

Human Rights Initiatives

Category 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 ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work, OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the UN International Bill of Human Rights, 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. 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 exercise 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 NOF 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, 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 Corporate Code of Ethics to become the NOF Group Corporate Code of Ethics and communicated this to Group companies in Japan and overseas by distributing a booklet. We are also asking employees for a deeper understanding by deploying an educational video across the entire Group in April 2026.

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.

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Response to key risks for monitoring (harassment / 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 FY2024 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 Corporate Code of Ethics, (2) Development of harassment response procedures, (3) Strengthening awareness of human rights and compliance, and (4) Implementation of employee engagement surveys (human rights due diligence for employees).

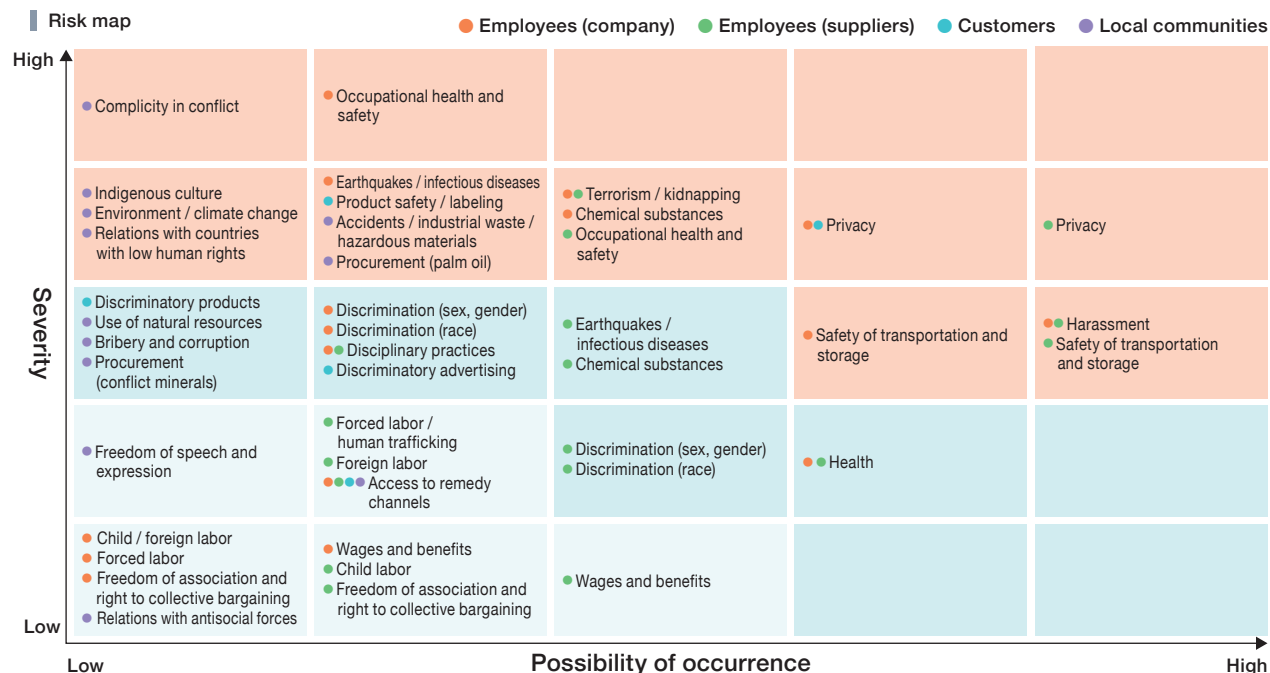
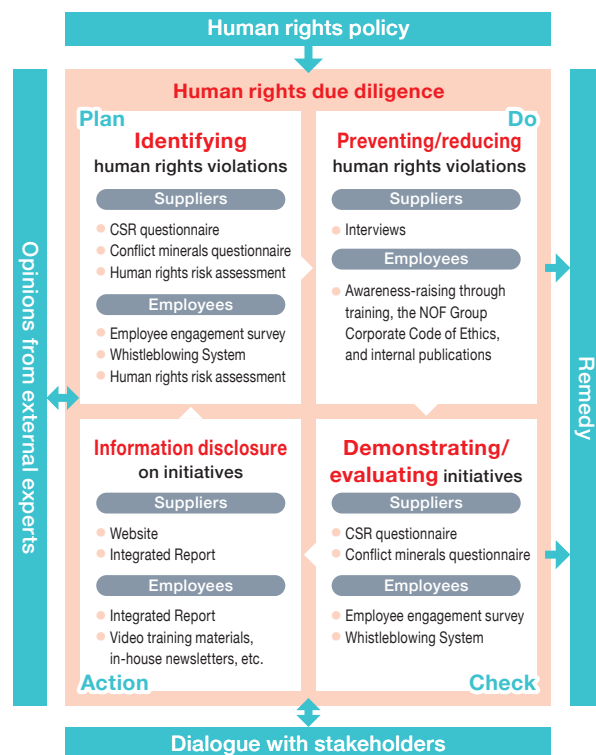
In FY2025, we conducted human rights due diligence for the first time as a Group. As a result of continuous review and evaluation by a team including external experts targeting the entire Group, including the upstream and downstream of the supply chain, no serious human rights violations were identified. This survey was discussed by the Sustainability Committee, in which all Directors participate, and approved by the Board of Directors.

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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 based on the opinions of external experts, and taking corrective action through appropriate means.

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Creation of a human rights risk map

We mapped each human rights issue for our company and the supply chain, with severity on the vertical axis and likelihood of occurrence on the horizontal axis. For identified high-risk human rights issues, we will first monitor the risks. If the results of monitoring indicate a need for risk reduction, we will consider and implement specific countermeasures.

Key human rights risks for monitoring

Based on the results of the human rights risk assessment and the business activities of the NOF

Group,

we have defined the following as key risks for ongoing monitoring: (1) Health and safety, (2) Harassment, (3) Privacy infringement, (4) Safety of transportation and storage, (5) Product safety, (6) Appropriate labeling and explanation, and (7) Human rights risks in responsible procurement.

Going forward, we will monitor cases that fall under these risks and, for matters requiring countermeasures, formulate and execute measures in a prompt manner to address them.

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