

Nichirei Group Human Rights Policy

The Nichirei Group Human Rights Policy (hereinafter, the “Policy”), which is based on the Nichirei Group Sustainability Policy, is the foundation of all of the Nichirei Group’s business activities.

This Policy applies to all officers and employees of Nichirei Group companies. In order to fulfill our commitment to upholding human rights in our business activities, we also expect all of our business partners, including suppliers, to understand and support this Policy.

The Board of Directors of Nichirei Corporation, the holding company, is responsible for compliance with this commitment as well as for monitoring measures for ensuring that compliance. As such, the board will improve the organizational structure and promote efforts to respect human rights.

“All officers and employees of Nichirei Group companies” refers to directors, corporate auditors, executive officers, supervisors and others involved in the business execution of Nichirei Group companies, as well as people who carry out duties under employment contracts with Nichirei Group companies, staff on loan from other companies and temporary employees.

Respect for Human Rights

We understand that our business activities, from research and development and procurement to provision of products and services, may have potential or actual impacts on human rights.

We respect the internationally recognized human rights stipulated in the UN International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. In addition, we conduct our business activities in line with the UN Guiding

Principles on Business and Human Rights. The Nichirei Group has also signed the UN Global Compact and supports its Ten Principles.

We understand and adhere to the laws and regulations relating to our operations wherever we conduct our business activities. In the event that the laws and regulations of a particular country or region differ from or conflict with international human rights norms, we will seek ways to respect internationally recognized human rights to the greatest extent possible within the scope of the laws and regulations of that country or region.

Human Rights Due Diligence

In line with the UN Guiding Principles on Business and Human Rights, we carry out due diligence to identify, prevent and mitigate adverse impacts on the human rights of people connected with the Nichirei Group's business activities.

In addition to not violating human rights ourselves, we make efforts to avoid inadvertent involvement in human rights violations by stakeholders including suppliers and other business partners. If we are found to have caused a human rights violation or to have been somehow complicit in such a violation, we will take steps to rectify the situation.

If we become aware of a stakeholder whose human rights are, or may be, adversely impacted in the course of the Nichirei Group's business activities, we work with them on corrective measures so that we do not contribute to such adverse impact.

We share human rights issues relating to our business activities with our stakeholders, and work to address those issues at the appropriate time.

Human Rights Issues Relating to Our Business Activities

We recognize that addressing the following human rights issues relating to our business activities is an important part of our human rights responsibilities.

Discrimination: We respect the human rights and diversity of every individual. In addition, we always respect the dignity of individuals and do not discriminate based on nationality, race, ethnicity, religion, ideology, gender, age, disability, gender identity, sexual orientation, type of employment, or any other characteristics protected by law in the relevant country or region.

Harassment: We do not engage in speech, behavior or any form of harassment that could harm another person, regardless of whether the harm is mental or physical.

Forced labor and child labor: We do not use forced labor or child labor, and do not tolerate any form of modern slavery, including human trafficking.

Freedom of association and right to collective bargaining: We respect freedom of association and the right to collective bargaining in accordance with the applicable laws and regulations in the countries and regions where we do business. If freedom of association and the right to collective bargaining are restricted by laws and regulations of a country or region that do not meet international human rights standards, we seek ways to respect these rights by establishing alternative means of dialogue with employees.

Occupational health and safety: We create safe and healthy workplace environments by confirming laws and regulations relating to workplace health and safety and their enforcement.

Working hours and wages: We comply with all laws and regulations regarding working hours and wages that are applicable in the countries and

regions where we do business. We also strive to ensure wages that allow employees to have at least a minimum standard of living.

Impact in the supply chain: We strive to get a clear understanding of business partners and the entire supply chain. We share this Policy with suppliers, and confirm and evaluate their compliance with it. In addition, we cooperate with stakeholders other than suppliers to promote respect for human rights across the entire supply chain.

Impact on local communities: We recognize that the Nichirei Group's business activities could have an impact on human rights in local communities, including property rights, the right of access to water, the right to health, and the rights of indigenous people. We strive to contribute to the sustainability of society by fulfilling our responsibilities toward human rights in the communities where we do business.

Grievance Mechanisms

We set up and operate mechanisms and reporting channels that enable employees or representatives of employees of the Nichirei Group, its business partners and suppliers who feel that their human rights have been violated to make reports at any time in all countries and regions where the Nichirei Group does business. We will establish a system for anonymous reporting to identify impacts on human rights related to our business activities, and will continue efforts to rectify them.

We do not treat any stakeholder unfairly, including employees who report issues. We endeavor to securely manage personal information and maintain confidentiality regarding those reports. We believe that doing so increases the transparency of the Nichirei Group's business activities and enhances trust with stakeholders.

Education and Training

We make efforts to disseminate and ensure Group-wide compliance with this Policy. This includes translating it appropriately into the languages used in the countries and regions where we do business and by providing ongoing training and education to all officers and employees.

Monitoring and Reporting

We continuously monitor compliance with this Policy, and make improvements as necessary. We use the Nichirei Group's website, integrated report and other communication tools to disclose the progress of initiatives aimed at promoting understanding of this Policy and our efforts to promote respect for human rights.

This Policy was approved on XXXX XX, 2022 by the Board of Directors of Nichirei Corporation.

April 1, 2022

Kenya Okushi
Representative Director, President
Nichirei Corporation