# Kyokuto Kaihatsu Group Compliance Policy

Kyokuto Kaihatsu Group regards compliance as "not only observance of laws/regulations and internal rules, but also honest conduct in compliance with social norms, corporate ethics, and management philosophy, etc., which will enable us to respond properly to social demands and expectations." We thus position it as one of the most important management issues. By ensuring proper conduct of the following nine principles by all Group officers and employees, we make constant efforts for thorough compliance practices.

#### 1. Compliance with laws/regulations and other rules

We dedicate ourselves to proper business conduct by complying with domestic and overseas laws/regulations and other rules, etc. related to our business, and respecting our Management Philosophy, Company Policy, and the ideas embodied in them.

#### 2. Conduct based on ethics and integrity

We will act sincerely with the integrity and high ethical standards expected of members of society, both inside and outside the workplace.

#### 3. Pursuit of safety and security

Regarding our customers' safety and sense of security as our highest priority, we provide quality products and services.

We also promote creation of safe work environments where our officers and employees can work free of concerns.

#### 4. Promotion of fair trade

We will comply with the Antimonopoly Act, promote fair and free competition, and conduct fair transactions. In addition, we do not engage in cartels, bid rigging, and other acts that may restrict competition, as well as unfair trade practices such as taking advantage of our position in transactions.

#### 5. Prohibition of bribery, etc.

We will maintain sound and honest relations with the governments/administrative bodies, both in Japan and abroad, and will not engage in any bribery or corruption.

# 6. Prohibition of insider trading and timely and fair disclosure of corporate information To secure stakeholders' trust, our executives and employees do not engage in insider trading. We also disclose corporate information in a fair and timely manner to ensure management transparency.

#### 7. Rejection of any relations with antisocial forces

We eliminate all relations with antisocial forces and reject all unfair demands and illicit transactions.

### 8. Utilization of Ethics Hotline

We utilize internal and external ethics consultation facilities (Ethics Hotline) to prevent compliance issues. Furthermore, we will not treat anyone disadvantageously because the person has used the Ethics Hotline.

## 9. Protection of personal information, etc.

Personal and customer information obtained in the course of business will be properly managed and handled in accordance with laws/regulations and other rules.

March 14, 2025 Tatsuya Nunohara Representative Director, President, CEO, Kyokuto Kaihatsu Kogyo Co., Ltd.