

Human Rights Policy

We at the Mitsubishi HC Capital Group recognize that conducting business with the utmost respect of human rights is a major challenge, and we will fulfill our responsibilities in this matter across all our business activities.

Through dialogue and collaboration with relevant stakeholders, we will exclude exploitative labor practices such as modern slavery, forced labor, human trafficking, and child labor, from the businesses and supply chains of the Mitsubishi HC Capital Group.

We will address human rights risks relevant to our businesses earnestly and appropriately to fulfil our obligations to respect human rights in a manner expected of global companies, aiming to realize a society that respects human rights.

We will realize a flexible working style and respect a diversity of values, and strive to create a comfortable working environment in which each and every individual can demonstrate their maximum potential.

1. Global Standards to be Respected and Upheld

We respect the human rights described in the Universal Declaration of Human Rights, the International Bill of Human Rights (International Covenant on Civil and Political Rights and the International Covenant on Economic Social and Cultural Rights), and the ILO Declaration on Fundamental Principles and Rights at Work which stipulates core labor standards.

Furthermore, based on the Guiding Principles on Business and Human Rights, as a corporate group that operates its businesses globally, we will uphold and respect internationally recognized standards relating to human rights, and concurrently comply with associated laws and regulations. Where there is a contradiction between internationally recognized standards, or the like, and the laws and regulations of a country or region in which we operate, we will seek methods to maintain respect for the international standards.

2. Role

This human rights policy complements the Mitsubishi HC Capital Group Code of Ethics and Code of Conduct. The policy clarifies our commitment to conduct business activities while fulfilling our responsibilities to respect human rights. As such, the policy has been approved by the Executive Committee and reported to the Board of Directors.

3. Scope of Application

This human rights policy will apply to all persons engaged in duties at any Mitsubishi HC Capital Group company. Additionally, we will actively require customers, partners, and suppliers to uphold and practice this human rights policy. Furthermore, if the measures we

take to ensure this are deemed insufficient or inappropriate, and they are confirmed to contribute to violating human rights, we will take the appropriate action to rectify these measures.

4. Human Rights Due Diligence

We will abide by the Guiding Principles on Business and Human Rights and create a human rights due diligence framework, and continue to make efforts to evaluate and identify human rights risks in our business activities and supply chains, and to prevent and mitigate such risks.

5. Relief Measures, etc.

In addition to not violating human rights ourselves in our business activities and services we provide, we will take action to ensure our stakeholders, including customers, partners, and suppliers do not violate human rights. Furthermore, if it is determined that we have caused a human rights violation, or have engaged in or contributed to such a violation, we will act to provide relief for and rectify the situation.

Specifically, based on the internal reporting system, we will make efforts to prevent improper actions on a global basis. Furthermore, we will make clear that we will not tolerate such practices as forced labor or child labor, and make efforts to create relief and rectification mechanisms in anticipation of risks of incidents present at our company and across the supply chain.

6. Communication, Dissemination, Education and Awareness-Raising

We will communicate, disseminate, and provide appropriate education, awareness-raising and talent development so that this human rights policy is incorporated in all business activities.

7. Dialogue with and Information Disclosure to Stakeholders

We will hold dialogue and discussions with relevant external stakeholders on measures for potential and real impacts on human rights. Furthermore, we will disclose our efforts that are based on this human rights policy on our corporate website, etc., and work to obtain the understanding of stakeholders.

8. Governance and Administration Framework

Determination of the necessity of revisions, etc. to this human rights policy will be subject to approval by the Executive Committee, then reported to the Board of Directors.

Established: March 31, 2023