

Code of Conduct for Officers and Employees

(Compliance Manual)

Bic Camera Inc.

This document is an English translation of the Japanese version.
In the event of any inconsistency, the Japanese version shall prevail.

Code of Conduct for Officers and Employees (Compliance Manual)

Scope of Application

This Code of Conduct for Officers and Employees (hereinafter referred to as the “Code”) applies to all officers and employees working for Bic Camera Inc. and its group companies.

All individuals who act as members of the Bic Camera Group shall comply with this Code and endeavor to conduct business activities with integrity and fairness.

1. Compliance with Laws and Respect for International Norms

All business activities shall be conducted in strict compliance with all applicable laws and regulations. In addition, in light of the globalization of the supply chain, the Company shall respect not only the laws and regulations of the countries and regions in which it operates, but also internationally recognized norms and standards.

2. Fair Trade and Business Ethics

(1) Compliance with Antitrust Laws

Antitrust laws aim to ensure fair and free competition by prohibiting private monopolization, unreasonable restraint of trade, and unfair trade practices. The Company shall ensure thorough compliance with these laws.

(2) Prohibition of Unfair Trade Practices

The Company shall not engage in practices such as predatory pricing, unjustified returns, unjust price reductions, unjust consignment sales, coercive bargain buying, refusal to accept private-brand products, hard sell, improper use of employees of suppliers, unjust rebates, retaliatory treatment for refusal of requests, or disadvantageous treatment related to reports to the Japan Fair Trade Commission.

(3) Representation and Premiums

The Company shall not provide excessive premiums, nor engage in misleading representations regarding the quality of products or services, or misleading representations regarding prices.

(4) Abuse of Superior Bargaining Position

The Company shall not engage in acts that violate antitrust laws, including abuse of a superior bargaining position, or acts that violate the Act against Unjustifiable Premiums and Misleading Representations.

In addition, the Company shall not issue direct instructions to staff of business partners (such as supplier helpers), nor request them to perform duties unrelated to the sale of suppliers' products.

(5) Compliance with Related Laws and Regulations

In conducting business activities, the Company shall obtain all necessary permits and approvals

and comply with relevant industry-specific laws and regulations, including but not limited to: the Civil Code, Act on Preventing Delay in Payment to Small and Medium-Sized Entrusted Business Operators in Relation to Manufacturing Consignment, Secondhand Goods Business Act , Act on Securing Quality, Efficacy and Safety of Products Including Pharmaceuticals and Medical Devices , Health Promotion Act, Food Sanitation Act, Copyright Act, Basic Consumer Act , Consumer Contract Act, Act on Recycling of Specified Kinds of Home Appliances , Unfair Competition Prevention Act, Foreign Exchange and Foreign Trade Act, Act on Identity Confirmation, etc. Performed by Mobile Voice Communications Carriers for their Subscribers, etc. and Prevention of Wrongful Use of Mobile Voice Communications Services , and Act on the Measures by Large-Scale Retail Stores for Preservation of Living Environment .

(6) Insider Trading

The Company shall fully understand the purpose of insider trading regulations.

If non-public material information concerning the Company or other listed companies becomes known, such information shall be kept strictly confidential, and trading of the relevant securities shall not occur until the information is publicly disclosed.

(7) Gifts, Entertainment, Bribery, and Corruption

- ① The Company shall not engage in bribery or any conduct involving gifts or entertainment that deviates from socially accepted business practices.
- ② The Company shall not engage in gifts, entertainment, or corrupt practices toward public officials that violate applicable laws, including the National Public Service Ethics Act.
- ③ Regardless of whether domestic or overseas, the Company shall not engage in any form of bribery, facilitation payments, or improper receipt or provision of benefits.

(8) Politics and Public Administration

The Company shall establish transparent relationships with political and administrative bodies in compliance with applicable laws and regulations.

Political donations shall be made in compliance with relevant laws, and no opaque expenditures or improper benefits shall be provided.

Charitable donations and sponsorships shall be limited to purposes with public benefit and transparency, and shall be conducted appropriately in accordance with internal procedures.

(9) Anti-Social Forces

The Company shall take a firm stance against anti-social forces and completely sever any relationship with them.

(10) Prohibition of Conflicts of Interest

- ① Officers and employees shall act to avoid conflicts between personal interests and the interests of the Company.
- ② Acts that damage the Company's reputation or credibility, or unjustly impair tangible or

intangible assets of the Company, shall not be undertaken.

(11) Protection of Whistleblowers

When reports are made regarding legal violations or human rights infringements, the confidentiality of the whistleblower shall be protected, and no retaliation or disadvantageous treatment shall occur.

Officers and employees shall cooperate with investigations when requested.

Reports made for improper purposes, acts to identify whistleblowers, or disadvantageous treatment related to cooperation in investigations are prohibited.

3. Respect for Human Rights

(1) Respect for the Human Rights of All Individuals Involved in Business

The Company shall comply with international human rights norms and related laws and respect the human rights of all individuals involved in its business activities, including employees, customers, business partners, and shareholders.

(2) Prohibition of Forced Labor and Child Labor

The Company shall not tolerate forced labor, labor obtained through coercion or slavery, including within its business partners.

Child labor below the minimum working age is prohibited, and young workers under the age of 18 shall not be engaged in hazardous work that may threaten their health or safety.

(3) Prohibition of Discrimination

No discrimination shall occur based on race, ethnicity, nationality, religion, beliefs, social origin, occupation, age, physical characteristics, gender, sexual orientation, gender identity, or disability. Employment and treatment of employees shall be evaluated fairly based on job responsibilities and performance, and employee diversity and sustainable well-being shall be respected.

(4) Prohibition of Inhumane Treatment

Any inhumane treatment, including physical or mental abuse, coercion, sexual harassment, power harassment, maternity harassment, paternity harassment, or care harassment, shall not be permitted.

(5) Compliance with Labor Laws and Respect for Collective Bargaining

① Labor-related laws shall be complied with, and constructive dialogue between labor and management shall be pursued.

② The rights of workers, including those of business partners, to organize and engage in collective bargaining shall be respected.

(6) Occupational Health and Safety

The Company shall strive to create safe and healthy workplaces for all working individuals, including employees and business partners.

4. Provision of Safe, Secure, and High-Quality Products and Services

- (1) The Company shall develop and provide socially valuable products and services with full consideration given to customer needs and safety.
- (2) Clear and accurate information shall be provided when offering products and services.
- (3) In the event of product or service defects, facts shall be communicated to customers and prompt action taken.
- (4) In the event of accidents or trouble, prompt and sincere responses shall be made.

5. Information Security

(1) Protection of Personal Information

Personal information shall be used only within the scope of stated purposes, shall not be provided to third parties without legitimate reason, and shall be strictly and appropriately managed to prevent unauthorized access, loss, alteration, or leakage.

When the handling of personal information is entrusted to a third party, guidance shall be provided to ensure that such third party manages personal information appropriately.

(2) Prevention of Confidential Information Leakage

Confidential information obtained from customers or third parties shall be properly managed and shall not be disclosed without legitimate reason or legal basis.

(3) Implementation of Information Security Measures

Information equipment, email tools, and software shall be used and managed in accordance with internal rules, and appropriate cybersecurity measures shall be implemented under the guidance of relevant departments.

6. Disclosure of Information

- (1) Important company information concerning operations, management, and performance shall be disclosed in a timely and appropriate manner.
- (2) Useful information shall be provided to stakeholders in a timely manner in accordance with social norms, and efforts shall be made to collaborate with relevant stakeholders.

7. Environmental Conservation

The Company shall proactively address environmental issues such as global warming and contribute to the realization of a circular economy.

Efforts shall be made to reduce environmental impact and risks in business activities, and to develop and provide environmentally friendly products, services, and business models.

Response to Violations

Any individual who violates this Code or fails to address violations shall be subject to strict disciplinary actions in accordance with the Company's employment regulations.

Causes shall be investigated, organizational structures reviewed as necessary, and efforts made to prevent recurrence.