

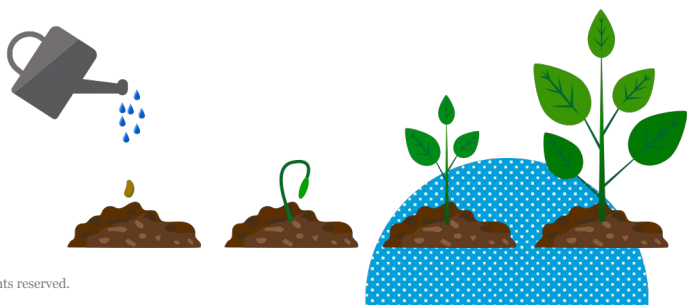


# Our Commitment

Lifetime Empowerment

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# First of all

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# 1. Introduction

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This Code of Conduct is based on "Our Commitment" to ensure that Aoba-BBT Group ("ABG") conducts its business with integrity towards all stakeholders, including learners, parents or sponsors, alumni, educational partners, board members and employees.

The Code of Conduct provides guidelines for making decisions and acting in accordance with Our Commitment. Adherence to this Code of Conduct will help us to perform our business optimally in an environment of fairness.

If you become aware of a violation or potential violation of this Code, you must promptly report to the appropriate authorities to ensure that corrective actions can be applied to prevent a recurrence of the issue.





## 2. Purpose of this Code of Conduct

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The Code of Conduct is intended to guide us in making sound decisions and acting with leadership and problem-solving skills in order to achieve better learnings for our learners and to create global leaders.

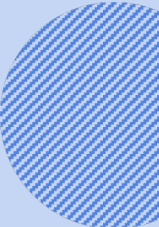


## 3. Our Leadership

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Our leadership means that all of us act as leaders in the following perspectives:

- (1) Focus on learners and customers
- (2) Promote innovation
- (3) Build better mutual/trusting relationships
- (4) Demonstrate authority and influence in challenging situations
- (5) Develop organization and human resources
- (6) Strengthen education programs



## 4. How to make the right decision

Ask yourself how you would behave:

- Does the conduct potentially violate ABG's Code of Conduct, Company Policy, or Legal Regulations?
- Does the action align with the responsibilities of the "Our Commitment"?
- Could external stakeholders perceive the conduct as unethical?
- Does the conduct have the potential to harm you or ABG's reputation?

You may seek assistance if any of these situations apply to you.



# To Those who gather in our learning community

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Our first commitment is to all those who gather to learn in our community including students, guardians, sponsors, educational and business partners, and alumni.

# What is important to you when dealing with learners?





# Our responsibility - for Learners

- Together, we help students to develop a lifelong ability to survive in a world where there aren't always easy answers.
- We develop human resources with an international perspective and a pioneering spirit who can create and innovate solutions for local and global issues.
- The school provides education through interaction and collaboration that respects learners' spirit of inquiry in an environment that incorporates state-of-the-art instructional design and technology.
- Responsible for ensuring that the learners achieve their goals and that the clients receive the expected results.
- We will do our utmost support to learners who are willing to put forth the effort to realize their aspirations.





## What it means

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Our primary stakeholders are students (hereinafter referred to as “customer”) aspiring for better learning, as well as clients anticipating expected outcomes.

We highly value customer feedback or requests and promptly respond to it with respect and appropriateness. Valuing customer’s voice means ensuring that their inputs are justly reflected in the improvement and expansion of our services.

## Why it matters

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There are numerous factors that contribute to the customer’s success, and it demands continuous attention and effort. Customers receive support from their parents, sponsored companies and more. It’s essential to strike a balance between the success of the customer and the success of their sponsors.

Listening to our customers and sponsors feedback and responding in a timely manner leads to an increase in learners’ satisfaction, loyalty, growth, and trust.



# How we do it

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1. We are committed to high standard and quality service delivery.
  - 1-1 Select and retain faculty members who are highly knowledgeable, ethical, and capable of providing optimal learning opportunities.
  - 1-2 We understand our duty to provide accurate information and to handle it with modesty and integrity in the development, marketing and delivery of our services.
  - 1-3 We adhere to laws and regulations and establish proper relationships with external accreditation(International Bacculaureate Association, Cambridge CP, CLS, A-Levels, CIS, NEASC, JIHEE, JUAA), and ensure compliance with required regulations.

While it is essential to do our utmost to assist our customer's' success, it's equally vital to select customers who are open to and capable of realizing the full potential of our support. To assist them in this process, we've put in place an evaluation and feedback system.

2. To improve the educational experience, we create a respectful, collaborative atmosphere and maintain appropriate professional relationships between customers and faculty. It fosters an attitude of cooperation, mutual learning and it encourages open and healthy communication between customers, faculty and sponsors



# How we do it

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3. We guarantee a secure learning environment that is free from harassment and discrimination, prioritizing the well-being and trust of everyone involved.
  - 3-1 We value diversity, fairness, inclusivity and non-discrimination. We treat people's opinions with respect and courtesy. Discrimination or bullying in any form is not tolerable. We actively promote education and prevention programs against discrimination to promptly address any issues.
  - 3-2 We understand the importance of having a health and safety policy in place for the learning environment. We establish and implement the following guidelines;
    - Safety initiatives in accordance with the various guidelines set forth by law
    - Communicating and facilitating communication with parents regarding health and safety issues
    - Confirmation of the safety of classrooms, school buildings, gymnasiums, and other facilities and equipment
    - Conducting evacuation drills on a regular basis
    - Creation of checklists for student safety
    - Prevention of harassment.
4. We aim to foster a suitable relationship with our customers. Should any issues or conflicts of interest arise, the company proactively addresses them as a collective rather than on an individual basis.
5. The implementation of technology will be carried out in accordance with ethical considerations, laws and regulations, and after consultation with the appropriate departments. We uphold cyber security measures, respect privacy and adhere to guidelines for responsible usage.
6. We recognize the significance and potential risks associated with using social media as an educational communication tool. We manage its capabilities to improve learning and advance our educational mission while also upholding ethical and responsible social conduct.
7. We understand the importance of privacy in our business operations. We commit to using the personal information we collect solely for lawful purposes and ensuring compliance with applicable laws in our private policy.

# Our responsibility - for Educational partners

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- We provide an environment in which our educational partners can deliver quality education.
- We work together with all our business partners to maintain sustainable relationships.





## Why it matters

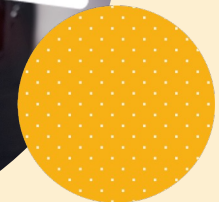
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Our utmost priority is our customers, which includes our educational and business partners who support them.

## What it means

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Our services cannot be delivered by our employees and teachers alone. Working with our educational and business partners is essential, as we need them to realize their full potential.



# How we do it

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1. We respect our educational and business partners.
2. The selection of a partner will determine his skills and suitability for the client's objectives as well as the establishment of the terms and conditions, including compensation, to allow a lasting and sustainable relationship.
3. We create an environment that allows our education partners to fully utilize their skills through regular evaluation and, and by providing the necessary resources to support their growth and program development.
4. We adhere to applicable laws and regulations to ensure fair sales and purchasing practices. We do not engage in business with partners who fail to comply with these laws and regulations.
5. We dialogue with partners on how the Code of Conduct and our policies should be applied to their day-to-day work and listen to their concerns and questions.



# Our responsibility - for Alumni

- We support learners to develop lifetime empowerment for resilience and success.
- We will maintain and continue to develop strong ties with the Alumni.







## Why it matters

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Alumni not only have the opportunity to retake the course, but also to become educational partners themselves. Therefore, it is important to establish a strong and positive relationship with them.

## What it means

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Alumni are part of our family and they are our achievements. It is our responsibility to maintain a long-term good relationship with them.



# How we do it

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1. We maintain communication with Alumni and provide a platform for receiving their feedback and input.
2. We consistently provide them with up-to-date information and valuable suggestions from our side.



# To Our employees, faculty and staff

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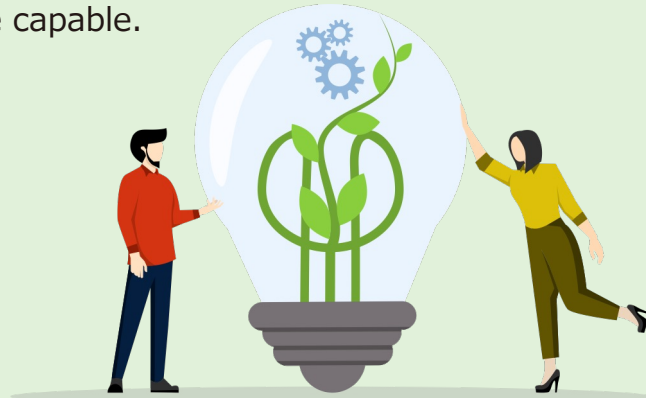
The second commitment is to all of our employee, faculty and staff who work with us around the world.

**What kind of work environment would you like to have in order to make the most of your abilities?**



# Our responsibility - for The working environment of employees, faculty and staff

- We create a workplace where employees, faculty and staff take responsibility for their actions and work efficiently as a team.
- We create a working environment where every employee, faculty and staff is valued and respected as an individual.
- We ensure a working environment in which employees, faculty and staff are encouraged to freely offer suggestions and opinions.
- We will create an environment in which employees, faculty and staff are fairly evaluated and rewarded for their efforts and achievements.
- We provide equal opportunities for employment, development, and promotion to those who are capable.





## Why it matters

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To optimize value for customers, it is the duty of the company to provide an equitable and dynamic work environment where employees, as service providers, can harness their full potential. Working in a secure environment will enable us to deliver top-quality services.

## What it means

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The company will focus on creating an environment in which employees, faculty, and staff can reach their full potential. Specifically, the company fosters a culture that recognizes individual effort and achievement by providing opportunities for employees to freely express their opinions and suggestions, and through regular feedback and fair evaluation.

While it's crucial for employees, faculty and staff to be well-prepared and efficient in delivering maximum value to customers, the company must also create the best possible environment to facilitate this.



# How we do it

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1. All employees, faculty, staff, and educational partners are encouraged to operate in a clean and secure work setting and to lead wholesome lives, both in terms of physical and mental well-being.
  - 1-1. We will give top priority to health and well-being, striving to establish a safe and hygienic working environment.
  - 1-2. We promote a safety-oriented culture by adhering to occupational health and safety regulations, addressing potential hazards, implementing preventive measures, and delivering relevant training.
  - 1-3. We encourage the timely reporting of safety concerns, near misses, or accidents. All reports will be treated confidentially, and we will conduct thorough investigations, implementing appropriate corrective actions as needed.
  - 1-4. We promote a healthy work-life balance, offer access to medical and other support services, and ensure employee well-being by implementing tools such as stress assessments.
  - 1-5. We establish communication procedures by formulating an emergency response strategy and regular training to ensure an efficient response to any crisis or emergency situation.



# How we do it

2. We do not tolerate any type of harassment, whether it's sexual harassment, power harassment, bullying, intimidation, or any behavior that disrupts a suitable work environment.
  - 2-1. Any such behavior, whether by employees, faculty, staff, educational partners, clients, or any other individuals connected to our organization, is completely prohibited.
  - 2-2. If you encounter or witness such behavior, please report it immediately.
  - 2-3. The person making the report will be kept confidential and the reported issue will be handled appropriately.
  - 2-4. We are responsible for our personal behavior and actions. Failure to address harassment may result in disciplinary action, including termination of employment or business relationship, when necessary.
  
3. We equally recognize people and provide opportunities to work in roles that align with their unique skills and abilities, regardless of attributes like gender, age, or nationality.
  - 3-1. Discrimination based on characteristics like age, gender, race, ethnicity, sexual orientation, gender identity, place of birth, or religion is strictly prohibited in our organization.
  - 3-2. We prohibit any form of illegal, abusive, or forced labor among our employees, faculty, staff, educational partners, and business partners.
  - 3-3. The evaluation of employees, faculty, and staff will be based on the judgment of the appropriate evaluator, following the defined evaluation criteria.





## Our responsibility - for Employee skill development

- The company is committed to improving its employees' problem-solving, leadership, and entrepreneurial skills, as well as their ability to work independently. We will work towards enhancing these capabilities.





## Why it matters

To deliver maximum value to our customers, our employees, we as service providers must maximize their abilities and continually grow. This will enable us to provide high quality services and strengthen our competitiveness as a company.

## What it means

We will put this into action by fully utilizing the training and work opportunities provided by the company to enhance our problem-solving, leadership, and entrepreneurial skills to a higher standard. We will also promote self-improvement and create an environment where employees can proactively enhance their skills. This entails allocating time for self-study and offering support for participation in professional training and seminars.

We are accountable for honing our skills to deliver optimal value to our clients. This not only fosters our personal development but also reinforces the organization's overall performance.



# How we do it

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1. We make the most of the training and work opportunities provided to employees, faculty, and staff. We will provide constructive feedback on their learning, work outcomes, and the methods they've employed, supporting their individual growth and development.
2. We provide opportunities for self-study and encourage participation in professional training and seminars.
3. We encourage and provide support for independent activities related to educational projects, including writing and presenting research papers and books, as well as participating in conferences.



# Our responsibility - for Senior leaders

- We appoint leaders who demonstrate exceptional abilities and uphold fair and principled conduct.





## Why it matters

In management policy decisions and emergency situations, consensus-driven decision-making is crucial and important. It is necessary to have leaders who can effectively facilitate the process. During emergencies, quick and effective decision-making is essential. Therefore, we need leaders who can make the best decisions swiftly and efficiently in such situations.

## What it means

Our approach is not to rely solely on the extraordinary abilities of a single individual to manage our company. Instead, each of us acts independently to support the management. However, for crucial decisions related to management policies or during emergencies like disasters, we need capable senior leaders to oversee the organization and projects.



# How we do it

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1. Each of us must demonstrate autonomous leadership and support the overall management of the organization.
2. In times of emergency, such as during management policy decisions or disasters, we appoint exceptional leaders to supervise both the organization and projects.
3. Leaders are expected to set an example, consistently upholding ethical standards and make operational decisions in accordance with the Code of Conduct.
4. This responsibility should be fulfilled by regularly assessing the qualifications and conduct of leaders and, if necessary, facilitating their development or considering replacements.



# To Our Community

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**How do you view the community that extends beyond your work?**

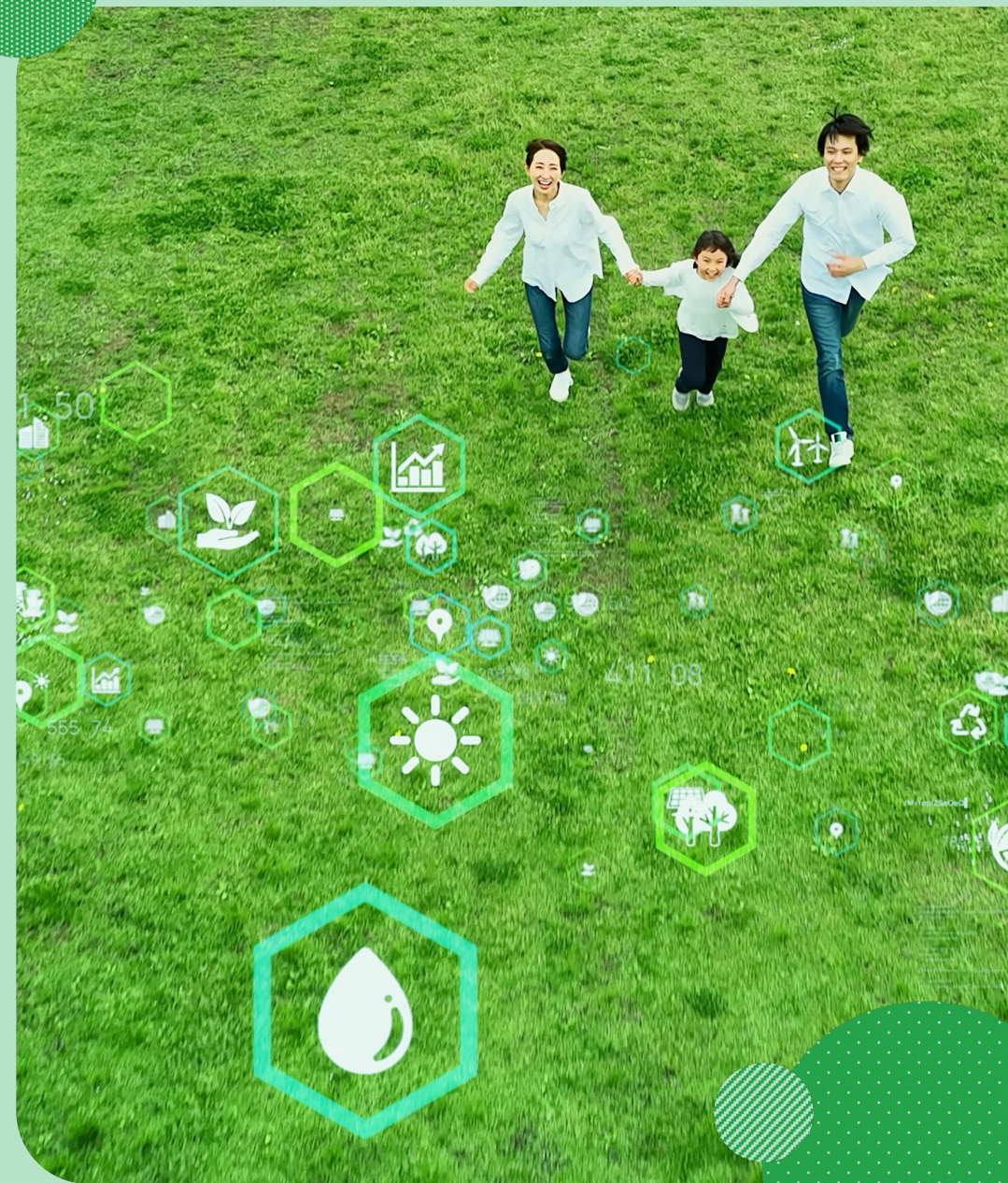




# Our responsibility - for Community

The third commitment is to the communities and the environment in which we live and work, as well as to the global community as a whole.

- We will contribute to the sustainable development of both local and global communities by nurturing individuals capable of addressing global challenges and by spreading awareness of Lifetime Empowerment.
- As responsible citizens, we will actively support valuable social and welfare programs, enhance educational opportunities, and fulfill our tax obligations.



## Why it matters

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As expected, contributing to community through education is of utmost importance. It's a fundamental requirement for gaining acceptance within the communities we serve.

## What it means

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Active employee involvement

ABG prioritizes diversity and inclusion, aiming to cultivate a workplace where every employee actively practices ethical and positive conduct to address challenges and cater the needs of participants and the community.

Our business cannot stand on its own; it relies on understanding the local community and the social contributions that form the basis of our business.



# How we do it

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1. We are aware of our strong connection with the local community, as well as our broader environment.
2. We will fulfill our responsibilities by maintaining a constant dialogue, assessing what is feasible and necessary for both parties, create plans based on mutual agreement, and executing these plans accordingly.



# To Our Stockholders

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**What economic activities do you think are important to provide the best environment for customers?**



# Our responsibility - for Stockholders

The fourth commitment is to our stockholders. We believe that by implementing all of these principles, stockholders will receive fair returns.

- As an educational institution, we will strive for sustainable profits.
- We build up reserves for times of adversity.
- We will explore creative concepts, create innovative learning services, and invest in the future.
- If we encounter setbacks, we will take corrective actions.
  1. We must conduct our business activities in a transparent manner
  2. We must make the necessary investments for development





## What it means

We operate as both an educational institution and a stock company school, receiving only partial public subsidies. Therefore, financial independence is crucial, and we must build our own funds to prepare for any future challenges. Moreover, investing our own funds is essential to create the best possible environment for our customers.

## Why it matters

While capital accumulation and investment are important, it's also crucial to fulfill the natural obligation of returning profits to the stockholders. Ensuring sustainable returns to stockholders while accumulating and investing appropriately is of utmost importance.

1. We build trust with stakeholders, including stockholders, by promptly disclosing information about our business activities and financial performance.
2. We make necessary investments in system development, facility maintenance and upgrades, M&A, and other areas to ensure the company's sustainable growth and healthy profits.



# How we do it

From a sustainable management standpoint, we will continuously monitor our operations to ensure profitability while delivering the best possible services. This will be achieved by timely selection and emphasis on effective business strategies.

1. We establish trust-based relationships with stakeholders.
2. We allocate the required resources for investments, including the maintenance and enhancement of systems and facilities, as well as potential mergers and acquisitions, to secure sustainable and steady growth, along with health profits.
3. Employees, faculty, and staff are expected to keep the confidentiality of important non-public information before it is made available to the public. In addition, they are refrained from trading the company's shares outside the designated share trading period and should avoid disclosing such information to third parties.





