

# Snow Peak Anti-Corruption Basic Policy

In accordance with our cherished mission statement, the Snow Peak Group, consisting of Snow Peak, Inc., its subsidiaries, and affiliates (hereinafter referred to collectively as "Snow Peak"), has established the basic policy on anti-corruption initiatives (hereinafter referred to as the "Basic Policy") for all officers and employees of Snow Peak and its group companies (hereinafter referred to as "Officers and Employees"). The purpose of disclosing this Basic Policy is to promote the anti-corruption efforts of the entire Snow Peak and to earn the trust and confidence of all stakeholders by clearly stating this Basic Policy.

## **1. Compliance with Laws and Regulations**

Officers and Employees are required to comply with all applicable anti-corruption laws and regulations, ordinances and rules in each country or region in accordance with internal rules, internal regulations, manuals, or other applicable rules established by Snow Peak (hereinafter referred to collectively as the "Internal Rules etc.>").

## **2. Prohibition of Corruption**

Officers and Employees must not engage corruption (meaning any act which acquiring wrongful benefits in abuse of its power. This includes to provide, offer, or promise money or benefits to public officials, business partners, or other parties with the wrongful intention of corrupting them or accept these money or benefits; to give instructions or tacit approval to bribery through third parties; and to demand or promise, or accept any wrongful or unjust benefits.).

## **3. Thorough Record Keeping and Safekeeping**

Officers and Employees must ensure that financial reporting procedures are followed, that accurate records are kept, and that relevant materials are properly archived.

## **4. Lawful Entertainment, Gifts, etc.**

Officers and Employees must appropriately manage entertainment, gifts, travel expenses, donations, support, or sponsorship with public officials etc. and business partners etc. that have legitimate business purposes and are provided or received lawfully, in accordance with the Internal Rules etc.. Particular attention should be paid to entertainment and gifts to public officials, etc., as well as political contributions and provision of political funds. Also, when choosing agents or consulting etc., Officers and Employees will hire reliable person and organization based on sufficient investigation and request them to act in accordance with the Basic Policy and to comply with all applicable anti-corruption laws and regulations, ordinances and rules. In relation to agents or consulting etc., entertainment and gifts beyond common sense

shall not be received or provided.

#### **5. Education**

Snow Peak will provide appropriate training on compliance of the Basic Policy and the Internal Rules etc. for all Officers and Employees.

#### **6. Donation**

Snow Peak will donate for a lawful charity purpose and in accordance with the policies of Snow peak and check sufficiently that it does not fall under corruption when making a donation.

#### **7. Facilitation Payments**

Snow Peak prohibits “facilitation payment”. “Facilitation payment” means a payment to public officials for expediting the performance or procedure related to their duties or other administrative services.

#### **8. Auditing**

Snow Peak must establish a system to confirm compliance of Officers and Employees with the Basic Policy and the Internal Rules etc. by appropriately conducting self-inspections and internal audits according to the degree of risk.

#### **9. System and Response**

In order to ensure compliance with this Basic Policy, the Snow Peak has established a whistleblower hotline where Officers and Employees can report compliance issues, including anti-corruption. In the event where Snow Peak find a violation of the Internal Rules etc., a rigorous internal investigation will be conducted and cooperation with the relevant authorities will be provided. Violating Officers and Employees will be subject to strict disciplinary action in accordance with the rules of employment and the Internal Rules etc. to which they belong, in addition to possible legal liability.

#### **10. Revision, Abolition, and Management**

Revision or abolition of the Basic Policy shall be made by a decision of the Board of Directors. The General Affairs Division is in charge of operations related to the revision or abolition of the Basic Policy.

Established: December 13, 2023

Snow Peak, Inc.

Tohru Yamai

Representative Director, Chairperson, President and CEO