

ALPS ALPINE GROUP ANTI-BRIBERY POLICY

1. Basic Policy for Anti-bribery

Alps Alpine Co., Ltd. and its group companies (collectively, “We” or “Our”) establish this Alps Alpine Group Anti-Bribery Policy (“Policy”) based on anti-bribery provided in the Alps Alpine Group Code of Conduct. In accordance with this Policy herein defined, We will endeavor to prevent bribery by complying with applicable anti-bribery laws and regulations in countries and regions of the world and by ensuring transparency and fairness in business activities.

2. Scope of Application

This Policy applies to Our directors, officers, and employees (collectively, “Employee”).

3. Prohibition of Bribery

(1) In all jurisdictions, Our Employee will neither directly or indirectly give or receive bribes to or from, or engage in any act that could be perceived as bribery with, any public official or person in an equivalent position (“Public Official”), any business partner or other business operator (whether an entity or a natural person), or any officer or employee of the Business Operator. Bribery or any act that could be perceived as bribery includes providing, promising, or offering entertainment, gifts, payment of travel expenses, donations, or any other benefit/gain which exceeds socially acceptable limits.

(2) Our Employee will, in principle, not make facilitation payments (small amounts of money paid to Public Officials to facilitate procedures relating to standard administrative services). However, in situations where Our Employee’s life, physical safety, or freedom is at risk, the highest priority will be given to personal safety. Once removed from such a situation, Our Employee shall record the circumstances and reasons and promptly report to Our relevant department.

4. Proper Accounts and Records

We will maintain accurate accounting records of all transactions in accordance with the facts, retaining related forms, reports, and other documentation as appropriate. We will also establish, maintain, and appropriately implement the necessary internal controls.

5. Providing Information and Training

We will provide information and training relating to anti-bribery to Our Employee, to promote Our Employee's awareness and understanding of anti-bribery.

6. Monitoring

We will periodically monitor the status of Our compliance with anti-bribery laws and regulations

and its related actions and will continually pursue necessary promotion and improvements for such compliance and actions.

7. Response to Misconduct Found Out

Once We find a suspected violation of anti-bribery laws or regulations, We will promptly investigate its facts, take appropriate measures and disciplinary action against the violator, and endeavor to prevent a recurrence.

Established February 1, 2026