

# Sustainable Procurement Policy

## 1. Introduction

The KJRM Group (meaning corporate group consisting of KJRM Holdings, KJR Management and KJRM Private Solutions; hereinafter the same) has established the Sustainable Procurement Policy (hereinafter, the “Policy”) to contribute to the realization of a sustainable society. We recognize that, in order to contribute to the realization of a sustainable society, not only is it important for us to implement our own procurement activities based on the Policy, but it is also important to make efforts along our entire supply chain, which includes our business partners.

## 2. Scope of Application

The Policy applies to the suppliers of all products, materials, raw materials, and services that the KJRM Group procures. It applies to our entire supply chain, including indirect suppliers (such as businesses commissioned or contracted by, or that supply to, our direct suppliers).

## 3. Procurement Policy

### 3.1 Compliance with Laws and Regulations, etc.

In addition to complying with applicable domestic and foreign laws and regulations, etc., we respect international codes of conduct<sup>1</sup> and conduct business activities in accordance with appropriate business practices and corporate ethics.

### 3.2 Respect for Human Rights

We conduct business activities in compliance with international human rights and labor standards<sup>2</sup> and with respect for human rights. We also ensure that our business activities do not cause or contribute to human rights violations.

### 3.3 Establishment of Corporate Ethics

#### (1) Preventing corruption

We do not engage in any form of bribery, corruption, extortion, embezzlement, or obstruction of justice, etc., nor are we complicit in such activities.

#### (2) Exclusion of antisocial forces

We exclude all relationships with antisocial forces and organizations that threaten the order and safety of civil society. We firmly refuse any and all improper demands.

#### (3) Promotion of fair business activities

We comply with the Antimonopoly Act, the Unfair Competition Prevention Act, and other relevant laws and

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<sup>1</sup> “International codes of conduct” refers to expectations for the behavior of organizations based on principles and declarations established by international organizations, such as the United Nations, as well as on intergovernmental agreements (including treaties and conventions). Relevant examples include the following international human rights and labor standards and the Sustainable Development Goals (SDGs).

<sup>2</sup> “International human rights and labor standards” refers to the International Bill of Human Rights (the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights), the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises, etc.

regulations, and we promote fair business activities without engaging in any acts that impede free and fair competition or acts of unfair competition. We also respect intellectual property rights, and the transfer of technology and know-how is done in a way that protects intellectual property.

(4) Appropriate disclosure of information

We appropriately disclose in accordance with not only applicable laws and regulations but also social norms and guidelines of industry associations, etc. Falsification of records or disclosure of false information is not tolerated.

### **3.4 Consideration for the Environment**

(1) Addressing climate change

We contribute to the realization of net zero carbon emissions by striving to improve energy efficiency and use renewable energy, and by engaging in activities to continuously reduce energy consumption and greenhouse gas emissions.

(2) Conservation of biodiversity

We work to reduce our impact on the surrounding environment, biodiversity, and ecosystems. When procuring raw materials, we give consideration to the conservation of biodiversity and the sustainable use of resources.

(3) Prevention of pollution and management of chemical substances

We comply with relevant laws and regulations and implement measures to reduce and prevent the release of hazardous substances into the air, water, soil, etc.

(4) Effective use of resources, and waste management and reduction

We make effective use of resources and minimize the generation of waste. We also strive to use water and other natural resources efficiently and to optimize and reduce the amounts we use.

### **3.5 Improvement of Service and Quality**

(1) Ensuring safety

We consider the safety, security, and health of the users of our services, etc. in all aspects of our business activities.

(2) Quality control, quality assurance, and disclosure of information

In addition to establishing appropriate quality control and quality assurance systems for the services we provide in accordance with relevant laws and regulations, quality standards, and social demands, we constantly strive to improve quality. We also provide information on our services that is accurate and not misleading.

(3) Ensuring convenience and comfort

We consider and examine the convenience and comfort of the users of the products and services we provide, through such means as inclusive design and universal design.

### **3.6 Information Security**

(1) Appropriate management of information

We appropriately manage and protect not only our own confidential information but also the confidential information received from customers and third parties.

(2) Protection of personal information

We comply with relevant laws and regulations and appropriately manage and protect the personal information of all suppliers, customers, employees, and others.

### **3.7 Establishment of Complaints Handling Mechanisms**

(1) Establishment of complaints handling mechanisms

We have complaints handling mechanisms in place for investigating and responding to problems and to enable

officers and employees to make reports. We also protect the confidentiality of information and the anonymity of informants, and eliminate any retaliation against informants. We strive to disseminate these mechanisms to our officers and employees.

(2) **Dissemination of the KJRM Group Compliance Reporting Desk**

We strive to inform enterprises involved in our business of the Compliance Reporting Desk for Business Partners that we have set up.

### **3.8 Crisis Management**

In order to minimize any damage to officers, employees, customers, and other stakeholders, or to assets, due to natural disasters, accidents and other emergencies, we prepare action procedures for emergency response plans and business continuity plans, install necessary equipment, etc., and conduct education and training.

## **4. Remedial Measures**

We have established a Compliance Reporting Desk for Business Partners to receive consultations and reports on violations of laws and regulations, information management violations, various types of harassment, human rights, and the working environment in regard to our business operations. If we receive a report or consultation, we take appropriate corrective and remedial measures, and respond with due consideration to the protection of informants.

Compliance Reporting Desk for Business Partners <https://www.kjrm.co.jp/english/contact/index.html>

## **5. Policy Manager and Revision/Abolishment of Policy**

- (1) The head of the person in charge of sustainability at KJRM Holdings shall be the rule administrator for the Policy, and the Policy shall be classified as management-related regulations in the system of internal rules and regulations.
- (2) Revision or abolishment of the Policy is subject to the approval of the Chief Operating Officer of KJRM Holdings.

### **Supplementary Provisions**

Established on October 4, 2025.