

## **Harassment Prevention Policy**

### **1 . Basic Principles**

JAFSCO Group Co., Ltd. (hereafter referred to as the “Company”) believes that fostering mutual respect for human rights and dignity and striving to eliminate discrimination and harassment from society with all parties connected to the Company, including directors, officers, employees, members of portfolio companies and investment candidates, clients, and business partners, is essential for achieving sustainable corporate growth and fulfilling its social responsibility.

Harassment is an unacceptable act that unjustly harms the dignity and character of an individual. Not only does it disrupt workplace order and environment, impairing work performance, but it also damages the social reputation of the Company and may hamper the development of the private equity industry. In the context of investment in unlisted securities, which forms the core of the Company’s business, the relationship between investor and investee may give rise to power imbalances. Harassment in the workplace as well as harassment towards members of portfolio companies and candidates for investment fundamentally undermine trust in our business and are completely unacceptable. As a responsible business entity, the Company is committed to establishing a work environment where each individual is respected, can work safely, and can fully express their enthusiasm and abilities, and it will uphold the human rights of all associated stakeholders, conducting business with high ethical standards.

### **2 . Scope of Application**

This policy applies to the Company and its directors, officers, employees (including temporary, seconded, and contract employees, as well as part-time workers), and prospective employees (hereafter collectively referred to as “employees, etc.”).

### **3 . Prohibited Conduct**

Harassment refers to speech or behavior, such as those that cause distress or discomfort, which unjustly harm an individual’s dignity or character.

The Company prohibits all forms of psychological and physical harassment, including power harassment, sexual harassment, and harassment related to pregnancy, childbirth, childcare leave, and caregiving leave.

### **4 . Disciplinary Action**

If an employee, etc. is found to have engaged in harassment, they will be subject to disciplinary action according to the Company's employment regulations, internal rules, etc. Disciplinary action may also be applied even if the victim is not an employee, etc. of the Company but rather an executive or employee of a portfolio company or other, depending on the situation.

## 5 . Corrective Measures

The Company provides a reporting channel for not only direct victims of harassment but all stakeholders to report incidents or potential occurrences of harassment. This channel is made known to all, and includes not only an internal point of contact but also an external point of contact managed by an independent attorney. The Company strictly prohibits any retaliatory actions or unfavorable treatment towards those who report harassment, cooperate in the investigations, or provide information, and it makes every effort to prevent such behavior.

When approached with a harassment-related consultation, the Company endeavors to promptly conduct an investigation, confirm the facts, and take appropriate action. The Company's employees, etc. have the right to consult on harassment matters. They also have a duty to cooperate in harassment-related company investigations.

If harassment is confirmed to have occurred following an investigation, the Company will discuss appropriate solutions and preventive measures. Necessary action will be taken, including disciplinary action against the offender and the development of measures to prevent recurrence.

## 6 . Protection of Privacy

The Company makes every effort to protect the privacy of those involved in harassment cases and strictly maintains confidentiality. The Company's employees, etc. are prohibited from disclosing personal information such as names and contact details of involved parties as well as consultation details and investigation results to any third party.

## 7 . Prohibition of Retaliation and Secondary Harassment

The Company prohibits retaliation or actions that could be perceived as retaliatory by the party accused of harassment towards the party seeking counsel or individuals assisting in investigations. Actions that harm the work environment through breaches of confidentiality or other means constitute secondary harassment and are strictly prohibited as unacceptable acts.

Individuals who are found to have engaged in the above actions or who have subjected those who reported harassment or cooperated in investigations to disadvantageous treatment as a result of their report or cooperation will be subject to disciplinary action.

## 8. Raising Awareness and Preventing Recurrence

To prevent harassment, the Company works to raise awareness internally through compliance training as well as tiered training, etc. In the event that harassment occurs, measures are implemented to prevent recurrence. The Company strives to accurately assess and review the status of employment management measures such as through questionnaire surveys, discussions, and other methods as necessary.

Formulated November 13, 2024

JAFCO Group Co., Ltd.