

## **Mori Trust Group Anti-Bribery Policy**

Mori Trust Co., Ltd. and its group companies (hereinafter referred to as the “Mori Trust Group”) are committed to preventing bribery, suspected acts of bribery, and the provision or receipt of improper benefits, in line with the “Mori Trust Group Anti-Bribery Policy” (hereinafter referred to as the “Policy”).

This Policy has been established for the purpose of clarifying the Mori Trust Group’s policy for anti-bribery, based on applicable domestic and international laws, rules and regulations concerning bribery (hereinafter referred to as “Anti-Bribery Laws and Regulations”).

This Policy applies to all officers and employees (including dispatched workers; hereinafter collectively referred to as “Officers and Employees”) of the Mori Trust Group. Some group companies have established their own anti-bribery policies based on their business activities, in such cases, their own policies shall apply.

### **1. Compliance with Anti-Bribery Laws and Regulations**

Officers and Employees shall comply with the Anti-Bribery Laws and Regulations applicable to them.

### **2. Prohibition of the Provision of Improper Benefits**

Officers and Employees shall not, regardless of domestic or overseas context, offer, promise or provide money or other benefits to public officials or persons in equivalent positions (hereinafter “Public Officials, etc.”) (hereinafter collectively referred to as “bribery”), in the event of a violation of applicable anti-bribery laws and regulations, with a fraudulent intent, or when deemed to exceed socially acceptable norms and standards. This includes small facilitation payments (regardless of the name used) for the purpose of expediting routine governmental action related to normal administrative services provided by public officials, etc.

### **3. Management of Accounting Records**

When making payments or bearing expenses for Public Officials, etc., Officers and Employees shall follow the prescribed internal procedures and conduct appropriate after-the-fact check to confirm the details of such payments or expenses.

### **4. Dealing with Third Parties and Risk Assessment**

Officers and Employees shall not engage in bribery through third parties. Especially, when appointing agents or engaging in joint ventures, M&A, etc., they shall conduct assessments that include the anti-bribery risk considerations, and only engage in honest and trustworthy partners, taking appropriate anti-bribery measures appropriate to the level of risk.

## **5. Education and Training**

Mori Trust Group shares this Policy and corporate philosophy with all Officers and Employees and continuously carries out the education and training on anti-bribery with the aim of preventing bribery before it occurs

## **6. Measures in Case of Violations**

If Officers and Employees violate Anti-Bribery Laws and Regulations or this Policy, the Mori Trust Group will take strict disciplinary measures in accordance with the work rules and disciplinary regulations separately established by each company.

## **7. Promotion System and Contact Points**

### **(1) Promotion System**

General Affairs and Human Resources Division, General Affairs and Human Resources Department, Legal & Compliance Group in Mori Trust Co., Ltd. is responsible for building internal control systems and supporting compliance with laws and regulations related to business execution. The Group promotes anti-bribery initiatives in cooperation with relevant departments of group companies.

### **(2) Whistleblowing and Consultation Contact Points**

Officers and Employees, advisors, consultants, part-time and temporary workers, and secondees from group companies can consult or report legal violations through the internal whistleblowing system in Mori Trust Co., Ltd. Consultations received are investigated for fact-checking and addressed as appropriate, with efforts made to improve the working environment. General Affairs and Human Resources Department, Legal & Compliance Group in Mori Trust Co., Ltd. serves as the contact point, ensuring the protection of privacy and confidentiality, and protecting whistleblowers from dismissal or any other disadvantageous treatment due to whistleblowing. The Group also coordinates with compliance departments of relevant group companies, as necessary.

Established: October 23, 2025

Mori Trust Group

Mori Trust Holdings, Inc.

President & CEO: Miwako Date