

## Society

# Human Rights Initiatives

Materiality

② Strengthen the business foundation

### Policy (our fundamental view)

Based on our Corporate Philosophy of “Contributing to humanity and society as a corporate group that creates new value through the power of chemistry, from the biosphere to outer space,” we have clearly stated “respect for human rights” in our Basic CSR Policy and NOF Group Corporate Code of Ethics, and are promoting initiatives to respect human rights. As the NOF Group expands its business globally, we support and respect international norms such as the International Bill of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact, and the Government of Japan’s National Action Plan on Business and Human

Rights (2020-2025). To fulfill our responsibility to respect human rights throughout all corporate activities, including the prohibition of child labor, forced labor, and human trafficking, as well as the assurance of freedom of association and the right to collective bargaining, we established the NOF Group Human Rights Policy in fiscal 2021, which applies to all executives and employees of the Group. For this, we respect not only the international norms listed above, but also the culture, customs, history, and labor-related laws and regulations of the countries and regions in which we do business. This also includes addressing harassment based on race or nationality (racial harassment).

We also consider and implement initiatives to address human rights risks that could arise in our business activities. Specific examples of activities include conducting employee engagement surveys to check the status of human rights compliance within the company, taking corrective actions on

identified issues, and carrying out CSR questionnaires to suppliers across the supply chain to assess the status of respect for internationally recognized human rights.

Furthermore, in the current fiscal year, we worked on spreading awareness of the values in the revised Corporate Philosophy and Guiding Framework, revised in April 2023. In April 2025, we revised the former Code of Ethical Conduct to become the NOF Group Corporate Code of Ethics and communicated this to Group companies in Japan and overseas. We are also developing responses within the company to the revised Act for Eliminating Discrimination against Persons with Disabilities, which entered into force in April 2024. We will continue to work to reduce human rights risks by further deepening our human rights due diligence efforts through enhanced employee education, dialogue with stakeholders, and other means.

## Response to key risks for monitoring (harassment and human rights violations)

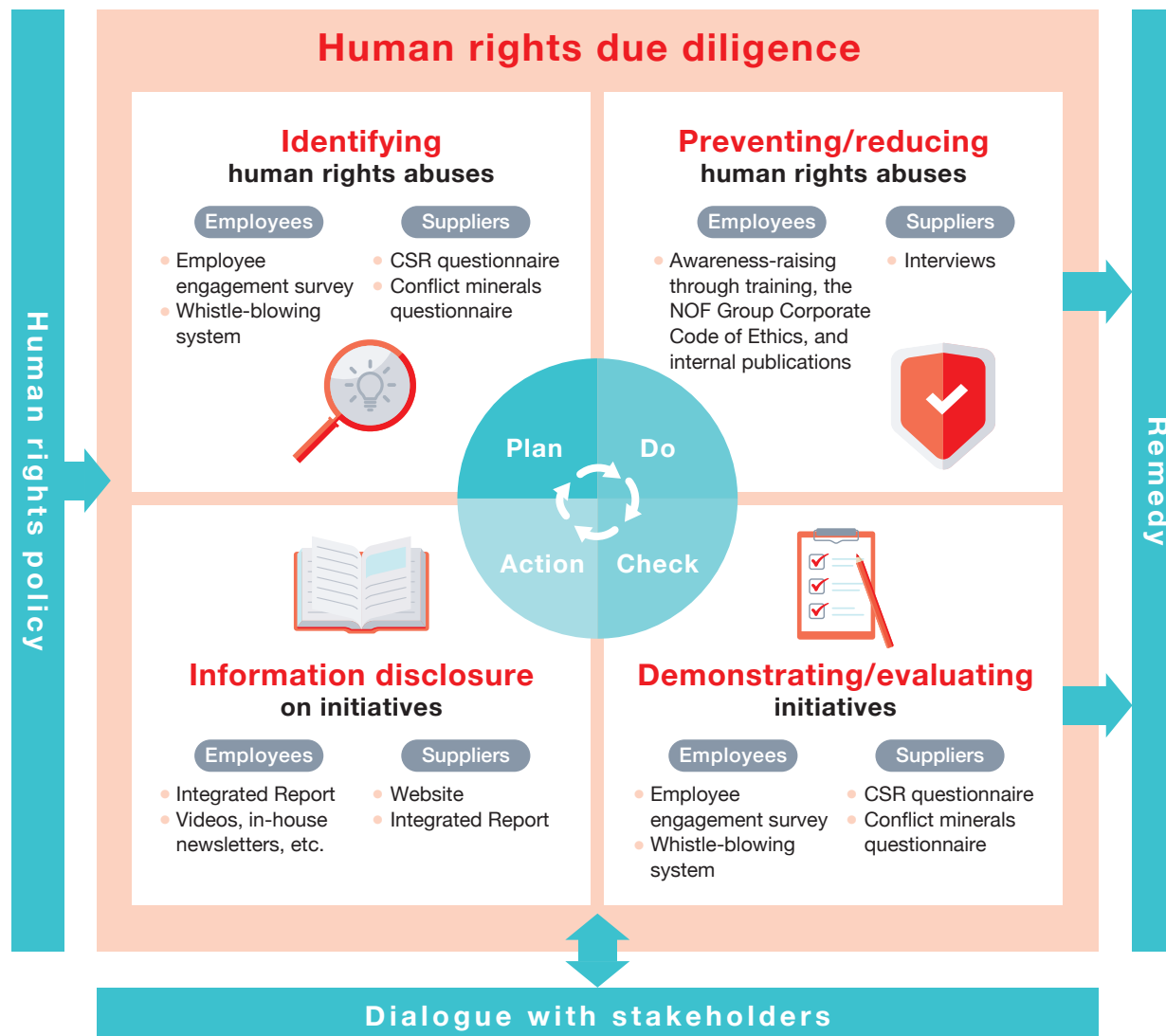
The NOF Group comprehensively identifies management risks surrounding its business and designates as key risks for monitoring those areas where resilience needs to be strengthened. In the fiscal 2024 risk assessment, harassment and human rights violations were selected as key risks for monitoring, and we are implementing measures focused on the following four themes:

- (1) Revision of the Code of Ethical Conduct
- (2) Development of harassment response procedures
- (3) Strengthening awareness of human rights and compliance
- (4) Implementation of employee engagement surveys (human rights due diligence for employees)

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## Human rights due diligence process

The NOF Group has established a human rights due diligence framework in line with the procedures outlined in the UN Guiding Principles on Business and Human Rights. We continuously work to prevent or mitigate adverse impacts on human rights by proactively identifying and investigating issues and taking corrective action through appropriate means.



### Human rights initiatives for NOF Group employees

#### Initiatives to safeguard occupational safety and health in the workplace

The whole NOF Group, including the staff of cooperating companies assigned to NOF's works, is making all-out efforts to eradicate occupational accidents. The NOF Group has clearly expressed its determination to make its workplaces secure and safe for all the workers involved in Group activities, and to realize this ideal, set forth its Occupational Safety and Health Policy in April 2006. The major initiatives are as follows. Please refer to page 121 for information on the occurrence of occupational accidents.

##### 1. Development of OSHMS (Occupational Safety and Health Management System)\*

The NOF Group, under its Occupational Safety and Health Policy, is undertaking buildup of the Occupational Safety and Health Management System (OSHMS). Referencing the guidelines of the International Labor Organization and the Ministry of Health, Labour and Welfare, we are building up our own system and promoting activities. The Risk Assessment program, which started in fiscal 2008 at every works of the NOF Group, is now adopted by domestic member-companies of the NOF Group as well.

##### 2. Implementation of various training and drills

The NOF Group conducts a variety of training programs, including safe forklift operation, handling of hazardous and chemical substances, prevention of slips, falls, and chemical burns in the workplace, and heatstroke prevention, as well as disaster preparedness drills and BCP drills.

#### Management of work hours

In order to improve operational efficiency and productivity while enriching employees' lives outside of work, the NOF Group is thoroughly enforcing proper labor management and promoting initiatives to reduce overtime work. These include restricting work after the designated end time and introducing a work interval system.

#### Establishment of internal whistle-blowing contact points

Consultation desks in Japanese, English, Chinese (Simplified Chinese), Korean, Indonesian, and Portuguese have been set up at external third-party institutions as contact points for whistle-blowing / consultation in all countries where the NOF Group's business bases are located. Employees can contact the desks if they become aware of a violation or potential violation of compliance rules.

In fiscal 2024, we received a total of 19 reports, mainly concerning harassment and workplace management. We carefully investigated the facts of each report promptly and without searching for the whistleblower, and took necessary corrective actions and measures to prevent recurrence. For example, in harassment-related reports, we issued guidance to the reported individuals or imposed disciplinary actions.

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#### Implementation of the employee engagement survey

Since fiscal year 2022, NOF has conducted an employee engagement survey for Company employees to investigate the occurrence of harassment within the Company, respect for privacy, treatment and evaluation of women and non-Japanese employees, occupational safety and health in the workplace, and awareness of whistle-blowing contact points and disadvantageous treatment. Responses were received from 1,869 employees in fiscal 2024. The percentage of employees who said they were aware of the whistle-blowing contact points rose from 90.4% in fiscal 2023 to 94.3% in fiscal 2024, indicating increased awareness of the contact points. On the other hand, there was not much change in the proportion of employees, around 20% of respondents, who answered that the awareness that discrimination and harassment are unacceptable has not yet been firmly established in the workplace.

To address these issues, between February and March 2025, we conducted on-site, in-person training sessions at all locations under the theme of "Strengthening Workplace Response Capabilities to Harassment." This training, aimed at managers as the key figures in responding, covered initial response to harassment cases, mindset expected of managers, and preventing secondary harm to victims, in order to raise awareness of proactive involvement toward improvement.

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\* A management system that defines the organization, responsibilities, procedures, processes, and management resources necessary for businesses to continuously reduce potential safety and health risks.

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### Human Rights Initiatives for Stakeholders Involved Through Business Transactions

#### Formulation of the CSR Procurement Policy and CSR Procurement Guidelines, and incorporating CSR-related clauses in basic purchasing contracts


The NOF Group established the CSR Procurement Policy for stable, sustainable procurement. In addition, we created the CSR Procurement Guidelines that compile measures the NOF Group implements and requests its suppliers to implement.

Furthermore, when signing a new basic purchasing contract with a business partner, we decided to add a clause stating efforts to comply with the NOF Group's CSR Procurement Policy and CSR Procurement Guidelines. We will also gradually revise our basic purchasing contracts that have already been concluded.

#### Implementation of the CSR questionnaire

In the procurement unit, we provide our main suppliers with necessary explanations on the NOF Group's CSR Procurement Policy and conduct questionnaires on the status of CSR activities at our main suppliers, using the CSR/Sustainable Procurement Self-assessment Questionnaire

created by the Global Compact Network Japan (GCNJ) to improve the objectivity of the questionnaire.

Most recently, we surveyed our major suppliers from fiscal 2023 to 2024 and achieved a coverage rate of 92% based on purchase amount. For suppliers whose efforts were deemed insufficient, we conducted interviews in fiscal 2024 to confirm whether any human rights risks were present. As of now, no suppliers have been identified as having human rights risks.  Sustainability Report ▶ P.181

#### Procurement of sustainable palm oil

The existence of human rights and labor problems has long been noted in the oil palm plantations where palm oil is produced. The NOF Group joined the Round-table on Sustainable Palm Oil (RSPO) in 2012 and obtained supply chain certification from the organization in 2014. NOF, a founding member of the Japan Sustainable Palm Oil Network (JaSPON) which was launched in Japan in 2019, conducts activities to procure sustainable palm oil.

#### Response to responsible mineral procurement

With regard to conflict minerals (3TG\*) that may have an impact on human rights and other issues, we use the Responsible Minerals Initiative (RMI)-prescribed Conflict Minerals Reporting Template (CMRT) and conduct questionnaire surveys of all


key business partners. Furthermore, starting from fiscal 2023, we have initiated a survey using the Extended Mineral Reporting Template (EMRT), a unified format for target minerals cobalt and natural mica, with our key business partners.

#### Establishment of external whistle-blowing contact points

The NOF Group recognizes compliance as a foundation that supports the company and believes it is crucial to prevent or promptly correct incidents that violate laws, regulations, and the Corporate Code of Ethics, or involve human rights abuses, to avoid them becoming severe or prolonged. To this end, we have established a contact point for whistle-blowing from outside the Company, including our business partners.

#### Respect for customers' human rights

The aforementioned contact point for whistle-blowing from outside the Company accepts reports not only from suppliers but also from NOF customers. To date, we have not received any reports on human rights (violations) through the contact point.

>  Click here for details on the contact point for whistle-blowing from outside the Company  
<https://www.nof.co.jp/csr/english/governance/hotline>

\* Refers to the four minerals of tin, tantalum, tungsten, and gold extracted in the Democratic Republic of Congo and neighboring countries