Okamura Group Human Rights Policy

We, the Okamura Group, have the perspective of "Where people can thrive" at the core of all of our management philosophy, "Okamura Way," which comprises Okamura's Mission (our management approach), the Okamura Declaration (what we want to be), and Okamura Basics (the values we hold dear), using it as a guide in our daily business activities and decision-making. We aim to realize a society in which all people can work and live with vitality and smiles.

We understand that we need to respect the human rights of every individual affected by the Okamura Group's business activities in order to contribute to the realization of a sustainable society that the world is aiming. We hereby announce the adoption of the Okamura Group Human Rights Policy (the "Policy") based on the Guiding Principles on Business and Human Rights adopted by the United Nations Human Rights Council in June 2011 with the aim of fulfilling our responsibility to respect the human rights of every individual affected by our business activities.

1. Basic Stance on Human Rights

The Okamura Group supports and respects the United Nations International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights), which sets out the fundamental human rights of every individual, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, which sets out people's fundamental rights at work, as well as other international codes of conduct related to human rights, for example, conventions on workers' human rights such as wages and working hours, the OECD Guidelines for Multinational Enterprises and the United Nations Declaration on the Rights of Indigenous Peoples. The Okamura Group also supports and respects the Ten Principles of the United Nations Global Compact as its signatory.

The Policy is a commitment by the Okamura Group to respect human rights based on the Okamura Group's Management Philosophy, Code of Conduct, Sustainability Policies, Sustainable Procurement Guidelines, Diversity and Inclusion Policy, and related internal policies and regulations in order to fulfill our responsibility to respect human rights of our stakeholders.

2. Scope of Application

The Policy applies to all executives and employees of the Okamura Group. The Policy also requires all business partners and other parties involved in the Okamura Group's business, products, and services to comply with the Policy.

3. Responsibility to Respect Human Rights

The Okamura Group understands that our business activities may directly or indirectly cause adverse human rights impacts. We will fulfill our responsibility to respect human rights by not violating the human rights of individuals affected by our business activities, and by taking appropriate remedies in case our business activities may cause or contribute to any adverse impacts on human rights.

Although we cannot ascertain all the ways in which our products and services are used by our business partners and other parties, we do not intend for any of them to be used in any way that contributes to human rights abuses. In the case where an adverse impact on human rights caused by our business partners or other parties is suspected to be linked to our business, products, or services, we will ask those business partners or other parties to respect, and not harm human rights.

4. Responsibility to Respect Human Rights

The Okamura Group will establish a human rights due diligence system in accordance with the United Nations Guiding Principles on Business and Human Rights to identify, prevent, and mitigate any adverse human rights impacts that we may have on our stakeholders.

5. Dialogue and Consultation

In the process of implementing the Policy, the Okamura Group will apply the expertise of independent third parties on human rights and will sincerely engage in dialogue and consultation with our stakeholders.

6. Education and Training

The Okamura Group will provide appropriate education and training to our executives, employees, business partners and other parties, to ensure that the Policy is integrated into all of our business activities and is implemented effectively.

7. Remedy

If it becomes clear that the Okamura Group's business activities have any adverse human rights impacts, or our involvement through business partners or other parties becomes apparent or suspected, we will work to remedy such impacts through dialogue and appropriate procedures in accordance with the international code of conduct.



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8. Responsible Executive Officer(s)

The Okamura Group will entrust a board member or members with the responsibilities of implementing the Policy and supervising its implementation status.

9. Information Disclosure

The Okamura Group will disclose the progress and results of our efforts to respect human rights on its website and through other media.

10. Compliance with Applicable Laws and Regulations

The Okamura Group will comply with the laws and regulations of each country or region in which we operate. Where there is a conflict between internationally recognized human rights and the laws and regulations of each country, we will seek ways to respect internationally recognized human rights principles to the maximum extent possible.

The Policy has been approved by the Board of Directors and signed by Representative Director, President and Chief Executive Officer.

May 1st, 2022 Masayuki Nakamura Representative Director, President and Chief Executive Officer OKAMURA CORPORATION

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