## Compliance Action Guidelines and Rules

The rules for compliance under the Compliance Action Guidelines are as set out below.

- 1. Respect human rights and do not engage in discrimination or harassment.
- (1) Never discriminate against any person on the basis of their beliefs, religion, nationality, gender, age, background, physical or mental disabilities, illness, sexual orientation, gender identity, or for any other reason.
- (2) Do not engage in sexual harassment, power harassment, or any other form of harassment.
- (3) Comply with labor laws and maintain a safe and healthy work environment.
- 2. Comply with environmental laws and regulations and conduct activities in an eco-friendly manner.
- (1) Comply with national and local environmental laws and regulations.
- (2) Strive to use resources and energy efficiently, undertake green purchasing, recycle and properly dispose of waste, and prevent pollution of the environment.
- 3. Comply with laws and regulations and act with fairness when carrying out business transactions.
- (1) Comply with all laws and regulations related to the products we handle and the services we provide, and ensure that the procedures for processes such as obtaining necessary permits and approvals and submitting various notifications are completed in full.
- (2) Do not engage in unfair business practices, such as unreasonable restraint of trade (cartel), abuse of a superior bargaining position, or discriminatory treatment in business associations in violation of the Antimonopoly Act.
- (3) Do not engage in any acts that unfairly impair the interests of contractors with whom a manufacturing, service, or other contract has been agreed.
- 4. Besides managing company information in a proper manner, do not engage in any acts that involve the misuse of information obtained from outside the company or that infringe on the intellectual property rights or other rights of third parties.
- (1) Carefully manage the Company's confidential information (including trade secrets), and do not disclose or use such information for unauthorized purposes.
- (2) Take special care in the handling of personal information, and do not use such information for purposes other than those for which it was obtained. Take all necessary and appropriate measures to prevent leakage, loss, or other such incidents, and for the purpose of security management.
- (3) Do not disclose or use the Company's confidential information (including trade secrets) even after termination of employment.
- (4) Do not handle inquiries and other communications from outside the company on the basis

- of individual judgments; handle them in cooperation with the relevant departments. If a specific department is designated as a point of contact, ask this department to handle the matter (e.g. contact from media  $\rightarrow$  contact the public relations/branding group).
- (5) Do not engage in acts that infringe on the intellectual property rights of other companies or individuals, such as unauthorized copying of computer software, unauthorized reproduction of images on the Internet, newspapers, magazines, books, or other copyrighted materials.
- 5. Do not engage in illegal trading of stocks or other securities (insider trading).
- (1) Do not sell or purchase the Company's securities while in possession of "the material non-public information (the fact that has a significant impact on investment decision)" belonging to or related to the Company or any of its subsidiaries until such information is released publicly.
- (2) Do not sell or purchase securities of other companies, including business partners that are public or listed companies, while in possession of "the material non-public information (the fact that has a significant impact on investment decision)" belonging to or related to such companies until such information is released publicly.
- 6. Take a firm stand against antisocial activities and forces, and never offer any benefits to them.
- (1) Never yield to pressure from anti-social forces such as organized crime groups, *sokaiya* (corporate blackmailers), or terrorist groups. In the unlikely event of an unreasonable demand from such anti-social forces, never attempt to find a quick solution with money or other such means.
- (2) Be aware of and avoid contact with anti-social forces such as organized crime groups, sokaiya (corporate blackmailers), or terrorist groups, taking into consideration that such forces might pretend to be normal business partners.
- (3) Do not become knowingly involved in or unwittingly become party to acts of terrorism, drug dealings, money laundering, and other individual or organized criminal activities, and take all reasonable steps to ensure that neither you nor the Company becomes involved, knowingly or unknowingly, in such activities.
- 7. Do not engage in any activities that are contrary to the interests of the Company. Additionally, maintain a clear line between public and private matters. Maintain proper legal and ethical standards with respect to gifts and entertainment.
- (1) Do not use the Company's tangible and/or intangible assets for unauthorized business purposes.
- (2) Do not use company's assets or resources for personal gain.
- (3) Do not misuse the Company's corporate information systems.
- (4) Do not take on another job while employed by the Company without the Company's prior approval.

- (5) On termination of employment, return to the company all of its assets in your possession, including but not limited to any materials or equipment, and any files and documents generated for, or in connection with, the conduct of Company business.
- (6) Do not engage in political, religious, or any other personal activities unrelated to work in the workplace.
- (7) Never use your position in the workplace to obtain money, goods, or other benefits, or to gain personal or third-party benefits.
- (8) Do not engage in money lending and borrowing or other transactional activities with other employees without due cause.
- (9) Do not improperly or illegally provide entertainment, gifts, conveniences, or other economic benefits to public officials or those in a similar position, whether domestically or abroad.
- (10) Do not pay a fee to an agent or consultant when it is known, or should be known, that part of such fee or donations could be used to wrongfully gain influence with public officials or those in a similar position.
- (11) Do not provide any gift, entertainment, or any other type of economic gain to customers, their directors, officers, employees, or other related persons, in excess of accepted business and social norms.
- (12) Do not accept gifts or entertainment in excess of accepted business and social norms. Obtain approval or complete any other necessary procedure according to internal corporate rules prior to accepting any gift or entertainment from any organization or entity rendering services to the Company.
- Record and report financial and accounting matters in a timely and proper manner.
- (1) Do not record accounting and financial information inaccurately or in a way that would mislead those who receive it.
- (2) Record expense and revenue in a timely manner.
- (3) Record credit and debt accurately.
- 9. Respond promptly and appropriately to accidents and other incidents at business sites to stop the spread of damage as well as to strive to prevent their recurrence.
- (1) Pay close attention to safety management at each business site, especially at sites where products are moved and stored (logistics centers, etc.), and strive to prevent fatal accidents, injuries, and damage to the property of those who work at or use these sites. If an accident should occur, take prompt and appropriate action to limit damage and to prevent recurrence.
- (2) Work to ensure that as well as employees, subcontractors also comply with laws and regulations related to logistics operations and internal rules and regulations related to logistics center operations.
- (3) When using company-owned vehicles, comply with all relevant laws and regulations and drive with the utmost care. In the event of an accident, deal with it promptly and appropriately, giving top priority to the preservation of life and limb.

- (4) Give consideration to other parties in the vicinity to ensure a harmonious relationship.
- 10. Thoroughly pursue safety and security in quality control and other processes, conduct proper labeling, and offer products that gain the satisfaction and trust of consumers.
- (1) In all processes from product development to contract manufacturing, purchasing, and sales to customers and consumers, take a rigorous approach to the selection of raw materials and products, control quality, freshness, temperature, and hygiene, and provide products that are safe, reassuring, and properly labeled.
- (2) Purchase from manufacturers and suppliers that comply with environmental, safety, and health related laws and regulations, and that conduct quality control in conformity with the Product Liability Act, and ensure that expiration date management is strictly enforced.
- (3) In the event that a complaint is received from a customer, consumer, or other such party regarding our products, swiftly ascertain and confirm the facts of the situation and promptly take, in good faith, the appropriate action as required.
- 11. Observe other laws, regulations, and rules, and act responsibly with a sense of social propriety.
- (1) Comply with company rules and regulations, and do not disrupt the order of the workplace or act arbitrarily in excess of one's workplace authority.
- (2) Never drive under the influence of alcohol, whether in a company-owned vehicle or a private vehicle (passenger car, motorcycle, bicycle, etc.), and never overlook the drunk driving of other directors, officers, or employees.
- (3) Comply with all other laws, regulations, and rules, and do not engage in any conduct that tarnishes your image as a director, officer, or employee.