

# Nichiden Group Human Rights Policy

## ■ Policy and Basic Approach

The Nichiden Group, consisting of Nichiden Corporation and its subsidiaries, will fulfill, in accordance with its corporate philosophy, its corporate responsibility to respect human rights. To that end, we have established the Nichiden Group Human Rights Policy (hereinafter, “this Policy”) and will always strive to conduct our business and to act in a way that is in harmony with the international community.

### 1. Scope

This Policy applies to all officers and employees (including contract and temporary employees) of the Nichiden Group worldwide. The Nichiden Group will also expect, and work to ensure, that the companies in its supply chain, as well as its other business partners, respect and do not infringe upon human rights, in accordance with this Policy.

### 2. Support and Respect for International Norms

As a corporate group that supports the United Nations Global Compact, the Nichiden Group supports and respects international human rights standards, such as the International Bill of Human Rights, the International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Furthermore, we have formulated this Policy in accordance with the United Nations Guiding Principles on Business and Human Rights and will work to respect human rights.

### 3. Compliance with Laws and Regulations

In the Nichiden Group, we comply with all applicable laws and regulations in the countries and regions in which we do business. In the event that there is a conflict between internationally recognized human rights and the laws and regulations of a country or region, we will seek to find, to the greatest extent possible, a way to respect international norms regarding human rights.

### 4. Human Rights Priority Issues

The Nichiden Group recognizes the following items as significant human rights issues and will make efforts to improve and resolve them.

1) Prohibition of forced labor and child labor: We prohibit child labor, forced labor, and human trafficking within the Nichiden Group and in our supply chain.

2) Elimination of discrimination and harassment: We respect people's mutual diversity, individuality, and abilities, and will not engage in unfair discriminatory treatment or harassment on grounds such as race, nationality, sex, gender, religion, creed, birth, age, physical or mental disability, sexual orientation, or social status in any aspect of the employment process, including recruitment, hiring, promotion, and wages.

3) Occupational safety and health: We will prevent accidents, disasters, and injuries in the workplace, prohibit excessive working hours that have a negative impact on officers and employees, and ensure a safe and healthy working environment is maintained.

4) Freedom of association and the right to collective bargaining: To the extent permitted by the laws and regulations of each country and region, we will respect workers' freedom of association and right to collective bargaining. We will work to improve and streamline working environments, living environments, and working conditions.

5) Working hours and wages: We will comply with all applicable laws and regulations related to working hours and wages in each country and region.

6) Right to privacy: We respect each individual's right to privacy and will treat all information with the utmost care, using it for legitimate business purposes.

7) Human rights issues in the supply chain: We will conduct responsible procurement based on the recognition that compliance with laws and regulations and protection of human rights are important not only for the Nichiden Group but also in the supply chain.

## **5. Promotion Structure**

The Nichiden Group will establish a system for implementing this Policy through the Compliance and Risk Management Committee, chaired by the president. In addition, the Board of Directors is responsible for overseeing compliance with, and implementation of, this Policy.

## **6. Human Rights Due Diligence**

Based on the United Nations Guiding Principles on Business and Human Rights, the Nichiden Group will implement human rights due diligence to identify, prevent, and mitigate adverse human rights impacts, and fulfill our accountability for these.

## **7. Relief and Remediation**

If it becomes clear that the Nichiden Group has caused, or contributed to, an adverse impact on human rights, we will take appropriate measures to remedy the situation. We will establish a mechanism for addressing grievances in line with international standards and take appropriate measures to provide relief to those whose human rights have been adversely affected.

## **8. Dialogue and Consultation**

The Nichiden Group will ensure there are opportunities for dialogue with relevant stakeholders and will consult with them in good faith regarding responses to actual or potential adverse human rights impacts.

## **9. Information Disclosure**

The Nichiden Group aims to realize fair and highly transparent management. With due consideration for affected stakeholders and the confidentiality of commercial transactions, we will appropriately disclose information about our human rights initiatives in accordance with this Policy, as well as about the results and status of progress of our human rights due diligence.

## **10. Education and Training**

The Nichiden Group will provide appropriate education and training to its officers and employees through the Compliance Action Guidebook to ensure that this Policy permeates all business activities and is thoroughly complied with.