

# The Nichirei Group Human Rights Policy

Under the Nichirei Group's corporate vision of "continuing to support good eating habits and health by leveraging our state-of-the-art manufacturing practices that optimize nature's bounty, along with our leading-edge logistics services," we create new customer value and contribute to finding solutions to challenges facing our society, in an effort to be an indispensable member of society.

Recognizing that our business processes may have direct or indirect effect on human rights, we have established the Nichirei Group Human Rights Policy (hereafter referred to as the "policy"), based on the United Nations Guiding Principles on Business and Human Rights. This policy guides us in our efforts to fulfill our responsibility to respect human rights of all stakeholders of our business.

## 1. Scope

The policy is applicable to all employees and officers of the Nichirei Group. We will also require business partners to support the policy and work towards ensuring respect for human rights.

## 2. Basic Principles

In addition to our efforts to promote respect for human rights based on the United Nations Guiding Principles on Business and Human Rights, the Nichirei Group supports and upholds the following international standards:

- The United Nations International Bill of Human Rights (the Universal Declaration of Human Rights and the International Covenants on Human Rights);
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work; and
- The United Nations General Assembly Resolution: The United Nations Declaration on the Rights of Indigenous Peoples.

## 3. Identification of, Response to, and Disclosure of Issues Related to Human Rights

The Nichirei Group will establish a system of human rights due diligence to identify, prevent, and mitigate adverse impact on human rights generated by our group in society.

- If any business activities of the Nichirei Group cause adverse impact on human rights or if it is discovered that the Nichirei Group is involved in causing adverse impact on human rights through our business transactions with stakeholders and the like, we will take steps to provide a remedy based on internationally recognized processes.
- The Nichirei Group will utilize the expertise and knowledge of independent, external human rights experts in implementing this policy, and engage in earnest dialogue and consultation

with stakeholders who may be affected by our business.

- The Nichirei Group will specifically assign officers with responsibility in implementing the policy and monitor implementation of this policy.
- The Nichirei Group will appropriately conduct education and training to ensure that this policy is being effectively implemented across all business activities of the Nichirei Group.
- The Nichirei Group will regularly disclose results of, and progress made in, our efforts to promote respect for human rights based on this policy.
- The Nichirei Group will comply with all laws and regulations of countries and regions in which we conduct our business activities. Where there is a conflict between national laws/regulations and internationally recognized human rights standards, the Nichirei Group will seek ways to respect international human rights to the maximum extent possible.

April 1, 2019

Representative Director and President

A handwritten signature in black ink, reading "Keiya Chushi". The signature is written in a cursive, flowing style.