

## **MARUI GROUP Policy for Preventing Money Laundering and Terrorism Financing**

MARUI GROUP (the Company and its subsidiaries and affiliates) recognizes that it has an important management responsibility to prevent money laundering and terrorism financing, as described in legislation on preventing transference of money appropriated through illegal means, relevant government ordinances, and guidelines issued by the relevant authorities (referred to collectively as “relevant legislation” hereinafter). The MARUI GROUP Policy for Preventing Money Laundering and Terrorism Financing has been established based on an understanding of this responsibility and compliance thereof is practiced to fulfill this responsibility.

### **1. Management Systems**

Group companies that are applicable as specified business operators based on relevant legislation (referred to as “specified Group companies” hereinafter) create and maintain appropriate management systems by defining the roles and responsibilities of personnel and organizations related to the prevention of money laundering and terrorism financing, in order to ensure compliance with the relevant legislation applicable to their business. In addition, a Groupwide management system has been established to facilitate close coordination and the sharing of information among Group companies.

### **2. Measures by Management**

Members of management of MARUI GROUP spearhead measures for preventing money laundering and terrorism financing in accordance with relevant legislation while pursuing ongoing improvements to the relevant management systems as an important part of management strategies.

### **3. Risk Management**

In accordance with relevant legislation, specified Group companies identify, assess, and take appropriate measures to mitigate the money laundering and terrorism financing risks faced given their respective products and services.

### **4. Customer Due Diligence**

Specified Group companies perform due diligence activities to confirm the identities of customers when conducting transactions in accordance with relevant legislation and maintain records of transactions and confirmations for use in preventing money laundering and terrorism financing.

### **5. Notification of Suspicious Transactions**

Specified Group companies submit notifications of suspicious transactions and take other steps to prevent money laundering and terrorism financing as required by relevant legislation and government authorities.

### **6. Employee Training**

Specified Group companies provide training on the prevention of money laundering and terrorism financing to all officers and employees in accordance with their roles to bestow the knowledge and foster the awareness necessary to ensure compliance with relevant legislation and to cultivate a corporate culture that is in staunch opposition to money laundering and terrorism financing.

### **7. Internal Controls**

MARUI GROUP performs regular internal audits to verify the status of the systems for preventing money laundering and terrorism financing described in this policy. The results of these audits are used to guide further improvements to internal control systems.

Established in August 2024

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Representative Executive Officer, CEO  
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