

(Translation)

ROHTO GROUP BASIC POLICY FOR INFORMATION SECURITY

The ROHTO Group (“Group” or “we”) acknowledges that our stakeholders’ personal information, the Group and our business partners’ confidential information, and internal information assets constitute integral parts of our management assets, which are the foundation of trust from society and corporate value. Based on that perception, we set out principles for taking measures for information security, “ROHTO Group Basic Policy for Information Security” (“Policy”), as follows:

1. Establishment of Management Structure

The Group will establish the structure to swiftly implement information security measures to protect and adequately manage all retained information assets.

2. Development of Rules

The Group will develop and maintain internal rules for information security. We will communicate and disseminate those rules and principles to all members of the Group to protect and adequately handle the stakeholders’ personal information, the Group and business partners’ confidential information, and internal information assets.

3. Legal Compliance

The Group will comply with all applicable laws, ordinances, and norms regarding confidential information and internal information assets and fulfill all contractual requirements and obligations regarding the stakeholders’ information.

4. Training

The Group will provide all our members with training programs to enhance their knowledge and foster information security awareness. We will also monitor their attendance at those programs.

5. Response to Incidents

The Group will strive to prevent information security incidents. If an incident occurs, we will adequately address it, investigate its cause, and strive to minimize the damage and avoid re-occurrence.

6. Evaluation and Continuous Improvement

To ensure the effectiveness of this Policy, we will check and review the information security management structure and measures when appropriate. If necessary, we will revise and strive to improve them continually.

Established on March, 2025