

Kirin Group Compliance Guidelines

1. Relations to Compliance Policy

These guidelines are based on the Kirin Group Compliance Policy, which outlines the minimum required philosophy and actions of each Group company and its officers and employees for each stakeholder group, as well as a commitment to compliance with these guidelines.

2. Definition of Compliance (Re-posted from the Compliance Policy)

The Kirin Group defines "compliance" as follows

Each Kirin Group company and their employees shall not only comply with laws and regulations, internal and external rules and regulations, but also meet the demands of society and fulfill their legal responsibilities and ethical responsibilities as required by society.

Thereby meeting the expectations of stakeholders* and maintaining and enhancing the trust and corporate value of the Kirin Group.

*By defining compliance as not simply observing laws, regulations, rules, etc., but as responding to the demands of society, we, as a company, shall work toward thorough compliance in accordance with these guidelines, while always being aware of changes in society.

*"Stakeholders" refers to (1) customers, (2) the global environment, (3) communities, (4) employees, (5) business partners and (6) Shareholders and investors.

3. General Rules

In addition to complying with laws and regulations, we will strive to conduct sensible corporate activities in response to the demands of society.

- (1) We shall comply with domestic and foreign laws and regulations.
- (2) We shall be fully aware of the corporate ethics required of the Kirin Group, and act sensibly with responsibility as members of society, in accordance with Kirin's philosophy, Vision and Values.
- (3) We shall not ignore any problems that we believe are problematic in accordance with the Kirin Group Compliance Guidelines, but will promptly report or consult with the leader or the contact point designated by each Group company. Each company shall ensure the protection of those who report or consult, and shall not share information that could identify the person who made the report or consultation to anyone other than those within the designated scope.

4. Bylaws

4-1. Relations with Customers

Provide safe, secure, high-quality products and services

We shall strive to provide high quality products and services with customer satisfaction, safety and security in accordance with the Kirin Group Quality Policy and Action Guidelines.

- (1) In all value chains from planning and development to manufacturing and sales of products and

services, we shall always pay attention to customer satisfaction and safety, fully understand and comply with laws and rules related to products and services, and aim for higher levels of safety and quality.

(2) We shall provide appropriate information on our products and services in a timely manner so that consumers may place their trust in us.

(3) We shall respond promptly, sincerely, and politely to customer suggestions, placing the highest priority on customer safety, and shall promptly investigate the cause of the problem and strive to prevent recurrence.

Advertising and marketing activities

(1) We shall endeavor to use appropriate and easy-to-understand expressions and displays in connection with labeling, advertising and promotion of our products and services.

(2) In documents and information we send out in our advertising activities, we shall refrain from using exaggerated expressions that may mislead recipients or slander other companies, and shall strive to engage in sound competition with a high sense of ethics.

Protection of Personal Information

Personal information of customers, business partners, etc. shall be handled appropriately in accordance with laws, guidelines, and other norms related to the handling of such information.

4-2. Relations with the Global Environment

Environmental conservation

We shall make sustainable business growth by solving social issues the cornerstone of the company's management, and by generating positive impacts on nature and people, we shall ensure an enriched society and the Earth for the next generation.

We shall set high goals in all aspects of our business activities to solve social problems related to the environment as one of the most important management issues, and shall work toward these goals with the leadership of top management and the participation of all employees.

4-3. Relations with Communities

Compliance with various laws and business laws / Harmony with local communities

In deploying its business, the company shall comply with the various laws and regulations of the countries where it operates, as well as with the relevant business laws pertaining to the products and services it handles. It also respects the economies, societies, traditions, cultures, and other aspects of the countries and regions involved, both in and outside of Japan.

Regulations on donations and political contributions

- (1) We shall fully understand and comply with the laws and guidelines of the countries and regions where we conduct business and shall not be involved in any corrupt practices, whether directly or indirectly, under any circumstances.
- (2) When making political contributions or donations to various organizations, we shall comply with relevant laws and regulations and follow proper methods.
- (3) We shall strive to build sound and transparent relations, strictly refraining from bribery, profiteering, illegal political contributions, and any other conduct that could lead to misunderstandings such as collusion with politics and government.

Severance of relations with antisocial forces, import/export control

- (1) We shall take a resolute attitude toward antisocial forces and shall not have any relations with them. In the event that we receive an unreasonable demand, we shall not attempt to resolve the matter by handing over money or other means.
- (2) We shall comply with the laws and regulations of each country applicable to import/export controls and other transactions with specific countries and organizations.

Compliance with Antitrust Laws, etc.

Under no circumstances shall we engage in cartels, resale price maintenance, agreements, or any other conduct that may violate antitrust laws by unfair means, and we shall engage in fair and free competition.

Respect for Human Rights

Based on the recognition that respect for human rights shall be the foundation of all its business activities, the Company shall conduct its business activities with the utmost respect for internationally recognized human rights in every process of its value chain, from research and development and raw material procurement to the manufacture and sale of its products and services. In addition, the Company shall conduct company-wide human rights awareness activities, and its officers and employees shall proactively participate in these activities.

Response to Alcohol-Related Problems

As a social responsibility of a company that manufactures and sells alcoholic beverages, we shall bring joy to society by solving various problems caused by inappropriate drinking and continuing its efforts to promote proper drinking in order to eradicate harmful consumption of alcohol.

- (1) We shall conduct ongoing educational activities to prevent various problems caused by inappropriate drinking.
- (2) In its business activities, we shall comply with laws and regulations, industry standards, and the Kirin Group's voluntary standards.

(3) As members of the Corporate Group handling alcohol, its employees shall be aware of their responsibility to society and act proactively..

4-4. Relations with Employees

Respect for diversity and prohibition of discrimination

- (1) The Company shall respect the humanity of its employees and build equal relations with them. Based on the recognition that diversity is a key driver to realize innovation, it shall create an environment where each individual can demonstrate diverse perspectives and values, and shall realize the maximum potential of its diverse human capital by mutually accepting each other.
- (2) The Company shall not discriminate in any way against any individual on the basis of race, ethnicity, nationality, social status, family origin, gender, disability, health status, ideology, creed, sexual orientation, gender identity, job category, employment status, or on any other basis.

Realization of a rewarding work environment and corporate culture

- (1) We shall clarify roles and duties of each employee, and create an organization where employees can experience personal growth and fulfillment through fair evaluation and treatment.
- (2) We shall accept each other's differences and strive to foster an open workplace culture through active communication.
- (3) We shall comply with labor-related laws and regulations and maintain a fair employment environment.
- (4) We shall strive to create a comfortable work environment with due consideration for health, safety and sanitation.
- (5) We shall strictly refrain from any harassment of any kind, including language or behavior that may hurt the other party. In addition, we shall strive to create a corporate culture where harassment does not occur in any of our workplaces.
- (6) We shall understand and comply with various company rules and regulations.

4-5. Relations with Business Partners

Appropriate transactions with suppliers and subcontractors

- (1) In transactions with suppliers and subcontractors, we shall act with common sense and integrity, comply with social norms, relevant laws and regulations, and the spirit of such laws and regulations, and create sound business relations with them.
- (2) We shall also require our suppliers to comply with the Kirin Group's Sustainable Supplier Code and expect them to do their best to comply with all applicable laws, regulations, and social norms, as well as international and industry standards.

Appropriate business entertainment and exchange of gifts

We shall never exceed the range of social common sense in cases of giving or receiving entertainment or gifts to or from our business partners.

4-6. Relations with Shareholders and Investors

Disclosure of management information

We shall conduct proper accounting procedures in accordance with applicable laws and regulations and internal rules, disclose management information to shareholders, investors, and other stakeholders in a timely and appropriate manner, including the status of the Company's financial affairs and business activities, clearly convey the Corporate Philosophy and management policies, and earnestly respond to opinions and criticism regarding them.

Prohibition of insider trading

In the event that we become aware of inside information about the Company, its affiliated companies, or its business partners in the course of conducting its business activities, we do not buy or sell stocks or bonds of said companies until said information has been officially disclosed to the public. In addition, we shall not leak said information to others.

Prohibition of Conflicts of Interest

We shall not be engaged in any activity that would cause a conflict of interest with the Company.

(1) We shall not work for or have a financial relation to any competitors or business partners as an employee, consultant, or otherwise.

(2) We shall not conduct business as a business partner of the Company without obtaining a permit.

Appropriate use of company assets

We shall recognize the need to utilize company assets efficiently and keep them available at all times, and shall handle them properly to prevent damage, theft, etc., regardless of whether it is tangible or intangible.

The intellectual property rights of the Company are important company assets, and we shall strive to use them appropriately and preserve their rights, and shall not engage in any conduct that infringes on the intellectual property rights of other companies.

Management of critical information and trade secrets

We shall strive to properly manage critical information and trade secrets, and shall not disclose or leak them outside the company.

5. Supplementary Rules

5-1. Scope of Compliance Guidelines

These Compliance Guidelines shall apply to all executives and employees of Kirin Group companies.

In case an executive/employee's behavior is deemed to violate these Compliance Guidelines, he/she will be subject to disciplinary action in accordance with the company's internal rules.

5-2. Revision or abolition of compliance guidelines

Revision or abolishment of these Compliance Guidelines shall be decided by the Chairman of the Group Risk and Compliance Committee upon deliberation by the Committee.

5-3. Roles of the Group Risk and Compliance Committee, its secretariat, and each Group company

The Group Risk and Management Compliance Committee shall exercise overall control and supervision over compliance issues, and work toward the full enforcement of these Compliance Guidelines.

The Group Risk and Management Compliance Committee Secretariat shall draft, promote, and support policies for the full enforcement of these Compliance Guidelines at Kirin group companies, and implement regular monitoring and reporting to the Group Risk and Management Compliance Committee regarding the status of compliance in an effort to establish the PDCA cycle.

Kirin group companies shall draft and promote their own policies to fully enforce these Compliance Guidelines, while having their members understand the importance of compliance to avoid non-compliance.

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