

Nichirei Group Supplier Code of Conduct

To fulfill the Nichirei Management Principles and meet the expectations of stakeholders, the Nichirei Group requests its suppliers to comply with the following items based on the Nichirei Group Sustainable Procurement Policy. We ask our suppliers to help successfully implement this initiative by establishing and maintaining an administrative system backed by the commitment of their management. We also ask for their cooperation in verifying compliance with this code of conduct.

“Suppliers” refers to companies from which the Nichirei Group procures raw materials and products, companies to which we outsource manufacturing, and partner companies to which we outsource logistics services such as transportation and freight handling.

Legal Compliance and Ethical Behavior

Legal Compliance

- Suppliers shall comply with the laws and regulations of applicable countries and regions and respect international standards of conduct.

Prohibition of Bribery and Corrupt Practices

- Suppliers shall not engage in any form of corruption, including bribery, graft, extortion and embezzlement.

Anti-competitive Practices

- Suppliers shall comply with applicable laws and shall not engage in bid-rigging or other anti-competitive practices.

Exclusion of Antisocial Forces

- Suppliers shall not conduct any transactions with antisocial forces.

Human Rights and Labor

Freedom of Occupational Choice

- Suppliers shall respect the free will of employees, and shall not use forced labor, slave labor, human trafficking, bonded labor or involuntary prison labor.

Child Labor and Young Workers

- Suppliers shall not involve children who are under the minimum working age in labor. Employees under the age of 18 shall only be permitted to engage in non-hazardous work.

Discrimination

- Suppliers shall not discriminate based on characteristics including race, color, place of birth, age, gender, gender identity, sexual orientation, disability, pregnancy, ethnicity, religion, political views, union membership, home environment, and marital status.

Freedom of Association and Right to Collective Bargaining

- Suppliers shall respect the right of all employees to form or join a labor union and engage in collective bargaining.

Harassment and Punishment

- Suppliers shall not engage in inhumane treatment such as harassment and abuse.

Working Hours

- Working hours shall not exceed the maximum prescribed by law. Employees shall be given a minimum of one day off per week.

Wages

- Suppliers shall pay appropriate wages and allowances that meet statutory requirements including minimum wage, overtime wages, legal

benefits and employee benefits. Also, suppliers shall not make unreasonable wage reductions for disciplinary reasons.

Occupational Health and Safety

Employee Safety

- In workplaces and company-provided housing, suppliers shall identify potential chemical, biological or physical hazards that affect the safety of employees, and take safety measures.

Emergency Response

- Suppliers shall take emergency preparedness measures in workplaces and company-provided housing, and shall conduct periodic emergency drills.

Safety of Equipment, Facilities and Vehicles

- Suppliers shall conduct regular inspections and take safety measures for production machinery, vehicles, and other facilities and equipment.

Physically Demanding Tasks

- Suppliers shall take safety measures for physically demanding tasks, including those that require lifting of heavy objects or prolonged standing, and highly repetitive tasks.

Sanitation

- In workplaces and company-provided housing, suppliers shall provide ready access to clean toilet facilities and potable water, and sanitary eating facilities.

Health Management

- Suppliers shall practice proper health management with consideration for maintaining employees' health.

Communication

- Suppliers shall share, convey and provide education on the necessary health and safety information in employees' native language or in a language they can understand.

Environment

Climate Change

- Suppliers shall set targets for reduction of greenhouse gas emissions, and make efforts to reduce greenhouse gas emissions by promoting energy conservation and the use of renewable energy.

Water

- Suppliers shall make efforts to reduce the amount of water used in business processes, and prevent the release of polluted water into the environment.

Waste

- Suppliers shall make efficient use of raw materials, and reduce and properly treat waste.

Control of Emissions into the Atmosphere

- Suppliers shall make efforts to reduce emissions of ozone-depleting substances and atmospheric pollutants.

Control of Chemical Substances

- Suppliers shall conduct appropriate control of chemical substances, make efforts for reduction of use, replacement with low-toxicity substances, and prevention of leakage.

Consideration for Local Communities

- Suppliers shall show consideration for neighboring residents by reducing noise, vibration and odors caused by the supplier's business operations.

Biodiversity

- Suppliers shall make efforts to conserve biodiversity and the natural environment.

Animal Welfare

- Suppliers shall give consideration to animal welfare.

Raw Material Procurement

- Suppliers shall ensure the traceability of raw materials and conduct procurement with consideration for protection of natural resources, the environment and animal welfare.

Management

Establishment of Management System

- Suppliers shall establish an appropriate internal management framework and operate a management system for complying with this code of conduct.

Operating Permits

- Suppliers shall properly obtain and maintain the permits, authorizations and notifications, etc. that are necessary in their operations.

Quality Control

- Suppliers shall ensure the quality and safety of their products and services.

Information Management

- Suppliers shall properly manage and protect the inside information of other companies, including intellectual property, as well as the personal information of related parties.

Harmonious Coexistence with Local Communities

- Suppliers shall strive for harmonious coexistence with local communities as a member of society.

Business Continuity

- To meet their supply obligations, suppliers shall formulate business continuity plans to ensure preparedness for large-scale natural disasters and other adverse events.

Grievance Mechanisms

- Suppliers shall accept reports from stakeholders regarding acts that violate this code of conduct, and implement mechanisms for rectification.

Supplier Management

- Suppliers shall encourage upstream suppliers to comply with guidelines consistent with this code of conduct.