

PACIFIC INC.

Hulic Minatomirai 10F, 1-1-7 Sakuragicho, Naka-ku, Yokohama, Kanagawa 231-0062, Japan

Anti-Bribery and Anti-Corruption Policy

Effective Date: 21 August 2026

1. Purpose

Pacific Inc. is committed to conducting its business with honesty and integrity. This policy prohibits bribery and corruption in all forms, in every country in which the Company operates.

2. Scope

This policy applies to the representative director, all employees, and any agent, subcontractor, or third party acting for or on behalf of Pacific Inc.

3. Prohibited Conduct

The Company does not offer, promise, give, request, or accept any bribe, kickback, or improper benefit — whether in the form of cash, gifts, entertainment, travel, employment, or anything else of value — to or from any person, including Government Officials, in order to obtain or retain business or to secure any improper advantage.

For the purposes of this policy, "Government Official" means any officer or employee of a government, government department or agency, state-owned or state-controlled enterprise, public international organization, political party, or any candidate for public office, as well as any person acting in an official capacity for or on behalf of any of the foregoing.

4. Facilitation Payments

Facilitation payments — small payments made to secure or expedite routine government action — are prohibited without exception, regardless of local practice or custom.

5. Compliance with Law

The Company complies with the Unfair Competition Prevention Act and the Penal Code of Japan, the United States Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act, and all other anti-bribery and anti-corruption laws applicable to its operations.

6. Books and Records

All payments and transactions are recorded accurately and in reasonable detail in the Company's books, and are supported by appropriate documentation. No undisclosed or unrecorded accounts are established or maintained for any purpose.

7. Reporting

Any suspected violation of this policy must be reported directly to the representative director. Pacific Inc. will not retaliate against any person who reports a concern in good faith.

8. Consequences of Violation

Violation of this policy may result in termination of employment or of the business relationship, and may be referred to the appropriate authorities.

9. Review

This policy is reviewed by the representative director at least annually, and updated as required to reflect changes in applicable law or in the Company's operations.

Approved and adopted by:

Shin Sasaki

Representative Director

Pacific Inc.

21 August 2026