

ITO EN Group Human Rights Policy

Respect for human rights forms the foundation of the ITO EN Group's management principle, "Always Putting the Customer First," and underlies all of our business activities.

We have established the ITO EN Group Human Rights Policy to summarize the ITO EN Group's Founding Charter and the Code of Conduct and are committed to fulfilling our responsibility to respect human rights by facilitating understanding of human rights issues in connection with our business activities.

Basic Concept

The ITO EN Group shall promote efforts to ensure respect for human rights by complying with applicable laws and regulations of the countries and regions where we conduct our business activities and establishing the ITO EN Group Human Rights Policy (the "Policy") in accordance with the United Nations (UN) Guiding Principles on Business and Human Rights (the "Guiding Principles") and based on the International Bill of Human Rights* and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Moreover, in the event of a conflict between laws and regulations of individual countries and internationally accepted norms for human rights, we shall aim to follow methods that respect internationally accepted norms for human rights.

All officers and employees working in the ITO EN Group shall promote efforts to ensure respect for human rights through proactive cooperation in each country with consumers, shareholders, retailers, suppliers, financial institutions, local communities and other customers.

The ITO EN Group prohibits any form of discrimination based on gender, sexual orientation (gender identity), age, ethnicity, nationality, race, religion, thoughts, beliefs, social status, family origin, and disability, prohibits harassment, creates an appropriate work environment, secures fair working conditions and respects constructive labor-management dialogue. Moreover, we do not tolerate any form of slave labor, including forced labor, child labor and human trafficking. We shall engage in business activities that promote respect for other fundamental human rights.

*The International Bill of Human Rights is the collective term for three documents. They are the Universal Declaration of Human Rights, and covenants that made the provisions of the Universal Declaration of Human Rights binding for states: The International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights.

Scope of Application

The Policy shall apply to all officers and employees (including part-time workers, contract workers and dispatched workers) in the ITO EN Group. The Board of Directors of ITO EN, Ltd. shall be responsible for the implementation of the Policy.

Moreover, we expect all customers in connection with the products and services of the ITO EN Group to support the Policy and request the understanding of and support for the Policy from our suppliers and other business partners, thereby sharing and fulfilling our responsibilities to respect human rights.

Fundamental Policy

- (i) We recognize the importance of internationally accepted norms for human rights and respect human rights in all business activities linked with our products and services.

- (ii) We recognize the importance of understanding human rights risks from stakeholders' perspectives. We shall hold earnest dialogues and discussions with stakeholders, establish frameworks for working to identify, prevent, mitigate and relieve human rights risks in accordance with the Guiding Principles and continuously implement this human rights due diligence.
- (iii) We shall share the Policy with our suppliers, check and assess their status of compliance with the Policy and promote initiatives on respecting human rights in the supply chain.
- (iv) We shall, in accordance with the Guiding Principles, work to establish effective grievance mechanisms.
- (v) We shall strive to avoid causing or contributing to human rights abuses with which we are involved. If we identify that we have caused or contributed to adverse impacts on human rights, we shall take appropriate remedies and corrective measures. In addition, in the event that our business or services are involved in adverse impacts on human rights through our business relationships, we shall encourage our business partners and other relevant parties who are directly involved in other corporate activities, products or services to take corrective measures.
- (vi) We shall continuously provide officers and employees with the education and training needed to implement the Policy.
- (vii) We shall disclose the status of progress in our initiatives on respecting human rights on ITO EN's web pages and integrated reports.

This Policy has been formed based on advice from external experts who have specialist knowledge and practical experience in matters regarding human rights. We will continue to hold dialogues with stakeholders and reflect the outcome in the Policy and our initiatives on respect for human rights as needed in the future.

Established on March 26, 2020
ITO EN, Ltd.
Daisuke Honjo, President and Executive Officer