

## Human Rights Policy

In 2022, the Hakuholdo DY Group established its Group Human Rights Policy. In 2023, the Company identified significant human rights issues as priorities and reported on these issues at a Sustainability Committee meeting in February of that year. The Company has also formulated Human Rights Due Diligence Guidelines and conducts Groupwide human rights due diligence based on four cycles—identification and assessment, prevention and mitigation, monitoring, and disclosure.



### The Hakuholdo DY Group’s Human Rights Policy “Realizing a society in which *sei-katsu-sha* can flourish and live active lifestyles of their choosing”

At the Hakuholdo DY Group, we aim to achieve our sustainability goal of “realizing a society in which *sei-katsu-sha* can flourish and live active lifestyles of their choosing” through our creative human resources, who serve as our greatest asset. Respect for human rights is the foundation upon which the Hakuholdo DY Group is built, and we promote respect for human rights as the root of ethical, sustainable business. In order to fulfill our responsibility to respect human rights more thoroughly, we have formulated a Human Rights Policy for the Group based on the “Protect, Respect and Remedy” framework outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Details ▶ [WEB Full text of the Human Rights Policy \(Japanese only\)](#)

### Implementation Structure

The Hakuholdo DY Group’s Board of Directors has a responsibility to implement ongoing monitoring of all activities stipulated by the Policy in regard to respect for human rights. While fulfilling the monitoring function concerning measures to address particularly salient human rights issues, the Board will also devise appropriate measures to prevent any direct or indirect involvement in human rights infringements. The Corporate Sustainability Division, as the unit responsible for sustainability matters, will work under the guidance of the director responsible for overseeing sustainability to spread awareness of the Policy and promote all initiatives related to respect for human rights.

### Human Rights Due Diligence

#### Disclosure of Significant Human Rights Issues

Human rights issues		Rights holders whose human rights could potentially be negatively impacted		
		Employees	Suppliers*	<i>Sei-katsu-sha</i>
Expression and dissemination of information	Restrictions on expression in production process	Medium	Medium	—
	Discrimination arising from expression or dissemination of information	—	—	High
	Leakage of personal information or invasion of privacy	Low	—	High
Labor	Discrimination or harassment in employment	High	High	—
	Discrimination in hiring	Low	Low	—
	Overwork and long working hours/ Safety and health	High	High	—
	Forced labor	Low	Medium	—
	Child labor	Low	Medium	—
Religion	Religious freedom	Medium	Medium	—

\* Mainly business partners

Details ▶ [WEB Identification process and decision criteria \(Japanese only\)](#)

### Relief Mechanism

To ensure that corporate officers and employees who have experienced human rights violations are able to receive support, we have established a relief contact point within the Company for whistleblowing and consultations. This contact point monitors the situation, considers appropriate measures, and reports to the Group Compliance Committee.

Details ▶ [WEB Relief mechanisms \(response contact point\) \(Japanese only\)](#)