The Tokuyama Group considers respect for human rights to be a corporate responsibility forming the foundation of all its business activities. The Tokuyama Group Human Rights Policy (hereinafter, the "Policy"), established based on the Tokuyama Group Code of Conduct, outlines the standards that all officers and employees of the Tokuyama Group must meet in respecting human rights.

This Policy was created with the advice of relevant internal personnel and external experts, and it has been approved by the Board of Directors.

Tokuyama Group Human Rights Policy

Enacted Dec. 1, 2022

Revised Apr. 4, 2026

1. Basic Approach to Human Rights

The Tokuyama Group considers respect for human rights to be the basis for all its business activities. In order to fulfill its corporate responsibility to respect human rights, the Tokuyama Group supports and adheres to international human rights norms, such as the UN International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. Moreover, as a signatory of the UN Global Compact, we also support and follow the Ten Principles of the UN Global Compact.

The Tokuyama Group recognizes that its business activities could potentially have adverse impacts on the human rights of stakeholders, or contribute to such impacts, while its businesses, products and services could have direct adverse impacts on human rights in the broader society. Therefore, we strive to avoid any human rights infringement while addressing any adverse human rights impacts that the Group’s activities may contribute to.

2. Scope

This Policy applies to all officers and employees of the Tokuyama Group. Moreover, we expect all business partners and others who are directly involved in any Tokuyama Group business, product, or service to support and respect the Policy, and we encourage all to strive to protect human rights.

3. Respect for Human Rights

The Tokuyama Group is committed to avoid infringing upon the human rights of anyone affected by its business activities, and for this purpose, emphasizes the following six pledges.

1) Prohibition of discrimination

The Tokuyama Group promotes diversity and does not permit discrimination against anyone on

the basis of a personal attribute that is completely unrelated to the performance of duties. These attributes may include birth, nationality, race, ethnicity, gender, age, occupation, employment type, educational background, religion, creed, sexual orientation, gender identity, marital status, pregnancy, illness, disability, or economic background.

2) Prohibition of actions that can harm individual dignity

Under no circumstances will the Group engage in or condone activities that may violate the human rights or dignity of individuals, such as engaging in physical violence, using abusive language, making derogatory comments, slander, coercion, inhumane treatment, or harassment.

3) Prohibition of forced or child labor

The Tokuyama Group will never use forced or child labor for its business activities in any country or region.

4) Respect basic labor rights

The Group recognizes basic labor rights, including freedom of association and the right to collective bargaining, and strives to build and maintain cooperative labor-management relationships through dialogue. Moreover, we comply with all relevant laws and regulations, while implementing responsible labor practices, such as providing fair and appropriate wages and properly managing working hours.

5) Occupational safety and health

The Group seeks to build workplace environments that enable employees to work in safety and health. We comply with the occupational safety laws and regulations of the countries and regions in which we operate, and we strive to prevent work-related accidents and disasters.

6) Respect privacy

The Group will respect the privacy of individuals and will only collect personal information to the extent that is necessary and appropriate. All personal information collected will be handled appropriately in accordance with the relevant laws and regulations of each country concerned.

4. Efforts to address human rights issues

1) Education and awareness-raising

The Tokuyama Group will implement the appropriate education and awareness-raising activities to ensure that all officers and employees have a proper understanding and awareness of human rights.

2) Human rights due diligence

Based on this Policy, the Group works to identify any adverse impacts on the protection of human rights within the Tokuyama Group and at any business partner directly involved in a Tokuyama Group business, product, or service. We build and continue to implement mechanisms to prevent, minimize, and rectify any such impacts, and to evaluate the effectiveness of our efforts. We also explain and disclose information on how we are dealing with adverse impacts.

Moreover, if human rights are found to be adversely affected in the Group's supply chain, we will urge the business partners concerned to rectify the situation.

3) Dialogue and consultation with stakeholders

In implementing this policy, the Tokuyama Group will engage in dialogue and consultation with stakeholders, while also pursuing human rights expertise by seeking advice from relevant internal departments and external experts, among other means.

4) Remedy and complaint mechanisms

Whenever it becomes clear that one of the Group’s business activities has caused or contributed to an adverse human rights impact, the Group will work to remedy the situation with appropriate measures. Moreover, if it becomes clear that a Group business, product, or service is causing a direct adverse impact on human rights, we will take appropriate measures to prevent and mitigate the impact concerned.

We strive to identify and rectify human rights issues at an early stage through proper operation of our whistleblower system and effective maintenance of reporting mechanisms. In addition, we regularly review the whistleblower system to ensure remedies are effective.

5) Information disclosure

The Tokuyama Group regularly discloses its efforts to ensure respect for human rights, as well as the results of such activities, on its website and elsewhere.

6) Applicable laws

The Group complies with all relevant laws and regulations in the countries and regions in which it operates. Wherever internationally recognized human rights standards are not adequately upheld by local laws and regulations, we pursue ways to comply with international standards to the greatest extent possible.