

INTRODUCTION

Modern slavery is a serious and morally reprehensible crime that deprives a person's liberty and dignity for another person's gain. Every company is at risk of being involved in this crime through its own operations and its supply chain.

K. Mikimoto & Co., Ltd. ("Mikimoto", the "Company" or "we") is fully committed to preventing modern slavery and human trafficking in its operation and supply chains.

MIKIMOTO'S BUSINESS STRUCTURE AND OPERATIONS

The Company is a supplier and retailer of exclusive jewellery. Our headquarters are based in Japan with operations in Asia, Middle East, United States of America and across Europe. We sell our own jewellery products directly to consumers via our own stores (Incl. on our own website) and supply our products to wholesalers.

Suppliers to Mikimoto are selected and on-boarded in accordance with the criteria below, which includes the supplier's reputation, compliance and respect of human rights, as set out by the Company.

Our supply chains include: suppliers of pearls, gold, diamond and other precious stones based in Japan, the EU, Asia, Australia and the Middle East.

MIKIMOTO'S COMMITMENT

The Company joined the Responsible Jewellery Council ('RJC'), an international standard setting organisation for the jewellery and watch industry in August 2021. We obtained Certified Member status under *the Code of Practice 2019* in August 2023. *The Code of Practice 2019* provides the requirements for the responsible ethical, human rights, social and environmental practices throughout the supply chain. In order to continue the RJC certification obtained in 2023, the external auditor, who was authorised by London branch office of the Company, conducted an interim audit and the certification was extended until August 2026. Furthermore, with regard to the Human Rights Policy (as explained in the next section), the progress and status of Mikimoto's commitment are reported twice a year at the Risk Management Committee and the Compliance Committee, both of which are attended by all executives, in

which the president is the chairperson. Moreover, the Company is strengthening the group structure by sharing the information with subsidiaries.

POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Mikimoto has the following policies in place for identifying and preventing slavery and human trafficking in its operations:

1. Human Rights Policy: The Policy is intended to inform all employees and executives of the Company's responsibility to respect human rights and to have respect for human rights. We have these set out in our guidelines for employees and executives to clearly indicate the Company's stance on the respect for human rights to suppliers and other business partners. This is done to respect the human rights of all people involved in the Company's business and supply chains. The Human Rights Policy is publicly available on our website (https://www.mikimoto.com/jp_en/social-responsibility) which can be accessed by anyone.
2. Employee's Code of Conduct and Compliance Code: Respect for human rights, a stance against discrimination and/or harassment, and general compliance to laws and regulations are all included in both Codes to which every employee and executive is required to comply. A breach of the above Codes may give rise to a disciplinary action according to the Employee Handbook.
3. Corporate Ethics Hotline: All employees and executives have access to a direct contact to report in confidence any concern over compliance or issues regarding labour or harassment. Any concern over modern slavery or human trafficking can be reported to the Hotline. Whistle blowers who have reported a concern will be protected against any penalty or disadvantageous treatment.

Moreover, the head office of the Company is committed to protect employees and to provide a pleasant work environment by making the basic policy on customer harassment publicly available on the Company's website. This is achieved by internally informing all employees through the

establishment of a consultation system and the adoption of a response manual. The Company is also ensuring that the human rights standards of our suppliers and other business partners are upheld. This will be done by requiring them to establish a system which complies with the “Act on Ensuring Proper Transactions Involving Specified Entrusted Business Operators”, which will be subject to review. With respect to each task and measure, the Company will make efforts to take appropriate initiative by sharing this information with overseas branch offices and by complying with laws and regulations of each country.

TRAINING

The Company explains to its workers the UK Modern Slavery Act 2015 and its significance at compliance training sessions. The Company also posts on its internal portal site the overview of its Human Rights Policy and the awareness-raising materials on respecting human rights.

Furthermore, the Company conducts training sessions on “responsible procurement” to relevant employees by inviting external professional instructors. The Company also continuously promotes compliance by means such as making the documents on our Human Rights Policy, anti-money laundering, harassment, and protection of personal information readily available to all employees on its portal site.

RJC’s Code of Practice 2019 is also included in employee training for workers in charge of precious stones and bullions. This is followed by a survey on how well they understood it.

SUPPLY CHAIN DUE DILIGENCE

We understand that dealing with precious stones may involve high modern slavery risks and expect our suppliers will adhere to our values and not tolerate any slavery or human trafficking. In this regard, the Company has been conducting due diligence on any key suppliers and has been requesting them to agree with the OECD Due Diligence Guidance ANNEX II. Specifically, the Company requests new suppliers and other business partners to provide a written confirmation to declare that no violation of human rights has been found so far. The Company has also

been requesting any key suppliers and other business partners for their understanding on the Company's responsibility to respect human rights by informing them of the Human Rights Policy of the Company.

We guarantee that all our diamonds are conflict-free. Conflict diamonds are mined in war zones and sold to fund military action against governments. The Kimberley Process Certification Scheme was established in 2003 to put an end to the conflict diamond trade. This was done by requiring a certificate issued by the country of origin to export or import rough diamonds. There is also the System of Warranties that requires suppliers to provide warranty statements on all sales and purchase invoices for not only rough diamonds, but also polished diamonds. We adhere rigorously to both the Kimberley Process and the World Diamond Council's voluntary System of Warranties.

All the gold we use is from refineries accredited by the London Bullion Market Association (LBMA) to avoid contributing to conflict and human rights abuses. The LBMA is a London-based international trade association representing the global wholesale gold and silver market and responsible for maintaining benchmarks for all precious metals. It also accredits auditors and assurance providers to enable them to conduct responsible gold audits. By trading with the most trusted and reliable suppliers, we ensure the quality and integrity of our gold.

FURTHER STEPS

TRAINING

We will continue to periodically raise awareness about respecting human rights and promote measures beneficial to our corporate and social responsibility goals. This will be done and enhanced by providing employees with access to on-demand awareness-raising materials on our internal portal site and by conducting group training sessions to employees. Furthermore, we will dedicate ourselves to gain a deeper understanding within the Company on responsible corporate activity in order to prepare for RJC's "Code of Practice 2024" recertification audit scheduled for 2026.

SUPPLY CHAIN DUE DILIGENCE

We will implement more continuous approaches to ensure our supply chains are committed to preventing modern slavery and human trafficking. We will consider reviewing the existing due diligence measures to ensure no modern slavery or human trafficking will happen within our supply chains.

We will also continue to share with our subsidiaries the status of our commitment to human rights and consider developing a mechanism which can further strengthen the group structure.

MONITORING

The Company continues to regularly monitor Mikimoto's policies and procedures along with compliance, and supervise regional operations in order to prevent modern slavery within our business.

Regarding the Human Rights Policy, the Company will continue to report its progress at the Compliance Committee and the Risk Management Committee, both of which will be held twice a year, and review whether to revise the contents of policies at the board meeting which will be held once a year.

The Company also intends to further develop an internal system and to receive an audit from an authorised external auditor in order to renew the RJC certification which the Company obtained in August 2023.

This statement represents Mikimoto's modern slavery and human trafficking statement, concerning the period between 1 September 2024 to 31 August 2025 and was approved by the board of K. Mikimoto & Co., Ltd on 30 September 2025.



Shinichi Nakanishi
President
K. MIKIMOTO & CO., LTD.
September 30, 2025