

Oenon Group Action Guidelines

Chapter 1: General Provisions

(Purpose and Scope of Application of the Action Guidelines)

Article 1 The Oenon Group Action Guidelines (hereinafter referred to as the “Action Guidelines”) are established to ensure the faithful implementation of the Oenon Group Principles of Conduct (hereinafter referred to as the “Principles of Conduct”) and the universal concepts of a “customer-oriented focus” and a “profit-oriented focus” (hereinafter collectively referred to, together with the Principles of Conduct, as the “Principles of Conduct etc.”). By putting these into practice, we aim to realize our corporate philosophy through the co-creation of future value. These Action Guidelines set forth the behavioral standards to be followed by officers and employees of Oenon Holdings, Inc. and its Group companies (collectively referred to as the “Oenon Group”; individual companies are referred to as “Group Companies”). Officers and employees of the Oenon Group shall regard these Action Guidelines as the foundation for their daily business activities and duties.

2. The officers (including persons in equivalent positions) and employees (including contract employees, part-time workers, and temporary staff) of the Oenon Group (hereinafter collectively referred to as “we”) shall comply with these Action Guidelines, recognizing that fulfilling our social responsibilities through respect for human rights, strict adherence to compliance, and conduct based on high ethical standards contributes to enhancing the corporate value of the Oenon Group.

(Responsibility for Compliance and Measures Against Violations)

Article 2 We shall act with an awareness that each of us bears responsibility for promoting compliance, and we shall take the initiative in promoting compliance within our respective departments.

2. In addition to complying with laws, regulations, and internal rules, we shall act based on sound corporate ethics and social norms in accordance with societal common sense.
3. We shall not pursue profit or operational efficiency at the expense of compliance.
4. Officers and individuals in supervisory or managerial positions at Group Companies shall, as promoters of compliance within their departments, take the lead in complying with relevant laws, regulations, and internal rules, while also ensuring that compliance initiatives are appropriately communicated and thoroughly embedded within their departments.
5. Officers and individuals in supervisory or managerial positions at Group Companies shall create a workplace environment where subordinates can consult without hesitation regarding any compliance-related questions or concerns.
6. Officers and individuals in supervisory or managerial positions at Group Companies shall not ignore any sense of discomfort encountered in daily operations, but shall take appropriate

action, such as confirming the circumstances with the relevant parties.

7. Upon recognizing a compliance-related issue, officers and individuals in supervisory or managerial positions at Group Companies shall promptly report and consult with the Corporate Planning Department of Oenon Holdings, Inc. or with their own supervisor. They shall take appropriate measures to rectify the issue and must never condone or overlook it.
8. We acknowledge that any violation of laws, regulations, or internal rules may result in disciplinary action, including dismissal, in accordance with the employment regulations of the respective Group Company. In addition, we recognize that the individual responsible for the violation may be subject to civil liability (damages) or criminal liability (imprisonment, fines, etc.), and that such violations may cause both tangible and intangible serious consequences for the Company, including civil or criminal liability, administrative sanctions, and loss of trust from stakeholders.

(Compliance Framework)

Article 3 Oenon Holdings, Inc. shall establish a CSR & Compliance Committee, chaired by the president of Oenon Holdings, Inc., for the purpose of building a compliance framework across the Oenon Group. In addition, the heads of departments at Oenon Holdings, Inc. and the presidents of Group Companies shall bear responsibility for maintaining and enhancing systems to ensure compliance with laws, regulations, and internal rules within their respective departments and companies, and shall work to promote compliance activities.

2. If we become aware of conduct that constitutes, or may constitute, a violation of compliance, we shall promptly report the matter to our supervisor or consult with/report to either the internal or external whistleblowing contact point established by Oenon Holdings, Inc., or the personnel consultation desk of the relevant Group Company.
3. Group Companies shall protect the privacy of whistleblowers and individuals seeking consultation. Except in cases where a report is made for an improper purpose, no whistleblower or individual seeking consultation shall be subjected to disadvantageous treatment for having reported or consulted. Furthermore, Group Companies shall not tolerate any obstruction of reports or consultations, or any retaliatory acts toward whistleblowers or individuals seeking consultation.

(Responsible Department)

Article 4 The department responsible for the Action Guidelines shall be the Corporate Planning Department of Oenon Holdings, Inc. This department shall provide advice, recommendations, and support to Group Companies concerning the implementation of matters stipulated in the Action Guidelines and the establishment of corporate ethics.

(Revisions and Abolitions)

Article 5 Any revision or abolition of the Action Guidelines shall be determined by the Board of Directors of Oenon Holdings, Inc. following deliberation by the CSR & Compliance Committee.

Chapter 2: Relationships with Customers and Business Partners

(Development and Provision of Safe, Secure, and High-Quality Products and Services)

Article 6 We shall contribute to the enjoyment of food and the healthy lifestyles of our customers by striving to develop and provide safe, secure, and high-quality products and services based on biotechnology centered on fermentation technology, in order to meet the expectations and earn the trust of our customers, and to ensure their satisfaction.

2. We shall provide appropriate information regarding our products and services.
3. In the event that a safety issue arises with any product, we shall immediately verify and analyze the facts, disclose accurate and necessary information in a timely manner, and take swift and appropriate action. In addition, we shall investigate the root cause of the issue and work to prevent recurrence.

(Compliance with Contracts)

Article 7 We shall not enter into contracts that violate laws, regulations, or social norms.

2. We shall faithfully fulfill all contracts we have entered into, in order to earn and maintain the trust of our business partners.

(Fair Advertising and Promotion)

Article 8 We shall strive to use accurate and easy-to-understand language and labeling regarding product quality, and shall not use misleading, false, exaggerated, or defamatory expressions.

(Fair Competition)

Article 9 We shall conduct fair transactions with all business partners based on the principles of free competition and in compliance with the Antimonopoly Act and other applicable laws and regulations.

2. We shall not engage in cartels or bid-rigging with competitors. Furthermore, we shall not use improper means to exclude competitors from the market or obstruct the entry of new participants. We shall not participate in any meetings or exchange information that may restrict fair and free competition or raise such suspicions, and we shall consistently act in a fair and transparent manner.
3. We shall not engage in inappropriate acts such as providing excessive entertainment, gifts, or money to customers, business partners, or other parties, and shall always act with sound

judgment.

(Export and Import Control)

Article 10 We shall comply with the Foreign Exchange and Foreign Trade Act and other relevant domestic and international laws and regulations, and shall properly conduct export and import transactions of products, raw materials, and other items in accordance with internal rules and procedures.

2. We shall comply with laws and regulations related to customs duties and shall accurately file declarations for the export and import of products, raw materials, and other items.

(Fair Procurement)

Article 11 We shall treat suppliers, subcontractors, service providers, labor service providers, and other such parties (hereinafter collectively referred to as “Business Partners”) in an equal and fair manner at all times, and shall not engage in transactions that impose unjust disadvantages by abusing a superior bargaining position.

2. We shall neither accept nor solicit improper benefits from Business Partners. In addition, we shall not accept entertainment, gifts, travel expenses, or other favors that could give rise to suspicions of impropriety.
3. We shall clearly communicate our expectations to Business Partners regarding compliance, human rights, labor practices, the environment, anti-corruption, and other matters, and shall request that they implement such practices.

Chapter 3: Relationship with Shareholders and Institutional Investors

(Disclosure of Corporate Information and Financial Reporting)

Article 12 We shall disclose corporate information—including management policies, business activities, financial data, and sustainability initiatives—in a timely and appropriate manner to stakeholders, including shareholders and institutional investors. We shall strive to ensure that such disclosed information is presented in a manner that is useful to its recipients.

2. Based on relevant laws, regulations, and internal rules, we shall prepare and maintain financial and accounting records and reports accurately and clearly, and preserve such records and reports appropriately.
3. We shall strictly follow internal control procedures in the preparation, approval, and recording of accounting-related matters. In addition, we shall operate the internal control system properly, regularly verify its effectiveness, and make improvements as necessary.

(Prohibition of Insider Trading)

Article 13 We shall not trade in stocks or other securities of the Oenon Group or its business partners while

in possession of material non-public information related to them.

Chapter 4: Relationship with Employees

(Respect for Employees' Human Rights)

Article 14 We shall respect and uphold international standards related to human rights (such as the Universal Declaration of Human Rights) and labor (such as the ILO Core Labour Standards).

2. We do not permit any form of forced labor or child labor.

Forced labor refers to labor performed against one's will, including situations in which individuals are forced to work to repay debts, enslaved through human trafficking, or subjected to inhumane prison labor. It also includes cases where individuals are restricted in their movement or residence against their will (e.g., confiscation of identification documents). Child labor refers to labor that interferes with the right to receive compulsory education (for those under 15 years of age, or under 14 in developing countries), labor that hinders healthy development, dangerous or harmful labor performed by those under 18, and exploitative labor involving children.

3. We shall provide fair opportunities to acquire education, experience, skills, and abilities appropriate to job roles. We shall also ensure fair treatment based on individuals' experience, skills, abilities, performance, and potential for growth.

4. We shall respect individual human rights and dignity and eliminate discrimination in recruitment and employment based on status or circumstances unrelated to a person's aptitude or ability—such as race, religion, gender, sexual orientation, age, nationality, language, disability, social origin, property, or family background. We strive to ensure fair treatment, mutual respect, inclusivity, and recognition of individual differences, thereby fostering a work environment in which a diverse range of personnel can thrive. We shall also make appropriate accommodations for employees' religious practices to the extent reasonable.

5. We shall not tolerate any acts that threaten personal dignity, including physical, sexual, racial, psychological, verbal, or any other form of harassment, bullying, or abuse. We shall work to create an open and respectful workplace environment. We shall not turn a blind eye to harassment and shall make use of available channels, including personnel consultation desks established by Group Companies.

6. We shall respect and uphold fundamental labor rights, including freedom of association, the right to organize, and the right to collective bargaining. Any form of intimidation, harassment, retaliation, or violence toward union members or worker representatives is strictly prohibited.

(Maintaining a Healthy and Safe Working Environment)

Article 15 We shall place the highest priority on the health and safety of all individuals involved in our business activities. We shall comply with all relevant laws and regulations, continuously pursue

the most appropriate safety standards for each business activity, and maintain and develop a work environment where employees can work in good health and safety.

2. In the event that a workplace accident or similar incident occurs, we shall make every effort to minimize the damage and shall promptly implement measures to prevent recurrence.

Chapter 5: Relationship with the Company

(Protection of Company Assets and Avoidance of Conflicts of Interest)

Article 16 We shall use and manage all Company assets—both tangible and intangible—appropriately and solely for the purpose of performing our duties. We shall not misuse or waste such assets, use them for non-business purposes, or act in ways that impair their value.

2. We shall act in the best interests of the Company and ensure that our personal interests do not influence business decisions. We shall not accept payments, loans, gifts, discounts, entertainment, or other benefits from third parties in exchange for favorable treatment in company decisions or the provision of confidential information or Company assets, as doing so constitutes a conflict of interest and may also be considered bribery.
3. We shall take appropriate measures to avoid situations in which our personal interests—or those of relatives or other close parties—conflict with the interests of the company. If such conflicts cannot realistically be avoided or are otherwise unavoidable, we shall report the situation to the company and seek advice or approval.

(Protection of Personal Information)

Article 17 We shall respect the right to privacy and handle personal information of others as well as that of officers and employees of the Oenon Group in accordance with applicable laws, regulations, and internal rules. Such information shall be collected, used, retained, and disclosed only by fair, transparent, and secure means.

(Protection and Utilization of Intellectual Property)

Article 18 We shall appropriately protect and manage intellectual property—such as inventions, designs, brands and logos, trade secrets, and know-how—resulting from research and development, sales activities, and other business operations, in accordance with intellectual property rights including patent rights, design rights, trademark rights, and copyrights. We shall also promote the effective utilization of such intellectual property in our business. When disclosing the Oenon Group's trade secrets to third parties, we shall enter into a non-disclosure agreement and impose an obligation of confidentiality on the recipient. When receiving trade secrets from others under a non-disclosure agreement, we shall comply with the agreement and protect and manage the information appropriately.

2. We shall respect the intellectual property of others, shall not infringe upon the intellectual property rights of others, and shall not improperly acquire or disclose others' trade secrets.

(Information Security)

Article 19 We recognize that confidential information handled by the Company—including personal information and intellectual property—is of critical importance. We shall implement security measures to prevent unauthorized access, leakage, loss, or alteration of such information.

Chapter 6: Relationship with Society

(Responsibility and Conduct as a Corporate Citizen)

Article 20 We shall value relationships of trust with a wide range of stakeholders and work toward the realization of a sustainable society by contributing to society through our business activities.

(Environmental Conservation)

Article 21 We shall not only comply with relevant environmental laws and regulations but also strive to minimize the negative environmental impact of our business activities and promote initiatives that contribute positively to the environment, in order to pass on the global environment—which nurtures the blessings of nature—to future generations.

(Thorough Crisis Management)

Article 22 We shall establish strategic risk management and organizational crisis management systems in preparation for threats such as terrorism, cyberattacks, and natural disasters, and shall continuously strive to strengthen these systems.

(Addressing Alcohol-Related Issues)

Article 23 As a company engaged in the manufacture and sale of alcoholic beverages, we recognize our social responsibility and shall continue to work toward the elimination of inappropriate drinking and the promotion of responsible alcohol consumption.

(Severance of Ties with Antisocial Forces and Anti-Money Laundering)

Article 24 We shall have no relationship whatsoever with antisocial forces or organizations that pose a threat to the order and safety of civil society. If subjected to unjust demands, we shall respond resolutely and shall not comply with such demands.

2. We shall comply with laws and regulations related to the prevention of money laundering and shall take care to ensure that we do not become complicit in such activities in the course of our transactions.

Chapter 7: Relationship with Politics and Public Administration

(Prohibition of Bribery and Other Inappropriate Gifts and Entertainment)

Article 25 We shall comply with all relevant laws and regulations, including the Political Funds Control Act, the Public Offices Election Act, and the Unfair Competition Prevention Act, with respect to political donations, contributions, elections, and political activities.

2. We shall not, by any means, provide gifts, entertainment, money, or any other benefits that may constitute bribes to domestic public officials, foreign public officials, or persons in equivalent positions. We shall maintain sound and proper relationships with political and administrative bodies.
3. When making donations or sponsorships, we shall ensure fairness and transparency in accordance with internal rules and procedures, and shall do so only after careful consideration of their necessity and appropriateness.