

Haseko Group's Human Rights Policy

1. Purpose

- This policy is established in line with the United Nations Guiding Principles on Business and Human Rights for the purpose of clarifying our stance on respecting human rights and of discharging the Haseko Group's responsibility to respect human rights by deepening our initiatives to that end, based on the Haseko Group's Corporate Philosophy and the Haseko Group Standards of Conduct.

2. Scope of Application

- (1) All officers and employees as well as all people working with Haseko Group companies shall uphold this policy and endeavor to respect human rights.
- (2) We shall also require our partner companies and other constituents of our supply chains to respect human rights in their business activities on an ongoing basis.

3. Respect for and Compliance with International Norms, Laws, Regulations, etc.

- (1) We shall support international norms including the International Bill of Human Rights, the eight core Conventions as set out in the ILO Declaration on Fundamental Principles and Rights at Work, and the Children's Rights and Business Principles, and respect the human rights prescribed therein.
- (2) We shall comply with the human rights-related laws and regulations of the countries and regions in which we conduct our business activities. When faced with conflicting requirements between international norms and local laws and regulations, we shall seek ways to honor the international norms.

4. Respect of Human Rights

- (1) Respect of Human Rights and Prohibition on Discrimination and Harassment
 - We shall respect the fundamental human rights and diversity of all people in all our business activities, and shall not discriminate against people based on race, nationality, birth, creed, religion, sexual orientation, gender identity, age, disability, or any other reason, nor shall we commit any act that undermines the dignity of individuals.
 - We shall endeavor to respect the personality of every person, and never engage in harassment, which we define as words or actions that undermine the dignity of

individuals, or that disadvantage or intimidate an individual in the context of factors such as gender, official authority, and status (including power harassment, sexual harassment, and maternity harassment).

(2) Compliance with Labor Laws and Regulations, etc.

- We shall comply with laws, regulations, and internal rules with regard to labor affairs, and work to maintain mental and physical health. We shall also maintain a constant awareness of the importance of raising productivity, and endeavor to reduce working hours.
- We shall manage working hours, provide days off and rest times appropriately, and endeavor to prevent overwork.
- In the payment of wages, we shall comply with statutory minimum wage provisions, as well as taking into account so-called “living wage” standards.
- We shall respect workers’ freedom of association and their rights to organize, bargain collectively, and act collectively.
- We shall eliminate all forms of forced labor, child labor, and the like.
- We shall give consideration to the human rights of foreign workers and foreign technical intern trainees.

(3) Respecting Life and Securing Safety and Hygiene

- We shall make respect for human life our top priority at all times in our business activities.
- We, together with our partner companies, shall take a thoroughgoing approach to the management of safety on and around construction sites, and endeavor to prevent workplace accidents.
- We shall pay careful attention to the safety of all people connected with our business, including customers and local community members.
- We shall comply with laws, regulations, and internal rules relating to safety at work, and endeavor to provide safe and pleasant working environments.

(4) Protection of Personal Information

- In accordance with internal rules, we shall strictly manage and protect all personal information handled in the course of work.

(5) Respect for Culture and Customs

- We shall respect the cultures and customs of the countries and regions where we do business.

5. Approach to Discharging Responsibilities in Respect of Human Rights

(1) Periodic Human Rights Due Diligence

- We shall identify and conduct risk assessments on potential negative impacts of our business activities on human rights, including those related to our supply chains.
- On the basis of these risk assessments, we shall institute measures to avert or mitigate negative impacts on human rights, verify the effects of the measures instituted, and revise them as necessary.

(2) Establishment of Consultation Points

- We shall establish consultation points where internal and external stakeholders can consult regarding the human rights impacts of the Haseko Group's business activities. We shall also establish structures enabling these consultations to be dealt with appropriately.

(3) Corrective and Remedial Action

- In the event that the Haseko Group's business activities are found to have impacted human rights negatively, we shall pursue appropriate corrective and remedial action.
- In the event that negative impact on human rights is found in relation to our supply chains, we shall endeavor to take corrective and remedial action in cooperation with our business partners and other relevant parties.

(4) Education and Training

- We shall pursue human rights-related education and training on an ongoing basis in order to promote understanding of this policy among officers and employees as well as all people working with the Haseko Group, and to embed it in all our business activities.

(5) Information Disclosure

- We shall make this policy public, and disclose our initiatives toward respect of human rights in accordance with the policy.

(6) Stakeholder Dialogue

- We shall pursue reviews of this policy through dialogue with the relevant stakeholders and other parties.

6. Implementation Structures

- The officer in charge of the Haseko Corporation's Sustainability Promotion Department shall have primary responsibility for implementing this policy, and shall pursue initiatives under it in cooperation with primarily the Risk Management Department, Personnel Department, Human Resources Development Department, and Construction Planning Department and the various divisions of Haseko Corporation and companies in the Haseko Group.

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