Whistleblowing Policy

The ARE Holdings Group (hereinafter, the "Company") contributes to the realization of a sustainable world through its Precious Metals Business and Environmental Preservation Business by valuing limited resources and protecting the global environment. To achieve this, we believe that high standards of business ethics and compliance awareness on the part of each individual are essential. In order to promptly identify and correct inappropriate conduct, including violations of laws and regulations, we have established the following whistleblowing policy and are committed to strengthening compliance throughout the Group.

1. We establish reporting channels that directly accept reports from all officers, employees, contract employees, part-time employees, temporary workers, and outsourced workers of Group companies in Japan and overseas when illegal or improper conduct is discovered, and we work toward appropriate resolution of reported issues.

2. Anonymous reports are accepted. The Company protects the human rights and privacy of both whistleblowers and reported persons. The Company will neither engage in nor permit dismissal or any other disadvantageous treatment on the grounds that an individual has made a report.

3. Where investigations confirm violations of laws or regulations or other misconduct, the Company will promptly implement corrective actions and measures to prevent recurrence.

4. Based on this policy, the Human Resources Department of ARE Holdings develops and maintains internal reporting and whistleblower protection systems. The Representative Director and the Audit and Supervisory Committee receive reports on and supervise the maintenance and operation of these systems.

The Company will continuously review and improve this policy and related management systems in response to changes in laws and regulations and the social environment in each country and will strive to remain a trusted corporate group.

June 30, 2026

Tomoya Higashiura

Representative Director, President & CEO

ARE Holdings, Inc.