

M3 Group Basic Policy on Procurement

1. Basic Approach

M3 Group (which refers to the Company and its affiliates, etc.¹, as defined in the “Code of Conduct” stated below; the same shall apply hereinafter) has declared in the “M3 Group Code of Conduct” (hereinafter referred to as “Code of Conduct”), which is a code of conduct to be observed by each and every director, officer and employee of M3 Group, that it selects its suppliers, etc. on the basis of objective standards and that procurement decision will be based upon the business benefit to M3 Group and its customers (“3.9 Fair Procurement”).

This Policy clarifies M3 Group’s approach to procurement as set forth in the Code of Conduct and applies to all directors, officers and employees of M3 Group.

2. M3 Group's Basic Policy on Procurement

M3 Group will conduct fair procurement in accordance with the following policies and rules.

1) Policy on Purchasing Activities

- M3 Group will provide all business partners, both domestic and overseas, with fair opportunities and conduct purchasing based on fair evaluations.
- M3 Group will comply with laws and regulations, and social norms in all purchasing-related activities and strive to be considerate of human rights and the global environment.
- M3 Group will purchase appropriate goods and services from appropriate business partners at appropriate prices and delivery times.
- M3 Group will strive to build relationships of mutual cooperation and trust with business partners and fulfill its corporate social responsibility together with business partners through its purchasing activities.

2) Policy on Selecting Business Partners

When selecting its suppliers, contractors and OEMs for goods and services, M3 Group will make decisions based on the basis of competitive price, quality, delivery and other objective standards. In addition, when selecting business partners, M3 Group will give priority to companies that meet the following conditions and we also give priority to these companies when continuing business transactions:

- It complies with laws and regulations, and social norms, etc. and places emphasis on human rights and environmental considerations;
- Its financial condition is sound;
- Its quality, price and delivery time are at an appropriate level;
- It has the ability to provide a stable supply and to respond flexibly to fluctuations in supply and demand;
- It has advanced technical capabilities that can contribute to the services and products of each company in M3 Group;
- It has an appropriate system for information management; and
- It has the ability to resume service provision and product supply as quickly as possible even in the event of a disaster or other unforeseen circumstances.

3) Prohibited Acts for Fair Purchasing

M3 Group will not engage in the following acts with suppliers or contractors, etc.:

- Having a personal interest in the supplier or contractor, etc.;

¹ It refers to (1) M3, Inc. (2) any company in which M3, Inc. directly or indirectly holds a majority of the outstanding voting shares or equity interests and (3) any other company that the Board of Directors of M3, Inc. decides to include in the scope of the Code of Conduct as appropriate.

- Receiving entertainment or gifts from the supplier or contractor, etc. that are beyond the scope of personal benefit or social common sense;
- Forcing the supplier or contractor, etc. to make donations, etc.; and
- Divulging confidential information of the supplier or contractor, etc. obtained through purchasing or contracting transactions.

3. Initiatives throughout the Supply Chain

In order to fulfill the purpose of this Policy, M3 Group has established the “**M3 Group Supplier Conduct Guidelines**” as attached, which M3 Group would like all of its business partners to cooperate with and will strive to request cooperation from each business partner.

M3 Group Supplier Conduct Guidelines

M3 Group (which refers to the Company and its affiliates, etc.², as defined in the “Code of Conduct” stated below; the same shall apply hereinafter) aims to contribute to the resolution of social issues, including sustainable development and environment-related issues, with the business goal of “making use of the Internet to increase, as much as possible, the number of people who can live longer and healthier lives, and to reduce, as much as possible, the amount of unnecessary medical costs.”

As part of the above, M3 Group has declared in the “**M3 Group Code of Conduct**” (hereinafter referred to as “Code of Conduct”), which is a code of conduct to be observed by each and every director, officer and employee of M3 Group, that it selects its suppliers, etc. on the basis of objective standards and that procurement decision will be based upon the business benefit to M3 Group and its customers (“3.9 Fair Procurement”) and has established the “**M3 Group Basic Policy on Procurement**” to further clarify this approach.

In order for M3 Group to achieve this purpose as it conducts business activities in various fields, it is necessary to act based on high ethical standards, not just to comply with laws and regulations, in the supply chain of all businesses.

M3 Group respects the independence of its business partners, vendors, suppliers, consultants and contractors (hereinafter collectively referred to as “Suppliers”). At the same time, the cooperation of Suppliers is essential in order to achieve the purposes listed above.

When entering into a contract with M3 Group and conducting business activities on behalf of M3 Group, M3 Group asks that Suppliers not only comply with the laws and regulations but also with the ethical standards stipulated in these Guidelines, in addition to their own procurement policies.

In implementing these Guidelines, M3 Group asks that not only Suppliers but also all related companies, including their own suppliers, to cooperate to the extent possible.

These Guidelines may be revised from time to time. Please check and refer to the latest version each time.

1. General Standards

1 Compliance with Laws as well as Internal Rules and Policies; Honest and Ethical Business Conduct

M3 Group’s basic policy is to comply with all applicable laws and regulations of the countries and regions in which it operates and to conduct its business activities in an honest and ethical manner. M3 Group asks that Suppliers comply with all laws, regulations and internal company rules and policies relating to their business activities and have policies in place prohibiting all types of unethical activities.

2 Relationship with Stakeholders

It is the core corporate responsibility of M3 Group to the society to pursue its corporate value enhancement through innovation and sound business practice. Suppliers shall endeavor to carry out M3 Group's business, considering that sound business practice requires that business decisions give due consideration to the interests of its stakeholders including shareholders, customers, employees, suppliers, business partners, local communities and other organizations.

3 Appreciating Diversity

M3 Group conducts its business in an environment that is diverse and global. Conduct that

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is socially and professionally acceptable in one culture or region may be viewed differently in another. Suppliers shall give careful consideration to cultural and regional differences in performing their business.

2. Respect for Human Rights

Suppliers shall respect the human rights of all workers and treat them with dignity and respect in accordance with international human rights principles. M3 Group has established the “**M3 Group Basic Policy on Human Rights**,” and Suppliers shall also confirm and comply with the contents of the Policy.

1 Equal Employment Opportunity

Suppliers shall not discriminate in recruiting, hiring, training, promoting and otherwise treating applicants and employees based on their race, religion, color, national origin, age, sex, disability or other factors that are unrelated to the legitimate business interests. Suppliers shall make every effort to create a workplace free from discrimination and harassment.

2 No Forced Labor / Child Labor

Suppliers shall not use any form of forced or involuntary labor and shall not employ children. The term “child” refers to a person younger than 15 years old (or 14 years old where a local law provides for a lower age) or the local legal minimum age for labor, if it is higher. However, this policy does not apply to work or service of performers or recording artists or that otherwise by its nature is reasonably necessary to be procured from a child, to the extent permitted by local law (for example, a child actor/actress).

3 Sound Labor and Employment Practices

Suppliers shall adopt sound labor and employment practices to treat their employees at all times in accordance with the applicable laws and regulations of the countries and regions in which they operate.

4 Work Environment

Suppliers shall maintain a healthy, safe and productive work environment that is free from discrimination or harassment and shall ensure that none of their directors, officers and employees make sexual advances, actions or comments, or racial or religious slurs, jokes or any other comments or conduct in the workplace, that create a hostile work environment. Suppliers shall also recognize that the safety in the work place is a primary concern and adhere to all applicable health and safety laws and regulations as well as internal rules and policies respecting workplace safety.

5 Humane Treatment

Suppliers shall not use corporal punishment, violence, verbal abuse, sexual harassment or any other form of harassment or threaten workers in any way.

6 Freedom of Association

Suppliers shall respect the rights of workers to freedom of association, join a union and bargain collectively in accordance with applicable laws and regulations.

3. Conducting Business with Integrity and Fairness

1 Product and Service Safety

The safety of customers using M3 Group’s products and services is of utmost concern to M3 Group. In all phases of its operations, including R&D, planning, design, production, sales and after-sales service, Suppliers shall continually develop and implement programs that meet or exceed legal requirements to help ensure the safety of their products and services. Suppliers must be committed to giving safety instruction and information to

customers that is accurate, understandable and prominently displayed. Should an accident or safety problem be reported in connection with M3 Group's products or services, Suppliers shall cooperate in promptly investigating the matter and taking appropriate action.

2 Fair Competition

It is the basic policy of M3 Group to comply with all applicable antitrust, competition and fair trade laws and regulations of each country and region where M3 Group conducts business. These laws and regulations are designed to prohibit agreements or undertakings vis-à-vis third parties that fix prices, divide markets, limit production or otherwise impede or destroy market forces. Some countries or regions have antitrust or competition laws that assert extraterritorial jurisdictions over certain activities taking place outside the jurisdictions if they affect the markets of those jurisdictions.

Suppliers shall know and comply with those laws and regulations applicable to their business.

3 Advertising

When advertising the M3 Group's products and services, Suppliers shall not engage in false or misleading advertising or advertising that slanders others.

Suppliers shall confirm and comply with laws and regulations regarding advertising, including comparative advertising.

4 Personal Information

Suppliers shall respect the privacy of individuals, such as customers, employees of suppliers and business partners, and directors, officers and employees.

Accordingly, Suppliers shall develop policies and internal rules regarding the personal information and observe all applicable laws and regulations as well as applicable internal rules and policies in collecting, maintaining, using, disclosing, disposing of and otherwise handling personal information.

5 Intellectual Property

Suppliers shall recognize the value of intellectual property (such as patents, designs, trademarks, trade secrets, and copyrights including compositions, sound recordings, film works and computer programs) of M3 Group and other companies.

6 Confidential and Proprietary Information

Suppliers must recognize that information is a valuable corporate asset and safeguard its own confidential and proprietary information as well as the information that suppliers, business partners or customers entrust to M3 Group. Generally speaking, "confidential and proprietary information" is information that has not been disclosed to the general public or that gives an enterprise an advantage over its competitors or that could harm an enterprise if released prematurely or inappropriately and includes invention, creation, know-how and trade secrets as well as financial information, corporate strategy, marketing programs, and information about relationships with customers, suppliers and business partners.

Suppliers shall not disclose or distribute any confidential and proprietary information of M3 Group except as authorized in advance by M3 Group and shall use such information only for the purpose permitted by the company in connection with the business of M3 Group.

7 Fair Procurement

Suppliers shall select their suppliers, contractors and OEMs for goods and services on the basis of competitive price, quality, delivery and other objective standards and procurement decision shall be based upon the business benefit to M3 Group and its customers.

For details, please refer to the "**M3 Group Basic Policy on Procurement.**"

8 Gifts and Entertainment

Suppliers shall not make any payment to individuals employed by current or prospective M3 Group customers, suppliers or other business partners for the purpose of obtaining or retaining business, or for the purpose of obtaining any other favorable business action.

It is also prohibited to accept any payment, gift or entertainment that is intended to influence, or that appears to influence, business decisions of M3 Group. No gift or payment may be given to government officials, directly or indirectly, for the purpose of, or that appears to be for the purpose of, seeking favorable arrangements or action by such officials.

In addition to the foregoing, Suppliers shall observe local laws and regulations, as well as applicable internal rules and policies set by each M3 Group company with respect to giving and receiving gifts, entertainment and other benefits.

For details, please refer to the “**M3 Group Basic Policy on Preventing Corruption and Bribery.**”

9 Recording and Reporting of Information

All records, recordation and reporting of information, including but not limited to books and other financial records, shall be accurate, complete, honest and timely and must be a fair representation of facts. Suppliers shall never cause records to be inaccurate or create records that are misleading or artificial.

4. Environmental Conservation

Suppliers shall take environmentally friendly measures. Suppliers shall also endeavor not to have a negative impact on society, the environment or natural resources. Furthermore, M3 Group has established the “**M3 Group Basic Environmental Policy,**” and Suppliers shall also confirm and comply with this Policy.

1 Compliance with Environmental Laws and Regulations, etc.

Suppliers shall comply with all laws and regulations regarding environmental conservation in the countries and regions where they operate. Suppliers shall consider the environmental impact of their business activities, including hazardous substances, air emissions, greenhouse gases, water discharge and recycling.

2 Response to Climate Change

Suppliers shall be aware of the effects of climate change and the related risks and opportunities and shall work to mitigate and adapt to climate change.

3 Environmental Permits and Reporting

Suppliers shall obtain and keep current with all environmental permits and registrations that are required to conduct business activities and comply with operational and reporting requirements.

4 Pollution Prevention

Suppliers shall minimize or eliminate the emission of pollutants and the generation of waste when discharging pollutants and generating waste.

5 Hazardous Substances

Suppliers shall ensure that chemical and other substances that pose a risk to human health and the environment are identified, labeled, managed, handled safely and disposed of properly.

6 Waste Management

Suppliers shall reduce all types of waste by implementing appropriate management, including storage, treatment at facilities, reuse, recycling and disposal of waste.

- 7 **Reducing Environmental Impact and Resource Conservation**
Suppliers shall recognize the importance of efficient and sustainable use of energy and resources in promoting all business activities and strive for continuous improvement to reduce environmental impact through measures such as reducing greenhouse gas emissions, actively introducing renewable energy, reducing energy and resource consumption, promoting waste reduction and recycling, reducing water use, reducing atmospheric impact, reducing waste and building a procurement network that takes into account the natural environment.
In addition, Suppliers shall regularly monitor the situation and set targets for reducing environmental impact as necessary in order to achieve the above.
- 8 **Conservation of Biodiversity**
Suppliers shall recognize the importance of biodiversity conservation and work to prevent or reduce the negative impact of their business activities on the environment and biodiversity.
- 9 **Sustainability Management System**
In order to achieve the above purposes, Suppliers shall establish and maintain an appropriate management system that includes top management and take the necessary initiatives.
- 10 **Information Disclosure and Communication**
Suppliers shall endeavor to disclose information related to the environment and promote active communication with all stakeholders, both internal and external, including business partners and suppliers.

5. Ethical Personal Conduct

- 1 **No Insider Trading**
Suppliers shall not trade in shares, convertible bonds, bonds with subscription rights to shares or other securities of M3 Group while in possession of material non-public information about M3 Group or its business partners. Further, Suppliers may not induce such trading by others (such as family, friends, customers and other officers and employees) by way of disclosing material non-public information. "Material non-public information" is any non-public information which could influence a reasonable investor to trade stocks or securities and includes financial performance including earnings, dividend plans, alliances with other companies, divestiture, acquisitions, new products, advances in research and development and any other significant activities.
- 2 **Conflicts of Interest**
In transactions with M3 Group, Suppliers shall avoid situations in which the personal interests or relationships of directors, officers and employees of M3 Group could inappropriately influence, or be likely to influence, M3 Group decision-making. If Suppliers become aware of such a situation, they shall promptly notify M3 Group.
- 3 **Corporate Assets**
Suppliers have a duty to protect M3 Group's assets from loss, damage, misuse, theft or sabotage and shall not pursue personal benefits using M3 Group's assets. These assets cover both tangible and intangible assets, including brand, trademark, know-how, confidential and proprietary information and information systems.
To the extent permitted under applicable laws, M3 Group reserves the right to monitor and inspect how M3 Group's assets are used by Suppliers. This includes monitoring and inspection of all e-mail, data and files kept on PCs or other network terminals.
- 4 **Media Relations and Public Statements**
Suppliers shall not initiate contact with media, etc. or respond to their inquiries for or on behalf of M3 Group without the authorization of the corporate communications, investor

relations, or other departments of M3 Group given the authority to deal with those inquiries.

6. Relation to Superior Regulations

Each basic policy established by the M3 Group (including the Basic Policy on Human Rights, the Basic Policy on Procurement, the Basic Policy on Preventing Corruption and Bribery and the Basic Environmental Policy) is superior to these Guidelines. In the event of any discrepancy between these Policies and these Guidelines, the former shall prevail.

Enforced in January 2025