

IWAKI Co., Ltd. Human Rights Policy

IWAKI Co., Ltd. (“we”) understands that respect for the human rights of all people affected by our business activities is a prerequisite for our corporate philosophy, “to always be at the forefront of efforts to advance development in the global markets, industries and communities where we operate while building trust with, and contributing to the happiness of everyone we interact with.”

We have established this policy based on the United Nations’ Guiding Principles on Business and Human Rights in order to promote initiatives to respect human rights. This policy, based on our corporate philosophy, is positioned as the most significant guiding principle in our efforts to respect human rights.

1. Support International Standards

We support international standards on human rights, including the International Bill of Human Rights* and the International Labour Organization (ILO) Core Labour Standards established in the ILO Declaration on Fundamental Principles and Rights at Work.

*Universal Declaration of Human Rights and International Covenants on Human Rights (International Covenant on Economic, Social and Cultural Rights and Covenant on Civil and Political Rights)

In the event that the laws and regulations of the country or region in which we operate conflict with international human rights standards and cannot be reconciled, we will seek methods that maximize respect for international human rights principles.

2. Scope of Application

This Policy applies to all our officers and employees (including dispatched, temporary, and part-time, etc. employees). We will also continue to encourage our business partners and suppliers to understand this Policy and to promote efforts to respect human rights.

3. Governance

The Sustainability Committee, which is composed of directors, etc. oversees compliance with this Policy and the state of initiatives based on this Policy.

4. Responsibility to Respect Human Rights

We will fulfill our responsibility to respect human rights by ensuring that our business activities do not infringe on the human rights of others, and by taking appropriate action if our business activities have an adverse impact on human rights. If any of our business partners or suppliers are involved in activities that have an adverse impact upon human rights, we encourage such partners to respect and not infringe on human rights.

5. Human Rights Due Diligence

We will establish a human rights due diligence mechanism, which we will implement on an ongoing basis in order to fulfill our responsibility to respect human rights. Human rights due diligence includes identifying, preventing, and mitigating any potential adverse impact of our business activities on human rights, as well as disclosing a set of initiatives relating to respect for human rights to the public.

6. Corrections and Remedies (Grievance Mechanism)

We will work to establish an effective grievance mechanism in order to promptly identify human rights issues in connection to our own business activities and to take appropriate action to correct and remedy any adverse impacts. We will establish a whistleblower hotline for stakeholders that guarantees anonymity, and we will ensure the confidentiality of reports and the protection of whistleblowers.

7. Training

We will provide appropriate education and training to all our officers and employees to ensure that this Policy is firmly embedded in all our business activities, and we will reflect this Policy in our related policies, guidelines, and other necessary procedures.

8. Dialogue and Consultations with Stakeholders

We will draw on independent, outside human rights expertise when implementing the series of initiatives set forth in this Policy. We will also engage in dialogue and consultations with relevant internal and external stakeholders, including those stakeholders who are actually or potentially impacted by our business activities.

Date Enacted: October 19, 2022

IWAKI Co., Ltd.

President

Shigeru Fujinaka

(Appendix) Important Human Rights Issues

IWAKI Co., Ltd. (“we”) conducted a risk assessment of the impact on human rights together with outside experts with human rights expertise, and we identified the following items as “important human rights issues.”

We will prioritize our efforts to prevent and correct adverse human rights impacts with regard to these important issues. We will regularly review the important issues listed in this appendix based on social conditions, legislative trends, and changes to our business activities.

1. Prohibition of Child Labor and Forced Labor

We do not tolerate any form of child labor or forced labor, including human trafficking. We will promote initiatives to protect and respect the human rights of workers who are prone to be in a vulnerable position to eliminate the risk of child labor and forced labor throughout our supply chain in Japan and overseas, which involves the procurement of raw materials, including minerals, and the manufacture of our products.

2. Elimination of Discrimination and Harassment, Respect for Diversity

We will eliminate all forms of discrimination on the basis of gender, age, race, nationality, religion, creed, disability, sexual orientation, and gender identity, etc. We will strengthen our efforts to create an environment in which diverse human resources can fully demonstrate their potential and abilities.

We do not tolerate any form of harassment, including workplace (power) harassment and sexual harassment, etc., or any conduct that tarnish the dignity of any individual. We will promote initiatives to create an open and fair workplace environment where the dignity of all people is equally respected.

3. Ensure a Safe and Health Workplace Environment

We will strive to secure a safe and hygienic workplace environment to support the maintenance and promotion of our employees’ health. At the same time, we will work to ensure health and safety in the workplace environments at our suppliers.

We also recognize the importance of employees being able to balance their work and private life and will properly manage working hours to create a comfortable workplace environment for everyone.

4. Ensuring Safety When Selling and Using our Products, etc.

The safety and quality of our goods, products and services (“Products, etc.”) is our top priority, and we strive to provide Products, etc. that can be used with confidence. We will promptly work to investigate the cause and take appropriate action when any problems or defects occur in our Products, etc.

We will also work to build a safe and appropriate value chain to prevent inappropriate use of our Products, etc. by our customers and users, and any ensuing damage or adverse effects.