

Nittoku Human Rights Policy

NITTOKU supports the "United Nations Guiding Principles on Business and Human Rights", international human rights principles, and international norms on human rights, and promotes efforts to respect human rights based on these principles.

We have established the following human rights policies and will comply with them to ensure that human rights are respected.

1. Scope of application

This policy applies to all directors, officers, employees, and temporary employees of our company. We also encourage our suppliers, business partners, and others who support us to respect human rights in accordance with international human rights norms and to make every effort not to violate them.

2. Respect for human rights

We, NITTOKU Corporation (hereinafter referred to as "we" or "us"), shall take utmost care not to infringe upon the human rights of others in all aspects of our business activities, and shall strive to prevent and mitigate negative impacts on human rights, thereby fulfilling our responsibility to respect human rights.

We will conduct human rights due diligence to assess the impact of our business activities on human rights, and will continuously monitor and report the impact to the appropriate parties. If any negative human rights impacts should arise through our business activities, we will respond appropriately with fair and equitable remedial measures to mitigate or eliminate such impacts.

3. Diversity and inclusion (acceptance of diversity)

We are committed to maintaining a work environment that is free from disparate opportunity, discrimination, disadvantageous treatment, or harassment based on race, ethnicity, gender, physical characteristics, nationality, social origin, religion, age, disability, sexual orientation, gender identity or expression, or political opinion.

Recruitment activities, hiring, staffing, training, compensation and promotion are conducted with respect to competence, performance, skills and experience.

We do not tolerate any form of harassment or conduct that is offensive to personal dignity, including, but not limited to, lack of respect, inappropriate behavior, unfair treatment, or retaliation. These will not be tolerated outside the workplace as well as in the workplace.

We will continue our efforts to prevent human rights violations through regular education and other measures.

4. Freedom of association and the right to collective bargaining

We respect the right of employees to form labor unions without fear of reprisal or harassment, and to choose whether or not to participate in such unions in accordance with applicable laws and regulations. If a labor union is formed, the Company will endeavor to have a constructive dialogue with the labor union and will negotiate in good faith.

5. Prohibition of forced labor

We prohibit all forms of forced and compulsory labor.

6. Prohibition of child labor

We will comply with minimum age limits for employment in accordance with applicable laws and regulations.

7. Maintaining the safety and health of employees

We will comply with all safety and health laws and regulations, and strive to create and improve a healthy, safe and sanitary work environment.

8. Internal reporting system

An internal reporting system has been worked to accept consultations and reports.

If you become aware of any conduct that violates or may violate laws, regulations, corporate ethics, internal rules and regulations including this policy, or other unethical practices, you may report or consult with your division or department head. Anyone may also report anonymously to the Compliance Hotline.

The consultation system shall maintain anonymity and confidentiality, and shall prohibit any disadvantageous treatment or retaliatory measures against such persons by the concerned parties.

We will investigate and respond to reports, take appropriate action, and take appropriate corrective or remedial measures in the event of violations.

9. Privacy

We will comply with laws and regulations regarding personal information and ensure that all personal information is obtained and handled appropriately.

This policy has been approved by our Board of Directors and signed by our President and CEO.

October 31, 2023

President and CEO Junichi IDE