To all parties concerned

TSUBURAYA FIELDS HOLDINGS INC.

# Announcement on the Formulation of Key Policies Promoting Sustainability Management

TSUBURAYA FIELDS HOLDINGS INC. Group (the Group) has newly formulated the following policies for promoting sustainability management across the organization, with the aim of achieving sustainable growth; the *Environmental Policy*, the *Human Rights Policy*, the *Sustainable Procurement Policy*. In addition, we have developed a Policy on *Fair Economic Transactions*.

#### 1. Formulation of Key Policies

On October 1st, 2025, following deliberation by the Group Sustainability Committee, our Group formulated three new policies: the *Environmental Policy*, the *Human Rights Policy*, and the *Sustainable Procurement Policy*. These policies are designed to serve as a shared framework for pursuing both sustainable growth and resolution of social issues, reflecting both international norms and guidelines as well as the unique characteristics of our business.

The full text of each policy is provided in the sections below.

- Environmental Policy: We are committed to reducing environmental impact through initiatives addressing climate change, resource circulation, and biodiversity conservation.
- Human Rights Policy: Respect for human rights is a fundamental principle of our business activities, including the prohibition of discrimination, elimination of forced and child labor, and the assurance of safe and healthy working environments.
- Sustainable Procurement Policy: we aim to realize responsible procurement by collaborating with suppliers and partners. Focusing on human rights, labor practices, environmental protection and ethical standards.
- Policy on Fair Economic Transactions: We have newly established specific policies to prevent anticompetitive practices, bribery and corruption, and tax avoidance, thereby enhancing fairness and transparency in our corporate activities.

These policies are positioned not only as a foundation for the daily conduct of our employees, but also as a shared basis for collaboration with our suppliers and partners.

## 2. About the Group Sustainability Committee (Reference Information)

Our Group is committed to realizing our shared corporate philosophy, "The Greatest Leisure for All People." As society continues to mature and the value of leisure increases, we aim to enrich people's entertainment and experiences, contributing to the happiness of society as a whole.

We believe that a sustainable society is an essential foundation for realizing our corporate philosophy. Addressing various social challenges is not only a corporate responsibility, but also a driver of value creation. To this end, we have positioned sustainability as a key management theme. By appropriately identifying and assessing both risks and opportunities, we aim to integrate sustainability into our overall business strategy. As part of this initiative, we have established the *Group Sustainability Committee* (hereinafter referred to as "the Committee").

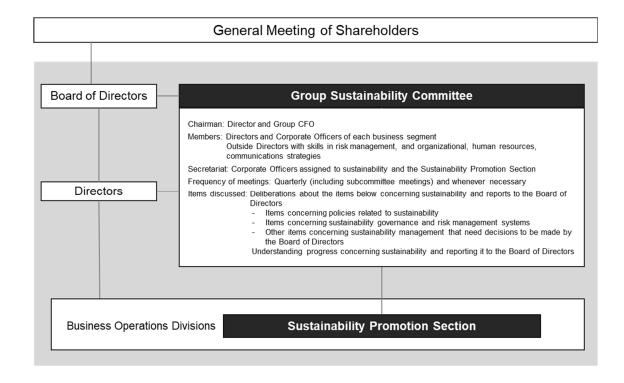
# (1) Role

The Committee serves as an advisory body to the Board of Directors and comprehensively oversees and promotes sustainability initiatives, and also provides advice to the President and Group CEO (responsible for operations) on the promotion of sustainability management. In the Sustainability Committee, members establish subcommittees for each topic and make the appropriate deliberations. Items deliberated by the Committee include:

- 1. Items concerning policies related to sustainability
- 2. Items concerning sustainability governance and risk management systems
- Other items concerning sustainability management that require decisions to be made by the Board of Directors

## (2) Composition

The Committee is comprised of the Director and Group CFO as chair, Directors and Corporate Officers of each business segment, and Outside Directors with skills in risk management, organization/human resources, and communication strategies.



#### **Key Policies**

#### **Environmental Policy**

Our Group recognizes that the sustainability of the global environment is an essential prerequisite for achieving sustainable growth. We view the harmony between our business activities and the environment not only as a vital responsibility, but also as a driver of value creation. Accordingly, we are committed to promoting sustainable business practices.

#### 1. Contribution to Climate Change Mitigation and Decarbonization

We will set clear targets for reducing greenhouse gas emissions and steadily work toward achieving them. Utilizing the TCFD framework, we will assess and respond to climate-related risks and opportunities, while ensuring transparent information disclosure.

#### 2. Efficient Use and Circulation of Resources

We aim to contribute to building a circular economy by practicing efficient resource use, reducing waste, reusing and recycling, and conserving water resources.

## 3. Consideration for Chemical Substances, Pollution, and Biodiversity

We will ensure proper management of chemical substances, strive to prevent environmental pollution, and conduct business activities with consideration for the conservation of biodiversity.

## 4. Reducing Environmental Impact in Collaboration with Partners

To ensure that our contents and the products we deliver can be enjoyed safely across generations, we will work with partners to minimize environmental impact throughout the entire lifecycle of our products and services.

# 5. Compliance and Information Disclosure

We will comply with all environmental laws and regulations, act with high ethical standards, and disclose information appropriately regarding our environmental initiatives and achievements, while valuing dialogue with stakeholders.

#### **Human Rights Policy**

To earn the trust of society and achieve sustainable growth, our Group believes that respecting the human rights and dignity of all individuals involved in our business is a fundamental prerequisite. Based on this belief, we have established this policy.

#### 1. Compliance with Laws and Norms

We declare our commitment to fulfilling responsibilities based on internationally recognized principles such as the International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights.

# 2. Scope of Application

This policy applies not only to our Group's officers and employees but also to all partners, including suppliers. We require the practice of human rights respect across our entire value chain.

#### 3. Promotion System

The President and Group CEO serves as the highest responsible officer for this policy, with the Group CFO assigned as the officer in charge of promotion. The Group Sustainability Committee, chaired by the Group CFO, will promote initiatives based on this policy.

## 4. Human Rights Due Diligence

Our Group will continuously assess human rights risks in its business activities and value chain, and establish processes and systems to prevent, mitigate, and remedy such risks.

## 5. Remedy and Corrective Measures

In the event of confirmed human rights violations, we will promptly respond and provide remedies to affected individuals.

## 6. Education

We regularly conduct training and awareness raising activities to ensure understanding implementation of this policy.

#### 7. Stakeholder Engagement and Transparency

Through dialogue with partners, local communities, and external experts, we will ensure proper implementation and improvement of this policy. We commit to disclosing the progress and status of our human rights initiatives transparently via our website and other channels.

#### Sustainable Procurement Policy

Under our corporate philosophy of, "The Greatest Leisure for All People," we aim to people's entertainment and leisure through innovative products and services, thereby contributing to the happiness of society. To achieve this, responsible procurement practices and a sustainable supply chain are essential. We work with our partners to fulfill our social responsibilities, in accordance with international norms and our Human Rights Policy and Environmental Policy.

#### 1. Respect for Human Rights

We respect the fundamental human rights of all individuals and eliminate discrimination and harassment. We value diversity and contribute to creating a safe and inclusive working environment.

# 2. Responsibility Toward Labor

We prohibit child labor and forced labor and respect workers' rights to freedom of association and collective bargaining. We ensure appropriate working hours and fair wages.

#### 3. Health and Safety

We prioritize the health and safety of employees and stakeholders and establish systems for preventing occupational accidents and managing hygiene.

#### 4. Environmental Consideration

We address climate change, promote efficient use of resources, and work to reduce waste. We also emphasize proper management of chemical substances and pollution prevention. These principles align with our Environmental Policy.

#### 5. Fair Transactions

We prohibit bribery, corruption, and other unethical practices, and ensure fair and transparent transactions. We respect free and sound competition.

#### 6. Compliance with Laws and Business Ethics

We comply with domestic and international laws and regulations, and act responsibly based on social norms and ethical standards.

# 7. Information Disclosure and Accountability

We appropriately disclose information related to procurement and transactions to enhance transparency, fulfilling our accountability to society and stakeholders.

#### 8. Product Quality and Safety

We prioritize the quality and safety of our products and services to earn consumer trust. In the event of any issues, we respond promptly and sincerely.

# 9. Information Management and Privacy Protection

We properly protect personal and confidential information, and prevent data breaches and misuse.

#### 10. Respect for Intellectual Property

We respect the intellectual property rights of our group and third parties and promote responsible business activities that avoid infringement or unauthorized use.

#### Policy on Fair Economic Transactions

#### Prevention of Anti-Competitive Conduct

We comply with all laws and regulations related to antitrust and fair competition in our business activities. We engage in fair competition with our competitors and contribute to the healthy development of the market.

In selecting business partners, we make comprehensive decisions based on necessity, quality, price, and other relevant factors, ensuring fair and impartial standards.

#### Prevention of Bribery and Corruption

We do not offer or accept any form of bribery in dealings with public institutions or private entities. When conducting administrative procedures necessary for business activities, we follow proper procedures and exercise utmost caution in transactions with all parties, including public officials and those in equivalent positions.

# Prevention of Tax Avoidance

We understand the importance of proper tax filing and payment in accordance with tax laws, accounting regulations, and internal rules, and strive to raise awareness of tax compliance.

We comply with all tax laws and related regulations relevant to our business activities and make appropriate tax payments.