Oji Group Human Rights Policy

The Oji Group recognizes respect for human rights as a global code of conduct and we have established the Oji Group Human Rights Policy as our basic stance on human rights. We remain committed to respecting human rights and the diverse values of individuals, as well as contributing to the realization of a society in which everyone can manifest their abilities to the fullest.

1. Basic Principles

We undertake initiatives to respect human rights in keeping with the Guiding Principles on Business and Human Rights endorsed by the UN Human Rights Council, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises. We also adhere to and respect international norms such as the International Bill of Human Rights (the Universal Declaration of Human Rights and International Covenants on Human Rights), the ILO Declaration on Fundamental Principles and Rights at Work,* and the Declaration on the Rights of Indigenous Peoples, as well as international human rights, including indigenous peoples' right to "free, prior, and informed consent".

If the laws and regulations of a country differ from international human rights norms, we will adhere to the higher standard, and if they contradict each other, we will seek ways to respect internationally recognized human rights to the greatest extent possible.

Moreover, as a signatory to the United Nations Global Compact, we support its 10 principles, and have formulated this policy based on advice from experts both inside and outside our group.

* Including core labor standards, namely the prohibition of child labor and forced labor, elimination of discrimination in employment and work, recognition of freedom of association and collective bargaining rights, and maintaining a safe and healthy workplace environment.

2. Scope of Application

This policy applies to the officers and employees of the Oji Group.

We also expect our business partners and other parties directly linked to our business operations, products, and services to respect human rights in line with this policy, and will continuously leverage our influence over those business partners through the Oji Group Sustainability Action Guidelines for Supply Chains and other requirements.

3. Governance related to Human Rights

We deliberate matters that are material to fulfilling our commitment to respecting human rights through the Sustainability Committee (Chairperson: Group CEO, Members: All Company Presidents and others) and monitored and supervised by our Board of Directors.

4. Human Rights Due Diligence

To fulfill our responsibility of respecting human rights in accordance with the procedures described in the United Nations Guiding Principles on Business and Human Rights endorsed by the UN Human Rights Council, we commit to conducting human rights due diligence by taking into account the perspectives of our stakeholders. Through such due diligence, we will identify, prevent, and mitigate adverse effects on human rights that may be caused or contributed to by our business activities or which may be directly related to our business operations, products, and services through business relationships, by conducting an ongoing dialogue with stakeholders. We also will continually verify the effects of these actions.

The Oji Group commits to providing suitable education to all executives and employees to promote the understanding and effective implementation of this policy.

5. Remediation and Remedies

If it becomes evident that we are causing or contributing to adverse effects on human rights, we will engage in dialogue with those concerned and strive to provide remedies through appropriate procedures. Additionally, in the event that our business operations, products, or services are directly related to adverse effects on human rights through our business partners or other related parties, we will consider encouraging these parties to provide remedies.

The Oji Group has joined a non-judicial grievance mechanism platform that complies with the United Nations Human Rights Council's "Guiding Principles on Business and Human Rights." This platform is available to all stakeholders, including employees, the supply chain, local residents, and indigenous people. It provides a remedy mechanism for addressing negative impacts on human rights and the environment throughout the entire value chain of the Oji Group, both domestically and internationally, and ensures appropriate responses. When receiving reports through this platform, we guarantee the anonymity of the whistleblower and the confidentiality of the report's contents, and we promise to protect the whistleblower from any disadvantages arising from the report.

Additionally, we have established a consultation desk on our company website for consumers and external stakeholders. Furthermore, we operate a "Corporate Ethics Helpline**" for all Oji Group employees, where they

can consult and report issues, including legal violations and misconduct (including labor relations and harassment).

** When consulting with the external helpline, employees can choose to speak with either a male or female lawyer.

6. Dialogue and Information Disclosure

The Oji Group commits to engaging in dialogue and discussions with rights holders and other relevant stakeholders regarding our human rights initiatives based on this policy, while simultaneously receiving advice and assistance from outside experts on human rights.

We commit to making appropriate disclosures and reports on the progress of our initiatives regarding respect for human rights through our website, integrated report, securities reports, and other means.

This policy has been approved by our board of director and signed by the group CEO.

Oji Holdings Corporation Representative Director of the Board President and CEO Hiroyuki Isono

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