

Policy Against Customer Harassment

At Withceed Hospitality Management Inc., that operates Hotel the Lutheran, our philosophy is “WITH – CEED: Together, We Proceed.” We believe that moving forward together begins with mutual respect. We are committed to fostering an environment where the dignity and human rights of our guests, employees, and business partners are respected and protected.

In line with this commitment, we have established the following Policy Against Customer Harassment.

1. Definition of Customer Harassment

Customer harassment refers to complaints or behaviors by customers or related parties where the means or manner used to pursue a demand are socially inappropriate and negatively impact employees' working environment.

2. Cases Considered Customer Harassment Under This Policy

(1) Examples of Potentially Unreasonable Customer Demands

- Where no defect or negligence is identified in the Company's products or services.
- Where the request is unrelated to the Company's products or services.

(2) Examples of Conduct That May Be Considered Socially Inappropriate in the Means or Manner of Making a Demand

① Conduct That Is Highly Likely to Be Considered Inappropriate, Regardless of the Legitimacy of the Demand

- Physical or psychological aggression, including assault, threats, intimidation, defamation, insults, or abusive language
- Requiring employees to kneel (dogeza) or engage in other humiliating acts
- Coercive or restrictive behavior, such as refusing to leave Company premises, making excessively long or repeated phone calls, remaining on-site for extended periods, unlawful confinement, demanding repeated explanations, or forcibly entering offices
- Discriminatory remarks or conduct based on race, nationality, gender, place of origin, sexual orientation, gender identity, age, religion, beliefs, disability, or other personal characteristics
- Sexually inappropriate behavior or remarks, including indecent acts, stalking, unauthorized photography, or any conduct that causes physical or psychological distress through sexual harassment

- Targeting individual employees with personal attacks or demands
 - Conduct that harms the reputation or credibility of the Company or its employees, including posting false or misleading statements on social media, spreading misinformation online, or publishing photos of employees' faces or name badges without consent
- ② Conduct That May Be Considered Inappropriate Depending on the Reasonableness of the Demand
- Requests for product exchanges
 - Requests for monetary compensation
 - Requests for an apology without reasonable grounds

The definitions and examples provided here are based on the “*Corporate Manual on Customer Harassment Prevention*” issued by the Ministry of Health, Labour and Welfare of Japan.

Please note that the examples are provided for reference only and do not cover the full range of conduct that may constitute customer harassment.

3. Response to Customer Harassment

- If behavior or remarks are determined to constitute customer harassment, we will take firm action to protect our employees. In such cases, we may, if necessary, refuse further service or interaction with the customer.
- In cases of particularly malicious behavior or conduct deemed criminal, we will work with external experts such as the police or legal counsel and respond appropriately, including pursuing legal action if necessary.

4. Employee Support and Protection

- We will implement clear procedures for addressing customer harassment and ensure all employees are fully informed and educated .
- Employees will receive training on identifying harassment and responding effectively and confidently.
- A dedicated reporting and consultation system will be available to support employees in handling incidents.
- The safety and well-being of employees affected by customer harassment are our highest priority, and we are committed to preventing recurrence.

5. Request to Customers

At Withceed Hospitality Management Inc., we aim to be attentive to our customers' needs and to provide experiences that satisfy and delight.

However, should any behavior or remarks be deemed to constitute customer harassment, we will respond in accordance with this policy.

We appreciate your understanding and cooperation in helping us maintain a safe, respectful, and welcoming environment for all.

(Established December 1, 2025)