KURA SUSHI USA, INC.
CODE OF BUSINESS CONDUCT AND ETHICS

I. Covered Persons/Purpose of this Code

This Code of Business Conduct and Ethics (this *"**Code**"*) of Kura Sushi USA, Inc. (the *"**Company**"*) applies to the Company's principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions (collectively, the *"**Covered Officers**"*), as well as to all directors, officers, and employees of the Company and its subsidiaries (together, with the Covered Officers, the *"**Covered Persons**"*) for the purpose of promoting:

i. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;

ii. full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (*"**SEC**"*) and in other public communications made by the Company and its subsidiaries;

iii. compliance with applicable governmental laws, rules and regulations;

iv. the prompt internal reporting of violations of this Code to an appropriate person or persons identified in this Code;

v. avoidance of conflicts of interest, including disclosure to an appropriate person or persons identified in this Code of any material transaction or relationship that reasonably could be expected to give rise to such a conflict;

vi. accountability for adherence to this Code; and

vii. an enforcement mechanism for compliance with this Code.

Each Covered Person shall adhere to a high standard of business ethics and shall be sensitive to situations that may give rise to actual, as well as apparent, conflicts of interest.

II. Fair Dealing

Each Covered Person shall deal fairly with customers, suppliers, competitors and employees. No person may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

III. Compliance with Laws

All actions taken by the Company and the Covered Persons, without exception and wherever they may be acting, must be in compliance with the laws, rules and regulations (including insider trading laws) applicable to the Company and its subsidiaries.

Covered Persons are expected to comply with United States laws and the Company's policies governing its business activities. These laws and policies include compliance with the Foreign Corrupt Practices Act (the "***FCPA***"), competition laws and money laundering laws.

Anyone aware of any violation by any Covered Person, whether based on actual fact or reasonable grounds for suspicion, of any applicable law, rule or regulation, or of any provision of this Code, must immediately make a written report to the Company's Compliance Officer, the Board of Directors of the Company (the "***Board***") or other appropriate person or committee of the Board as identified herein or by any other Company policy. In situations where a Covered Person prefers to place an anonymous report in confidence, a 24-hour ethics hotline is available to utilize as needed, which can be accessed at: https://secure.ethicspoint.com/domain/media/en/gui/85888/index.html or 1 (833) 254-1961.

IV. Covered Persons Shall Handle Ethically Actual and Apparent Conflicts of Interest

Overview. A "conflict of interest" occurs when a Covered Person's private interest interferes with the interests of, or his or her service to, the Company and its subsidiaries. For example, a conflict of interest would arise if a Covered Person, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company and its subsidiaries.

Other conflicts of interest are also covered by this Code. Specifically, it is recognized by the Board that the Covered Officers may also currently, or in the future, serve as officers, employees or service providers of one or more public or private companies covered by other codes of ethics or conduct. The following list provides examples of conflicts of interest under this Code, but Covered Persons should keep in mind that these examples are neither exhaustive nor exclusive. The overarching principle is that the personal interest of a Covered Person should not be placed improperly before the interest of the Company and its subsidiaries.

Each Covered Person must:

i. not use his or her personal influence or personal relationships improperly to influence investment decisions or financial reporting by the Company and its subsidiaries whereby the Covered Person would benefit personally to the detriment of the Company and its subsidiaries;

ii. not cause the Company or its subsidiaries to take action, or fail to take action, for the individual personal benefit of the Covered Person rather than for the benefit of the Company and its subsidiaries;

iii. not use material non-public knowledge of transactions made or contemplated by the

Company and its subsidiaries to trade personally or cause others to trade personally in contemplation of the market effect of such transactions; and

iv. not retaliate against any other Covered Person for reports of potential violations that are made in good faith.

V. Gifts and Entertainment

Gifts include physical objects, services, favors or other items of value. Some business situations call for giving gifts or receiving gifts. Gift giving and receiving practices vary among cultures. In all cases, gifts given or received by Covered Persons must be legal and reasonable. Covered Persons must never pay or receive a bribe, or accept anything that would or would make it appear that their judgment to act in the best interests of the Company could be compromised.

Covered Persons may accept or provide entertainment (i.e., activities where a representative of both parties is present), provided such activities or entertainment advances the Company's interest and is reasonable in the context of that business. Accepting entertainment that may appear inappropriate should be discussed with management in advance if possible, and if not possible, then promptly after the event has occurred. In some instances it may be impractical or harmful to refuse or return a gift. In those cases the Covered Person should disclose the circumstances and the gift to management.

VI. Applicable Anti-Corruption Laws

Applicable anti-corruption laws, including the FCPA and, where applicable, the UK Bribery Act and other local anticorruption laws, prohibit the Company and its Covered Persons from offering, giving or promising money or any other item of value, directly or indirectly, with the intent to improperly secure business, retain business, or to influence any act or decision of any government official, political party, candidate for political office or official of a public international organization. Stated more concisely, Covered Persons are prohibited from giving or receiving bribes, kickbacks or other inducements in order to obtain an improper business advantage. This prohibition also extends to payments to a third party agent of the Company (an "***intermediary***") if there is reason to believe that the payment will be used indirectly for a prohibited payment to foreign officials. Indirect payments include any transfer of money or other item of value to another individual or organization where the person making the transfer knows or has reason to know that some or all of that transfer is for the benefit of an individual to whom direct payments are prohibited. The use of intermediaries for the payment of bribes, kickbacks or other inducements is expressly prohibited. Violation of an applicable anticorruption law can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment.

VII. Corporate Opportunities/Duty of Loyalty

Covered Persons owe a duty to the Company to advance its legitimate interests to the best of their abilities. Covered Persons are prohibited from:

i. diverting any business opportunities from the Company or any of its subsidiaries for his or her own benefit or taking for themselves personally opportunities that are properly within the scope of the Company or such subsidiary's activities pursuant to the Company's or such subsidiaries' internal procedures or requirements relating to review and consideration of such opportunities; and

ii. using Company property, information or position for personal gain, financial or otherwise.

VIII. Fair Employment Practices

The Company pursues fair employment practices in every aspect of its business. Copies of the Company's detailed policies, including the Employee Handbook, are available from the Human Resources Department. Covered Persons must comply with all applicable labor and employment laws, including anti-discrimination laws and laws related to freedom of association and privacy. It is each Covered Person's responsibility to understand and comply with the laws, regulations and policies that are relevant to his or her job. Failure to comply with labor and employment laws can result in civil and criminal liability against Covered Persons and the Company, as well as disciplinary action by the Company, up to and including termination of employment. The Company's Human Resources Department should be contacted with any questions about these laws, regulations and policies.

IX. Recordkeeping

Accurate and reliable records are crucial to the Company's business. The Company's records are the basis of the Company's earnings statements, financial reports, regulatory submissions and many other aspects of the Company's business and guide the Company's business decision-making and long-term strategic planning. Company records include financial records, personnel records, record relating to the Company's technology and regulatory submissions and all other records maintained in the ordinary course of the Company's business.

All Company records must be complete, accurate and reliable in all material respects. Each employee and director must follow any formal document retention policy of the Company with respect to Company records within such employee's or director's control. Covered Persons should contact their supervisor or the Human Resources Department to obtain a copy of any such policy or with any questions concerning any such policy.

X. Protection of Company Assets

All Covered Persons shall protect the financial security and assets of the Company and its subsidiaries (including premises and property, facilities and equipment, supplies, buildings, tools, stocks, systems, equipment and software, records, computers and computer systems and financial resources and all other kinds) and ensure their efficient use. Theft, carelessness and waste have a direct impact on profitability. All Covered Persons shall strive to properly use and conserve Company property and information under their charge, ensuring it is used efficiently and rationally and strictly for Company business. All Company assets shall be used only for

legitimate business purposes and not for personal use.

XI. Disclosure & Compliance

Each Covered Person shall:

i. be familiar with the disclosure requirements generally applicable to the Company and its subsidiaries under applicable laws, including the federal securities laws and the rules and regulations promulgated thereunder;

ii. not knowingly misrepresent, or cause others to misrepresent, facts about the Company and its subsidiaries to others, whether within or outside the Company and its subsidiaries, including to the Company's directors and auditors, and to governmental regulators and self-regulatory organizations;

iii. to the extent appropriate within his or her area of responsibility, consult with other officers and employees of the Company and its subsidiaries with the goal of promoting full, fair, accurate, timely and understandable disclosure in the reports and documents the Company files with, or furnishes to, the SEC and in other public communications made by the Company; and

iv. promote compliance with the standards and restrictions imposed by any applicable laws, rules and regulations.

XII. Reporting and Accountability

Each Covered Person must:

i. not retaliate against any employee or Covered Person or their affiliated persons for reports of potential violations of this Code;

ii. notify the Board promptly if he or she knows of any violation of this Code (failure to do so being a violation of this Code); and

iii. report to the Board, at least annually, any change in his or her affiliations from the prior year.

In addition, each Covered Person that is a director of the Company or an employee of the Company (each, a "***Certifying Person***") must:

i. upon adoption of this Code (or thereafter as applicable, upon becoming a Covered Person), affirm in writing to the Board that he or she has received, read, understands and will comply with this Code (see **Exhibit A** for an example of the affirmation to be signed by each Certifying Person); and

ii. annually, on or before August 31st of each year affirm to the Board that he or she has

received, read, understands and has complied with and will comply with the requirements of this Code (See **Exhibit A** for an example of the affirmation to be signed by each Certifying Person).

The Board is responsible for applying this Code to specific situations in which questions are presented under it and has the authority to interpret this Code in any particular situation. The Board is responsible for granting waivers to Covered Persons and determining sanctions, as appropriate, for violations of this Code.

The Company has established and the Audit Committee administers the procedures set forth in Annex A of the Audit Committee Charter (a copy of which is attached) relating to the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls over financial reporting or auditing matters, and the confidential, anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters.

XIII. Investigation and Enforcement

The Board will take any action it considers appropriate to investigate any actual or potential violations of this Code reported to it. The Board, in conducting investigations of potential violations and determining whether violations have occurred, may, at their discretion, consult with such other persons as they may determine to be appropriate, including, but not limited to, counsel to the Company and its subsidiaries, independent auditors or other consultants, subject to any requirement to seek pre-approval from the Company's Audit Committee for the retention of independent auditors to perform permissible non-audit services. If the Board determines that a violation has occurred, the Board will consider all appropriate action, which may include (a) review of, and appropriate modifications to, applicable policies and procedures; (b) notification to appropriate personnel of the Company and its subsidiaries; or (c) termination of the Covered Person's employment from the Company and its subsidiaries.

XIV. Waivers

The Board will be responsible for granting waivers, as appropriate.[1] The Board, in determining whether waivers should be granted, may, at its discretion, consult with such other persons as it may determine to be appropriate, including, but not limited to, counsel to the Company and its subsidiaries, independent auditors or other consultants, subject to any requirement to seek pre-approval from the Company's Audit Committee for the retention of independent auditors to perform permissible non-audit services.

Any waivers of this Code will, to the extent required, be disclosed as required by the rules and regulations promulgated by the SEC or the Nasdaq Stock Market from time to time.

[1] Instruction 2 to Item 5.05 of Form 8-K defines "waiver" as "the approval by the registrant of a material departure from a provision of the code of ethics" and "implicit waiver," which must also be disclosed, as "the registrant's failure to take action within a reasonable period of time regarding a material departure from a provision of the code of ethics that has been made known to an executive officer" of the registrant.

XV. Related Person Transactions

A "related person transaction" is defined as those required to be disclosed pursuant to Item 404 of Regulation S-K. In order to maintain the highest standards of integrity in its business, the Company has adopted the following guidelines with respect to related person transactions, as further set forth in the Company's Related Person Transaction Policy:

i. Covered Persons shall ensure that any and all related person transactions are brought to the attention of the Compliance Officer, who will determine if the Audit Committee's review is necessary;

ii. All related person transactions shall be considered and conducted in a manner such that no preferential treatment is given to any such dealing or transactions;

iii. The Audit Committee will review and approve all related person transactions for potential conflict of interest. The Company may not enter into or engage in any related person transaction absent approval from the Audit Committee; and

iv. No Covered Person shall vote on any transaction with the Company or any of its subsidiaries in which he or she, directly or indirectly, is a party or has a financial interest or other material interest.

Details of related person transactions will be included as standing items in the reports to the Board and will be publicly disclosed as required by applicable law.

XVI. Other Policies and Procedures

This Code shall be the sole code of ethics adopted by the Company for purposes of Section 406 of the Sarbanes-Oxley Act and the rules and forms applicable to it thereunder. Insofar as other policies or procedures of the Company and its subsidiaries govern or purport to govern the behavior or activities of the Covered Persons who are subject to this Code, this Code supersedes such policies or procedures to the extent that they overlap or conflict with the provisions of this Code.

XVII. Amendments

Any amendments to this Code must be approved or ratified by a majority vote of the Company's Board, including a majority of independent directors.

XVIII. Confidentiality

Covered Persons must maintain the integrity of confidential information and ensure that such information is used only for its intended purposes. Confidential information typically includes valuable commercial information, owned by the Company or entrusted to the Company by suppliers and others related to the Company's business, which is competitively sensitive and not generally known to the public. It may include certain written or oral information, data or documents relating to a business, including without limitation current or prospective customer or vendor lists, pricing or rebates, guidelines, manuals, standard operating procedures, personal notes, worksheets, computer data, source code, presentations, memoranda, operational, sales, promotional and marketing methods, techniques and studies, financial and corporate records, information pertaining to pending or future acquisitions, divestures or similar transactions (including information pertaining to related financings, if any). The obligation to preserve confidential information is ongoing and continues even after employment ends.

"Intellectual Property" includes trademarks, trade names, domain names, software, patents and trade secrets owned by the Company or another entity. Such property must be used properly and protected from infringement by others. Any unauthorized use of Intellectual Property may cause significant liability to the infringing party.

All reports and records prepared or maintained pursuant to this Code will be considered confidential and shall be maintained and protected accordingly. Except as otherwise required by law or this Code, such matters shall not be disclosed to anyone other than the Board and its counsel, or independent auditors or other consultants referred to in Section X above, or in accordance with applicable laws, rules or regulations.

XIX. Internal Use

This Code is intended solely for the internal use by the Company and its subsidiaries and does not constitute an admission, by or on behalf of any person, as to any fact, circumstance, or legal conclusion.

XX. Disclosure of Code

This Code will be made available on the Company's website at www.kurausa.com.

Adopted: August 5, 2019.

Last updated: October 29, 2026

Exhibit A

To: The Board of Directors of Kura Sushi USA, Inc. (the *"**Company**"*)
From: _____
Date: _____
Subject: Code of Business Conduct and Ethics (the *"**Code**"*)

Upon adoption of the Code by the Board of Directors:

I certify that I have received, read and understand the Code adopted by the Board of Directors of Kura Sushi USA, Inc. I will comply with the Code as long as I am employed with the Company or one of its subsidiaries.

By: _____

Name: _____

Date: _____

Annual Confirmation:

I certify that I have received, read and understand the Code adopted by the Board of Directors of the Company. I certify that I have complied with this Code during the past fiscal year and will comply with this Code as long as I am employed with the Company or one of its subsidiaries.

By: _____

Name: _____

Date: _____

Annex A to the Audit Committee Charter of Kura Sushi USA, Inc.

Procedures for the Submission of Complaints or Concerns Regarding Financial Statement Disclosures, Accounting, Internal Accounting Controls or Auditing Matters

(i) The Company shall forward to the Audit Committee any complaints or concerns that it has received regarding financial statement disclosures, accounting, internal accounting controls or auditing matters.

(ii) The Company shall establish procedures for receiving anonymous complaints or concerns related to financial statement disclosures, accounting, internal accounting controls or auditing matters. The Company may engage the services of a third-party service provider to receive such complaints on behalf of the Company via telephone, email or other appropriate method.

(iii) Any employee of the Company may submit, on a confidential, anonymous basis, if the employee so desires, any concerns regarding financial statement disclosures, accounting, internal accounting controls or auditing matters by setting forth such concerns in writing and forwarding them in a sealed envelope to the Chairman of the Audit Committee, such envelope to be labeled with a legend such as: "To be opened by the Audit Committee only." Employees may deposit such envelope in the Company's internal mail system or deliver it by hand to a member of the Audit Committee. If an employee would like to discuss any matter with the Audit Committee, the employee should indicate this in the submission and include a telephone number at which he or she might be contacted if the Audit Committee deems it appropriate.

(iv) The Audit Committee shall review and consider any such complaints and concerns that it has received and take any action that it deems appropriate in order to respond thereto.

(v) The Audit Committee may request special treatment for any complaint or concern, including the retention of outside counsel or other advisors.

(vi) The Audit Committee shall retain any such complaints or concerns for a period of no fewer than five (5) years.

(vii) The Company's Code of Business Conduct and Ethics prohibits any employee from retaliating or taking any adverse action against anyone for raising or helping to resolve business conduct or ethical concerns.