

TSUBURAYA FIELDS HOLDINGS Group

Sustainable Procurement Policy and Business Partner Guidelines

Ver 1.0

Sustainable Procurement Policy

Under our corporate philosophy of, “The Greatest Leisure for All People,” we aim to enrich 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.

Business Partner Guidelines

Message to Our Business Partners

To realize our corporate philosophy of “The Greatest Leisure for All People,” our Group believes it is essential to promote sustainability in collaboration with our business partners. We ask for your understanding of these guidelines and your cooperation in putting them into practice within your daily business activities.

We also appreciate your support in sharing these guidelines within your own supply chain to promote understanding and expand these initiatives. We may request confirmation of your progress as necessary. If matters requiring improvement are identified, we may request specific corrective actions and reporting.

We will continue to review and update these guidelines as appropriate in response to changes in the social environment and laws and regulations.

Business Partner Guidelines

1. Respect for Human Rights

(1-1) Prohibition of Discrimination: Suppliers shall respect diversity and eliminate discrimination in recruitment, development, and evaluation (including unfair treatment based on race, creed, gender, age, social status, lineage, nationality, ethnicity, religion, region of origin, skin color, sexual orientation, gender identity, disability, pregnancy, political views, union membership, or marital status). Suppliers shall strive to ensure equal opportunity and fairness in the treatment of workers. If a report is made regarding these matters, suppliers shall ensure that the whistleblower is not disadvantaged.

(1-2) Prohibition of Inhumane Treatment: Suppliers shall respect the human rights of workers and prohibit harsh or inhumane treatment. Inhumane treatment includes mental or physical abuse, corporal punishment, sexual harassment, power harassment (harassment through verbal abuse or coercive behavior), and maternity harassment.

2. Responsibility Toward Labor

(2-1) Prohibition of Forced Labor: Suppliers shall prohibit forced labor. Forced labor refers to any labor performed against a person's will, such as through

assault, threats, confinement, or other unjust restrictions on mental or physical freedom. Suppliers shall respect the right to leave a job freely and ensure that workers are not required to deposit identification cards, passports, or work permits with the employer.

(2-2) Prohibition of Child Labor and Consideration for Young Workers:

Suppliers shall refrain from employing children under the minimum working age defined by domestic laws, regulations and ILO standards. Suppliers shall ensure that workers under 18 are not assigned to hazardous tasks (including night shifts or overtime) that may harm their development, health, or safety.

(2-3) Consideration for Working Hours: Suppliers shall manage workers' hours, holidays, and leave to meet the legal requirements of all countries where business is conducted.

(2-4) Appropriate Wages and Benefits: Suppliers shall comply with laws and regulations regarding wages, overtime pay, legally mandated benefits, and wage deductions. Suppliers shall ensure workers are paid a living wage and avoid any unjust wage deductions.

(2-5) Freedom of Association and Right to Collective Bargaining: Suppliers shall

respect workers' rights to organize (freedom of association, collective bargaining, etc.) as a means of achieving labor-management consultations.

3. Health and Safety

(3-1) Occupational Safety: Suppliers shall identify risks to workplace safety (potential risks of accidents or health impairments during work) and ensure safety through appropriate design, technology, and management. Suppliers shall provide reasonable accommodation, particularly for pregnant women and nursing mothers.

(3-2) Emergency Preparedness: To protect life and physical safety, suppliers shall identify potential risks of disasters and accidents, create procedures for emergency response, install necessary equipment, and provide education and training on disaster response.

(3-3) Occupational Accidents and Illnesses: Suppliers shall monitor the status of occupational accidents and illnesses and implement appropriate countermeasures.

(3-4) Industrial Hygiene: Suppliers shall identify workplace situations involving exposure to hazardous chemicals, noise, or odors, and implement appropriate

countermeasures.

(3-5) Consideration for Physically Demanding Tasks: Suppliers shall identify physically demanding tasks and manage them appropriately to prevent accidents or illnesses.

(3-6) Safety Measures for Machinery: Suppliers shall identify safety risks for machinery used by workers and implement appropriate safety measures.

(3-7) Facility Safety and Hygiene: Suppliers shall ensure the safety and hygiene of facilities provided to workers (dormitories, cafeterias, restrooms, etc.).

(3-8) Health and Safety Communication: Suppliers shall provide workers with appropriate health and safety information, education, and training in a language they can understand regarding potential workplace hazards, and build a mechanism for workers to suggest safety-related opinions.

(3-9) Worker Health Management: Suppliers shall perform appropriate health management to maintain the health of all workers.

4. Environmental Consideration

(4-1) Environmental Permits and Reporting: Suppliers shall obtain necessary permits and approvals, perform required management, and report to authorities in accordance with relevant laws and regulations of all countries where business activities are conducted.

(4-2) Reduction of Energy Consumption and Greenhouse Gas Emissions: Suppliers shall promote efficient use of resources and energy-saving activities, and work continuously toward reducing greenhouse gas emissions.

(4-3) Atmospheric Emissions: Suppliers shall comply with all applicable laws and regulations regarding exhaust in all countries of operation and promote activities to prevent air pollution.

(4-4) Water Management: Suppliers shall comply with laws and regulations regarding wastewater in all countries of operation, monitor water usage and discharge, and practice water conservation.

(4-5) Resource Efficiency and Waste Management: Suppliers shall comply with laws and regulations regarding resource efficiency and waste management in all countries of operation, and promote the "3Rs" (Reduce, Reuse, Recycle) through appropriate management to minimize waste generation.

(4-6) Chemical Substance Management: Suppliers shall comply with laws, regulations, and customer requirements regarding the prohibition of specific substances in all countries of operation.

(4-7) Management of Chemical Substances in Products: Suppliers shall ensure products comply with laws, regulations and customer requirements regarding the prohibition of specific chemical substances in all countries of operation.

5. Fair Transactions

(5-1) Anti-Corruption: Suppliers shall prohibit all forms of bribery, corruption, extortion, and embezzlement, and refrain from bribery or illegal political contributions to public officials or other stakeholders.

(5-2) Prohibition of Improper Provision and Acceptance of Benefits: Suppliers shall refrain from providing or receiving improper benefits to/from public officials or other stakeholders, and eliminate relationships with antisocial forces.

(5-3) Fair Business Practices: Suppliers shall refrain from engaging in activities that hinder fair, transparent, and free competition. Suppliers shall conduct business, competition, and advertising in a fair and equitable manner.

(5-4) Whistleblower Protection: Suppliers shall implement activities to prevent misconduct, establish systems for early detection and response. Suppliers shall ensure the confidentiality of reports and anonymity of whistleblowers, and appropriately manage such reports to protect whistleblowers from retaliation or any disadvantageous treatment.

(5-5) Responsible Mineral Procurement: Suppliers shall conduct self-assessments and confirm with their own suppliers whether minerals such as tantalum, tin, tungsten, and gold contained in products cause or contribute to serious human rights violations, environmental destruction, corruption, or conflict in conflict-affected and high-risk areas..

6. Compliance with Laws and Business Ethics

(6-1) Legal Compliance and Respect for International Norms: Suppliers shall comply with applicable laws, regulations, and international norms in their own country and all countries of operation, not only within their company but also throughout the supply chain.

7. Information Disclosure and Accountability

(7-1) Appropriate Information Disclosure: Suppliers shall provide and disclose information regarding labor, health and safety, environmental activities, business activities, organizational structure, financial status, and performance in accordance with applicable laws and regulations.

8. Product Quality and Safety

(8-1) Ensuring Product Safety: When designing products under their own responsibility, suppliers shall ensure that products meet safety standards defined by the laws and regulations of all countries where business is conducted. Suppliers shall design products with sufficient safety, considering their responsibilities as a manufacturer.

(8-2) Quality Management: Suppliers shall comply with all applicable regulations regarding product and service quality, as well as their own quality standards and customer requirements.

(8-3) Accurate Information on Products and Services: Suppliers shall provide accurate and non-misleading information regarding products and services.

9. Information Management and Privacy Protection

(9-1) Defense Against Cyber Attacks: Suppliers shall implement defensive initiatives against threats such as cyber attacks and manage systems to prevent damage to themselves or others.

(9-2) Protection of Personal Information: Suppliers shall comply with laws and regulations regarding the personal information of business partners, customers, third parties, and their own workers, and manage/protect such information appropriately.

(9-3) Prevention of Confidential Information Leakage: Suppliers shall appropriately manage confidential information, not only their own but also information received from customers and third parties, to prevent unauthorized disclosure.

10. Respect for Intellectual Property

(10-1) Respect for Intellectual Property: Suppliers shall respect intellectual property and ensure the transfer of technology and know-how is conducted in a manner that protects intellectual property rights. Suppliers shall refrain from infringing on the intellectual property rights of others.