

Mitsubishi Chemical Holdings Group

Global Policy on Respecting Human Rights, Employment and Labor

Preamble

This policy provides specific guiding principle for Mitsubishi Chemical Holdings Group companies concerning “Respecting Human Rights” and “Employment and Labor” as provided in the Mitsubishi Chemical Holdings Group Charter of Corporate Behavior.

(Introduction)

We are committed to respecting human rights understood as, at a minimum, those set out in the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We support the United Nations “Guiding Principles on Business and Human Rights” and the spirit and meaning of the United Nations Global Compact, and we shall fulfill our social responsibilities as a business entity through the promotion of respect for human rights in the workplace and creation of adequate working environments, thus contributing to the realization of KAITEKI. We expect all our business partners to understand and act in line with the principles in this policy.

Respecting Human Rights

(Respect for the Dignity and Rights of Individuals)

1. We respect the dignity and rights of all individuals.
We shall not discriminate against individuals based on race, color, gender, age, nationality or national origin, ethnic or social origin, caste, belonging to an indigenous people, family status, disability, health conditions such as HIV/AIDS status, marital status, pregnancy, language, sexual orientation, gender identity, , property, religion, economic grounds, trade union affiliation, political or other opinion or any other grounds whatsoever.
2. We shall not tolerate any words or actions which could make a person feel degraded, nor engage in any behavior that would deny the integrity of an individual as a human being or impair the dignity of an individual, such as harassment in the workplace.

(Awareness of Human Rights and Education)

We shall endeavor efforts to provide human rights education in each organization so

that every employee may gain a better understanding of human rights and the various issues related to human rights. In addition, we work to integrate human rights in our relevant corporate procedures so that this policy is embedded throughout our business activities. We shall further provide the necessary education and training to our officers and members to provide them with the knowledge and capability to effectively implement this policy.

(Privacy Protection)

We shall protect the privacy of individuals. In handling personal information, we shall implement procedures to prevent any information loss or leakage and in compliance with related laws and regulations.

(Avoidance of Complicity)

We understand our business may have human rights impacts both inside and outside Mitsubishi Chemical Holdings Group companies throughout our business activities, including from research and development, procurement of raw materials, manufacturing, sales of products and services, distribution and disposal.

We expect all stakeholders relevant to our business to respect human rights and avoid human-rights infringements or unjustifiable discrimination. We shall endeavor to avoid complicity in human rights violations, even indirectly.

Should any questionable situation come to light, we shall strive to remediate it quickly and accurately, aiming for resolution of the issue, based on our fundamental philosophy of respect for human rights.

(Preventing Occurrence of Human Rights Infringement)

We shall endeavor to prevent human rights infringement from occurring in connection with our business activities, based on the concept of “Human Rights Due Diligence,” which is a process for recognizing, preventing and coping with adverse human rights impacts.

(Engagement with Stakeholders)

We recognize the importance of understanding negative impacts on human rights from the perspectives of stakeholders, in particular, affected stakeholders. We are committed to engaging with relevant stakeholders in each region where we do business when we consider our action to address potential and actual adverse human rights impacts linked to our business.

(Response to Human Rights Risk Situations)

Based on the basic philosophy of respect for human rights, we shall endeavor with particular care to prevent human rights infringement from occurring, even when we

are faced with certain circumstances and environments that involve a high risk of such occurrences, including conflicts, natural disasters and a culture of corruption.

(Response to Unexpected Problems)

We shall establish a mechanism to address unexpected human rights infringement as a matter of precaution so that relevant stakeholders can discuss and raise concerns. We shall endeavor to resolve any such problem promptly by using this mechanism in a fair, equitable and transparent manner.

Employment and Labor

(Compliance)

We shall establish and comply with company rules and regulations in accordance with applicable national and/or local employment and labor laws.

If national and/or local law requirements contradict internationally recognized human rights standards, we seek ways to honor the principles of international human rights without violating national and/or local laws.

(Prohibition of Forced Labor and Child Labor)

We shall not engage in forced labor or employ any child under the legal working age as prescribed in national and/or local laws and regulations. We shall require our business partners to adhere to the same policy.

(Favorable Relationship between Employers and Employees)

We respect freedom of association and the right to collective bargaining as well as other civil and political rights.

We shall develop a favorable relationship between employers and employees through dialogue and shall create a workplace culture and environment that places a high value on communication and teamwork.

(Utilization of Human Resources and Efforts to Ensure Diversity in the Workplace)

We shall create an organization where a diverse workforce is able to work in a lively and vivacious manner.

We shall endeavor to ensure equal opportunities in recruitment, job assignment, promotion, employability and occupational development, and shall endeavor to develop and utilize human resources from a mid or long-term perspective.

We shall aim at creating an environment where each employee is aware of his/her role, enhances necessary capabilities and respects diverse ways of working. We shall also strive for a workplace where employees are able to fully utilize their capabilities and

cooperate with each other to increase productivity, thereby allowing them to pursue and realize diverse ways of life at home as well as in their communities.

(Working Hours)

We shall comply with applicable national and/or local laws concerning working hours. We shall adequately manage our employees' working hours, holidays, and leaves so that our employees can work more efficiently in the limited time available for work and value both the work and personal lives.

(Wages)

We shall comply with applicable national and/or local laws concerning wages. We are committed to, at minimum, legal minimum wage in countries and regions where we operate and prohibiting unfair wage deductions.

(Ensuring Safety)

We shall endeavor to prevent workplace hazards by prioritizing safety over anything else.

We shall be able to ensure a safe occupational environment by exercising safety management in accordance with applicable national and/or local laws, and through the voluntary and proactive efforts of each employee.

(Promoting Health)

We shall work for the maintenance and promotion of the mental and physical health of our employees.

We believe that a key to business growth is employees who work lively and vivaciously. As such, maintenance and promotion of each individual employee's physical and mental well-being are essential. We shall strive to achieve and maintain a healthy occupational environment, and enable all employees to take the lead in managing their own health and devote their time to working lively and vivaciously.

Human Rights of Customers and Community

(Product Safety and Quality)

We conduct thorough quality control to ensure product safety and continuously improve quality.

(Community Impact)

We understand that our business activities may impact the human rights of local communities, such as land rights, access to water, health of individuals in the community, and the rights of indigenous peoples. In addition to understanding local cultures and customs, we are committed to respecting human rights and acting as a

good corporate citizen to meet the expectations of the local communities.

Communication and Disclosure

(Business Partners)

We shall share our position on human rights with all business partners and are committed to working with suppliers and other relevant stakeholders to promote respect for human rights throughout our business activities.

(Reporting and Communication)

We shall monitor the status of policy implementation, including the status of human rights due diligence, and regularly disclose the progress of our efforts related to our human rights commitments.

<Appendix>

1. This policy shall apply to all members of the following companies:
 - (1) Mitsubishi Chemical Holdings Corporation
 - (2) Mitsubishi Chemical Holdings Corporation subsidiaries (the juridical person, the management of which is controlled, or, the majority of all votes in which are owned, directly or indirectly, by Mitsubishi Chemical Holdings Corporation)
 - (3) Companies where Mitsubishi Chemical Holdings Corporation is otherwise deemed to directly or indirectly take a leadership role on the grounds of its shareholding ratio, involvement in personnel management, etc.
2. Amendment and abolishment of this policy shall be carried out with the final approval of the Executive Officer who supervises Human Resources Office of Mitsubishi Chemical Holdings Corporation.

History

Effective April 1, 2015

Partially amended on July 1, 2021