

The Toyo Seikan Group Human Rights Policy

The Toyo Seikan Group's Management Philosophy, which was launched in 2016, states that the Group will aspire to achieve a sustainable society and contribute as a group to people's happiness. We understand that respect for human rights throughout our business operations is a prerequisite for all endeavors to accomplish the intention of the management philosophy.

We have now formulated the Toyo Seikan Group Human Rights Policy (the "Policy"), which serves as a guide for us to drive our commitment to respecting human rights and to fulfill our responsibility, in accordance with the United Nations Guiding Principles on Business and Human Rights.

At the same time, however, we admit that we cannot completely eliminate the risk of adverse impacts that business activities may have on human rights. With this fact in mind, we will seriously address this issue to ensure greater respect for human rights.

1. Scope of Application

The Policy applies to all directors, auditors, officers and employees working within the Group.

We also expect all business partners who are associated with the Group's products, systems and services to comply with the Policy.

2. Basic Perspective

We promote our commitment to respecting human rights based on the United Nations Guiding Principles on Business and Human Rights, with our support and high regard for the following international rules and agreements related to human rights:

- The United Nations International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights)
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The United Nations Declaration on the Rights of Indigenous Peoples

3. Responsibility to Respect Human Rights

We will not infringe on the human rights of those affected by our business activities, and if an adverse human rights impact occurs through our operations, we will take appropriate action to remedy the situation. This is the way we fulfill our responsibility to respect human rights and build a responsible supply chain.

4. Human Rights Due Diligence

We establish a human rights due diligence process to identify, prevent and mitigate actual or potential adverse impacts on human rights.

5. Communication and Consultation

While implementing the Policy, we have honest communication and consultation with our stakeholders, drawing on independent external expertise in human rights.

6. Education and Training

We provide appropriate education and training so that the Policy is embedded throughout our business operations and effectively implemented across the Group.

7. Remediation

If our own activities cause adverse human rights impacts, or if it becomes clear that we are involved with adverse human rights impacts through our business relationships, we will provide remedies to redress the harm through communication and appropriate procedures based on international standards.

8. Director in Charge of Policy Implementation

We officially designate a director in charge of the Policy implementation and oversee the progress of the implementation.

9. Disclosure

We disclose the information on the progress and results of our human rights-related activities on our website and through other media.

10. Applicable Laws

We comply with laws and regulations of countries and regions where we operate. If there is any conflict between internationally recognized human rights and laws and regulations of a country or region, we will seek ways to honor international human rights principles to the greatest extent possible.

The Policy was approved by the Board of Directors of Toyo Seikan Group Holdings, Ltd. on June 25, 2019.

A handwritten signature in black ink, appearing to read 'T. Nakamura', with a stylized, flowing script.

Takuji NAKAMURA
President and Representative Director
Toyo Seikan Group Holdings, Ltd.