

Kitamura Holdings Co., Ltd. Human Rights Policy

We as Kitamura Holdings Group are committed to our mission of "Reflecting Your Time and Living with Your Heart." and our economic activities to pursue happiness through a fulfilling photographic lifestyle are aligned with the SDGs, which are global goals to be achieved globally. In addition to the inclusion of "Diversity and Inclusion" as one of our materialities, we have established a code of conduct that states, "We respect the fundamental human rights of all people in all aspects of our corporate activities, and will not engage in discrimination or conduct that offends individual dignity, regardless of the reasons for such conduct. We have also expressed our support for the 10 principles of the UN Global Compact in June 2022.

We recognize that our corporate activities may directly or indirectly affect human rights, and in order to promote activities that respect human rights in all aspects of our corporate activities, in June 2022, by a resolution of the Board of Directors, we established the "Kitamura Holdings Group Human Rights Policy" as our top-level policy on human rights in our company based on the UN Guiding Principles on Business and Human Rights.

Based on this policy, we will continue to promote respect for human rights.

1. Commitment to Respect Human Rights

We recognize that our business operations could be at risk to potential and actual human rights impacts. We seek to uphold the human rights of others, and shall address any human rights infringements that may arise from our business operations by taking responsibility for them.

2. Respect for Internationally Recognized Standards

We are committed to respecting human rights as stipulated in the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations (UN) Guiding Principles on Business and Human Rights, as well as being based on the approach of the Children's Rights and Business Principles developed by UNICEF. We are a signatory of the UN Global Compact and we support its ten principles.

3. Scope of responsibility

This policy applies to all executives and employees in Kitamura Holdings Group and its subsidiaries. We also expect our business partners, including our suppliers, to understand and

agree with this policy and to work with us to ensure that their business operations respect this policy. In particular, we will work with suppliers in accordance with the "Kitamura Holdings Group Sustainable Procurement Policy, we expect business clients and partners (such as suppliers and third parties) to act in accordance with this human rights policy. We strive to enhance our existing participation in collaborative initiatives and other such mechanisms in order to address adverse human rights impacts associated with our business clients and partners and to exercise our leverage to this end.

4. Applicable laws and Regulations

We respect the freedom of association and the right to collective bargaining. We comply with labor-related laws and regulations and observe labor-management agreements. We are committed to engaging in employees or their representatives in good faith through dialogue and consultations and continuously work to build constructive relations.

5. Implementation of human rights due diligence, Grievance Mechanisms

We will identify, prevent and mitigate adverse human rights impacts with which we are involved in line with the UN Guiding Principles on Business and Human Rights. We will act upon the findings of this due diligence and endeavor to deliver appropriate and effective remedy where we identify that we have caused or contributed to adverse human rights impacts. We also recognize that we may play a role in remediation where adverse impacts are directly linked to our products and services by business relationships. Where it is necessary to prioritize our actions, we will prioritize to address our most severe adverse human rights impacts based on their scale, scope and irremediability.

6. Initiatives for respecting Human Rights

(1) Respect for diversity, Prohibition of discrimination and harassment

We shall continue to promote the creation of a corporate structure with zero tolerance for any discrimination or harassment based on birth, nationality, race, ethnicity, beliefs, religion, gender, sexual orientation, gender identity, age, disabilities, preference, educational background, family or any other ground. We also strive to maintain a healthy working environment without discrimination in employment or treatment of employees.

(2) Prohibit forced and child labor

We oppose any form of slavery or forced labor, including human trafficking, and child labor.

(3) Management of Working Hours and Wages

We stipulate appropriate working hours, break time, overtime hours, late-night work, day offs, and vacation in our rules of employment in accordance with the Labor Standards Act and labor-management agreements. In compliance with legal requirements, we also stipulate minimum wage, legal benefits and deductions, overtime work, etc., in our pay regulations, and make payments directly to our employees.

(4) Respect freedom of association and collective bargaining

We respect the rights of employees to form trade unions based on the employees' own wills and the right to choose whether or not to participate. We authorize the exercise of collective bargaining right in an effective manner, and shall negotiate in good faith through constructive dialog with labor representatives.

(5) Maintenance of Employees' Safety and Health

We exercise due care to maintain our employees' physical and mental health and strive to secure safe and healthy workplace environments. We comply with the laws, regulations, and rules related to safety and health, and work to maintain this by adopting appropriate measures to address health risks.

(6) Freedom of Expression and Privacy Protection

We exercise due care to maintain our employees' physical and mental health and strive to secure safe and healthy workplace environments. We comply with the laws, regulations, and rules related to safety and health, and work to maintain this by adopting appropriate measures to address health risks.

7. Education and Training

We make efforts to disseminate and ensure group-wide compliance with this Policy. This includes translating it appropriately into the languages used in the countries and regions where we do business and by providing ongoing training and education to all officers and employees.

8. Consultation with stakeholders

We will incorporate relevant stakeholder input into our efforts to respect human rights and individuality and our responses to challenges, as well as engage in sincere dialogue and consultation with our stakeholders.

9. Monitoring and Reporting

We will regularly disclose our efforts to respect human rights as outlined in this policy through our website and other means of communication.

10. Responsible person and System

The promotion of human rights initiatives is overseen by the Sustainability Promotion Division under the supervision of the Compliance Committee, an advisory body to the Board of Directors that includes the Chief Executive Officer and the director in charge.

11. Reorganization

Ours Sustainability Promotion Division shall be in charge of the revision or abolition of this policy, and any important revision or abolition shall be made by a resolution of the Board of Directors.

Effective on June 23, 2022

Approved by the Board of Directors of KITAMURA HOLDINGS Co.,Ltd.