

# KOITO Group Human Rights Policy

The KOITO Group has established the "KOITO Group Corporate Behavior Charter" of which basic management policy is to create customer needs and contribute to the progress and development of society, while also fostering mutually beneficial relationships with all stakeholders including our shareholders, customers, employees, and business partners, guided by the theme of "Light." Following the Charter, we not only comply with all domestic and overseas laws and regulations and international rules expected of companies as well as their underlying spirit, but also conduct our corporate activities in accordance with corporate ethics.

In addition, with the aim of achieving sustainable growth of society, we will strive to resolve social issues through our business activities and fulfill our social responsibilities.

The KOITO Group Human Rights Policy (hereinafter referred to as the "Policy") was formulated with the advice of external experts, following the preparation of a draft by a cross-functional internal organization, and approved by the Board of Directors.

This Policy serves as the top-level policy concerning human rights based on the KOITO Group Corporate Behavior Charter.

## **1. Commitment to respect human rights**

The KOITO Group will respect the human rights of all persons. With an understanding that our business activities may potentially or actually impact human rights, we will strive to exercise maximum care to avoid infringing the human rights of others and to address any negative impacts on human rights arising from our business activities.

The KOITO Group respects internationally recognized human rights(respect for freedom of association and the right to collective bargaining, prohibition of all forms of forced labor, effective abolition of child labor, elimination of discrimination and harassment in employment and occupation, the provision of safe and healthy working environments, and the payment of wages that meet or exceed minimum wage and living wage standards,etc.) that are stipulated in "International Bill of Human Rights" and "International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work," support the UN's "Guiding Principles on Business and Human Rights," and make efforts toward implementation.

Furthermore, the KOITO Group will comply with the laws and regulations of countries and regions where we conduct our business activities. In cases where there is a contradiction between the laws of the relevant countries or regions and internationally recognized human rights, we will pursue methods that comply with the law while maximizing respect for internationally recognized human rights.

## **2. Scope of application**

This Policy applies to all the officers and employees of the KOITO Group (Koito Manufacturing Co., Ltd. and its consolidated subsidiaries).

We also expect all our business partners to understand and support this Policy.

### **3. Priority issues**

The KOITO Group recognizes the following human rights issues as priority issues.

#### **Occupational Health and Safety**

The KOITO Group will ensure the safety of all workers and strive to create a workplace environment where employees can work in good physical and mental health.

#### **Working Hours**

The KOITO Group will appropriately manage working hours to prevent excessive or unreasonable working hours.

The KOITO Group will also give due consideration, to the greatest extent possible, to the working hours of workers employed by business partners.

#### **Harassment**

The KOITO Group does not tolerate any improper conduct or instruction, including harassment, that impairs the physical or mental well-being of workers and other related persons.

#### **Safety of End Users**

The KOITO Group will ensure the safety of its products and services and strive to provide products that end users can use safely and with peace of mind.

#### **Sourcing from Conflict-Affected Areas**

To avoid contributing to human rights abuses in conflict-affected areas, the KOITO Group will ensure supply chain transparency and promote responsible sourcing.

The KOITO Group may also request business partners to exercise similar considerations and cooperation as necessary.

### **4. Human rights due diligence**

The KOITO Group will establish a series of frameworks for identifying, assessing, preventing, and mitigating the negative impacts on human rights arising from our business activities and will continuously implement such frameworks (human rights due diligence).

### **5. Correction and redress**

If it becomes evident that the KOITO Group has caused or contributed to negative impacts on human rights, we will take corrective actions through appropriate procedures.

The KOITO Group has established whistleblowing and consultation channels accessible to both internal and external stakeholders to ensure that adequate redress is available for such adverse impacts on human rights.

When reports are made, the KOITO Group will ensure that whistleblowers are not subjected to disadvantageous treatment.

## **6. Education**

The KOITO Group will provide appropriate education toward the dissemination and implementation of this Policy among all officers and employees.

## **7. Information disclosure**

The KOITO Group will disclose the progress of our efforts regarding human rights through our official website and other communication channels in an appropriate and fair manner.

## **8. Dialogue and consultation with stakeholders**

The KOITO Group will engage in constructive dialogue and consultation with relevant stakeholders, taking into account the opinions of experts, to identify, assess, prevent, and mitigate the negative impacts on human rights arising from our business activities.

Established: May 29, 2024

Revised: June 26, 2026

KOITO MANUFACTURING CO., LTD.

President

A handwritten signature in black ink, appearing to be 'M. Kato', written over a horizontal line.