

S. Ishimitsu & Co. Group Human Rights Policy

Under our corporate management philosophy, “Think together and work together for Mutual Prosperity,” S. Ishimitsu & Co. Group aims to be a company that continues to be needed and loved by society. To realize this vision, we recognize that it is essential to respect the fundamental human rights of all of those affected by our business throughout our business activities, and in order to fulfill our responsibility to respect human rights, we have established this Human Rights Policy (this “Policy”).

1. Respect for Human Rights in Business Activities

Respect for human rights is fundamental to our business activities, and we show our respect for internationally recognized human rights in accordance with the United Nations Human Rights Council’s “Guiding Principles on Business and Human Rights,” the Organisation for Economic Co-operation and Development’s “Guidelines for Multinational Enterprises,” and the International Labour Organization (ILO)’s “Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy”.

We understand that the fundamental rights listed in the International Bill of Human Rights (referring to the Universal Declaration of Human Rights, “International Covenant on Civil and Political Rights,” and “International Covenant on Economic, Social and Cultural Rights”) and “ILO Declaration on Fundamental Principles and Rights at Work,” which sets out fundamental rights at work, represent the bare minimum standard.

When there is a conflict between internationally recognized human rights and the domestic laws of a country, we will seek ways to respect internationally recognized human rights to the greatest extent possible.

2. Scope of Application

This Policy applies to our officers and employees.

Furthermore, we expect our business partners and other related parties directly linked to any of our business activities, products, or services to respect human rights in accordance with this Policy and will continue to encourage them to do so.

3. Human Rights Due Diligence

We respect the dignity, human rights, and diversity of all people, prohibit any discrimination, forced labor, child labor, harassment, among others, and strive to avoid even indirectly assisting or being linked to human rights violations; in addition, we engage in or participate in activities aimed at realizing a society wherein human rights are fulfilled.

We will establish a human rights due diligence process based on the United Nations Human Rights Council’s “Guiding Principles on Business and Human Rights,” identify any adverse impacts on human rights that our business activities cause, contribute to, or are directly linked to, determine priority issues to be addressed (risk-based approach), endeavor to prevent and reduce them, and continuously monitor their effects.

4. Key Human Rights Issues in Business Activities

Currently, the key issues related to respect for human rights that we should prioritize in conducting our business activities are as shown in the Schedule. We will review in a timely manner specific issues related to respect for human rights that we should prioritize, taking into account social conditions, the development of business activities, demands of us, etc.

5. Engagement with Stakeholders

With respect to our initiatives regarding human rights based on this Policy, we will secure opportunities to engage with relevant stakeholders and consult with them in good faith concerning the implementation of this Policy.

6. Remediation

If our business activities cause or contribute to adverse impacts on human rights, we will work to remedy them through appropriate procedures.

Furthermore, if any of our business activities, products, or services are directly linked to adverse impacts on human rights through our business partners or other related parties, we will consider encouraging such parties to remedy them.

We will proceed with the establishment of a grievance mechanism that is in accordance with international standards and take appropriate measures concerning remedies for those whose human rights have been adversely affected.

7. Education and Training

In order to ensure that this Policy is incorporated into our corporate activities and implemented effectively, we will provide appropriate education and training to our officers and employees and endeavor to work to spread awareness and understanding among our business partners and other related parties.

8. Information Disclosure

We will continuously monitor the status of compliance with this Policy, appropriately disclose the progress of our efforts toward respecting human rights through our website, etc., and endeavor to disclose information so that stakeholders can understand our efforts.

Schedule

Key Issues Related To Respect For Human Rights That We Should Prioritize

- **Respect for workers' rights in the supply chain, including prohibition of forced labor, child labor and discrimination, occupational health and safety, freedom of association and the right to collective bargaining, and ensuring adequate wages**

We do not tolerate forced labor, child labor and discrimination in our supply chain and respect the human rights of workers in our supply chain through managing occupational health and safety, ensuring appropriate working conditions such as wages, and encouraging the appropriate transfer of labor costs to prices and other measures.

- **Prohibit internationally prohibited discrimination and harassment within S. Ishimitsu & Co. Group and realize DE&I**

We do not tolerate any discrimination on the grounds of birth, gender, nationality, race, ethnicity, creed, age, sexual orientation, gender identity, disability, social origin, disease, etc., nor any harassment, including power harassment and sexual harassment. We strive to improve diversity, equity, and inclusion (DE&I) so that each and every one of us can play an active role regardless of gender, nationality, etc.

- **Respect for the rights of women workers, foreign workers, non-regular workers, etc.**

We strive to respect the human rights of vulnerable workers, in particular women workers, foreign workers, and non-regular workers.

- **Respect for the rights of local people**

We respect the rights of local people in the surrounding areas related to our operations to the environment and their rights to land, including preventing pollution and ensuring their right to water.

- **Ensuring access to remedy**

We will strive to develop and strengthen appropriate reporting systems as required to protect the abovementioned rights.