Compliance)

Preface:

If you foresee any possibility of a problem taking place or if you find any problem, it is our normal procedure for you to report such problem to your manager for resolution.

If you think that such problem cannot be resolved by the above normal procedure for whatever reasons, you are requested to please refer such problem for resolution in accordance with this Compliance Consultation and Reporting System ("System").

1. Purpose:

The purpose of this System is to discover any illegal or unethical act or conduct, whether actual or possible, and whether of individual or organizational nature, ("Misdeed") at an early stage and then to prepare and implement such action as necessary to prevent or correct such Misdeed.

2. Companies Concerned:

This System covers Misdeed concerning the following Chiyoda Group Companies:

Chiyoda Corporation	Arrow Business Consulting Corporation
Chiyoda Kosho Co., Ltd.	Arrow Human Resources Co., Ltd.
Chiyoda System Technologies Corporation	Arrowhead International Corporation
Chiyoda TechnoAce Co., Ltd.	Chiyoda Business Solutions Co., Ltd.
Chiyoda U-Tech Co., Ltd.	

In this System, "Consultation" shall mean asking about whether any problem falls into the category of being a Misdeed or not, and "Reporting" shall mean the reporting or disclosure of a Misdeed (including any possible, probable or imminent Misdeed).

3. Those who can Consult and Report:

Members (employees, agency personnel, etc.) working in the above Chiyoda Group Companies and members in companies having business with such Chiyoda Group Companies.

4. Methods of Consultation and Report:

By verbal or written communication including but not limited to e-mail, telephone, document (by using either the Compliance Post Box "Meyasu Bako" as referred to in Page 17 hereunder, or Postal Mail) or face-to-face meeting.

5. Integrity of Reporting:

Please take notes of the following:

- (1) Reporting should be done on an objective and rational basis. Reporting done for furthering individual interests, grudges or of a slanderous nature is not acceptable. Reporting that is damaging to others' due interests or public interests are also not acceptable. (For example, disclosure of confidential information not relating to the Misdeed.)

- (2) In Reporting, the objective and rational basis should be definitely distinguished from any speculation based on such grounds. The assertion of speculation and rumors as being objective facts or the use of expressions which might lead others to misunderstand situations is prohibited.

6. The Contact in English:

Please contact the Compliance & Export Control Section for Consultation and Reporting as follows;

Mr. M. Watanabe, Deputy General Manager (Extension No. 204858)

Mr. T. Nagai (Extension No. 211146)

Direct Phone: 81-45-225-7743

E-mail: compliance@ykh.chiyoda.co.jp

Postal Address:

Minatomirai Grand Central Tower, 4-6-2, Minatomirai, Nishi-ku, Yokohama, 220-8765, Japan

7. Procedures:

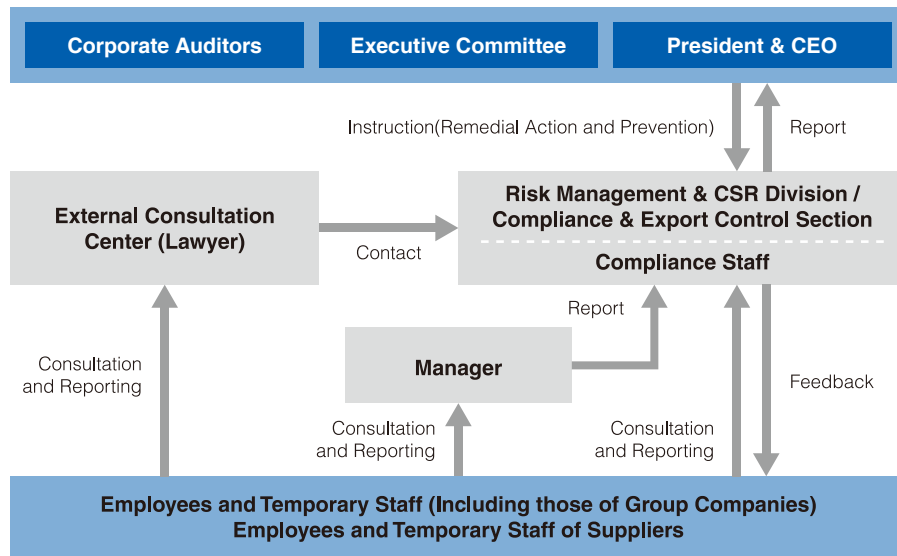
- (1) Please feel free to contact the above Compliance & Export Control Section. You will receive from the Office an official acknowledgement of receipt of your Consultation or Report within three (3) working days after your contact in case of E-mail.
- (2) If such acknowledgement does not reach you within the above timeframe, please call the Office to confirm your communication.
- (3) If you are asked about further details on your Consultation or Reporting in order for the Compliance & Export Control Section to follow it up, your cooperation is requested.

8. Protection:

- (1) Your Consultation/Reporting will be kept confidential and your privacy will be maintained.
- (2) Subject to your compliance with Item 5 above, if you face the situation of being unfavorably treated due to your Consultation/Reporting, you are requested to please report such treatment to the Compliance & Export Control Section so that the Section can follow up on such case.

Compliance Consultation and Reporting System

"Welcome to All About Compliance"



Chiyoda Corporation

Basic Policy

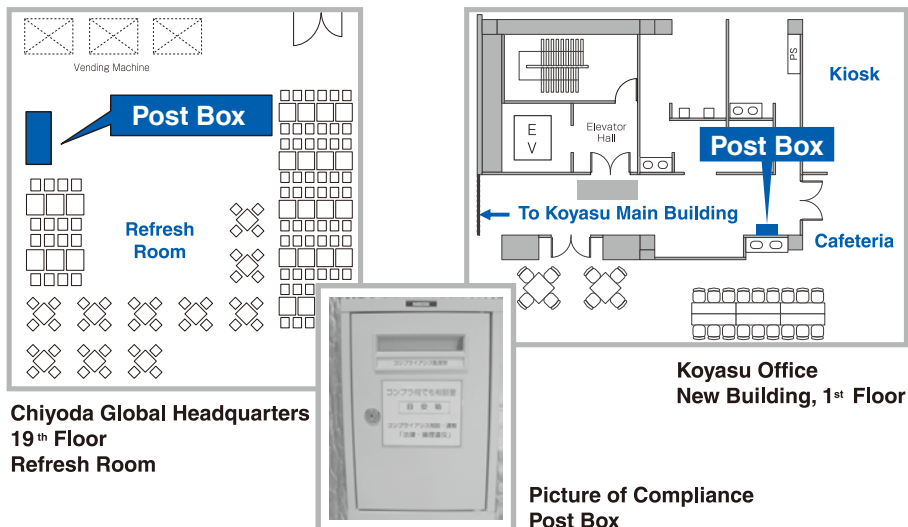
Corporate SQE Policy

Corporate Information Security Policy

Privacy Policy

Major Disaster Response Manual

Map of Compliance Post Box



Note: Among the above basic policies provided in the following pages, the Privacy Policy applies commonly to all group companies. The other policies apply only to Chiyoda Corporation and each group company is welcome to use them as reference whenever appropriate.

CORPORATE SQE POLICY

Chiyoda fully recognizes that all corporate activities must be performed in a responsible manner leading to "sustainable development" by balancing the advancement of humankind and conservation of global environment.

Chiyoda shall, through cooperation with our customers as well as other concerned companies, governmental authorities and communities endeavor to satisfy the requirements and needs of customers and society in general by means of the following Safety, Quality and Environmental ("SQE") policy.

1. Recognize the each individual person has duty and responsibility to promote SQE activities and enhance SQE awareness, knowledge and competence through continual education and training.
2. Provide high quality products and services which meet the requirements of customers and society related to Health, Safety and Environment (HSE) by utilizing Chiyoda's technology and engineering capabilities for facilities and equipment for customers or to Chiyoda.
3. Minimize SQE risks, including injuries and occupational disease during the planning, design, procurement and construction and through the lifetime of a project, to a level As Low As Reasonably Practicable (ALARP) by identifying every potential hazard and implementing proper controls.
4. Optimize the usage of natural resources and energy, reduce effluent and waste produced and recover usable material to achieve a low-carbon society through carbon management, including research and development of technologies to prevent or to resolve environmental problems; and transfer and spread such technologies globally.
5. Comply with relevant SQE legislation and regulations, and with such other requirements to which Chiyoda subscribes.
6. Ensure the continual improvements of SQE management systems.

Each individual staff member shall follow the directives set forth in this policy.

EVERY INCIDENT IS PREVENTABLE

We will be the most reliable Project Company in the world through SQE activities.


Shogo Shibuya
President & CEO
Chiyoda Corporation

CORPORATE INFORMATION SECURITY POLICY

In the highly computerized society by continuous and rapid growth of IT and its network technologies, the threats of illegal/unauthorized access to the computer system become larger and larger, requiring a well-organized comprehensive management system of Information Security.

Chiyoda believes that the maintaining the confidentiality and integrity of and maximizing the use of its own business and technical information resources developed through its years of experience as well as the confidential information entrusted to Chiyoda from time to time by its business partners such as clients, licensors and joint venture partners are fundamental to the company's engineering ability. All company personnel, in cooperation with its clients, vendors, subcontractors and other business partners, shall advance the information security in accordance with the following basic policy:

1. Recognition of Information Assets as Management Resources
All directors, officers and employees of Chiyoda recognize that information is Chiyoda's important asset, and protection thereof, as well as its effective utilization, should be the base of reputation and credit.
2. Protection of Information Resources
 - (1) All directors, officers and employees of Chiyoda shall not disclose any information assets inside and outside of Chiyoda, nor use the same for any other purpose than originally intended.
 - (2) All directors, officers and employees shall not make access to any information assets which are not relating to their own business.
 - (3) It is further understood that any access, transfer, revision and carrying in/out of any information assets shall be made with approval of the relevant managers.
 - (4) For potential or anticipated violation in the information security management system, a report shall be made to the responsible person and countermeasures shall be taken to secure the information.
 - (5) For actual violation or the symptom of violation in the information security management system, remedies for such breach shall be immediately reported to the responsible person.
3. Integrity of Information Resources
 - (1) Information shall be maintained in accordance with the rules.
 - (2) Information shall be updated with the latest changes and status.
 - (3) Damaged information shall be returned to the original condition.
4. Readiness of Information Resources for Use
 - (1) Method for use of information assets shall be correctly understood.
 - (2) Threats and risks for information assets shall be analyzed, and proper countermeasures shall be considered for its use.
 - (3) Computer information systems and application software shall be used proficiently.

The company's all directors to office staff, regardless of working places, shall proceed with the directives set forth in this policy.


Shogo Shibuya
President & CEO
Chiyoda Corporation

PRIVACY POLICY

In view of the importance of protecting the privacy of individuals and personally identifiable information ("personal information"), the Chiyoda Group takes appropriate measures when handling this information in compliance with the Chiyoda Information Security Management System and all applicable laws and guidelines.

All Chiyoda Group personnel, in cooperation with vendors, subcontractors and other business partners, are dedicated to preserving privacy and protecting personal information in accordance with the following guidelines.

1. The acquisition and use of personal information shall be conducted fairly and in compliance with applicable laws, and personal information shall be used only for a definitive and legitimate need.
2. Personal information shall not be used or disclosed for other than the originally intended purpose, and shall not be used or disclosed for a reason outside the intent and need of the original purpose.
3. Personal information shall be correctly and accurately maintained.
4. Personal information shall not be retained beyond the period required for the original purpose.
5. Personal information shall not be provided or disclosed to a third party without consent from the person concerned, except in cases where the Chiyoda Group is required to supply such information by order of a court, legal authority or other official body. In cases where personal information is made available to a third party, except a court, legal authority or other official body, it is mandatory to conclude binding confidentiality contracts with third parties concerning personal information.
6. The Chiyoda Group shall quickly and sincerely respond to inquiries and requests for modifications, amendments or deletions from an individual regarding his/her personal information.
7. Appropriate security measures shall be taken to protect personal information from unauthorized access, revisions, disclosure and/or losses due to an accident.
8. The Chiyoda Group compliance program, including this privacy policy, shall be reviewed from time to time, and shall be revised as necessary.

All personnel at the Chiyoda Group, regardless of where they work, shall adhere to the directives set forth in this policy.


 Shogo Shibuya
 President & CEO
 Chiyoda Corporation

Major Disaster Response Manual

You are requested to always keep this manual, the "Major Disaster Response Manual" issued by Corporate Services Unit in Apr.2014, at hand and be prepared for contingencies. This manual can also be accessed via EIP.

(1) Safeguarding Human Life Comes First

In all instances, Chiyoda personnel shall place the ultimate priority on respect for human life. In the event of a major disaster, personnel shall first secure the safety of themselves and their families. Upon confirmation of this safety, every possible effort shall be devoted to promptly restoring the company's operations.



(a) Secure own safety

- Maintain personal safety.

(b) Confirm safety of family members (generally members occupying the same residence)

- Determine safety contact methods, meeting places if becoming separated and other emergency plans in advance.

(2) Safety Reports to the Company

(a) Reports to Immediate Managers

- Chiyoda personnel shall promptly confirm and report the following safety matters to their immediate manager.
 - a. Safety of themselves and their family members
 - b. Status of damage to their residence
 - c. Ability to report to work
 - d. Other (evacuation site contact number, etc.)

(b) Reports to Managers in Charge at Own Company

- Non-Chiyoda employees and temporary workers shall report to the manager in charge at their own companies, as well as to their immediate manager at Chiyoda.



Chiyoda Group CSR Handbook

4th Edition, August 2014
(Translation of the 4th Edition of August 2014 Japanese Version)

Publisher: Compliance & CSR Unit of Chiyoda Corporation
Copyright © Chiyoda Corporation 2007-2014 Printed in Japan

Unit / Section	Name

The photo of the cover: the Chiyoda Global Headquarters



Japanese

English

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- Commitment to CSR
- Chiyoda Group CSR Vision
- A Reliable Company - CSR Vision 1 -
- Environmental Initiatives - CSR Vision 2 -
- Environmental Management System (EMS)
- Environmental Conservation Activities
- Low Carbon Society
- Chiyoda Group Companies Activities
- Biodiversity
- Environmental Data
- Social Contributions through Business Activities - CSR Vision 3 -
- Respect for Human Rights - CSR Vision 4 -
- Commitment to Fairness - CSR Vision 5 -

Environmental Initiatives - CSR Vision 2 -

The Chiyoda Group will work to remain an invaluable company to society by utilizing refined technologies to promote harmony between the global environment and economic and social activities.

- [Environmental Management System \(EMS\)](#)
 - EMS Organization
 - ISO 14001 Certification
 - Environmental Training
 - Environmental Auditing
- [Environmental Conservation Activities](#)
 - Environmental Activity Categories
 - Environmental Activities
- [Low Carbon Society](#)
 - Overview of Chiyoda's Environmental Technologies
 - Developing GTL to produce clean, environmentally friendly fuel
 - i WaterTM System
 - SPERA HydrogenTM
 - Shuttle Ship Transport and Offshore Injection System for CCS
 - Strengthening presence in Concentrated Solar Power Business
 - CT-CO₂ AR[®] : High Efficiency Synthetic Gas Production Using CO₂
 - Development of a New Manufacturing Process for Production of Propylene
- [Chiyoda Group Companies Activities](#)
 - Chiyoda Philippines Corporation (CPh)
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Employee Website

To PAGETOP

Chiyoda Corporation
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Yokohama 220-8765, Japan
Tel: (81)45-225-7777 (voice guidance)



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Japanese English

Commitment to CSR TOP

Commitment to CSR

Chiyoda Group CSR Vision

A Reliable Company - CSR Vision 1 -

Environmental Initiatives - CSR Vision 2 -

Environmental Management System (EMS)

Environmental Conservation Activities

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Social Contributions through Business Activities - CSR Vision 3 -

Respect for Human Rights - CSR Vision 4 -

Commitment to Fairness - CSR Vision 5 -

Environmental Management System (EMS)

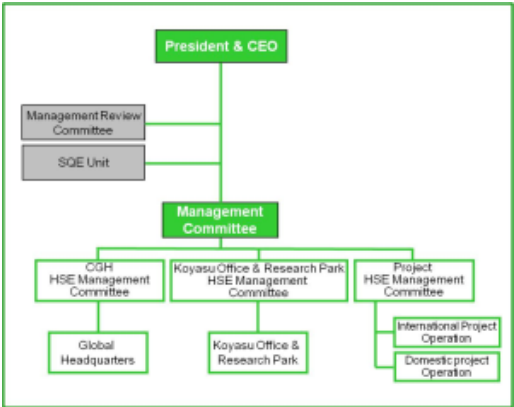
The Chiyoda Group became Japan's first engineering and construction company to acquire ISO14001 certification for environmental management in March 2001, and strives to upgrade the Corporate SQE Policy and management system it has instituted while conducting systematic environmental education and awareness activities.

Environmental Management System (EMS)

At the Group, the SQE Management Committee, which is part of the Management Committee, is responsible for decisions on environmental activities. This committee establishes Corporate SQE Policy and periodically reviews the Company's activities. In addition, the Company has established committees under the direct control of top management to promote occupational safety, health and environmental (HSE) activities. Lower-level committees at each operating base promote independent initiatives in the categories of office activities, R&D activities and EPC* activities.

Moreover, to counter global warming, the Group has established the Global Warming Countermeasures Working Group, which is under the President & CEO and the SQE Management Committee and comprises the general managers or the section managers of the related Units commencing with the Corporate Services Unit. The working group's initiatives to reduce office greenhouse gas emissions include formulating countermeasure plans and auditing the status of plan implementation.

* EPC: Engineering, procurement and construction



ISO14001 Certification

In March 2001, the Chiyoda Group became the first engineering and construction company in Japan to acquire ISO14001 certification. In March 2005, the scope of certification was expanded to include activities at the Research & Development Center . We underwent our fourth renewal inspection in November and December 2012, and with the addition of overseas project EPC operations to the scope of certification in February 2013 ISO certification now covers the management organization shown above.

Environmental Training

Chiyoda Corporation classifies environmental training into the following three areas.

Operational Health, Safety and Environmental Management System (HSEMS) general training:

The Chiyoda Group provides HSEMS general training to all employees covering the objectives of Chiyoda HSEMS, a summary of its structure and required items, general knowledge regarding HSEMS activities, and how to respond to accidents. Chiyoda is reviewing its environmental management system (EMS) general training and preparations to revise this training program are currently underway.



Specialist training:

Nine workshops for acquiring specialized EMS knowledge were held in the fiscal year ended March 2015, with topics including introductory and advanced health, safety and environmental management and environmental law. In addition, pre-assignment supervisor consultation were provided for all site managers.



Special training:

Training for acquiring specialized knowledge of operations that could potentially have a large environmental impact. Total of 97 supervisors have been qualified as Specially Controlled Industrial Waste Manager qualifications until the end of March 2015. Other Environment-related Training.

General environmental training:

General information about the environment and biodiversity is disclosed on the Company intranet for employees to learn about at their own convenience.

Moreover, the Group also implements other special training for HSEMS (Health, Safety and Environment Management System) to ensure human resources with high specialty and qualified person.


Environmental Auditing

The Group conduct annual internal audits environmental activities to ensure they are being carried out properly. In the fiscal year ended March 2013, we carried out simultaneous, combined SQE audits of occupational health and safety (S), quality (Q) and environmental aspects (E) and information security (IS). All key departments and locations undergo these audits every year, while other departments and locations are audited every one to three years according to their assigned level of importance.

The audits also include cover measures taken in response to issues raised by a third-party inspection organization.



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FTSE4Good

Chiyoda is authorized to run the following SRI Index.



Chiyoda is a signatory of the UN Global Compact.

Chiyoda Corporation
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Yokohama 220-8765, Japan
Tel: (81)45-225-7777 (voice guidance)



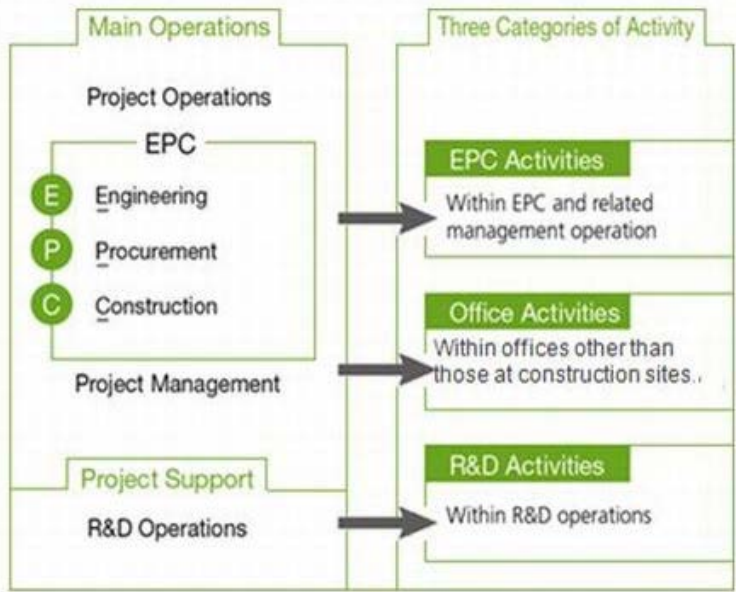
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Environmental Conservation Activities

Environmental Activity Categories

The Group's main operations are in the engineering, procurement and construction (EPC) of plants/facilities, project management with the related support services and research and development. We categorize these operations into EPC, Office and R&D activities, as shown in the diagram below, which also correspond to our environmental activity categories.



We have set environmental or HSE targets for the three areas of EPC, office and R&D. In addition, in Japan and overseas we contribute to the environment through our core business and monitor environmental impact at construction sites and offices while energetically undertaking environmental activities such as promoting recycling and green procurement.

Environmental Activities

EPC Activities

The Group establishes annual environmental goals(HSE targets) for each of its specialized engineering and procurement departments based on the environmental targets shown below. Self-evaluations of performance at the end of the first half and the full fiscal year are applied to the following fiscal year's activities.

<EPC Activities toward Environmental Targets(HSE targets) in the Fiscal Year Ended March 2015>

Target 1 -- Offer Proposals to Customers Considering for harmony with the environment

- Made an average of 1.45 environmental proposals per EMS project in Japan and overseas.

Target 2 -- Assess and reduce output of construction by-products

- The ratio of final landfill quantity to initial disposal quantity for construction sites in Japan during the fiscal year ended March 2015 was 10.1 percent. This is well explained with reasons that a high volume of insulation waste, debris and other hard-to-recycle waste such as glass and ceramics was emitted due to demolition of existing plant facilities in addition to the incineration or landfill disposal of a large quantity of plastic waste in outlying regions.

※Note: Starting from the fiscal year ended March 2011, residue after incineration is estimated at 7 percent of pre-incinerated waste volume and added to final landfill quantity.

Office Activities

- Reservation through intranet made possible in April. Workshop and get-together meetings were increased.
- Use as a venue for events such as concert. Live concert and baroque concert were held.
- Promotion of use as a venue with sales activities by challenged people (sweets etc. to be sold in the refreshment room to support challenged people in Yokohama City).
- After moving the office, the distribution of paper materials during meetings was ceased and instead, displaying materials on PC screens was entrenched.
- Printers were also changed to models with functions to prevent misprints and as the result the number of unnecessary printouts could be reduced.

<Office Energy Conservation Activities in the Fiscal Year Ended March 2015>

A district heating and cooling system is adopted in the new office building to get energy saving effect. In addition, we participate in Yokohama smart city project.

Research and Development Activities

The following are examples of activities based on targets of Occupational Health, Safety and Environment Management System for research and development in the Fiscal Year Ended March 2015.

<Environment activities toward Occupational Health, Safety and Environmental (HSE) Targets for research and development in the Fiscal Year Ended March 2015>

Target 1 -- Ensure compliance with the operation of occupational health and safety management system

- The Group acted to enforce RA (Risk Assessment), the RA review in case the occurrence of a change of the work or a near mistake that might lead to an accident, and to enhance the safety for contracted persons as well. We strengthen the role of the Koyasu HSE executive committee, to sustain a sufficient system for Occupational Health and Safety.



Target 2 -- Enhance the Safety Culture

- The Group performed periodical

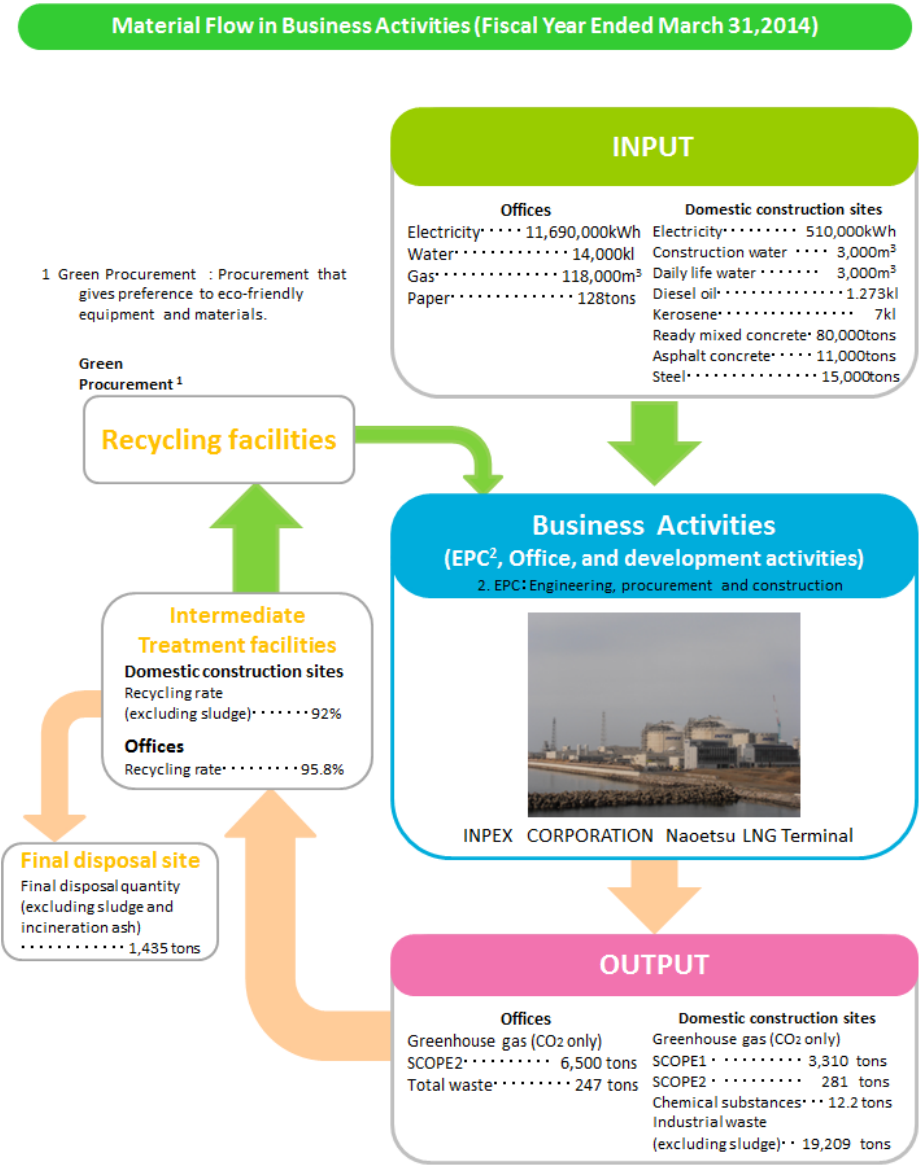
confirmation of working environment and safety system installed at the site of Research and Development Center. We also implemented steady enforcement such as measurement of working environment demanded legally and the special medical examination. We think we achieved the targets, because we have done all activities on schedule set at the beginning of this term.




- The Group carried out safety education in accordance with "Education and Training plan in fiscal year ended March 2015", "Education and Training Plan of procedure against Accident and Emergency " which we planned to complete for three years, and "Safety Education plan in fiscal year ended March 2015" called for high pressure gas. In addition, when a near mistake that might lead to an accident, occurred by the Koyasu HSE executive committee was held to discuss and feed back the results to each workplace. We evaluate that we could perform the HSE training as planned.

Material Flow

Material flow in business activities for the fiscal year ended March 2015 is shown below.





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CSR

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Commitment to CSR

Environmental Initiatives - CSR Vision 2 -

Low Carbon Society



Commitment to CSR

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Low Carbon Society

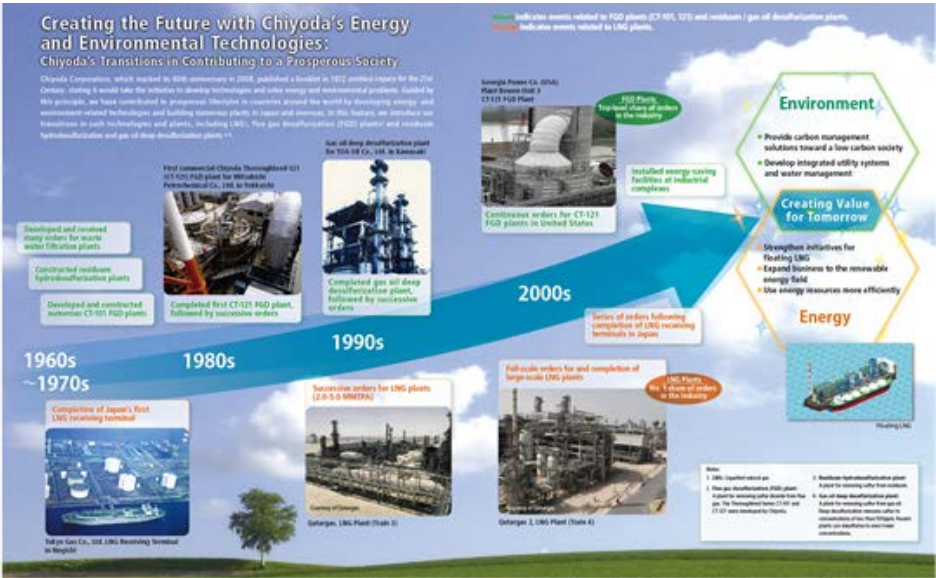
The Chiyoda Group conducts its business with a corporate philosophy centered on “Energy and Environment in Harmony.” Chiyoda has been fulfilling this philosophy since the 1970s by using technology development and engineering for both stable energy supply and environmental protection.

The environmental technologies we have developed include flue gas desulfurization, wastewater treatment and heavy oil cracking. Recently, in response to public demand, we have been steadily expanding our activities in the area of new energy. These include using solar photovoltaic, solar thermal, geothermal, biomass and other types of renewable energy, a hydrogen supply chain with our own technology for storage and transport of large quantities of hydrogen, and Gas to Liquids (GTL)-related technology.*

*Technology for producing liquid fuel from natural gas

Overview of Chiyoda's Environmental Technologies

Creating the Future with Chiyoda's Energy and Environmental Technologies: Chiyoda's Transitions in Contributing to a Prosperous Society



Examples of environmental technologies we are currently promoting.

As a joint project, Chiyoda is developing the Japan Gas to Liquids (GTL) technology to produce clean, environmentally friendly fuel.

Contributing to Stable Energy Supply and Greenhouse Gas Reduction
Gas to Liquids (GTL) Technology Using CO₂ as a Raw Material

A demonstration test project aimed at establishing Japan Gas to Liquids (GTL)*¹ technology was operated in Niigata Prefecture, with a production rate of 500 barrels per day. This is a joint project between the Japan Oil, Gas and Metals National Corporation and the Nippon GTL Technology Research Association composed of six private companies: INPEX Corporation, Nippon Oil Corporation, Japan Petroleum Exploration Co., Ltd., Cosmo Oil Co., Ltd., Nippon Steel Engineering Co., Ltd. and Chiyoda.



Fuels produced using GTL technology are promising as clean, environmentally friendly fuels because they are free of sulfur and aromatic compounds. Existing GTL technology uses natural gas as a raw material, but CO₂ must be removed. However, a feature of the Japan-GTL technology is that it employs Chiyoda's unique CO₂ reforming catalyst that allows natural gas containing significant amounts of CO₂ to be used as a raw material. This breakthrough technology opens a path to new, clean fuels using natural gas, which is found widely throughout the world, as a raw material. The demonstration plant, completed in April 2009, is under a two-year demonstration operation. We are looking at practical applications for this unique GTL technology to secure a stable energy supply while contributing to the global environment.

*¹ Gas to Liquids (GTL) Technology: Technology in which natural gas passes through a syngas (hydrogen and carbon monoxide) to become liquid hydrocarbon fuel.

i Water™System

Chiyoda has developed a next-generation water recycling system, the i Water™ System, as a solution to cope with increasingly severe water pollution and water shortages. This recycling system purifies and reclaims industrial wastewater from petroleum and chemical plants for re-use in plants as cooling water or boiler feed water. The reclaimed water can be supplied in the volume and quality that users require. One project related to this system is an order received in March 2011 from Marafiq, a power and water utility company in Jubail Industrial City, Saudi Arabia, to determine the feasibility of treating and re-using industrial wastewater in the industrial park. Through pilot tests and other processes, Chiyoda is aiming to contribute to the water environment in the industrial park by designing and proposing an i Water™ System. Chiyoda will continue to aggressively promote the i Water™ System for effective use of water resources.



[Click here](#) for further details on Chiyoda's environmental technologies.

SPERA Hydrogen™

Hydrogen is a clean energy that produces water when it combusts. As such, it is expected to play a key role in the low-carbon society of the future. Chiyoda has developed the world's first technology that enables the storage and transportation of large quantities of hydrogen energy. Using this technology, hydrogen is fixed to liquid toluene with a hydrogenation reaction as liquid methylcyclohexane (MCH). Since toluene and MCH are in the liquid state under ambient

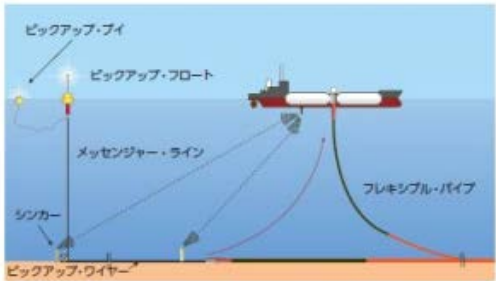


The hydrogenation and dehydrogenation reactors

temperature and pressure, it is easy to store hydrogen in large quantities over long periods without loss using ordinary tanks and transport with conventional chemical tankers for long distances without the cryogenic technology that liquefied natural gas and liquid hydrogen require. A test run conducted at a demonstration plant located in Chiyoda's Koyasu Office & Research Park in Yokohama verified the technology's expected performance. Chiyoda is now working to create a large-scale hydrogen storage and transportation system to supply large amounts of clean hydrogen energy to users around the world under the name SPERA HydrogenTM (the "Hydrogen of Hope").

Shuttle Ship Transport and Offshore Injection System for CCS

Carbon dioxide (CO₂) capture and storage (CCS) is a technology used to separate and recover CO₂ from the flue gases of thermal power plants and other facilities, then ship it to a storage site, and inject it under the seabed. It is one of the most powerful methods for global warming mitigation. Three modes of transport – pipeline, ship and truck – are currently being developed and studied as transport methods in CCS. Shuttle ship transport and offshore injection is a new ship-based CCS system. Using grants received over two years from the Global CCS Institute(GCCSI) established by the Government of Australia, Chiyoda verified technical and economic feasibility of the system with technical guidance from Professor Masahiko Ozaki of the University of Tokyo, who originated the concept. In this system, a medium-sized (3,000-ton capacity) shuttle ship is used to transport liquefied CO₂ to an unmanned, offshore storage site. The liquefied CO₂ is injected directly into the bore hole through a flexible riser pipe. The advantages of the system include its functionality over longer distances and in deeper water than pipeline transport, its adaptability to changes in shipping volume and distance, and its ability to function with smaller onshore and offshore facilities than larger ships. Chiyoda is developing an integrated CCS system, incorporating the separation and recovery method, for contributing to global warming mitigation.



The shuttle ship and offshore injection system for CCS

Note : A report on the shuttle ship transport and offshore injection system is available on the GCCSI website:
<http://www.globalccsinstitute.com/publications>

Strengthening Presence in Concentrating Solar Power Business

Chiyoda is also focusing on developing business in the field of concentrating solar power (CSP). In October 2012, Chiyoda acquired a 15 percent equity stake in Italian company Archimede Solar Energy(ASE). The two companies had previously signed a cooperation agreement in June 2011 to develop business in Molten Salt Parabolic Trough Concentrating Solar Power (MSPT-CSP), a next-generation solar power generation technology.ASE is the world's only manufacturer of the receiver tubes that are a core technology of MSPTCSP systems. Chiyoda and ASE have been working together in the construction and operation of a plant to demonstrate this



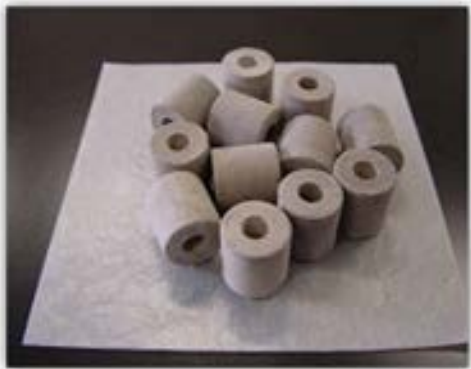
Demonstration plant in Italy

technology. In January 2013, Italy implemented a system under which electric utilities are obliged to purchase electricity generated from renewable energy sources at a fixed price. Expectations that this new system would accelerate the expansion of the MSPT-CSP business led Chiyoda to invest in ASE. The investment in ASE, which specializes in this industry and business, positions Chiyoda to develop the CSP business while expanding EPC orders and sales of ASE's receiver tubes. CSP business opportunities in Italy will provide a foothold for expansion of this business in the Middle East and North Africa. In this way, Chiyoda will contribute even more to the supply of clean energy.

CT-CO₂ AR®: High Efficiency Synthetic Gas Production Using CO₂

Chiyoda Group has accomplished effective utilization of CO₂ by developing a high-efficiency reforming process—CT-CO₂ AR®—employing a novel catalyst. This catalyst was already commercialized in an existing synthetic gas plant last year, exhibiting smooth and safe operation. The technology, comprising a catalyst with high resistance to carbon formation, produces synthetic gas from natural gas with higher efficiency than conventional reforming technology. It reduces energy consumption by around 10% and reduces carbon dioxide emission drastically.

CT-CO₂ AR® can not only reduce energy consumption by replacing the existing catalyst with a superior one, but can also achieve remarkable environmental benefits when applied to grass-root plants. Furthermore, it leads to resource minimization by downsizing facilities, and is expected to effectively utilize the CO₂ contained in natural gas. The technology succeeds in greatly reducing the environmental burden from chemical plants, such as oxo-alcohols and acetic acid.



High Efficiency Catalyst for reforming CO₂

The Development of a New Manufacturing Process for Production of Propylene

Propylene, one of the basic industrial chemicals, is mainly produced by thermal steam-cracking of hydrocarbon feedstock such as naphtha at present and alternative methods are desired to improve both high energy consumption and low propylene selectivity.

The Group has been developing an energy saving propylene manufacturing process by means of fixed-bed-type catalytic cracking using our own zeolite catalysts. We have received high appraisal for the results and won the Best Paper Award in the Fuels & Petrochemical Division of the American Institute of Chemical Engineers. The Group will accelerate its research and development to commercialize this technology and contribute to saving energy and reducing CO₂ emissions by applying it to non-conventional fossil resources such as shale gas and oil.



Best Paper Award

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The logo for FTSE4Good, featuring a green globe with a stylized '4' and the text "FTSE4Good" below it.

The logo for The Global Compact Network Japan, featuring a blue globe with the text "THE GLOBAL COMPACT" and "Network Japan WE SUPPORT" below it.

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Chiyoda Group Companies Activities

Chiyoda Group Companies carry out the following activities.

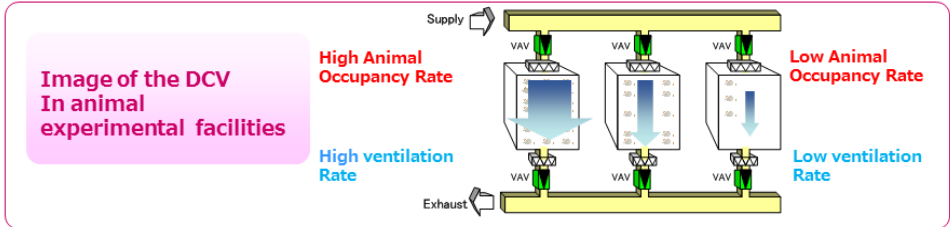
Chiyoda Philippines Corporation (CPh)

CPh renewed commitment to our society by planting more than one hundred fifty (150) saplings at Sitio Labahan, Barangay San Isidro, Angono, Rizal last April 05, 2014. The activity was participated by Sixty five (65) employees headed by our former President and CEO Mr. Kazuhisa Yanagihara. The activity was also meant to strengthen the camaraderie among employees by planting trees and shows that we care about the environment.



Chiyoda TechnoAce Co., Ltd. (CTA)

Energy saving is one of the most important issues of animal experimental facilities because a lot of energy is used in order to operate an air conditioning system for 24 hours, meet severe requirements for air quality and take in a large volume of outside air (ventilation rate). To cope with the above issues, Chiyoda TechnoAce introduced Demand Control Ventilation (DCV). This system is expected to save energy by reducing ventilation rate according to the animal occupancy or other good indoor air quality factors.



Through the series of our field wwvs in commissioning phase, we have verified that this air conditioning system works sufficiently for future DCV in terms of temperature uniformity and pressurization controllability.

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FTSE4Good

Chiyoda is authorized to run the following SRI Index.



Chiyoda is a signatory of the UN Global Compact.

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Biodiversity

The Chiyoda Group set forth and carried out initiatives to implement basic principles on preserving biodiversity (below).

1. Adhere to agreements and laws concerning biodiversity
2. Conduct biodiversity-conscious corporate activities
3. Raise employee awareness of biodiversity preservation
4. Proactively disclose information on initiatives

Internal Activities

As an internal initiative, Chiyoda aggressively makes environmental proposals to customers in engineering, procurement and construction work on plants and facilities. We made 376 such proposals for domestic and overseas projects in the fiscal year ended March 2015.

Forest Preservation Activities



Participation in Local Forest Preservation Activities

As one of its biodiversity preservation initiatives, Chiyoda has joined Foundation Kanagawa Trust Midori to support employees' forest preservation activities.

Tree thinning and planting Activities

As a part of restoration activities following the Great East Japan Earthquake, we are cooperating for such activities as tree thinning and planting activities in the areas damaged by bushfires due to tsunami in Kamaishi and Otsuchi.

In 2014, on the mountain slope, we cut the chopped down pine trees with chain-saw in such size as to be easy to carry, trimming the branches with saw, and stored them in several places, and also worked to prepare for planting trees.



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Environmental Data

The Chiyoda Group We contribute to society through our business activities in Japan and overseas. In addition, we monitor major environmental data at domestic and overseas construction sites and offices, and actively promote environmental activities, such as recycling and green procurement.

- [Status of Construction By -Product Disposal at Construction Sites in Japan \(PDF/339KB\)](#)
- [Office Environment \(PDF/214KB\)](#)
- [Environmental Accounting \(PDF/162KB\)](#)

Environmental Data for the Fiscal Year Ended March 2015



Status of Construction By-Product Disposal at Construction Site in Japan

■ Construction Waste by Type

Construction Waste by Fiscal Year (Tons)

Fiscal Year	FY Ended March 2012				FY Ended March 2013				FY Ended March 2014				FY Ended March 2015			
Type of Industrial Waste	Disposed Quantity	Recycled	Incinerated	Landfill	Disposed Quantity	Recycled	Incinerated	Landfill	Disposed Quantity	Recycled	Incinerated	Landfill(*1)	Disposed Quantity	Recycled	Incinerated	Landfill(*1)
Sludge	2,077.1	2,047.4	0.0	29.7	329.8	315.7	6.4	7.7	3,776.0	3,558.1	0.1	217.8	2,166.0	1,453.2	0.3	712.4
Oil	5.4	0.5	4.9	0.0	145.0	94.6	50.4	0.0	4.6	0.0	4.6	0.0	0.2	0.0	0.2	0.0
Acid	0.2	0.2	0.0	0.0	84.9	70.7	14.2	0.0	4.6	0.8	1.9	1.9	3.7	0.0	0.0	3.7
Alkaline	199.2	0.2	25.4	173.5	557.2	532.1	25.1	0.0	16.1	3.9	0.0	12.2	13.9	0.0	13.9	0.0
Plastic	877.2	609.4	21.1	246.7	996.2	720.6	90.5	185.1	1,266.4	871.6	34.3	360.6	632.9	436.8	24.4	171.9
Paper	106.1	76.0	2.6	27.4	187.1	128.4	16.9	41.8	211.0	158.6	12.1	40.3	177.3	170.5	6.0	0.8
Wood	833.9	822.8	10.6	0.6	1,391.5	1,381.5	9.7	0.3	3,672.4	3,656.4	7.2	8.9	3,880.1	3,833.7	33.8	1.8
Textiles	1.1	0.4	0.7	0.0	0.5	0.5	0.0	0.0	0.1	0.0	0.1	0.0	0.5	0.2	0.3	0.0
Rubber	14.6	0.1	14.5	0.0	0.5	0.0	0.5	0.0	0.5	0.0	0.0	0.5	1.4	0.0	0.5	0.8
Metal	341.1	340.4	0.0	0.7	318.5	316.0	0.0	2.5	184.2	184.2	0.0	0.0	131.7	130.3	0.8	0.9
Glass and ceramic	182.5	41.8	22.0	118.8	321.2	116.0	0.0	205.2	212.5	56.8	0.0	155.8	808.3	47.9	0.0	561.4
Plasterboard	149.7	142.3	0.1	7.3	223.2	202.1	1.2	19.9	152.4	147.6	0.0	4.9	109.0	102.2	0.0	6.8
Non-friable asbestos	0.0	0.0	0.0	0.0	0.0	0.0	0.0	104.8	18.1	0.0	0.0	18.1	0.0	0.0	0.0	0.0
Slag	46.3	0.6	0.0	45.7	6.0	6.0	0.0	0.0	12.1	0.0	0.0	12.1	43.4	0.0	0.0	43.4
Rubble (total)	1,189.1	841.7	0.0	347.4	397.2	292.4	0.0	0.0	230.5	176.6	0.0	54.0	392.0	232.3	0.0	159.7
Concrete debris	5,314.0	5,314.0	0.0	0.0	3,404.5	3,404.5	0.0	0.0	2,874.8	2,874.8	0.0	0.0	10,131.2	10,131.2	0.0	0.0
Asphalt concrete debris	904.0	897.3	0.0	6.7	1,509.2	1,509.2	0.0	0.0	792.7	792.7	0.0	0.0	1,433.1	1,433.1	0.0	0.0
Other rubble types	0.0	0.0	0.0	0.0	13.9	0.9	0.0	13.0	1,125.1	1,090.3	0.0	34.8	1,072.1	978.8	0.0	92.4
Mixed (stable)	78.1	53.5	3.5	21.1	31.6	16.8	0.0	14.8	171.4	43.6	0.0	127.8	58.9	16.9	0.0	43.0
Mixed (including managed substances)	54.5	21.2	0.0	33.3	147.1	95.1	0.0	52.0	387.4	186.7	33.3	167.4	728.7	349.4	31.1	348.1
Specially controlled waste	6.0	0.7	0.0	5.3	15.9	3.2	8.1	4.6	17.3	6.1	0.0	11.3	0.7	0.0	0.0	0.7
Total	12,380.1	11,210.5	105.4	1,064.2	10,081.0	9,206.3	223.0	651.7	15,130.2	13,808.4	93.5	1,228.3	21,376.1	19,118.3	111.0	2,147.8
Total (excluding sludge)	10,303.0	9,163.1	105.4	1,034.5	9,751.2	8,890.6	216.6	644.0	11,354.2	10,250.3	93.4	1,010.5	19,208.1	17,883.1	110.7	1,435.5

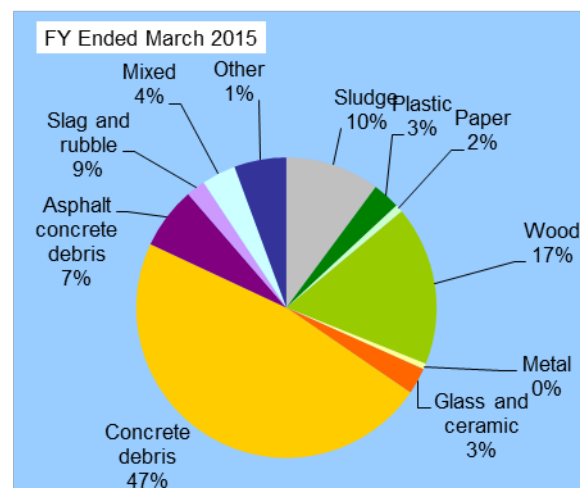
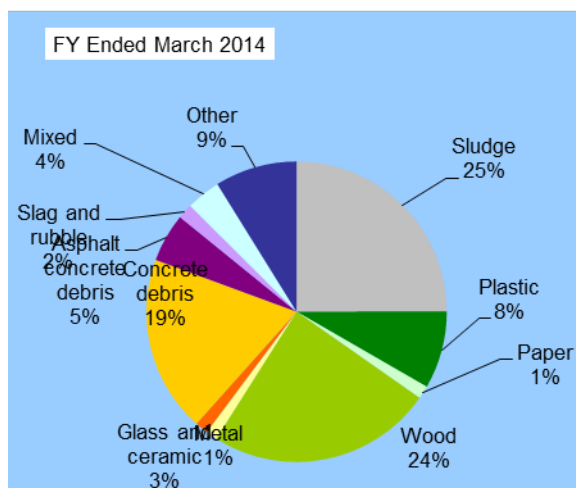
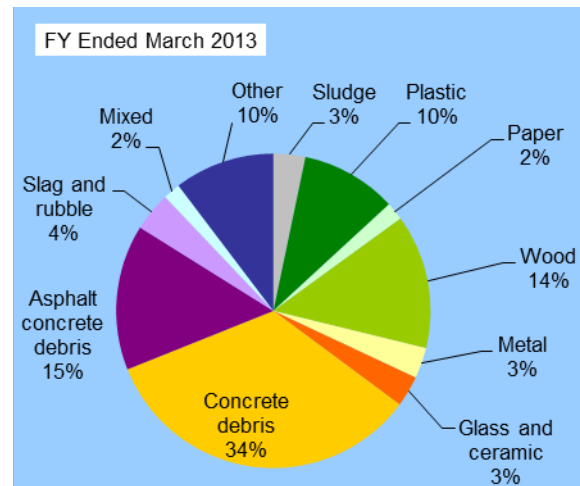
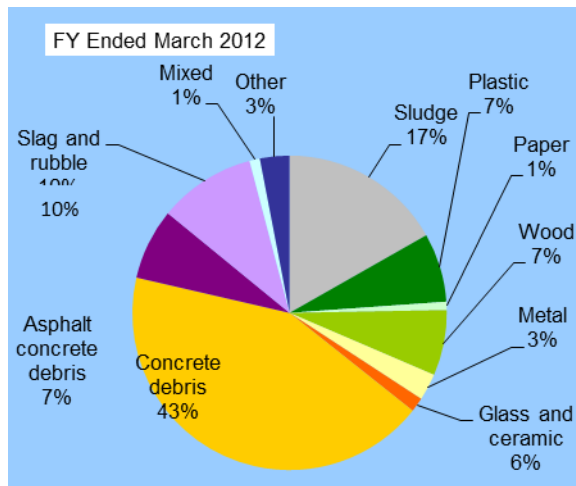
Note: Total excluding sludge is included for year-to-year comparisons that exclude the impact of special factors for individual projects.

(*1) : including the disposal into the sea.

Environmental Data for the Fiscal Year Ended March 2015



Composition of Construction Waste by Fiscal Year



Composition of construction waste tends to change considerably each year. The principle factor is whether large-scale buildings have been removed and the sites fully cleared, which can significantly alter the proportion of waste concrete and asphalt concrete and sludge in particular.

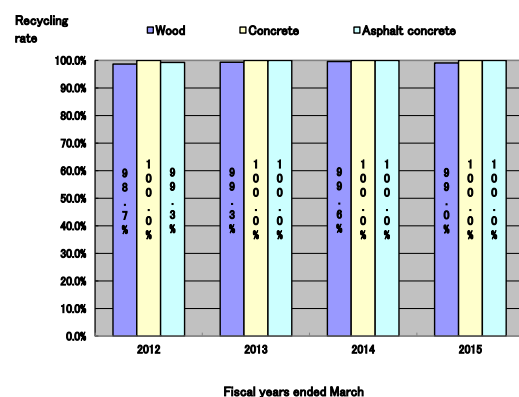
■ Status of Recycling vs. Other Disposal Methods

Recycling Rate for Construction Waste (Excluding Sludge)



The rate of recycling for construction waste materials varies widely by year depending on the type of construction.

Recycling Rates for Three Items Subject to the Construction Material Recycling Act



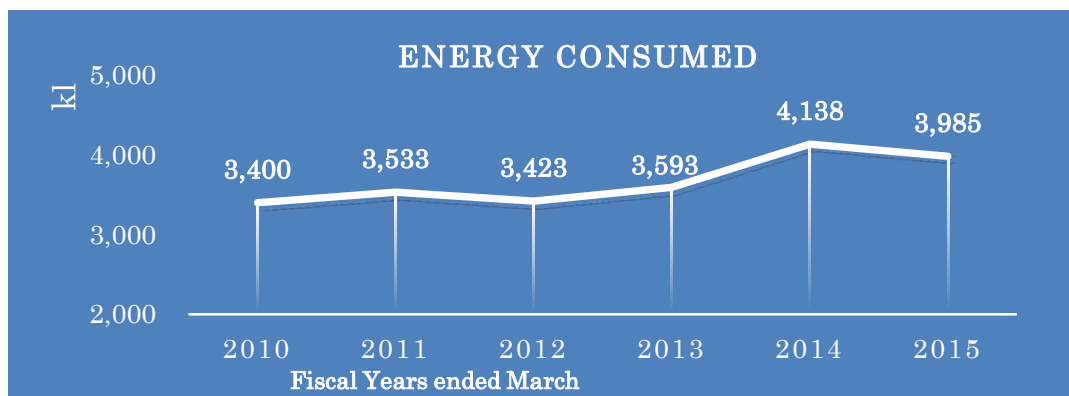
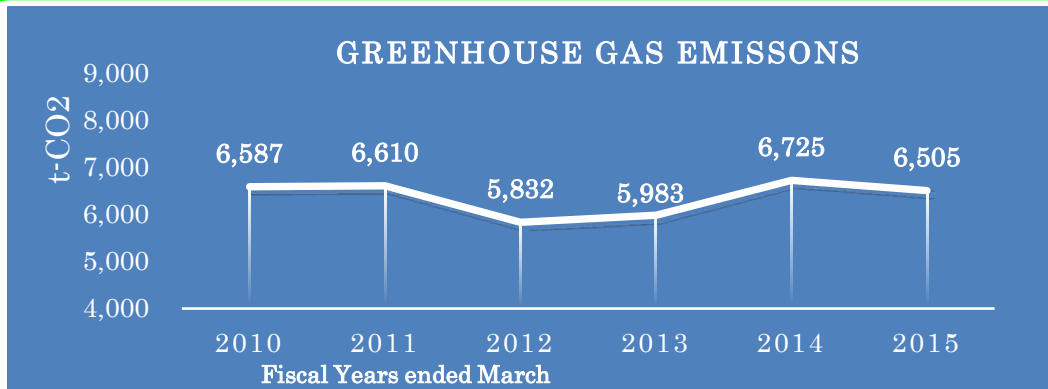
Environmental Data for the Fiscal Year Ended March 2015



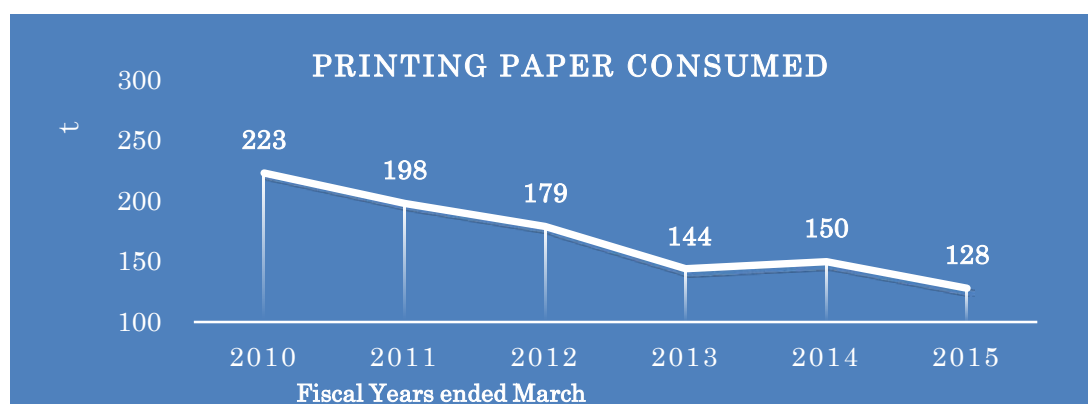
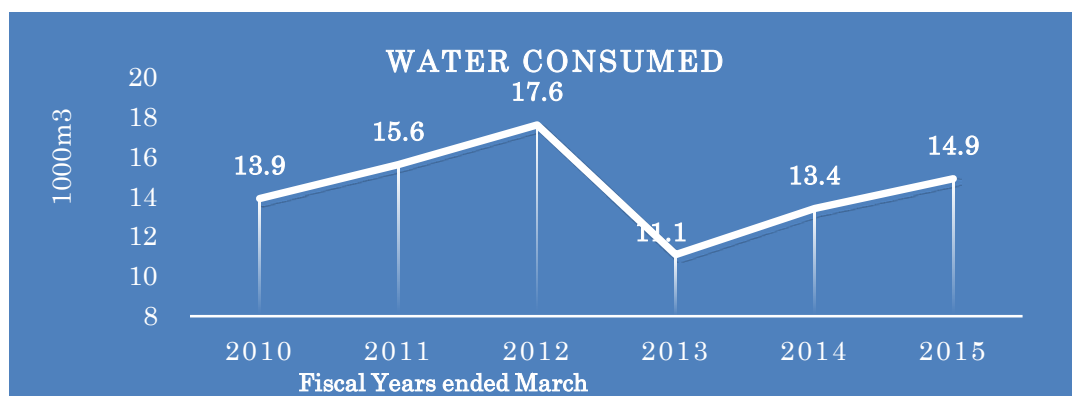
Office Environment

The data herein are shown with the gross weight.

(Note: The data were shown with numerical value per amount of completion construction until last fiscal year.



Environmental Data for the Fiscal Year Ended March 2015



Environmental Data for the Fiscal Year Ended March 2015



Environmental Accounting

Chiyoda Corporation's primary business is engineering, and introducing environmental accounting requires examination of various issues. Although Chiyoda has not officially introduced environmental accounting, it plans to continue examining how to use environmental accounting from its position as an engineering company.

During the fiscal year ended March 2015, Chiyoda undertook a partial evaluation of its environmental initiatives with the aim of reflecting the results in environmental management. Below are the results of an analysis of the data conducted in conformance with the Ministry of the Environment's Environmental Accounting Guidelines.

■ Costs for Environmental Protection for the Fiscal Year Ended March 2015

Breakdown of costs		Main activities	Costs (¥ million)	Applicable area
1. Business area costs	(1) Pollution prevention costs	Not applicable	0	Office activities
	(2) Global environmental protection costs	Not applicable	0	Office activities
	(3) Resource recycling costs	Waste disposal, recycling	130.6	Office activities, construction sites in Japan
2. Upstream and downstream costs		Not applicable	0	Office activities
3. Administration costs		Environmental meetings, internal audits, certification reviews, on-site environmental management, administrative committees, etc.	139.0	Office activities, construction sites in Japan
4. R&D costs		Environment-related research and development	1,027.7	Total cost of environment-related research and development
5. Social activity costs		CSR report production, company tours, Reconstruction activities, Volunteer activities.	11.2	Office activities and environmental promotion costs
6. Environmental remediation costs		Not applicable	0	Office activities, construction sites in Japan
Total			1,308.5	



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Social Contributions through Business Activities - CSR Vision 3 -

Through our engineering business in Japan and overseas, the Chiyoda Group contribute to local communities in ways including human resources development, technology transfer and environmental protection.

- Contribution to Local Communities
 - Promotion of Employment Opportunities and Transfer of Technology
 - Contribution to Local Communities
 - Chiyoda Group's Activities
- Human Resources
 - Domestic Activities in Japan
 - Overseas Activities
- Fundraising • Donations
 - Domestic Activities in Japan
 - Overseas Activities
- Main Activities Implemented in fiscal year ended March 2015 (FY 2014), including domestic Group

Cooperation for university education activities (dispatch of lecturers)	16 people
Training for interns	67 people
Visiting seminars (including non-internship workplace tours)	7 times
Community cleanup campaigns	Total of 100 people
ECOCAP program to enable the purchase of vaccines	198,316 caps (equivalent to those for 231 persons)
Disaster-hit areas support (dispatch of volunteers)	37 people
Support to challenged people	<ul style="list-style-type: none">In-house sale events of goods made by challenged people: 7 timesInviting 50 people from the Yokohama Blind Association to a concert
Food aid activity as TABLE FOR TWO	Total of 1,817 meals

Collaboration with NPO	<div><div>• Harvest Japan</div><div>• Food Bank Yamanashi</div></div>
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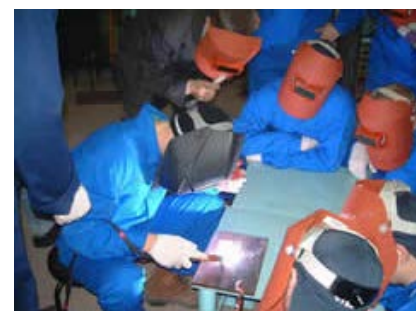

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Contribution to Local Communities

With the following basic policies, the Chiyoda Group has been conducting its social contribution activities.

1. Promote activities that contribute to local communities through our businesses
2. Enhance social contribution activities by providing intelligence and labor
3. Promote communication with stakeholders
4. Strengthen collaboration with outside institutions and nonprofit organizations

Further, the Group comprises group companies and field offices in Japan and overseas. Each company's head office and field offices endeavor to communicate with their stakeholders to continuously realize social contribution activities deep-rooted in their surrounding communities.



Welding technology training school
in Sakhalin

Promotion of Employment Opportunities and Transfer of Technology

The Chiyoda Group consistently promotes employment opportunities and technology transfer in Japan and overseas.

- **Promotion of Employment Opportunities.**

We give priority to using the services of local firms and hiring local workers.

LNG Project in Papua New Guinea extensively employed approximately 2,500 people from four local villages. Furthermore, nine young local engineers were given training in the Chiyoda Global Headquarters, machine manufacturing companies and on construction sites.



Chiyoda Sarawak Sdn. Bhd. (CSSB)

CSSB promoted employment of local workers for TMP2

Project execution with job placement programs implemented at several regions in Malaysia from March 2012.



- **Technology Transfer**

We provide health and safety training to raise the safety consciousness and technical skills of workers. We give priority to local firms in setting up construction site camps.



We establish welding schools to raise welders' skills. We prepare safety education programs and conduct health and safety training courses for local workers.

We invite young foreign engineers to provide them with on-the-job training in Japan. 24 staff members from various countries attended the 1st Japanese language school opened at CSSB in cooperation with Sarawak Japan Friendship Club on August 17, 2013.

CSSB trained local workers to be gas pipe fitters. All of 20 gas pipe fitters passed the accreditation test.



Contribution to Local Communities

In addition to the above contributions through its business activities, the Chiyoda Group has been conducting various activities with the aim of cooperating and coexisting with local communities.

Domestic Activities in Japan

- **Community Cleanup Campaigns**

The Group cooperate with local governments and community groups in cleanup campaigns in Minatomirai and Koyasu districts of Yokohama, where Chiyoda Global Headquarters and Koyasu Office & Research Park are located, and in the neighborhoods around field offices of construction sites.



The group have been participating in monthly cleaning activity of the Minatomirai 21 Grand Mole Park Humane Society since 2014, and more than one hundred employees participated in 2014.

Cleanup Campaign in the Koyasu District

In addition to participating in the cleanup campaign sponsored by Kanagawa Ward, the Chiyoda Group also carries out its own cleanup activities with its volunteer employees cleaning up the commuting route from the train station early in the morning. In the fiscal year ended March 2013, a total of 7 employees participated.



- **Purchase of Green Electricity**

According to the number of employees participating in restoration support activities at natural disaster-stricken areas, cleanup campaigns or other social contribution activities, Chiyoda calculates and affords a certain monetary amount for such activities, which amount is then subsidized for purchasing environment-friendly green electricity. In FY 2014, we purchased 15,000 kWh of green electricity generated by biomass.

- Volunteer Activities in the area of Great East Japan Earthquake**



The Group has been supporting its members to promote their social contribution activities in regional societies under the motto of “CSR to be promoted by each as a participant” since 2012. As part of this, volunteer members of the Group employees have been dispatched to the disaster-affected areas of the Great East Japan Earthquake twice a year, besides the dispatch to Shichiga-hama, Miyagi and Shirakawa, Fukushima. This fiscal year, the volunteer activities were conducted in Otuchi, Kamaishi and Rikuzen Takata, Iwate in May and November. Those included are the interaction with the kindergarten children through environmental lessons in collaboration with the local party “Oraga-Otushi Yume Hiroba”, reforestation activities under the guidance of Kamaishi Forestry Association and Kirikiri-koku , supporting the community in developing energy circulation system, supporting the construction of a workplace named “ Nadeshiko Kobo” to be used for making regional products and also used for an administration office of the area tourism. Then, the products were sold in the Group in-house sale in Yokohama.



This sale had been held thirty (30) times as of June 2015. Furthermore, since 2012 the Group’s employees have also visited a junior high school in Sendai-city, Miyagi annually and given a lecture to the students on its global activities. The Group also accepted them on their school trip to Chiyoda Global Headquarters in Yokohama. The Group constantly continues with its efforts to improve its activities by way of exchanging views with regional experts or local residents, and through discussions among the volunteer members including in house questionnaires.

- Cooperation with Local Governments**

The Group has disaster prevention agreements with the Kanagawa Ward Office, the local government of the Koyasu district and other private companies to cooperate in the event of a disaster to jointly support those suffered.

Chiyoda participates in environmental preservation efforts led by the local government where its global headquarters is located. (Such as participation in the Yokohama Climate Change Policy Business Conference, registration on the Eco Porto website of the Yokohama Environmental Planning Bureau, registration on the Yokohama Energy Map, etc.)

In-house sale events of goods made by challenged people are periodically held. Proceeds from the sales help support the people who made the goods (Heart-made goods).



In addition, such Heart-made goods are offered to the participants as souvenirs for “Chiyoda Family Day”. The family day event is held at Chiyoda Global Headquarters once a year for the purpose of promoting closer family ties as well as encouraging and helping employees to make their family members gain a better understanding of the nature of Chiyoda’s business and work environment. Since 2010, in accordance with the request from the Kanagawa Prefecture’s Education Board, Chiyoda has been collaborating in promoting the education at home, including promotions to participate in local communities’ clean-up campaign by families, and “Chiyoda Family Day” event, etc. Chiyoda has also been awarded a certificate as a collaborating company for the promotion from the Education Board * and continued efforts to further proceed with the relevant activities as part of realizing “Work Life

Balance”.

Activities of Chiyoda group companies

● **Chiyoda U-Tech Co. Ltd.(CUC)**

CUC continues international contribution as part of their consulting business, mainly through the Japan International Cooperation Agency (JICA). In addition, in the field of human resource development, they support as the secretariat in the educational training for the staffs of overseas customers hosted by CGH.U-Tech continues international contribution as part of their consulting business, mainly through the Japan International Cooperation Agency (JICA). In addition, in the field of human resource development, they support as the secretariat in the educational training for the staffs of overseas customers hosted by CGH.

● **Arrowhead International Corporation (AIC)**

AIC has been collaborating with the Environmental Fund of JATA (Japan Association of Travel Agents) in JATA’s Pamphlet Recycle System for Travel Agencies * to collect the used travel pamphlets. In 2014, AIC collected and donated 24 cartons of those.

*(The recycling system started in November 2009. It recycles tour pamphlets that are no longer needed by JATA member companies. JATA donates part of the sales profit of waste papers to JATA environmental foundation.)

● **Chiyoda (Thailand) Limited (CTL)**

CTL worked with universities, local government and local communities on regional development.

● **L&T-Chiyoda Limited (L&TC)**

L&TC organized an exhibition of handicraft items like mobile phone pouches, bookmarks, diaries, and candles made by challenged children from ‘Astiva’, a reputed NGO on October 25, 2013.

Astiva foundation is an NGO based in Bajwa village, Baroda where about 30 challenged children are educated, trained and rehabilitated. L&TC employees, fully supporting the objective, bought various items to encourage the creativity of such children.



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Human Resources

Domestic Activities in Japan

- Internship/Workplace Experience Program**

The Chiyoda Group offers internships for university undergraduate and graduate students. 67 students participated in the internships in the fiscal year ended March 2015 at Chiyoda.

- Dispatch of Instructors to Universities**

The Chiyoda Group dispatches 16 sophisticated members to the universities to give lectures in the fiscal year ended March 2015.

- Visiting Seminars and Career Education Supports for Elementary Schools /Junior High Schools**

The Group builds plants around the world that handle energy resources, water and air, and we utilize such experience to educate the next generation. The classes emphasize the importance of energy resources along with environmental conservation such as water and air.

In the fiscal year ended March 2013, we provided environmental classes for 118 fifth-grade students at Tsurumi Elementary School in Yokohama City and about 120 first-grade students at Imai Junior High School in Kawasaki City. The lively classes included quizzes and an experiments. The experiments made the children excited with joy.



Environmental class at an elementary school



Environmental class at a junior high school

In the fiscal year ended March 2015, the Group held the visiting seminars seven (7) times.

One of such seminars was held for the second-year students at Koyodai Junior High School in



Sendai, Miyagi Pref. in November, 2014. We gave a lecture on our global business activities as an engineering company. This seminar was followed up by our hosting some of the students' visit to Chiyoda Global Headquarters in Yokohama as part of the school excursion in May the following year. This kind of interchange with Koyodai Junior High School has been conducted since the fiscal year ended March.

The students explained on Chiyoda's SPERA hydrogen

• **Workplace On-site Training**

The Group has been collaborating since 2014 with a NPO "JUKE" in providing high school students in Kanagawa Prefecture with one day program of a workplace experience at its Global Headquarters in Yokohama as part of the study to build their career path. This program aims for them to understand "what and how is it for them to work as employees" through the one day hands-on experiences together with its employees. In 2015, Chiyoda received six (6) high school students (3 each from Seiko Gakuin and Senzoku Gakuen High Schools) at its workplace and have them learn what and how global activities are.



The students experiencing wearing a safety gear, harness

Overseas Activities

Chiyoda Group companies overseas conduct the following activities.

• **Chiyoda Singapore Ltd. (CSL)**

On 4th June 2014, CRC came across the "Adopt a Bank Box" section in the Food Bank Website, whereby a box will be adopted, and collect unwanted yet unopened and unexpired food items. These food items will then be made available to those in need, namely community service providers etc., via a network of The Food Bank Singapore Ltd's network of members beneficiaries.

Beginning 9th July 2014, a "Bank box" was adopted and installed in the CRC room, collecting food products, until the near full box was returned on 4th Aug 2014.

• **Chiyoda Almana Engineering**

Chiyoda Almana contributes to the development of human resources through various training and internship programs. We have provided programs not only for professionals working in Qatar, but also for Qatari and Japanese students. This activity was also introduced in the media "GULF TIMES" as the Universities Internship Program 2015.

• **Chiyoda Philippines Corporation (CPh)**

In cooperation with the Philippine Red Cross, Chiyoda Philippines Corporation (CPh) conducted the blood donation campaign with the theme "Give the Gift of Life – a little pain leads to a life to gain" on October 21, 2013 & February 19, 2014 at the CPh offices. More than 100 donors participated in the blood donation on each day.



• **L&T-Chiyoda Limited (L&TC)**

L&T-Chiyoda Limited (L&TC) conducted a blood donation campaign on the occasion of "World Blood Donor Day" on June 14, 2013. The blood donation was also organized on the eve of the Company's Incorporation Day i.e. 17th November 2013.




• **Chiyoda Malaysia Sdn. Bhd. (CMSB)**

Industrial Training was provided at CMSB from February 4, 2013 to April 30, 2013

Our industrial training initiatives at Chiyoda Malaysia provides a very unique hands-on experiences encouraging participating interns to have fresh ideas and different outlooks. Our internships allow them to be part of the working group from the first

day as we include them in ongoing challenging projects as a part of their experience in this training. Our goal is to help the interns hone their skills as preparation for entering the oil and gas industry. They will have mentors, gain valuable information from meeting/discussion sessions and visiting industrial sites for advance experience. They will also have a lot of fun, with frequent social events that allow them to network with fellow colleagues coming from various districts. Our corporate internships will not only give them a window into working at CMSB, but also a knowledge on the real-world that they can utilize wherever they go.

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Fundraising • Donations

In addition to enhancing social contribution activities by providing knowledge and labor, Chiyoda Group companies are strengthening collaboration with outside institutions and nonprofit organizations while conducting fund-raising and donations.

Domestic Activities in Japan

- Donations for the Great East Japan Earthquake**

Directors, employees and others working for Chiyoda Corporation and Chiyoda Group companies were encouraged to make donations to victims of the Great East Japan Earthquake. Donations were sent to the Central Community Chest of Japan (CCCJ) in March, 2011. Chiyoda Group companies also sent separate donations through the CCCJ and other organizations in April, 2011.

- Ecocap Movement**

Used plastic bottle caps (ECOCAP) are utilized for purchasing vaccines for children in developing countries. 860 caps earn 20 Japanese Yen, which enables to purchase the polio vaccination for one child. Some group of employee volunteers started the movement by installing Ecocaps collection box in December, 2013 and, with Chiyoda's promotion and support, the movement has expanded to be company-wide since August, 2014.

Meantime, Chiyoda Kosho Co., Ltd. (CKS) has been promoting Ecocap Movement since June, 2010.

- TABLE FOR TWO (TFT)/Support for Children in Developing Countries**

The Chiyoda Group is implementing the TFT program in the cafeteria at its Koyasu Office & Research Park to provide support to children in developing countries. In 2014 FY, a total of 1,817 meals under the TFT program were ordered with twenty yen (20 yen) for each meal donated.



- Donation of Emergency Storage Foods**

Chiyoda System Technologies Corporation (CST) donated emergency storage foods (the foods of one or two months prior to the best-before period) through the food bank activities of non-profit organization Second Harvest Japan and Food bank Yamanashi in FY2013.

- 420 pieces of Calorie Mate (food nutrition supplement) in May, 2013

- 200 meals of beef curry and 24 cans of beef boiled in soy sauce, sugar and ginger in February, 2014.

* Second Harvest Japan (<http://2hj.org/>) is a non-profit organization with the goal of supplying the needy with food provided by food companies and other organizations.

- Aluminum Cans, Newspapers, Plastic Bottles and Other Items for Recycling**

At domestic construction sites, Chiyoda Group companies routinely collect aluminum

cans, newspapers, plastic bottles and other items for recycling.

- **Support to the activities of academic and related organizations**

Chiyoda supports the activities of academic and related organizations for human resource development and technological advancement.

- **Support to the Japan Philharmonic Orchestra**

The Group supports the activities of the Japan Philharmonic Orchestra. In addition to the normal support activities we have made so far, we have, since 2011, been inviting people from the Yokohama Blind Association to a concert of the Japan Philharmonic Orchestra annually held in December at Yokohama Minato Mirai Hall. In 2014, we invited 50 people in 25 pairs from the Yokohama Blind Association to the concert in December. We received a certificate of appreciation for our activities from the Yokohama City Council of Social Welfare. The Managing Director of the association attended the presentation ceremony on behalf of those invited. "It was wonderful that I could feel the sounds of music flowing throughout my body. It was also a great pleasure that I could feel warm-hearted atmosphere. Appreciating the bonds with people, I would like to lead a life so that I can repay for their sincerity. Then, I would like to continue making efforts to communicate my aspiring thoughts to all the people in societies." said the Managing Director. "



Overseas Activities

Chiyoda Group companies overseas have conducted the following activities.

- **Chiyoda & public Works Co. Ltd. (CPW)**

Chiyoda CPW donated umbrellas to protect children from strong sunshine:

In March 2015, CPW joined a program with one of the local philanthropic groups to donate an Orphanage Monastery located in Kyun Oo Khattiya Village, Nyaung Tone Township, Ayeyarwaddy Division. This monastery is providing care and protection as well as education to 326 orphans and impoverished children.



In Myanmar, ultraviolet index in summer season is approaching dangerously high levels (nearly 12 in March), and rainy season soon to be started in June, CPW believes that, donating umbrella to the orphanage is the most appropriate and the best fulfillment to the needs of children.

Thus, all the staff donated from 1 to 20 umbrellas respectively and decided to donate as CPW. Then, on March 22, CPW team visited the Monastic school, and donated umbrellas with CPW logo to the orphan students. The children are very happy to receive beautiful umbrellas made/ prepared with loving kindness by CPW staff.

In addition to that, CPW staff also made donation by their own arrangements such as clothes, slippers, snacks etc. to the students on that day.

- **Chiyoda Malaysia Sdn. Bhd. (CMSB)**

Internship Training to 8 students from Osaka University and University Malaya:

August 2014, Chiyoda Malaysia Sdn Bhd (CMSB) played host to 8 students from Osaka University and University of Malaya, together with 3 visiting professor from their universities, to an internship program called the Coupling Internship (CIS) Program. This program was formulated to create communication skills and first hand technical



knowledge, fostering professionals capable of true leadership on a world stage. CMSB provided talks on various practical aspects of an Engineering and Construction Company specialising in the Oil and Gas Industry and also provided the student some hands on challenges of a practical live situation. Feedback from the students was very encouraging especially the aspect of combining their theory to the practical real live situation provided by the training team. CMSB was proud to play host to these students and hope that their experience in this training will prove invaluable in their future career.

Serving Local Community:

Having our ongoing Petron project in Negeri Sembilan, we are determined to give something back to the local community and had selected local orphanage named "Rumah Anak-Anak Yatim Darul Aminan". Taking the advantage of the holy fasting month of Ramadhan for Muslim, we arranged for breaking of fast dinner with all 36 orphans on 21 July 2014.



With additional contribution from our employees, we had purchased several items needed by the orphanage such as projector, irons, fans, vacuum cleaners, bed linen etc. At the end of this memorable event, each orphan was given cookies and some money or "Duit Raya" for their Hari Raya celebration.

GAWAI Day Celebration:

Gawai Day is a major celebration in Sarawak and preparation to celebrate this festival is done months earlier. Longhouse will be decorated lavishly and traditional delicacies will be prepared for guests and on the day itself there will be ritual offering ceremony as well. With our ongoing project for the past several years in Sarawak, CMSB had delightedly taken part in the Gawai Day celebration by contributing hampers for the longhouse in Nanga Ngungun, Kanowit. We share their joy for this special occasion.



- **Chiyoda Philippines Corporation (CPh)**

CPh CPh once again made a remarkable event last June 20, 2014, in our School Drive Campaign with its theme "Care and Provide for the Hope of the future." CPh Representatives headed by our President and CEO Mr. Fumiaki Tanaka arrived mid-morning with a van full of school supplies good for two hundred thirty (230) pupils of Oranbo Elementary School who greeted us with a smile.



The success of "Care and Provide for the Hope of the future" is a reflection of the ever increasing dedication and enthusiasm from all of us. Our generosity benefited 230 pupils of Oranbo Elementary School. This event would not have been a success without the involvement of CPh employees. The compassion we have shown to the pupils is an inspiration for all of us.

- **L&T-Chiyoda Limited (L&TC)**

Donation to AKSHAYA PATRA (Mid-Day Meal)
Akshaya Patra is a non-profit organization that operates across India in the space of promoting health and education to under-privileged children. It is an implementing partner of the Mid-Day Meal Scheme, and gets steady support from the Government of India, the various State Governments



and associated organizations.
This has enabled the program to grow from feeding 1,500 children in the year 2000 to 1.4 million children in 2014. Its vision is that “No child in India shall be deprived of education because of hunger.”
In April 2014, employees were encouraged to donate for this cause. Many employees happily came forward and contributed generously.

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We are dedicated to respecting the human rights of all people. We will create a corporate culture where the diversity, individuality and character of employees are respected, where people are motivated to do their best, and of which employees and their families are proud.

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Employee Skill Development and Work Environment

Occupational Health and Safety

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Commitment to Fairness - CSR Vision 5 -

Employee Skill Development and Work Environment

The Chiyoda Group promotes employee training with respect for the diversity, individuality and character of employees, and works to create a satisfying and energetic work environment.

Employee Training System

Our human resource development program consists of systems to strengthen organizational and management capabilities and to enhance individual professionalism and encourage self-improvement.

1. Career Development Program (CDP)

The Career Development Program (CDP) was created to support development of individual career path for employees by using a career development sheet (CDS) which shows details of desired career steps. By using this CDS, followed interviews will be conducted with relative managers and HRM supervisors who discuss the employee's career development. This process is repeatedly achieved every three years in principle. Included information in CDS are their sentiment and feelings toward their current job, specific technology field and qualifications they wish to acquire, an expectation of career direction, plan of internal job rotation, and career goals. Through the interviews, the employee can aware one's capability and potentiality, career direction, and agree with personal challenges to improve one's capability.

2. Stage Up training

Various training programs are available at employee's career milestone stages. Those training programs are focusing on to raise awareness of the employee's to find their own capability and potentiality as well as those areas of improvement. In addition, those programs give them an opportunity to partake in the reinforcement of the internal network in Chiyoda group. We are especially pouring our energies into new graduates training held on every April and May. The on-boarding program is including various introductory training, such as business etiquette, basic information about Chiyoda and so on. Plant Engineering training gives a background and basic knowledge of plant engineering business and execution of project management to the trainees. Meanwhile, ETF (English Tune-up for Freshman) training aims to help new employees boost their English skills. In addition, new employees partake in a three-month overseas training program after completing two-month introductory classroom training that is unique and special meaning for them. The objective of overseas training is to learn what businesses Chiyoda actually carries out and to impart real-life knowledge that will later be directly connected with their actual jobs through on-the-job experience at international environment. Assignment of this overseas training is determined based on the plan of their career path. During this training, new employees are deeply immersed in Chiyoda engineering based culture through on-the-job training at the construction site or our group companies in abroad.

3. Training for key position of Project Management

To ensure the success completion of a project operation, competent project manager (PM), top of project execution, is needed to head up the project. In order to turn out PMs with enough capability, we are implementing training programs and provide the planned assignment of key position of project. In addition to PMs, we also provide training opportunities for Project Key Person, such as Engineering manager (EM) and Business manager (BM).

4. Chiyoda Engineering Academy

The Chiyoda Engineering Academy is a collective terms for the series of training course of technical knowledge and skill for of young engineers. This is being implemented jointly with Chiyoda U-Tech Co., Ltd., our affiliated company, in order to achieve smooth technology transfer, including the highly specialized knowledge and well experienced practice on engineering from senior skillful engineers to young engineers. Those courses are also open to Chiyoda Group companies and it contributes to develop overall technological capabilities of the Chiyoda group's. In addition to technical knowledge courses, we are also providing English training seminars that focus on specialized business skills for carrying out ongoing job, such as negotiation skill and presentation skill.

5. Talent management through the Performance Appraisal system

One of the goals of Performance Appraisal system is the growth and development of young employees. Young employees and their supervisors set and share the goals of skill, knowledge and experience for the every year and followed by feedback interviews; Through this system, we are able to reinforce initiatives for acquiring and implementing knowhow, obtaining qualifications, and for external activities.

6. Self-improvement supporting program

We provide financial support to our employees to acquire knowledge and skills related to executing the job, official qualifications and licenses and participate in lectures organized by external organizations. To keep active vitalization in our wide range of business domains, we are supporting self-improvement initiatives that motivate employees to deepen their specialization while also broadening their horizons.

A Satisfying Work Environment

1. Holiday and Work Hour Systems

- Holiday System:
 - Seasonal Holidays (Three special paid holidays annually)
Employees can add these days to their seven paid holidays to take ten consecutive days off in any season, not just summer. They can also split these holidays into two separate vacations of five days each.
 - Anniversary Holidays
These provide an opportunity for employees to use annual leave days for occasions such as their own or family members' birthdays or their wedding anniversaries.
 - Refresh Holidays
Employees who reach ten, twenty and thirty years of continuous service are granted five consecutive special paid holidays to refresh their mind and body. They can add these to their ten regular paid holidays to take fifteen consecutive days off.
 - Accumulation of Holidays
Employees are granted paid holidays annually, according to years of service, and

can take them in half-day increments. Paid holidays not taken in a given year can be carried over and used in the following year, or accumulated.

- We are establishing the following systems to support work:
 - Shorter working hours, nursing leave, child-care leave, etc.
To support employees, we have established systems for shorter working hours or exemption from overtime work to facilitate child care and nursing leave. To suit various working conditions, we are constantly aiming to develop these support programs more accessible regardless of an individual employee’s working style. Moreover, we are continuing to carry out initiatives to facilitate a more comfortable work environment, including regular in-house lectures focusing on supporting working women as a central theme. .
- We are implementing the following management of working hours.
 - To achieve creative work execution, sound and healthy life-style, regular working hours are set from 8:00 to 16:36. Lights out at 8pm every night. To promote the overall health management of employees, working after 10:00 p.m. and coming to work on Sundays are prohibited in principle.

Support for Volunteer Activities

- Subsidies for Volunteers Assisting in Reconstruction Activities following Disasters the Group provides measures to subsidize the volunteer efforts of employees to assist in the quick recovery of disaster-affected areas granting of special paid leave
 - Applicable activities:
Activities in areas affected by natural disasters or other similar Total number of days granted: Five (per calendar year)
 - Five (5) days per year
 - Payment of volunteers’ insurance premiums
 - Lending of helmets and payment for masks
 - CSR Bulletin board
The CSR bulletin board is available on the company intranet to support employee volunteer activities by posting a variety of volunteer information.

Health Management

- Physical Health
Health Management Centers
Chiyoda's health management centers allow employees to receive physical and dental exams within the Company. They also provide periodic health checkups, checkups for lifestyle diseases, and checkups for employees before, during and after overseas assignments. The employee participation rate in periodic health examinations has reached 95 percent.
- Health Design Program
Chiyoda implements a “health design” program to set individual health goals and offer advice to improve lifestyle habits as necessary, depending on checkup results.
- Mental Health
To ensure the early detection and treatment of mental dysfunctions, Chiyoda conducts regular stress checks (84.2 percent response rate) for all employees and uses a support network that includes an industrial physician specializing in mental care at the health management centers and other locations.

Promotion of Diversity

We have been proactively continuing every effort to create a corporate culture and working environment where the diversity, individuality and characters of employees are respected and employees are motivated to vividly work irrespective of sex, nationality age, religion, etc. This is

based on our belief that a variety of perspectives gained through promoting the diversity will increase the organization’s strength of being flexible and coping with various situations. In this respect, we have undertaken the following:

- Establishment of a task force team to promote changing our mindset of the organization
- Establishment of a praying room
- Explanation sessions held for foreign students in Japan to recruit global human resources.

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Commitment to CSR

Chiyoda Group CSR Vision

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Employee Skill Development and Work Environment

Occupational Health and Safety

Crisis Management Initiatives

Commitment to Fairness - CSR Vision 5 -

Occupational Health and Safety

One of the Chiyoda Group's CSR medium-term policies is to instill in everyone involved that safety is a core value. We make ongoing efforts to ensure all employees fully understand that safety should be their number-one priority.

HSE Education

- Occupational Health and Safety Training Prior to Assignment to Construction Site

The Group conduct the following training programs to enable construction supervisors and managers to steadily implement occupational health and safety management during assignments at our construction sitesHealth and Safety Training Prior to Assignment to Construction Sites.

- Supervisors
 - Supervisor Health, Safety and Environmental (HSE) Training Course (two days course) based on the Industrial Safety and Health Law. (Conducted five (5) times and received totally 132 attendees in FY2014)
 - Refresher HSE Training Course prior to assignment to Construction Sites. (Conducted seventy five (75) times and received totally 233 attendees in FY2014)

- Site Managers and Construction Managers
 - Management Health, Safety and Environmental (HSE) Training Course for Site Manager and Construction Manager (one day course) (Conducted two (2) times and received totally 64 attendees in FY2014)

Consultation for Site Manager and Construction Manager. (Conducted twenty four (24) times in FY2014)

- Occupationed Health and Safety Training in Construction Site

We conduct training for all new workers at both domestic and overseas construction sites, as well as special safety training for those involved in hazardous operations. Safety activities also include TBM* and KYK (kiken yochi katsudo or "hazard identification activities") prior to the start of construction work. KYK employs a special checklist that workers go over together on a daily basis to confirm hazard prevention measures for the work they will undertake on that particular day.

※TBM (ToolBox Meetings): Meetings held by each work group to confirm safety

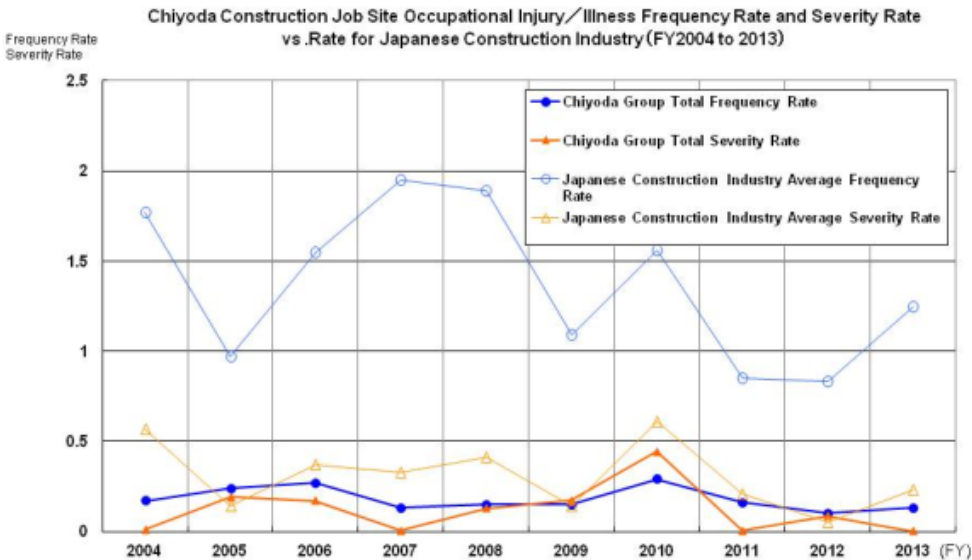
HSE Management System

Four (4) management systems for occupational safety and health, environment, quality and

information security are integrated and commenced to operate since August on 2014. Chiyoda has obtained accreditation of OHSAS18001 in February 2013, which is well known as one of the most authoritative management systems to verify the effectiveness of Chiyoda Management System.

In accordance with the requirements of above integrated management system, every fiscal year, the Chiyoda sets HSE (Health, Safety and Environment) Objectives and formulates an HSE Management Program to achieve such objectives. Based on this program, each project and project unit shall develop their own HSE programs to conduct specific safety management activities. And the safety targets for every fiscal year are established utilizing TRIR (Total Recordable Injury & Illness Rate based on OSHA Standard, USA) The safety target for FY2015(Domestic project) is less than 0.5.

The results of the above actions are shown in the following chart "Chiyoda Construction Job Site Occupational Injury / Illness Frequency Rate and Severity Rate vs. Rate for Japanese Construction Industry (FY2004 to 2013) ".



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Crisis Management Initiatives

Enhancement of Crisis Management

Recently, the security situations worldwide are changing more quickly than ever before, and most Japanese companies, not only Chiyoda, focus on the importance of risk management, which includes gathering and analyzing risk information related to the countries where they are engaged in business, as well as establishing security counter-measures based on the analysis. On April 1, 2013, Chiyoda established Crisis Management Unit as a special office mainly to deal with risk management at overseas high risk area, on the basic principle "Employee's Safety First". They are gathering various risk information related to terrorist organizations, criminal organizations, elections, political situations, etc. from various information sources such as security consultants in Europe and the United States, the Ministry of Foreign Affairs, Japanese Embassies, the U.S. Dept. of State and others. Based on the information, counter-measures are discussed and implemented.

Main Tasks of the Crisis Management Unit

- Internal training activities for crisis management awareness(training prior to overseas assignment)
- Gathering and analyzing risk information
- Developing and updating manuals(crisis prevention manual / crisis response manual)
- Grasping clearly the situation of those dispatched overseas and the communication network with them
- Risk pre-investigations in high-risk countries, determination of pros and cons for dispatching staff to high-risk countries, risk assessment in high-risk countries, etc.
- Gathering information about crisis management in general, and exchanging information with related organizations, etc.

Delivery of Security Information on Web site

Crisis Management Unit has made the risk information available on in-house intranet both in Japanese and English. This time, the information has become available on the Web-page. This system is intended to ensure that all the employees can directly access to such information at any place of the world or from smart phone terminals at any time as long as the internet circumstances are set up, duly considering the needs of those who timely require the life-threatening risk information in particular.

Disaster Prevention Measures

The Chiyoda Group has prepared Disaster Response Manual (Japanese and English versions). The Manual compiles the actions to be taken in the event of a disaster by those working in the Group including all the directors, employees, temporary staff members, customers and partners, and so on. Once a disaster occurs, Chiyoda Disaster Prevention Force is to be formed, and the emergency communication route is also to be set up to confirm the safety of all the above personnel and their family members as a first priority.

Further to be prepared for a disaster, the Group has been taking the following measures:

- Stock of emergency supplies such as PHS, drinking water, foods, blankets)
- Provision of helmets and emergency bags to all the personnel
- Formation of self-defense disaster prevention unit
- Participation in an emergency drill to be conducted twice a year both in Chiyoda Global Headquarters and in Koyasu Office & Research Park
- Safety confirmation drill to be conducted a few times a year



Disaster Prevention Drills

Chiyoda Group companies Activities

- **Chiyoda Malaysia Sdn. Bhd. (CMSB)**

Health and Basic First Aid Course

CMSB had organized a half day event of “Health Talk” to promote awareness among our employees. The event was held in Pantai Indah Hospital in Pandan Indah, Kuala Lumpur on 14 February 2014 and topics presented were Cardiac Health and Gynae Cancer Screening. We had also organized a 2 days course on basic first aid and CPR for our Safety Committee on 5 and 6 May 2014. With this initiative, we will be well prepared for any eventuality of medical emergency at our home office or construction site.



- **L&T-Chiyoda Limited (L&TC)**

- Support in Skill Building

During the festival of Diwali, people in India light numerous diya or earthen oil lamps.

In the month of October 2014, village women from Ankhol Village near L&T Knowledge City were invited to put up an exhibition cum sale of their handcrafted and painted diyas.

This was part of the CSR - Skill building initiative, so that these women get a chance to display their creativity and earn as well.

Employees ardently supported the cause and bought the diyas to encourage the creativity of the village women.



INTERNATIONAL WOMEN’S DAY CELEBRATION

International Women's Day is celebrated the world over, on the 8th of March every year. It celebrates womanhood and pays tribute to the indomitable spirit of women besides their economic, political, and social achievements. “When the power of women is unleashed, it secures the future for all”. To mark the occasion, and show our love & respect to the L&TC women employees, International Women’s Day was celebrated at L&TC. A group photograph was also taken as a memoir.




- Chiyoda Philippines Corporation (CPh)
 - CPh on the GO for an IMS

As a future-focused organization CPh demonstrates its commitment to maintain an effective health and safety, and environmental program through its aim for an Integrated ISO 14001 (An Environmental Standard) and OHSAS 18001 (an Occupational Health and Safety Standard) Management System Certification.


This is another management endeavour to improve the workplace condition and the surrounding environment by thinking about safety risks and environmental impacts. This means putting robust systems in place that will benefit the employees and the environment and will also reduce costs, improve efficiency and will definitely advance performance within the organization.

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Commitment to Fairness - CSR Vision 5 -

The Chiyoda Group is dedicated to achieving even greater transparency and stability by conducting our operations fairly in accordance with the highest ethical standards.

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 - Compliance Program, System
 - Compliance Training
 - Monitoring
 - Risk Analysis
 - Implementation of Preventive Measures (Control Activities)
 - Compliance Consultation and Reporting System
- [Risk Management](#)
 - CORPORATE RISK MANAGEMENT POLICY
 - Risk management System
 - BCP (Business Continuity Plan)
- [Export Control](#)
 - The Group's Export Control Organization
 - Training
 - Investigation and Classification
 - Audit
- [Corporate Governance](#)

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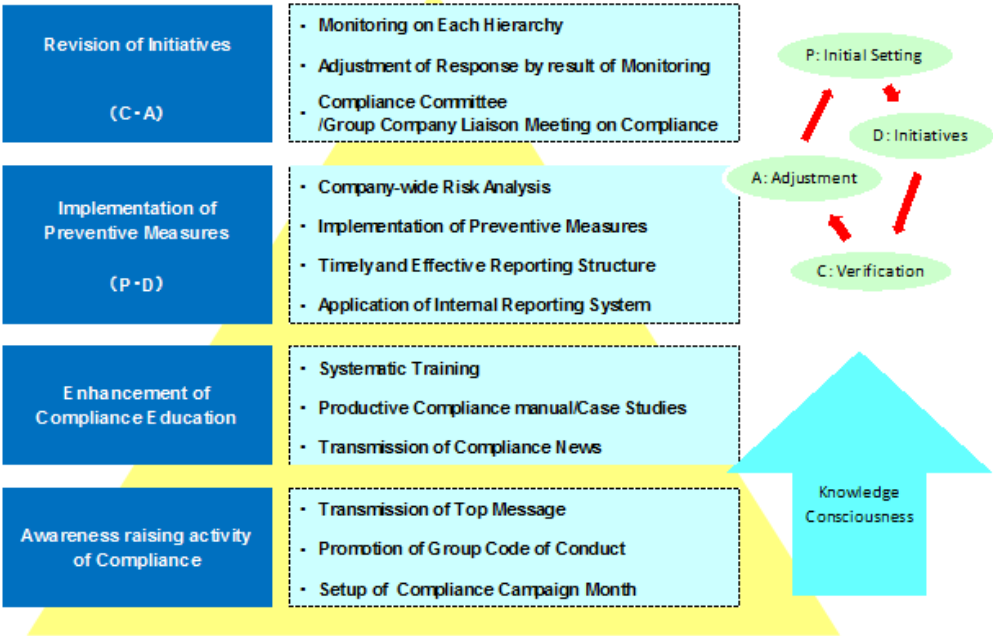
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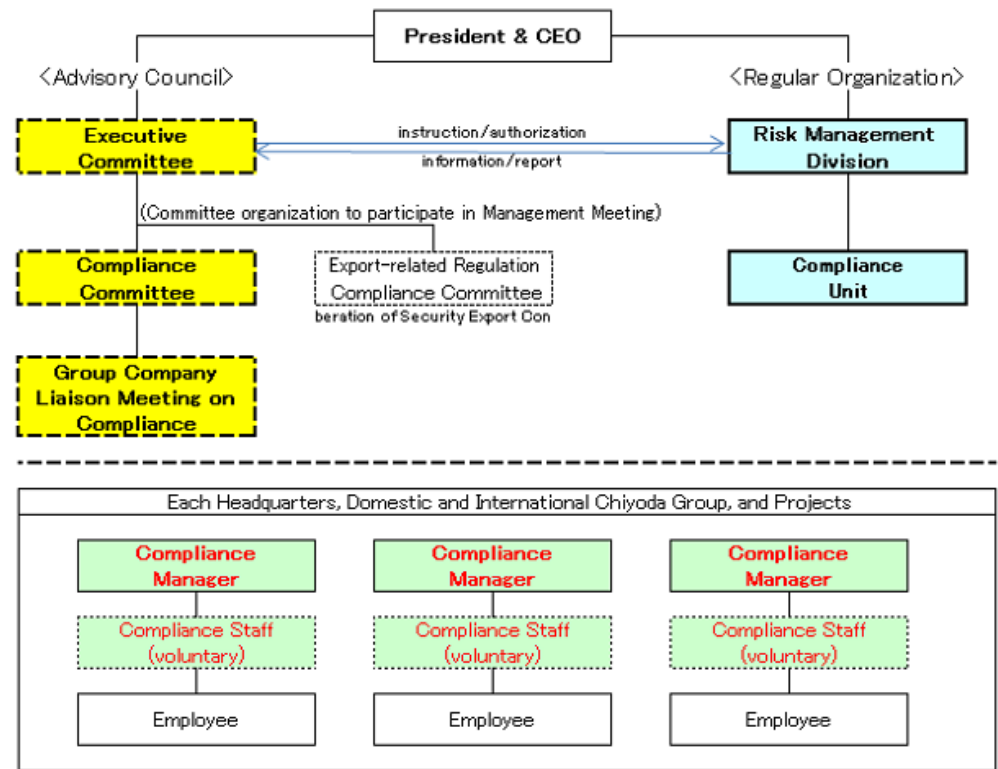
Compliance Initiatives

Compliance Program, System

- Compliance Program**
Recognizing importance of observing compliance, and utilizing training programs and manuals, we will raise consciousness and knowledge of compliance. In addition, we will recognize and evaluate the compliance risk that our group is exposed (Plan), implement concrete preventive measures for enforcement against the main risks, with periodic reporting (Do), and we review, measure the results, and improve them by monitoring (Check & Action).
As stated above, we are practicing PDCA cycle regularly, and cope with a compliance risk appropriately.
These systems are called "Compliance Program". Chiyoda Group's structure of the compliance program is as follows;



- Compliance System**
We have strengthened our compliance systems by establishing the Compliance Committee, which is directly managed by the Executive Committee, with the purpose of raising awareness and reinforcing promotion systems for compliance with a focus on global measures, including the prevention of anti-corruption practices.
We have also established the Group Company Liaison Meeting on Compliance with the purpose of enhancing a compliance system for the entire Group.
Also, we have assigned Compliance Managers who shall be responsible for the compliance activities in each division, group companies and project teams.



Compliance Training

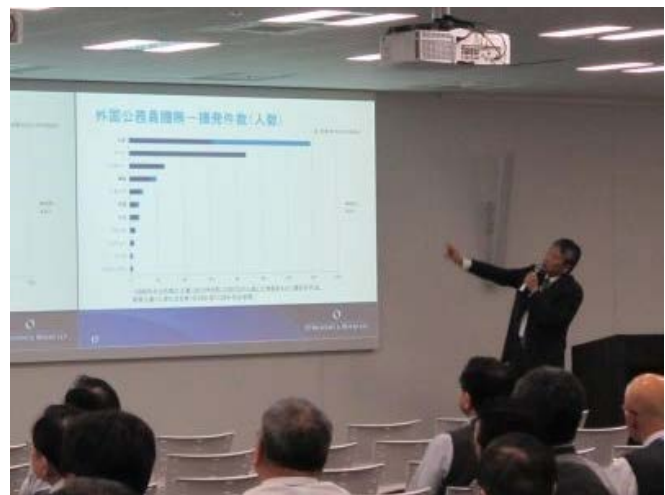
- Continuous Compliance Training**

We have continuously conducted the training programs such as New employees training and mid-career recruits training in terms of their careers or positions , and Pre-assignment training for site managers of field offices in terms of their job assignments . With the increase in global compliance risks, such as bribery for foreign government officials, human rights issues and the like, employees taking up new overseas assignments are given pre-assignment training with an emphasis on the risks associated with overseas assignments. Further, we have conducted the activities to raise awareness of the Chiyoda Group's Code of Conduct and relevant compliance rules among such members as in our overseas group companies and joint venture partners.

- Intensive Compliance Campaign Month**

Every year, a month during October and December has been designated as Intensive Compliance Campaign Month since October 2008. During the month, we have conducted compliance educations such as seminars by outside professional instructors and online courses by e-learning for all the employees including our group companies.

In 2014, we conducted the seminars on anti-bribery to foreign government officials, prevention on insider trading, construction industry laws, and e-learning on compliance both in English and Japanese.



Risk Analysis

The Chiyoda Group have plotted compliance risks according to the incidence frequency rate and the degrees of damages to examine and identify the risks for us to cope with. Now, we have established and implemented the countermeasures specific to such risks.

Implementation of Preventive Measures (Control Activities)

The Chiyoda Group implement the following preventive measures/ procedures , among other things, particularly for high risk items: ·Due Diligence relating to compliance on business partners of our supply chain including vendors, subcontractors, agents, consultants prior to forming the tie-up · Prior approval or confirmation procedures for foreign governmental officials, OFAC, biddings for public works , payments for entertainment fees, etc.

Monitoring

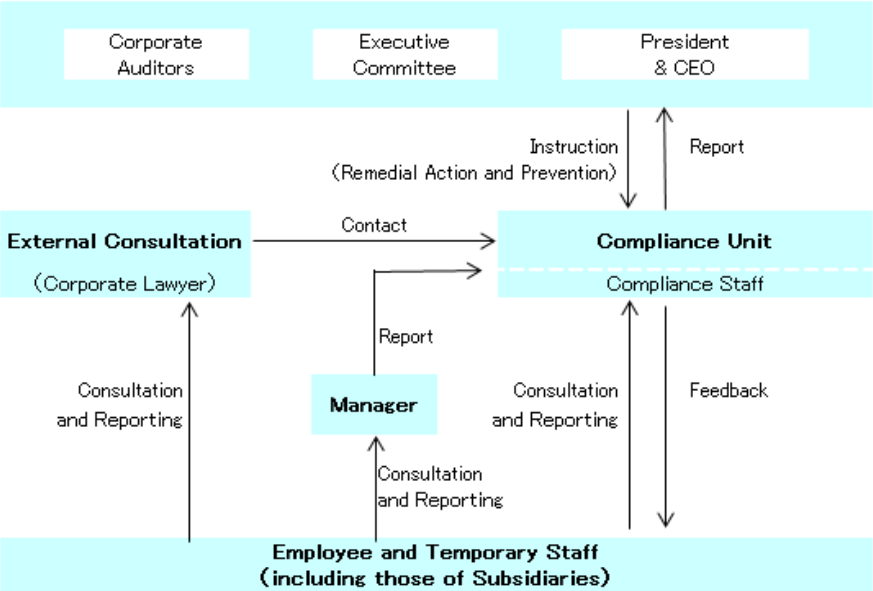
As part of our mechanism for ensuring compliance, we have also implemented internal auditing periodically, and made improvements if required. The auditing includes the Construction Industry Law, the Act against Delay in Payment of Subcontract Proceeds, etc. to Subcontractors, Unfair Competition Act (to prevent bribes to foreign officials), and the Anti-Trust Law (to prevent bid rigging), etc. Besides the Compliance Unit in charge of promoting compliance, the Internal Audit Unit as an independent organization also conducts auditing activities.



Compliance Consultation and Reporting System

The purpose of the Group’s consultation and reporting system (hotline), dubbed “Welcome to All about Compliance,” is to quickly detect and prevent any illegal activities or unethical conduct, whether actual or suspected, using a framework that properly processes reports and consultations regarding unethical conduct and illegal activities by individuals or organizations.

This hotline is operated jointly by Chiyoda and its seven domestic Group companies. It has an External Consultation Center with a lawyer available to everyone in the workplace and staff who specialize in women’s workplace issues.



In the fiscal year 2014(ended in March 2015), the system received reports as follows.
As feedback, Chiyoda reported the measures it took in each case.

	FY2014
Workplace Environment Improvement	10
Compliance on Company Regulations	1
Request for Order on Improvement	0
Others	5
Total	16

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Risk Management

CORPORATE RISK MANAGEMENT POLICY

The Group promotes the risk management activities and planning/ implementing Corporate Strategy as the robust wheels to support and drive maintaining/creating Corporate Value. Chiyoda Group ensures to properly disclose its business risk information to the stakeholders so as to increase transparency, to mitigate those risks by taking proactive countermeasures, then to achieve the business target.

That is exactly the aim of CORPORATE RISK MANAGEMENT POLICY. The purposes and action guidelines are defined as follows:

1. Purposes

- To maximize corporate value
- To maintain corporate assets
- To secure business continuity
- To gain confidence of all the stakeholders including shareholders, clients, employees
- To promote a preventive Safety and Health Culture, in which safety comes first

2. Action guidelines

- To report risk information immediately and share the information among the parties concerned.
- To ensure that all the directors and employees must well understand the importance of risk management and to make their best efforts in managing risks.
- To believe that every accident is preventable and conduct daily activities with this consciousness.
- To remember that the risks are defined as uncertainties which might affect the company's interests and that we must manage risks in a rational and an optimal method from an overall perspective so as to maximize corporate value.

Risk Management system

To manage individual project risk and profitability, the Chiyoda Group is increasing management transparency by implementing a double-check/internal control function in administration divisions in addition to a self-auditing system in project operation divisions. Professional auditing teams from

administration divisions have effectively implemented project audits to verify the validity of the project execution plans formulated by the project operation divisions.

The Group has established risk management and crisis management systems to deal with significant risks and has appointed risk managers and crisis managers. We constantly work to prevent the occurrence of problems. In the event that a problem occurs, we will establish a Crisis Control Center that minimizes damage by mobilizing the entire workforce.

BCP (Business Continuity Plan)

The Chiyoda Group has been coping with various risks such as fires, earthquakes, disease, information leakage, compliance violation and terrorist attacks, in addition to its project execution risks in the core business. In 2014, the Group established its Group BCP and BCM, anticipating various risks that would disrupt its business.

The BCP provides the direction and course of action in order to avoid such risks, or recover quickly even if such a disruption may occur, and was known to all employees. When a disaster including a fire/an earthquake or any epidemic, terrorism/turmoil, occurs, and if the impact on the Group is anticipated to be large enough to disrupt its Group business/operation, the Group immediately declares the imposition of BCP.

Then, based on the basic philosophy of “Employees’ safety First”, the Group makes utmost efforts to continue its minimally required important business and to make a quick return to normal operation as well as to contribute to the restoration of communities affected by such a disaster.

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Export Control

Export Control

The Foreign Exchange and Foreign Trade Act was established based on international agreements controlling exports of goods and transfer of technology with the aim of maintaining international peace and security.

In order to comply with this law in overseas projects, Chiyoda established the compliance program (CP) regarding export-related laws and regulations and registered it with the Ministry of Economy, Trade and Industry. The CP defines the export control policy of Chiyoda, and detailed procedures, rules and manuals.

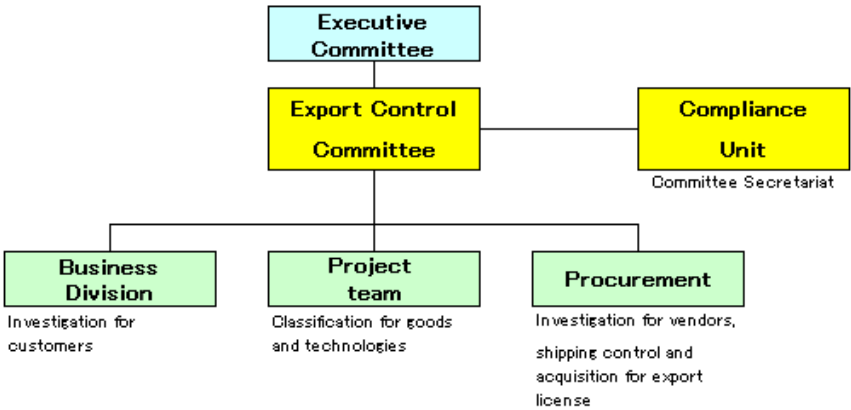
Based on the CP, Chiyoda organized the Export Control Committee where Compliance Unit serves as a Committee Secretariat to enforce export control management such as inspection, education and internal auditing.

Chiyoda has also prepared an operational manual to inform and educate its employees on the Company's response to the Export Administration Regulations of the United States.

Organization

As mentioned above, the export controls are administered with the organizational structure constituted by the Export Control Committee, where the Compliance Unit serves as the Committee's Secretariat, under the immediate direction of the Executive Committee.

The routine export control activities are carried out by export control coordinators assigned in each organizational unit, and are followed up on as a double-check by the Compliance Unit for reconfirmation.



Training

The training on export controls is provided to new recruits including new graduates and others. Also, a class room-type lecture is provided as the basic training course to all of the employees entering into a two-year career in the company so that they can grasp the basic knowledge of export controls. Furthermore, all the engineers who have finished the above basic course are required to take the special training course in order to have knowledge necessary for the determination of the classification for goods and technologies as to whether they shall be subject to export licenses.

Investigation and Classification

Based on the above mentioned CP, the examination or investigation on the export managements are performed as follows:

- Business development departments investigate the end-users conditions
- Procurement departments investigate the vendors and subcontractors conditions
- Project teams and supporting departments perform the classification in accordance with the export control manuals which are corresponding to the Japanese and U.S. requirements respectively.

No items should be shipped out unless the required screening has been completed.

Audit

Based on the CP, the Compliance Unit is to annually audit the relevant documentations and the implementation situations on the export controls for all of the on-going projects. Also, as the preliminary audit, the Unit is to select major projects from among such on-going projects and conduct hearings from those concerned on a semi-annual basis.

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Corporate Governance

The Chiyoda Group believes that CSR-oriented management that earns the support and trust of all its stakeholders, including shareholders, customers, and employees, is the basis of its corporate activities. We are therefore working in various ways to enhance corporate governance and actively implement CSR-oriented management, including maintaining transparency and soundness.

Corporate Governance System

Chiyoda has established the Compliance Unit and the Internal Audit Unit to raise the quality and transparency of management, improve response to stakeholders and reinforce risk management and the compliance system. We also established the Safety, Quality and Environmental (SQE) Unit and an internal control system directly linked to management.

To ensure speedy and accurate decision-making to deal with rapidly changing social and economic conditions, Chiyoda has adopted the executive officer system, which separates the functions of directors, who are responsible for management supervision, from those of executive officers, who are responsible for the execution of business operations.

The Board of Directors and Meetings of the Board of Directors

The Board of Directors is composed of 10 directors. Important matters concerning the Company are reported and resolved at meetings of the Board of Directors. The Executive Committee, made up of the four representative directors, examines matters before they are submitted for resolution at meetings of the Board of Directors. It makes decisions about business execution matters by unanimous resolution.

Audit & Supervisory Board

Chiyoda has also adopted the corporate auditor system. The Corporate Auditors Committee is made up of three outside corporate auditors who closely monitor the execution of duties by directors and executive officers. The corporate auditors attend meetings of the Executive Committee and express their opinion when necessary. In addition, their responsibilities include deciding the content of resolutions submitted to the General Meeting of Shareholders, such as the appointment or dismissal of accounting auditors, auditing consolidated financial documents in close cooperation with the accounting auditors, and preparing audit reports.

Executive Officer System

Where necessary, executive officers cooperate with outside specialists such as corporate lawyers in carrying out duties assigned to them at meetings of the Board of Directors and the Executive Committee. Executive officers provide regular progress reports at executive officer and Executive Committee meetings attended by directors and corporate auditors.

Reinforcing Internal Controls

The Chiyoda Group constantly conducts self-assessments of existing internal control functions and reinforces internal control systems. In addition, the Group has established the Internal Audit Unit as an autonomous unit to perform evaluations. Chiyoda has a system in place for auditing the development and operation of a suitable overall internal control framework and constituent components, and for submitting reports to the Executive Committee.

- To ensure the transparency of information and raise the effectiveness of audits, Chiyoda aims to establish an integrated framework of internal controls and a real-time monitoring system for senior management.
- To prevent insider trading, an information management system is in place that encompasses Group companies. All important information is appropriately reported to the Board of Directors and the Executive Committee.

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