

(Translation)

ROHTO Group Tax Policy

1. Basic Stance

As the code of action for fulfilling our social responsibilities, the ROHTO Group (“Group”) has set out the “ROHTO Action Agenda for Compliance” to establish full compliance and foster a higher sense of ethics through employee education and training. In addition, to ensure the appropriateness of our business activities, we have compiled the “ROHTO Group Global Management Book” as the guidelines for all Group companies, domestic and overseas, to conduct company management complying with laws and regulations and related rules. Specifically, for tax-related matters, we will adhere to tax laws and regulations (“Tax Laws”) in all countries and regions where we operate (“Relevant Countries”) and perform our tax obligations properly to contribute to developing local communities and enhancing corporate value.

2. Tax Compliance

In compliance with the Tax Laws of the Relevant Countries and international tax rules, such as the “OECD Transfer Pricing Guideline,” the Group will make tax payments fairly and transparently to perform our tax obligations appropriately. In particular, for transfer pricing, we are tackling the BEPS (Base Erosion and Profit Shifting) project and similar initiatives to ensure proper profit-sharing across borders according to the actual business situation.

3. Tax Governance

The Chief Financial Officer (CFO) is responsible for tax governance in the whole Group. For domestic Group companies (including ROHTO, subsidiaries, and affiliates), the Accounting and Finance Division of ROHTO takes the lead to ensure full tax compliance as the parent company. In each overseas Group company, the president and the accounting manager strive to establish and maintain a framework to keep sufficient communication with other Group companies to address relevant issues as the whole Group. Material tax-related matters require approval from the Board of Directors or one Representative Director of ROHTO under the “ROHTO Group Management Regulations.” After the approval, ROHTO’s division supervising subsidiaries’ businesses will monitor and follow up on the progress.

4. Optimization of Tax Costs

In compliance with the Tax Laws of the Relevant Countries, the Group will utilize applicable preferential tax treatments and similar programs for tax optimization to enhance corporate value. The Group intends to optimize tax costs only for our business objectives and considering actual activities. We will never intentionally avoid taxation by using tax havens.

5. Transfer Pricing

By setting the prices of intra-group transactions under the OECD Transfer Pricing Guideline and the transfer pricing taxation of each Relevant Country, the Group will strive to make proper tax payments to those Countries. Also, following the Tax Laws of the Relevant Countries, we will compile transfer pricing documents appropriately.

6. Reduction of Tax Risks

If any transaction is deemed ambiguous in interpretation for tax purposes during our business activities, the Group will strive to reduce tax risks associated with that transaction by taking appropriate measures, such as obtaining advice from outside professionals and making inquiries to the competent tax authorities in advance.

7. Relationships with Tax Authorities

The Group will strive to build a healthy and good relationship with the tax authority in each Relevant Country by responding to their requests, providing information appropriately, and acting in good faith.

Established in July 2023