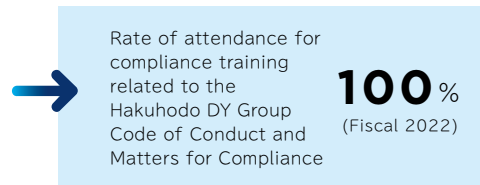


Compliance Initiatives

As a responsible corporate citizen, the Hakuholdo DY Group complies with laws and regulations and also recognizes the importance of earnest compliance with the expectations and demands of society.

Hakuholdo DY Group Code of Conduct and Matters for Compliance

In accordance with the Hakuholdo DY Group Code of Conduct and Matters for Compliance, which applies to all Hakuholdo DY Group officers and employees, all Group companies and employees must fulfill the basic responsibilities required of them.



Group Code of Conduct

In order to demonstrate our creativity and remain trusted partners of *sei-katsu-sha*, corporations, and media outlets, each of us working for the Group will conduct ourselves in a fair manner according to the highest ethical standards, strongly committed to compliance and conscious of our clear duty to abide by the following principles:

1. We will provide high-quality services	We will provide integrated marketing solutions of the highest quality while properly managing the confidential information and rights of our business partners.
2. We will constantly seek to maintain trust in us	We will abide by all laws and regulations, and sincerely do our best to live up to society's expectations and requests of us as members of society.
3. We will give full play to our own abilities and respect those of others	Recognizing that people are our greatest asset, we will always be bold in facing new challenges, and never forget our responsibilities and pride.
4. We will be transparent and fair in all we do	We will release all necessary information proactively and in a timely manner, and conduct ourselves in a fair manner, complying with all laws and regulations.

Compliance Implementation System

Chief Compliance Officers

Hakuholdo DY Group companies appoint chief compliance officers to serve as the highest-ranking officers responsible for enhancing compliance awareness.

Group Compliance Committee

The Group Compliance Committee, whose members include the presidents of Hakuholdo DY Group advertising and integrated media companies, is responsible for Groupwide compliance guidance and awareness. This committee is tasked with fostering a compliance-oriented mindset among Group officers and employees, making policies related to important compliance and corporate ethics matters, and establishing compliance systems. It also manages the progress of compliance activities at Group companies and provides advice, instructions, and guidance.

Information Security System

The Group Information Security Committee and the Information Security Committee have been established under the Group Compliance Committee to prevent losses of social trust or substantial damage to corporate value due to vulnerabilities in information management. The Information Security Committee implements and pursues improvements with regard to the Company's information management system, which conforms to the requirements of the ISO/IEC 27001:2013 and JIS Q 27001:2014 certification standards.

Risk Management

The Company established the Crisis Management Regulations to prevent losses of social trust or significant damage to corporate value as a result of inappropriate responses to major risk events. Based on these regulations, we have clarified the risk response system and the risk events it addresses, strengthening our ability to respond quickly and appropriately when risk events occur.

Appointment of Chief Risk Officer

We have appointed a chief risk officer as the chief executive officer in charge of managing all Group risks in order to strengthen and promote crisis management, thereby implementing risk management across the Group.

Employee Awareness Raising

In order to prevent misconduct and maintain high moral standards, we constantly communicate the importance of compliance to Group employees, raising awareness and understanding of compliance through online resources and the distribution of guidebooks.

Corporate Whistleblowing and Consultation Desk

The Hakuholdo DY Group has established the Corporate Whistleblowing and Consultation Desk as a framework for the appropriate processing of reports and consultations from officers and employees regarding potential legal violations by organizations or individuals with the goal of quickly identifying and remedying misconduct.