

# Valuence Group Human Rights Policy

The Valuence Group (hereinafter, the “Group”) operates under its purpose of “Circular Design for the Earth and Us” pursuing enhanced sustainability—including environmental stewardship—and the establishment of long-term competitive advantage. Through our reuse-centred business activities, the Group is committed to shared prosperity with all stakeholders—including its shareholders, customers, business partners, employees, and local communities—and to maximising its corporate value.

Respect for human rights is the most fundamental requirement underpinning every aspect of the Group’s business activities. To fulfil this responsibility, the Group hereby establishes this “Valuence Group Human Rights Policy” (hereinafter, the “Policy”).

The Board of Directors holds ultimate oversight responsibility for this Policy and the human rights initiatives derived from it. The ESG Promotion Committee serves as the central body for implementing the Policy, formulating measures, and monitoring progress. The Policy will be continuously reviewed with input from external experts as appropriate, and revised in response to evolving stakeholder expectations and changes in the business environment.

## 1. Scope of Application

This Policy applies to all officers and employees of the Group, regardless of employment type, including full-time, part-time, fixed-term, permanent, and dispatched workers. The substance of this Policy shall be reflected in the Group’s work rules and all other personnel and labour-related regulations, and respect for human rights shall be promoted across all business activities.

The Group respects the human rights of all persons who may be directly or indirectly affected by its business activities, including customers, business partners and their employees, workers throughout the supply chain, local communities, and shareholders and investors.

The Group expects its business partners—including suppliers, outsourcing contractors, and franchised partner stores—to support and comply with this Policy and the Valuence Group Supplier Code of Conduct. Where incidents suspected of constituting human rights violations are identified, the Group will engage with the relevant business partners to encourage corrective and remedial action, and will consider responses including the review of business relationships as necessary.

## **2. International Standards Referenced**

The Group supports and respects domestic and international norms and guidelines on human rights, including the following:

- International Bill of Human Rights (Universal Declaration of Human Rights; International Covenant on Civil and Political Rights; International Covenant on Economic, Social and Cultural Rights)
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- Ministry of Economy, Trade and Industry (METI) Guidelines on Respect for Human Rights in Responsible Supply Chains and accompanying Reference Material on Practical Approaches

The Group complies with the laws and regulations of each country and region in which it operates. Where conflicts or gaps exist between applicable national law and internationally recognised human rights standards, the Group will endeavour, to the greatest extent possible, to take actions consistent with international human rights standards.

## **3. Commitments**

Taking into account the nature of its business and supply chain, the Group is committed to addressing the following human rights issues as matters of particular priority.

### **3.1 Prohibition of All Forms of Discrimination**

The Group prohibits discrimination based on race, colour, sex, sexual orientation, gender identity, age, nationality, ethnic origin, social status, religion or belief, disability, pregnancy, childbirth, childcare or caregiving responsibilities, employment type, or any other characteristic. The Group promotes equal opportunity in recruitment, assignment, performance evaluation, remuneration and benefits, training, and all other aspects of employment, and strives to achieve diversity and inclusion. The Group also endeavours to provide reasonable accommodation tailored to individual circumstances, enabling all employees to realise their full potential regardless of disability.

### **3.2 Elimination of Harassment, Violence, and Customer Harassment**

The Group will not tolerate any form of inhumane treatment, including sexual harassment, power harassment (abuse of authority), maternity harassment, paternity harassment, care-related harassment, or psychological or physical abuse. The Group will also respond firmly to customer harassment—including abusive language, violence, excessive demands, and coercive conduct by customers or business partners—in accordance with its Basic Policy on Customer Harassment, to ensure the dignity and safety of its employees as the foremost priority.

### **3.3 Prohibition of Modern Slavery, Trafficking in Persons, Forced Labour, and Child Labour**

The Group will not tolerate any form of modern slavery, trafficking in persons, forced labour, or child labour. The Group requires its suppliers and partner stores to uphold equivalent standards, and will encourage human rights due diligence as well as corrective and remedial action to ensure that such practices do not occur anywhere in the supply chain.

### **3.4 Respect for Freedom of Association and the Right to Collective Bargaining**

The Group respects workers' rights to form and join trade unions and to engage in collective bargaining and other related activities in accordance with applicable laws and regulations.

### **3.5 Ensuring a Safe and Healthy Workplace**

The Group maintains and continuously improves safe and healthy workplace environments in compliance with occupational health and safety laws and regulations in all countries and regions in which it operates, and international standards. Based on its work rules and occupational health and safety regulations, the Group works to prevent occupational accidents, support employee mental health, and reduce excessive working hours.

### **3.6 Fair Labour Conditions and Living Wage Considerations**

The Group complies with minimum wage and working hours regulations in all countries and regions in which it operates, and gives due consideration to the payment of a living wage sufficient to enable employees and their families to maintain a basic standard of living. The Group also manages overtime and holiday work appropriately and takes steps to reduce excessive working hours.

### **3.7 Protection of Privacy and Personal Information**

The Group collects, uses, stores, and disposes of personal and sensitive information relating to customers, employees, business partners, and other parties in an appropriate manner, in compliance with applicable laws and internal regulations, and takes measures to prevent unauthorised access and information leaks.

### **3.8 Human Rights Considerations in the Use of AI and Technology**

The Group recognises that the use of digital technologies—including artificial intelligence—and the utilisation of data, including algorithm-based decision support, may generate adverse human rights impacts such as the reinforcement of discrimination, invasion of privacy, opaque decision-making, excessive surveillance, security incidents, misuse of disinformation, and adverse effects on employment and working conditions. The Group endeavours to prevent and mitigate these risks, and will pursue appropriate corrective and remedial action as necessary.

### **3.9 Environmental and Community Considerations in Business Activities**

Recognising that responses to environmental challenges—including climate change, resource constraints, and biodiversity loss—are inextricably linked to the human rights of present and future generations, the Group endeavours to reduce its environmental footprint and minimise adverse effects on local communities, in coordination with its Environmental Policy and associated environmental measures.

### **3.10 Exclusion of Stolen and Illegally Obtained Goods and Respect for Property Rights**

In its purchasing, sales, auction, and other business activities, the Group rigorously implements processes—including identity verification, authenticity assessment, and supplier management—to prevent the entry of stolen goods, illegally obtained items, or counterfeit products, and thereby upholds respect for property rights.

## **4. Human Rights Due Diligence**

In accordance with the UN Guiding Principles on Business and Human Rights and the guidelines issued by the Government of Japan and METI, the Group establishes and continuously operates a human rights due diligence framework.

Human rights due diligence is conducted through the following processes:

### **4.1 Identification and Assessment of Human Rights Risks**

The Group identifies potential adverse human rights impacts across its businesses, countries, and processes, and assesses priorities based on severity and likelihood. Human rights risks specific to its supply chain—including procurement, auctions, consignment sales, and logistics—are also identified and assessed in accordance with the Supplier Code of Conduct.

### **4.2 Integration and Implementation of Prevention and Mitigation Measures**

Based on the outcomes of the assessment, the Group makes necessary revisions to its Code of Conduct, work rules, master agreements, and operational manuals, and integrates risk mitigation measures into its business processes. For high-risk areas, the Group pursues prevention, correction, and remediation through means such as the review of contract terms, audits, on-site verification, and capacity-building support.

### **4.3 Tracking Effectiveness**

The Group regularly monitors the status of its responses by leveraging internal audits, compliance and risk management processes, and information received through internal and external reporting channels.

#### **4.4 Disclosure and Accountability to Stakeholders**

The Group endeavours to disclose in a transparent manner—through its website and other means—information regarding identified human rights issues, its response policies, and the status of its prevention, correction, and remediation efforts.

### **5. Remediation and Grievance Mechanisms**

Where adverse human rights impacts have occurred or are likely to occur, the Group will take appropriate corrective and remedial action commensurate with its causal involvement. With regard to grievance mechanisms, the Group endeavours to ensure their effectiveness and continuous improvement, with reference to the effectiveness criteria set out in the UN Guiding Principles: legitimacy, accessibility, predictability, equitability, transparency, rights-compatibility, and engagement.

#### **5.1 Internal and External Reporting Channels**

Employees may access the Group's internal whistleblowing system to consult with or report directly to designated recipients, including external legal counsel appointed by Valuence Holdings, Inc. (the "Company"). Business partners—including suppliers and partner stores—may use the external reporting system available on the Company's website to report conduct suspected of violating laws, regulations, this Policy, or any other applicable standard. To ensure strict protection of reporter privacy and prohibition of retaliation, anonymous reporting is available and the Group endeavours to improve accessibility, including provision of multilingual support.

#### **5.2 Protection of Reporters and Confidentiality**

No adverse action or retaliation will be taken against any person who seeks consultation or reports a concern, or who cooperates in an investigation. Personal information of reporters, including their identity and the content of the report, will be shared only to the minimum extent necessary, with full regard for privacy protection.

#### **5.3 Remediation, Corrective Action, and Follow-Up**

Where investigations confirm the occurrence or risk of a human rights violation, the Group will engage in dialogue with relevant parties to implement remediation and corrective measures, and will follow up on their implementation. Disciplinary action, review or suspension of business relationships, and consideration of legal action will be taken as necessary.

#### **5.4 Response to Customer Harassment Incidents**

Acts of customer harassment by customers or business partners will be addressed firmly in accordance with the Basic Policy on Customer Harassment, with the safety of employees as the foremost priority. Responses include discontinuation of engagement with the individual concerned, refusal of future business, and coordination with law enforcement and legal counsel as appropriate.

### **6. Stakeholder Engagement and Consultation**

In advancing its human rights initiatives, the Group places strong emphasis on dialogue and consultation with stakeholders who have been, or may be, adversely affected by its business activities.

Through dialogue with employee representatives and frontline management, the Group identifies and addresses human rights issues, harassment, and work-related challenges in the workplace. Through engagement with suppliers and partner stores, the Group shares awareness of supply chain human rights risks and provides support for improvement and capacity building. The Group also endeavours to establish responsible purchasing practices that ensure its procurement activities and contract terms do not adversely affect human rights across the supply chain.

The Group engages with external experts, NPOs, industry associations, and other relevant parties in the fields of human rights, labour, environment, and local communities, incorporating their expertise into its activities.

### **7. Training and Awareness-Raising**

To ensure this Policy is embedded in all business activities, the Group provides training to its officers and employees on respect for human rights and on the Group's Code of Conduct, work rules, and other relevant policies.

- Onboarding programmes for new graduates and mid-career hires include an explanation of the Group's Human Rights Policy and Code of Conduct.
- Regular training programmes—including e-learning—targeting all employees deepen understanding of human rights risk, harassment prevention, customer harassment response, and personal information protection.
- Training for managers focuses on the roles and responsibilities required to embed respect for human rights into management practices, performance evaluation, and workplace development.

## **8. Disclosure**

The Group will disclose, in a timely and appropriate manner and through its website and other channels, information regarding its human rights initiatives, the status of its human rights due diligence, and its responses to identified human rights issues.

In making disclosures, the Group will strive to enhance transparency to the greatest extent possible, while protecting the privacy of reporters and affected parties and complying with applicable legal and contractual confidentiality obligations.

## **9. Establishment and Revision of This Policy**

This Policy is established and revised by the Board of Directors of the Company.

Established August 26, 2021

Revised April 28, 2026

Valuence Holdings, Inc.

Representative Director

Shinsuke Sakimoto