

Dear Our Valued Business Partners,

At the JTB Group, ("JTB," "we," "our," or "us"), our mission is to foster peace and global interconnectedness through the creation of opportunities for meaningful human interaction. We promote corporate activities in good faith concerning opportunities to create exchange and aim to contribute to the actualization of a sustainable society ("Purpose"). However, it is difficult for us to fulfill this Purpose alone. For this reason, we want to strive towards fulfilling the Purpose together with our customers, clients, local community members, and our Business Partners, all of whom we have built relationships with, since our founding.

Based in this philosophy, we have established the JTB Group Sustainable Procurement Policy ("Policy") in accordance with the JTB Group Code of Conduct and JTB Group Policy and the JTB Group Sustainability Policy. This Policy designates the conditions for building sustainable business in collaboration between our Business Partners and us. We believe that, based on this Policy, sharing an awareness between all our Business Partners and us and striving to actualize the Purpose throughout the entire supply chain in mutual cooperation is absolutely essential.

Therefore, we ask our Business Partners to understand regarding the content of this Policy, that you comply with the Policy in transactions with us, and that you work together with us to fulfill the Purpose.

Eijiro Yamakita

President and CEO, JTB Corp.

A handwritten signature in black ink, appearing to read 'Eijiro Yamakita', with a long horizontal stroke extending to the right.

## JTB Group Sustainable Procurement Policy

### Contents

1. Legal compliance and respecting and complying with international standards
2. Respecting human rights
3. Fair competition
4. Maintaining a safe and healthy workplace
5. Improving service and quality
6. Building an information security system
7. Contributing to international and local community
8. Protecting the global environment
9. Establishing risk management systems

JTB has established this Policy aiming to achieve sustainable business and provide the best services to our customers and clients with our Business Partners (“you,” “your,” or “yours”).

1. Legal compliance and respecting and complying with international standards
  - (1) You shall comply with the laws and ordinances, rules, and social standards of each country and region as well as international standards, etc.
  - (2) You shall acquire the permits, certifications, and qualifications required for procurement and implement appropriate maintenance and management of such.
  - (3) You shall report to JTB promptly if you, your company’s directors, officers, employees, temporary staff, subcontractors, agents, or suppliers violate a Related law.

### 2. Respecting human rights

You shall comply with international standards, including, but not limited to the United Nations Charter, the Universal Declaration of Human Rights, and the Guiding Principles on Business and Human Rights, concerning human rights. You shall respect and protect the human rights of all humans that are granted in the constitutions and judicial precedent of each country, and you shall not allow or tolerate human rights violation.

#### (1) Prohibition on forced labor

In the hiring and employment process, you shall not force, or be complicit in the forcing of, a person to engage in employment or labor against their will through violence, intimidation, confinement, or any other physical, mental, or unreasonable methods that restrain a person mentally, physically, or

in terms of freedom of conduct.

(2) Prohibition on child labor

You shall not employ, or support the employment of, children who have not reached whichever age is higher, the age of 15 years or the age allowed to work pursuant to the Related law of that country.

(3) Prohibition on discrimination

You shall not discriminate against anyone due to reasons such as race, nationality, ethnicity, gender, age, birthplace, religion, academic history, mental or physical disability, sexual orientation, or gender identity. Additionally, you shall not give any employee unfavorable treatment for those reasons concerning employment, including hiring, salary, promotions, training, termination of employment, or retirement.

(4) Prohibition on violence and harassment

You shall respect the human rights of all people, and shall not engage in threats or acts of harsh or inhuman treatment, such as violence, any kind of harassment including sexual harassment and power harassment, sexual abuse, corporal punishment, mental or physical suppression, bullying, insulting or humiliating in a public space, and abusive language towards directors, officers, employees, job applicants, customers, subcontractors, delivery or service personnel, and/or members of the public.

(5) Wages and working hours

(a) Working hours of the employees shall be kept in line with the legal requirements of the Related law.

(b) The employees should be granted their stipulated annual leave and sick leave without any form of repercussions.

(c) You shall comply with the Related law in entering into employment contracts with your employees, and wages, overtime compensation, or statutory benefits paid by you must meet or exceed legal minimums and/or industry standards. No illegal or unauthorized deductions from wages are allowed.

(6) Freedom of association

In accordance with international standards and Related law, you shall respect the rights of workers, such as the freedom to associate and the right to collective bargaining.

(7) Respecting individual diversity (DEIB)

You shall respect individual diversity, individuality, and personality, provide an environment in which each individual can display their maximum abilities and where psychological safety is ensured, and also strive to ensure equal opportunity in an equitable and fair manner and maintain a workplace in which a diverse range of human resources can be active (DEIB: Diversity, Equity, Inclusion, and Belonging).

(8) Respect the lifestyles of indigenous peoples and regional residents

You shall respect the rights to traditional knowledge and genetic resources of indigenous people concerning elements such as the land, culture, customs, religion, and lifestyle format, and do not engage in conduct that unilaterally exploits their interests. Also, you shall be cautious that your business activities do not interfere with the lifestyles of regional residents.

(9) Protecting the rights of foreign and migrating workers

Towards foreign and migrant workers, pursuant to Related law, you shall i. explain labor conditions in a method the workers can understand, ii. conduct appropriate labor management, iii. not engage in unlawful or unfair conduct such as not paying wages, iv. not force them to work long hours illegally, v. not take away IDs, passports, or other documents essential to them, vi. not force them to return to their home countries, or collecting security deposits, and vii. respect the human rights of these workers.

3. Fair competition

(1) Promote fair competition

You shall not engage in private monopolies and anti-competitive practices, including, but not limited to bid-rigging, cartels, and abusing market position, that hinder fair and ethical competition.

(2) Prevent conflicts of interests

In situations in which the interests of your company and the private interests of directors, officers or employees of your company ("Employees") are in conflict, you shall make sure the interests of your company do not lose to the private interests of Employees.

(3) Prevent corrupt and immoral acts

(a) You shall not give any improper payments or excessive gifts, or conduct any other solicitation, to any administrative bodies or any similar organizations, civil servants, or any contractors including JTB. And conversely, you shall not accept any improper payment or excessive gifts.

(b) You shall not engage in gift exchange, entertainment, or the mediation of such, that is lacking in justness or could potentially be suspected of not being just, with the aim of directly or indirectly impacting an agreement or business.

(4) Refuse relationships with antisocial forces

You shall refuse relationships with antisocial forces and groups that threaten the order of civil society.

(5) Prevent money laundering

You shall comply with all applicable laws concerning the prevention of money laundering, and you shall not participate in acts of money laundering.

(6) Respect intellectual property

You shall respect the intellectual property of third parties, and do not infringe upon that property.

(7) Maintain a whistleblowing contact

Concerning reports and complaints from Employees, your subcontractors, suppliers, or service providers, you shall strive to take the appropriate measures, such as establishing and maintaining a contact for whistleblowing.

(8) Whistleblower protection

Pursuant to Related law, in addition to maintaining the confidentiality of information concerning whistleblowing, you shall also strive to protect whistleblowers and to ensure that whistleblowers are not subjected to disadvantages.

4. Maintaining a safe and healthy workplace

(1) Ensuring safety and health, and education

(a) Pursuant to Related law, you shall provide a safe and healthy workplace environment to Employees.

(b) You shall maintain effective measures to prevent Employees from potential accidents and injuries revolving around safety and health and illnesses including those of a mental nature, regularly provide Employees with education and training in order to build a safe and hygienic workplace environment, and strive to expand safety and health awareness and knowledge.

(2) Promote safety and health management

You shall minimize work-related injury and physical and mental illnesses in Employees, and strive to engage in efforts that ensure a safe and hygienic workplace environment, such as acquiring work safety and health related certification.

(3) Prepare for danger and emergencies

(a) You shall formulate workplace safety measures for emergencies like fires and earthquakes, and strive to ensure safety through daily efforts, such as disaster prevention training.

(b) You shall take appropriate safety measures for machines and equipment, such as establishing workplace rules necessary to ensure safety and implementing equipment check tests. Concerning work that includes the potential of danger, you shall implement education to Employees, and take steps to avoid danger as much as possible.

(4) Promote Employee health management and health and productivity management

(a) You shall implement appropriate health management to all Employees.

(b) Based on Related law, you shall aim for illness prevention and early illness discovery for Employees by providing health checkups and implement follow ups such as re-testing and detailed testing when necessary, and take due considerations concerning the prevention of health damage due to excessive labor and care for mental health, etc. as well.

(c) In Japan, you may acquire the Outstanding Organizations of KENKO Investment for Health Certificate, a Health & Productivity Management Recognition System in respective local governments, and certification concerning work-life balance for childcare, adult care etc., and you

shall promote implementing health and productivity management measures and mental health measures.

#### 5. Improving services and quality

You shall strive to ensure and improve quality of your products or services through efforts including the adoption of business-related quality management systems and third-party certification systems.

##### (1) Supplying information to customers

In the supplying of products or services, you shall provide accurate information to the customer.

You shall not mislead the customer with inaccurate announcements, displays, or advertisements.

##### (2) Improving customer satisfaction level with a Sustainability perspective

You shall continually assess customer satisfaction level with a Sustainability perspective, and strive for improvement when necessary.

##### (3) Maintaining and improving the quality of travel

Business partners related to the travel business shall strive to promote Sustainability through the acquisition of Sustainability certifications, such as GSTC certification.

#### 6. Building an information security system

##### (1) Preventing Personal Information leaks

You shall be concerned about external threats such as cyber-attacks, take prevention measures such as information security strengthening, and prevent Personal Information leaks.

##### (2) Building systems

You shall strive to build management systems concerning Personal Information protection set forth or recommended in Related law, and acquire certification.

##### (3) Preventing confidential information leaks

You shall appropriately manage and protect Confidential Information and prevent it from leaks.

#### 7. Contributing to international and local communities.

You shall engage in actions that contribute to the sustainable growth of international and local community through business practices.

##### (1) Contributing to local community

You shall strive to maintain sustainable and bountiful local community through local production for local consumption, the creation and expansion of employment opportunities within the region, and appropriate procurement transactions with local businesses.

##### (2) Preserving culture and history in local communities

You value the tangible and intangible culture rooted in the local community and the knowledge and skills inherited in the local community, respect their value and contribute to enhancing their value.

## 8. Protecting the global environment

You will actively tackle, together with JTB, global environmental issues and local environmental issues such as climate change and environmental pollution.

### (1) Complying with international community agreements

You shall respond fairly to agreements in the international community and industry associations in line with their aims.

### (2) Response to global warming

(a) You will actively work towards resolution measures for global environment issues, such as climate change and global warming.

(b) In order to reduce the impact of climate change, you will strive to assess and reduce greenhouse gas emissions across all business activities.

(c) You will strive to improve energy efficiency and work towards measures to minimize energy consumption amount and towards the expansion of renewable energy use.

(d) In transport and delivery methods, you will work towards using methods that reduce greenhouse gases as much as possible, within a reasonable range.

### (3) Response to environmental pollution

(a) You will actively work to address local environmental issues with regard to air pollution, soil pollution, water quality pollution, noise pollution, and sunlight obstruction, taking into account the health and safety of concerned local residents.

(b) Business partners that manage emission gases will regularly check to ensure that you are meeting the air pollution prevention standards set forth in Related law in the country or region in which you are conducting business, and strive for appropriate handling in consultation with the administrative bodies or authorities of the region.

(c) Business partners that manage drainage will strive to follow methods of safely discharging wastewater, including graywater, such as making sure it is properly handled or reused so as not to cause negative impact to local residents and the environment.

### (4) Handling water resources

For your water supply, you will use water that fulfills the standards of the country or region in which you are doing business. Also, you will measure the water consumption volume and strive to conserve water and preserve regional water resources.

### (5) Resource recycling and waste materials

(a) You will strive to minimize the generation and final disposal of waste materials through implementing appropriate management concerning the usage and disposal of resources.

(b) You will establish a system to measure and reduce the amount of waste, including food waste, and try to establish a system to re-use or recycle as much as possible of the waste that cannot be

reduced.

(c) You will ensure that final waste disposal is carried out appropriately and strive as far as possible to avoid negative impact on the local residents and environment.

(d) Concerning the procurement of raw materials and consumables, you will prioritize environmentally friendly products as much as possible, strictly manage the purchasing amount and usage volume of disposable products and consumables, including food products, and strive to effectively use resources.

(6) Managing chemical substances

(a) When handling chemical substances that harm or could potentially harm people or the environment, or toxic substances, you shall comply with Related law and manage such substances appropriately so that safe handling and disposal is thoroughly conducted.

(b) You will minimize the usage of these substances as much as possible, and strive to substitute them with non-harmful or less harmful substances.

(7) Considerations towards biodiversity

With an understanding of the importance of biodiversity, and in consideration of illegal procurement prohibitions of animals and plants and the wellbeing of animals, you will protect the wild animals and plants that are protected internationally or protected in the region where you do business, strive to prevent the spread of invasive species, and strive to conserve and restore ecosystems.

(8) Sustainable procurement and purchasing

Within a reasonable scope, you will strive to give priority to using and purchasing sustainable products that have acquired Sustainability certification.

9. Establishing risk management systems

In order to continue to live up to the trust of customers, Employees, and related subcontractors, you will examine risks related not only to the quality of products or services but also human rights, corporate ethics, and the environment, and strive to avoid or minimize risks and manage them, thereby preparing for disasters and unforeseen events.

(1) Risk assessment and management system establishment

You will strive to establish processes to identify risks related to factors such as human rights, corporate ethics, information leaks, the environment, and safety and health in the workplace, to assess the significance of identified risks and to manage them through appropriate procedures.

(2) Business Continuity Plan (BCP) establishment

Preparing for unforeseeable events, including, but not limited to natural disasters, the impact of climate change, the spread of epidemics, and political and economic turmoil, you shall establish the BCP as countermeasures and response methods to minimize damage to your business. In addition, you shall always review and revise the BCP even in normal times, and strive to maintain it, and



establish early recovery plans.

### Definitions

The following terms defined and used in this Policy shall be interpreted as follows:

"Related law": Applicable laws and regulations related to your business or business between you and JTB.

"Sustainability": A philosophy of sustaining society overall for the long term by engaging in activities that consider the environment, society, the economy, etc.

"Personal Information": Information related to any individual, including employees, that is handled during business, including all personal information set forth in Related laws concerning personal information in each country.

"Confidential Information": Non-disclosed information and know-how in your company, including all information disclosed or acquired in confidentiality from your customers, JTB, JTB subcontractors, and third parties.

"Sustainability certification": Certification by a third-party that assesses the international or domestic corporate activities or corporate products and services as sustainable endeavors that consider the environment, society, and the economy. (Examples: ISO Certification, Fair Trade Certification, FSC Certification, etc.)

Implementation / revision history

Implemented: June 25th, 2025

## Information concerning the JTB Group Sustainable Procurement Policy

### Scope of application

We request compliance with the Policy from all Business Partners involved in direct or indirect business on the supply chain for JTB and the business of JTB ("Business Partners"). We also request you to notify your subcontractors ("Subcontractor(s)"), which are indirect subcontractors of JTB, of the Policy, and ensure that they to comply with the Policy.

### Operation

JTB will strive to keep or expand business opportunities with the Business Partners who agree to and comply with the Policy. Additionally, when we enter into an agreement with a new Business Partner, we ask them to understand and comply with the Policy. If any discrepancies arise between the Policy and international standards, Related law, JTB will revise the Policy to meet stricter standards in time to time, therefore, we ask Business Partners to strive to comply with the revised Policy at the time.

### Mutual understanding

In order to deepen understanding between you and JTB concerning the Policy, JTB may ask you to respond to questionnaires from JTB.

### Reporting and response

1. If questionnaires given to you reveal any issues that should be resolved, we will discuss the issues with you.
2. In the course of performance under the business with JTB, if you or Subcontractor become aware of a material breach such as a conflict with international standards, Related laws in relation to the Policy ("Material breach"), please report it to JTB promptly.
3. If JTB does not receive any report from you concerning the Material breach, or if you do not take appropriate response to the Material breach, JTB will discuss with you options such as revising the agreement.

### Policy revisions

JTB has sole discretion to revise the content of the Policy in accordance with the changing of the times and demand from society and post the revised version of the Policy on our website. We request you to agree with the content of the Policy and comply with the Policy, even after it has been revised. If you have any questions or opinions regarding the revised content, please feel free to contact JTB.