

YAMADA HOLDINGS GROUP

Code of Conduct

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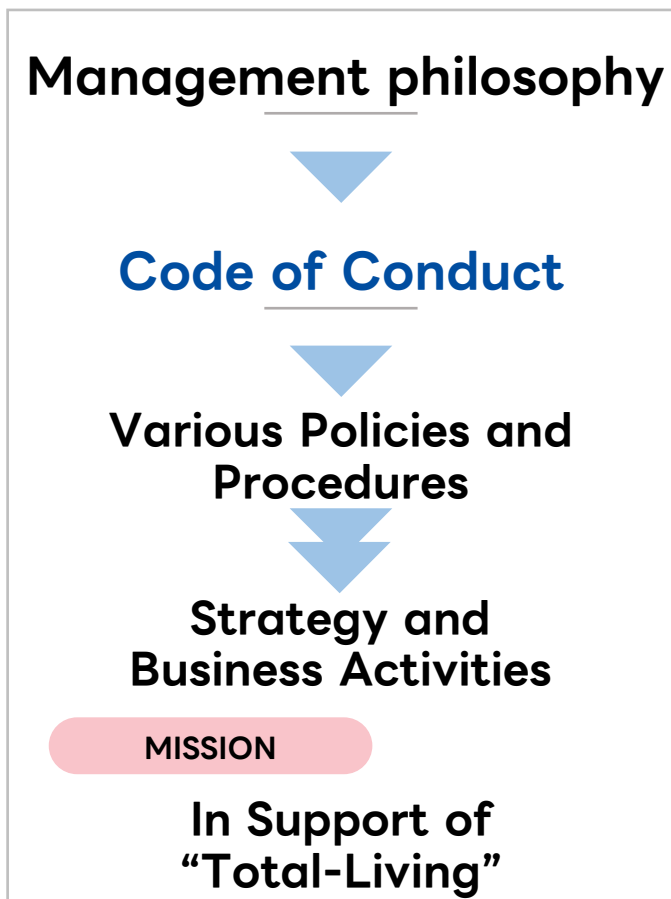
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Overview

What is Code of Conduct

The YAMADA HOLDINGS Group's Code of Conduct is based on our management philosophy of "Creation and Challenge" and "Appreciation and Trust."

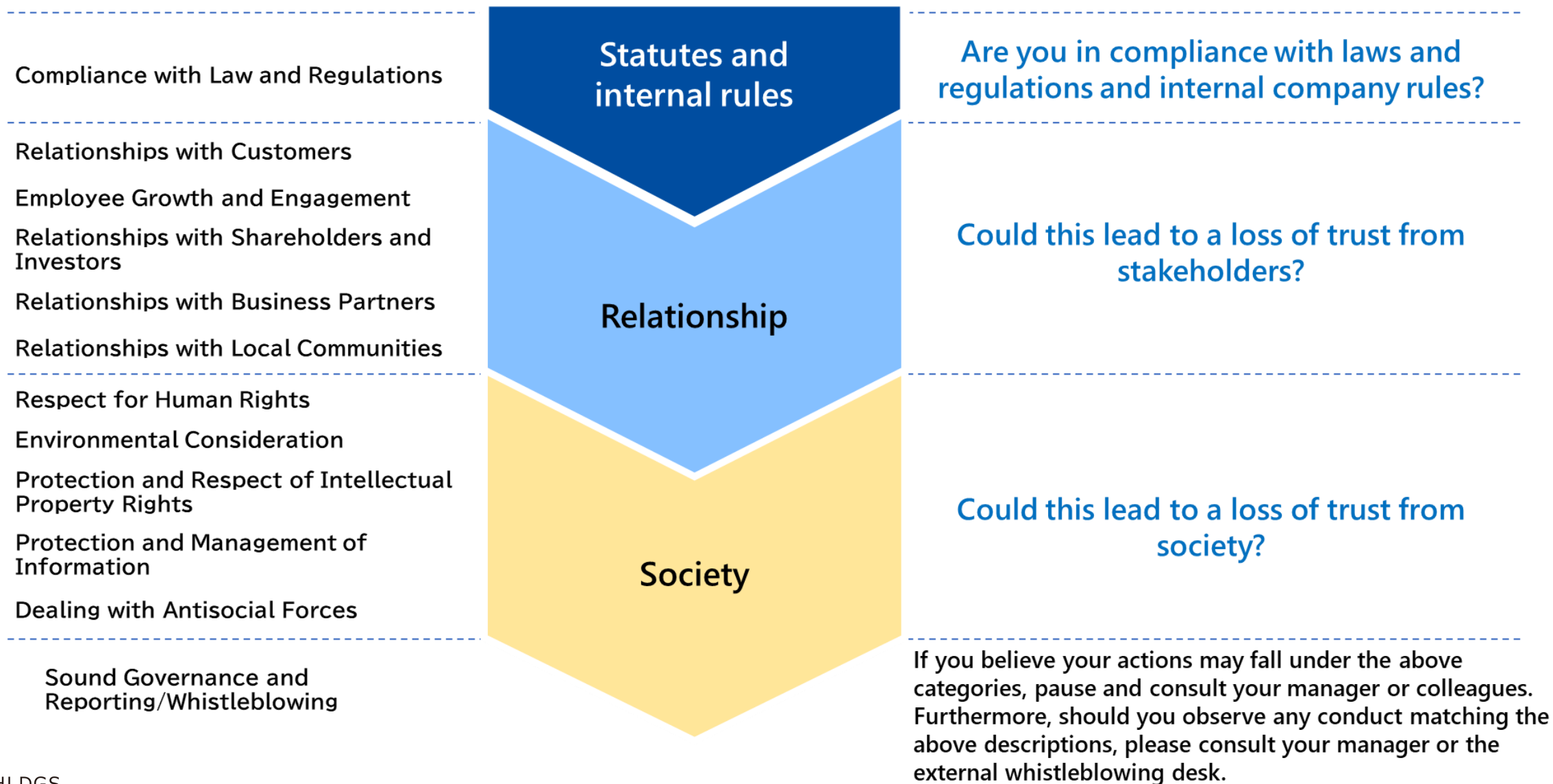
It defines the "ethical conduct" that all officers and employees, as members of our Group, must adhere to in order to build, maintain, and enhance relationships of trust with all stakeholders.



▲ Positioning of the "Code of Conduct" within Our Group and Flowchart for Enhancing Corporate Value

Guide to Implementing the Code of Conduct

When you're unsure about a decision, think through the questions in each code of conduct.



1

Compliance with Law and Regulations

We conduct corporate activities in a fair and conscientious manner in compliance with all laws, regulations and rules.

As a Matter of the Top Priority

This is the most critical item within our Code of Conduct. First and foremost, please ensure that your actions do not violate any laws, regulations, or company rules.

Legal compliance is fundamentally linked to the trust placed in us. If you find that your own actions are in violation of the law, you must stop immediately. Furthermore, if you witness such behavior, please report it promptly to your supervisor or through the Group's "Internal Reporting System (Whistleblowing System)."
(*See "12. Sound Governance and Reporting/Notification")

2

Relationships with Customers

We prioritize our customers above all else, always remembering to express our gratitude and striving to provide sincere service.

We also value our customers' voices and pursue a service approach that ensures safety and security while delighting every single customer.

Appreciation and Trust

Our Group's entire business cannot exist without our customers. Let us always interact with them with a heart of gratitude.

Losing the trust of even one customer can lead to losing many more customers thereafter.

3

Employee Growth and Engagement

We recognize people as our most important management resource.

We promote growth through fair and equitable evaluations, enabling each employee to maximize their abilities and individuality.

We continuously support diverse skill development through opportunities for challenging, self-directed career advancement and comprehensive training programs, while striving to enhance employee engagement.

An Organization Shaped by Diverse Personalities

Everyone possesses different abilities and individuality. Recognizing and properly valuing these qualities creates a positive environment, leading to individual challenges and growth.

The loss of diverse talent and the suppression of their growth stifles corporate activity.

4

Relationships with Shareholders and Investors

We will strengthen engagement through dialogue to meet the trust and expectations of our shareholders and investors, aiming to enhance long-term corporate value.

Furthermore, we will rigorously prevent insider trading and conduct transparent corporate activities through timely and appropriate disclosure.

Appropriate Disclosure

Our group discloses information through our integrated reports, corporate website, and other channels.

Insider Trading

Trading stocks based on material nonpublic information obtained through business activities is prohibited.

Furthermore, even if unintentional, be aware that you may be subject to penalties if you become involved in such trading.

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Relationships with Business Partners

We will prevent all inappropriate conduct, build trust throughout the entire supply chain through fair and equitable transactions, deepen our bonds as partners growing together, and strive for mutual prosperity.

Growing together

Our business partners are valued partners to our group.

Our group has established a “Trading Policy” and continues to conduct fair and equitable transactions.



Trading policy

(<https://www.yamada-holdings.jp/info/policy/trading-policy.html>)

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Relationships with Local Communities

We recognize that all our stores and business locations derive their purpose only through the love and support of local residents.

We strive to coexist with our communities and, as a company supporting social infrastructure, contribute to solving the challenges faced by local communities.

Community-based

The revitalization of local communities directly contributes to the growth of our group.

Through our business activities, we continue to support the lives of local residents, and it is through this sustained effort that solutions to challenges become apparent.

7

Respect for Human Rights

We consistently respect human rights and diversity, prevent discrimination and harassment based on race, nationality, gender, religion, or other grounds, and do not engage in inhumane activities such as child labor or forced labor.

We respect each other's personalities and individuality, and strive to create a safe and healthy working environment.

A Right for Everyone

Our Group has established a “Human Rights Policy” and is promoting initiatives to ensure that all executives and employees support international human rights standards and respect each other’s dignity and individuality.

We will take appropriate action against any harassment (such as workplace bullying or sexual harassment) that occurs in the course of business.



Human rights policy (<https://www.yamada-holdings.jp/info/policy/human-rights.html>)

8

Environmental Consideration

In conducting our business activities, we strive to promote the effective use of resources, recycling, energy conservation, waste reduction, and the prevention of environmental pollution.

We advance initiatives that consider both the reduction of environmental impact and profitability.

Connecting to the Future

Our group contributes to reducing the environmental impact on society as a whole by managing the entire product lifecycle within the group. Furthermore, we must not forget that the accumulation of small, thoughtful actions by each individual can have a significant impact on the global environment.



Environmental Policy (<https://www.yamada-holdings.jp/info/policy/environmental.html>)



Sustainability Basic Policy (<https://www.yamada-holdings.jp/info/policy/csr-ethics.html>)

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Protection and Respect of Intellectual Property Rights

We protect and manage our own intellectual property, utilize it effectively, and respect the intellectual property of others without infringing upon it.

Intellectual Property Rights

Intellectual property rights are broadly classified into two categories:

- “Industrial property rights,” which cover technologies, designs, and names
- “Copyrights,” which cover creative works such as novels, music, and movies

It is prohibited by law to imitate, use without permission, or reproduce and sell the technologies or creative works of third parties.

10

Protection and Management of Information

We will ensure the appropriate protection and management of personal information and confidential information handled through our business activities, in accordance with individual policies and internal regulations.

Becoming a Trusted Company

Information leaks and any actions that may cause them severely damage trust.

Exercise the utmost caution when handling personal information. If a leak occurs unintentionally or there is a risk of one, promptly report it to your supervisor and take appropriate action.



AI Ethics Policy (https://www.yamada-holdings.jp/lang-en/policy_ai-ethics-policy.html)

11

Dealing with Antisocial Forces

We maintain absolutely no ties with antisocial forces and will never comply with any unreasonable demands made by such groups.

We consistently act with social ethics and a sense of justice, responding with a resolute stance.

A Firm Response

Maintaining ties with antisocial forces will result in the suspension of various contracts and transactions.

In response to unreasonable demands, we will seek instructions from superiors or relevant departments before taking action.

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Sound Governance and Reporting/Whistleblowing

We will promptly report any conduct that violates or may violate this Code of Conduct to our supervisor or utilize the internal reporting system.

The company will not subject any reporter to any adverse treatment (retaliatory actions).

For a Healthy Work Environment

The company will not treat you unfavorably for taking courageous action.

[Examples of Unfair Treatment and Retaliation]

Demotion, pay cuts, transfers, harassment, etc., based on reporting concerns or cooperating with an investigation

YAMADA HOLDINGS Group, guided by our management philosophy of “Creation and Challenge” and “Appreciation and Trust,” ensures that our officers and employees adhere to our “Code of Conduct.” We strive to build relationships of trust with all stakeholders and remain a company that meets society's expectations.

1. Compliance with Law and Regulations

We conduct corporate activities in a fair and conscientious manner in compliance with all laws, regulations and rules.

2. Relationships with Customers

We prioritize our customers above all else, always remembering to express our gratitude and striving to provide sincere service. We also value our customers' voices and pursue a service approach that ensures safety and security while delighting every single customer.

3. Employee Growth and Engagement

We recognize people as our most important management resource. We promote growth through fair and equitable evaluations, enabling each employee to maximize their abilities and individuality. We continuously support diverse skill development through opportunities for challenging, self-directed career advancement and comprehensive training programs, while striving to enhance employee engagement.

4. Relationships with Shareholders and Investors

We will strengthen engagement through dialogue to meet the trust and expectations of our shareholders and investors, aiming to enhance long-term corporate value. Furthermore, we will rigorously prevent insider trading and conduct transparent corporate activities through timely and appropriate disclosure.

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8. Environmental Consideration

In conducting our business activities, we strive to promote the effective use of resources, recycling, energy conservation, waste reduction, and the prevention of environmental pollution. We advance initiatives that consider both the reduction of environmental impact and profitability.

9. Protection and Respect of Intellectual Property Rights

We protect and manage our own intellectual property, utilize it effectively, and respect the intellectual property of others without infringing upon it.

10. Protection and Management of Information

We will ensure the appropriate protection and management of personal information and confidential information handled through our business activities, in accordance with individual policies and internal regulations.

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