



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.





NOF Group Human Rights Policy

 Organizational setup diagram ▶ P.178

Basic approach to human rights

As a corporate group that creates new value in wide-ranging fields from the biosphere to outer space, the NOF Group has clearly codified respect for human rights in its Basic CSR Policy and Corporate Code of Ethics and promotes its initiatives for respecting human rights under its corporate philosophy of contributing to mankind and society. In the course of developing its business on a global basis, the NOF Group shall support and respect international standards on human rights, including the International Bill of Human Rights, the Ten Principles of the United Nations (UN) Global Compact, the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and fulfill its responsibility for respecting human rights across all of its corporate activities.

1. Principles and Purpose

With the profound awareness that human rights are essential to the pursuit of happiness and affluent life for all people, and guided by international standards on human rights and our corporate philosophy and guiding framework, the NOF Group will fulfill its responsibility for respecting human rights through its initiatives for respecting human rights, going beyond compliance with the laws and regulations of countries and regions where it operates. In the event that there are inconsistencies between internationally recognized human rights and national and regional laws and ordinances, the NOF Group will do its best to pursue methods to respect internationally recognized principles on human rights.

2. Scope of Policy

This policy shall apply to all officers and employees of the NOF Group. The NOF Group will also continue to encourage its business partners and suppliers with the expectation that they will support this policy and participate in similar initiatives, and work together to promote initiatives for respecting human rights.

3. Responsibility for Respecting Human Rights

The NOF Group will fulfill its responsibility for respecting human rights by ensuring that it does not violate the human rights of people who are affected by the Group's own business activities and also by taking appropriate actions to remedy issues in the event of adverse impacts on human rights being inflicted by the Group's own business activities. In the event where adverse impacts on human rights are being inflicted by business partners or suppliers, or in the process of supplying products, the NOF Group will require that they take appropriate actions. Specifically, this includes the following:

- Abolishing discrimination and prohibiting harassment
- Respecting privacy
- Appropriate working hours
- Fair and impartial compensation
- Freedom of association and right to collective bargaining
- Prohibition of human trafficking, forced labor, and child labor
- Occupational safety and health
- Impact on local communities and residents

4. Human Rights Due Diligence

The NOF Group will build mechanisms for human rights due diligence, investigate and identify issues in a preventive manner and remedy them through appropriate means, and strive continuously to prevent or mitigate adverse impacts on human rights. Specifically, this includes the following:

- Continuous monitoring to ensure no adverse impacts occur
- Identifying adverse impacts in the supply chain
- Initiatives to prevent and mitigate adverse impacts and risks
- Demonstrating the effectiveness of internal and external whistle-blowing systems
- Facilitating dialogue with stakeholders

5. Remedy

In the event where it is revealed that the NOF Group has caused or furthered adverse impacts on human rights, it will remedy the situation through appropriate procedures. The NOF Group has established whistle-blowing contact points (compliance hotline) to quickly detect conduct that violates or is suspected of violating human rights or corporate ethics. This system ensures the protection of the whistle-blower, which includes prohibiting searching for, unfavorably treating, and

retaliating against the whistle-blower. It can also be used by external parties such as business partners and suppliers.

6. Dialogue and Consultation

The NOF Group will conduct dialogue and consultation with relevant stakeholders in the event where adverse impacts on human rights are being inflicted or if there is a risk of such impacts.

7. Education

The NOF Group will continue to provide appropriate education to ensure that correct understanding of this policy is instilled both within and outside the Group and that the policy is put into practice effectively.

8. Promotion System

The Chairman of Compliance Committee will be appointed as the person responsible for this policy to promote initiatives on respecting human rights in line with the policy. Measures necessary for promoting initiatives and other matters are discussed by the Compliance Committee and reported to the Board of Directors, the details of which are disseminated internally.

9. Information Disclosure

The NOF Group will disclose the status of its initiatives on respecting human rights on its website and by other means.

Note: This policy was formulated with the advice of external experts who have knowledge and practical experience in human rights and was approved by the Board of Directors.

Established on November 1, 2021

Revised on July 30, 2025

President & Chief Executive Officer NOF Corporation
Koji Sawamura







Risks and opportunities for human rights

Major risk	Risk description	Opportunities	Major activities
Harassment	<ul style="list-style-type: none">● Loss of trust from society and damage to corporate value due to lawsuits filed regarding harassment	<ul style="list-style-type: none">● Elimination of harassment by instilling the corporate philosophy, values, and NOF Group Corporate Code of Ethics● Increase employee engagement and social recognition of corporate value	<p>[Shared activities]</p> <ul style="list-style-type: none">● Revision of the Code of Ethical Conduct FY2024 results: Amended the NOF Group Corporate Code of Ethics, prepared translations in various languages FY2025 plan: Activities to disseminate Code to Group companies in Japan and overseas● Development of compliance education with video materials FY2024 results: Selected platform, provided environment for viewing on company intranet FY2025 plan: Measures to recommend opportunities for viewing● Rolling out of an education program for Corporate Philosophy, values, and compliance FY2024 results: Incorporated program into education by rank and implemented, broadcast video message from the President FY2025 plan: Continue implementing as part of education by rank● Continuous awareness-raising activities utilizing in-house newsletters FY2024 results: Published articles in response to actual internal conditions and social conditions FY2025 plan: Select themes in line with actual internal conditions and social conditions and the results of employee engagement surveys <p>[Harassment]</p> <ul style="list-style-type: none">● Creation of a guide for responding to reports FY2024 results: Held briefing sessions for managers using the guide FY2025 plan: Roll out to Group companies, update content based on participant surveys
Human rights abuses	<ul style="list-style-type: none">● Reputation damage and economic losses such as suspension of transactions due to the occurrence of human rights issues in the supply chain, both internally and externally	<ul style="list-style-type: none">● Strengthening of cooperation with business partners and enhancement of trust from society● Enhancement of employee engagement	<p>[Human rights]</p> <ul style="list-style-type: none">● Implementation of human rights education FY2024 results: Implemented as part of education by rank FY2025 plan: Implement human rights education for management● Continued implementation of employee engagement surveys FY2024 results: Classified and aggregated open-ended responses published in in-house newsletter FY2025 plan: Identify evaluations of improvement measures based on open-ended responses



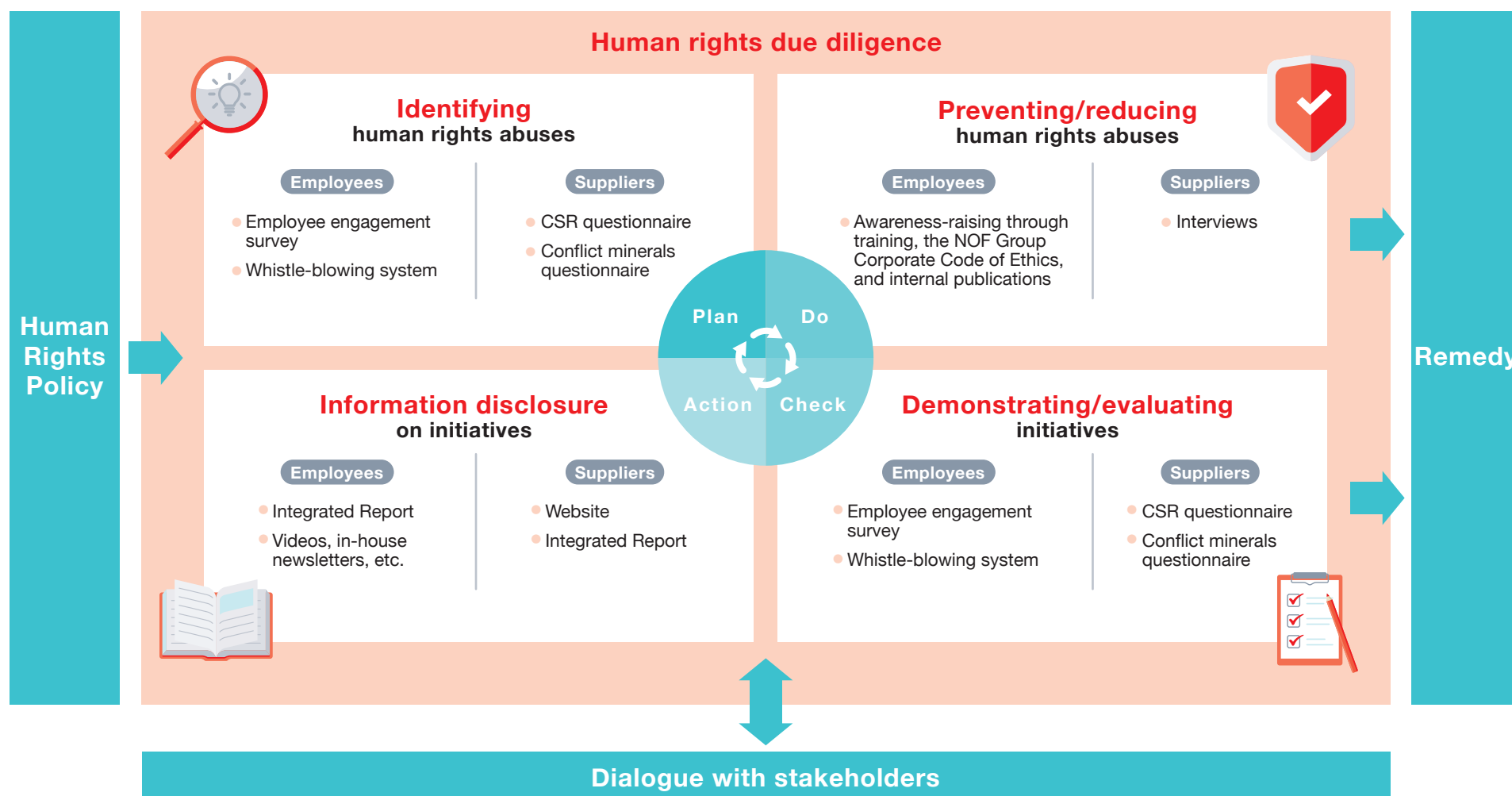
Response to key risks for monitoring (harassment and human rights violations)

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: The results of activities and plans for each measure are as follows.

Results of activities in FY2024		FY2025 activities plan
<div>1</div> <div></div> <div>Revision of the Code of Ethical Conduct</div>	Updated content was finalized as the NOF Group Corporate Code of Ethics based on the three values of the NOF Group. Prepared a special edition of the in-house newsletter for domestic Group companies. In addition, created and distributed translated versions in various languages for overseas Group companies	Prepare viewing environment for the prepared NOF Group Corporate Code of Ethics and distribute to individuals to spread awareness. Request that awareness of the Code is spread at each site and promote rollout through its use at training courses such as education by rank
<div>2</div> <div></div> <div>Development of harassment response procedures</div>	Conducted face-to-face training for managers, who play a key role in responding to harassment cases, on initial responses, the mindset of managers, and the perspective of preventing secondary victimization of victims, and asked them to actively participate in making improvements	Work to establish a system that promotes autonomous responses, such as holding workshops at specific plant sites. In addition, continue updating the content of guidebooks and improving training methods based on participant questionnaires
<div>3</div> <div></div> <div>Strengthening awareness of human rights and compliance</div> <div>Introduction of compliance education videos</div> <div>Implementation of education on values, human rights, and compliance</div>	<div>Selected a video viewing platform and prepared the viewing environment on the company intranet. Confirmed ongoing viewing status with themes decided for each department</div> <div>Created and implemented a compliance education program focused on harassment as part of education by rank organized by the Human Resources & General Affairs Department. In addition, provided education to relevant parties regarding specific laws such as the Subcontract Act.</div>	<div>As measures to encourage continuous and proactive utilization, hold awareness months and weeks, and announce recommendations to view videos in line with the actual situation within the Company</div> <div>Through revisions to the NOF Group Corporate Code of Ethics, promote awareness of human rights and compliance, including harassment prevention. In addition, plan to provide human rights education for management</div>
<div>4</div> <div></div> <div>Implementation of employee engagement surveys (human rights due diligence for employees)</div>	By classifying and compiling open-ended responses from employee engagement surveys and publishing the results in the company newsletter, communicated that the responses were delivered to the Company and that they are the basis for various measures	Continue conducting employee engagement surveys to understand how employees perceive the Company's initiatives and progress in resolving various issues, and use this as a reference for planning future measures



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.





Overview of human rights initiatives

Raw materials procurement	Business activities of the NOF Group	Use of products by customers
Stakeholder Engagement ▶ P.112		
Formulation of the CSR Procurement Policy and CSR Procurement Guidelines ▶ P.181	Initiatives to safeguard occupational safety and health in the workplace <ul style="list-style-type: none">● Development of OSHMS (Occupational Safety and Health Management System)● Implementation of various training and drills ▶ P.179	Respect for customers' human rights <ul style="list-style-type: none">● Establishment of external whistle-blowing contact points ▶ P.182
Incorporation of CSR-related clauses in basic purchasing contracts ▶ P.181	Management of work hours <ul style="list-style-type: none">● Thorough enforcing of proper labor management● Restricting work after the designated end time● Introduction of a work interval system ▶ P.179	
Implementation of the CSR questionnaire ▶ P.181	Establishment of internal whistle-blowing contact points <ul style="list-style-type: none">● Consultation desks in Japanese, English, Chinese (Simplified Chinese), Korean, Indonesian, and Portuguese set up at external third-party institutions ▶ P.179	
Procurement of sustainable palm oil <ul style="list-style-type: none">● Joined Round-table on Sustainable Palm Oil● Participated in Japan Sustainable Palm Oil Network (JaSPON) as a founding member ▶ P.181	Implementation of the employee engagement survey <ul style="list-style-type: none">● Implementation of engagement survey for Company employees● Raising awareness of harassment prevention ▶ P.180	
Response to responsible mineral procurement <ul style="list-style-type: none">● Conducted a questionnaire using a standardized format for target minerals ▶ P.182		
Establishment of external whistle-blowing contact points ▶ P.182		



Initiatives to safeguard occupational safety and health in the workplace

The whole NOF Group, including the staff of cooperating companies assigned to NOF's businesses, 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 208 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, has now been adopted by domestic Group companies as well.

2. Implementation of various training and drills

The NOF Group conducts a variety of training

programs, including 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 and BCP drills.

Management of work hours

In order to reduce employee working times and enrich employees' lives outside of work through improved operational efficiency and productivity, the NOF Group is thoroughly enforcing proper labor management and promoting initiatives to reduce working times. These include restricting work after the designated end time and introducing a work interval system.

Establishment of internal whistle-blowing contact points

The NOF Group has set up consultation desks in Japanese, English, Chinese (Simplified Chinese), Korean, Indonesian, and Portuguese at external third-party institutions as contact points for whistle-blowing and consultation in overseas 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.

* Acronym for Occupational Safety and Health Management System. A management system that defines the organization, responsibilities, procedures, processes, and management resources required for an operator to continuously mitigate potential occupational safety and health risks.



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.

Some of the results of the survey are as follows. 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.

Results of survey on awareness of whistle-blowing contact points

Options	Did you know that there are contact points for reporting and consulting about illegal or improper behavior in the workplace?	
	FY2023	FY2024
I know about the contact points, including how to reach them	50.1%	65.2%
I know about the contact points, but don't know how to reach them	40.3%	29.1%
I don't know about the contact points	9.6%	5.7%

Results of survey on establishment of awareness of preventing harassment

Options	Has awareness that discrimination and harassment are unacceptable been firmly established in the workplace?	
	FY2023	FY2024
Awareness has been fully established	33.3%	35.3%
Awareness has been somewhat established	45.6%	45.0%
Awareness has not really been established	17.0%	15.8%
Awareness has not been established almost at all	4.1%	3.9%



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.

The average scores of questions related to human rights are shown in the table below. Suppliers with scores below 50 points are considered to have potential human rights risks. Interviews were conducted in fiscal 2024 to confirm whether there were any human rights risks at suppliers, but no

Survey score

	90 points or above	70 to 89 points	50 to 69 points	Below 50 points
Human rights score distribution	56%	16%	18%	10%

CSR questionnaire results

Category	Question	Average score (out of 5 points)
I. Corporate governance concerning CSR	Establishment of an internal whistle-blowing system	4.39
II. Human Rights	1. Respect for human rights and prohibition of discrimination	4.25
	2. Avoidance of complicity (unintentional facilitation) in human rights abuse	4.10
	3. Respect for indigenous peoples' livelihoods and communities	3.75
III. Labor	1. Prohibition of discrimination in employment	4.50
	2. Provision of equal opportunities for employees regarding human resources development, career advancement, etc.	4.52
	3. Prohibition of inhumane treatment	4.64
	4. Payment of proper wages	4.78
	5. Fair application of working hours, leave/paid holidays, etc.	4.86
	6. Prohibition of forced labor	4.70
	7. Prohibition of child labor	4.68
	8. Respect for the religious traditions and customs of the countries and regions in which business operations are conducted	4.17
	9. Recognition and respect for freedom of association and the right to collective bargaining	4.39
	10. Proper management of employee occupational safety and health	4.82

suppliers have been found to have human rights risks as of now.

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.



Human Rights

Human Rights Initiatives for Stakeholders Involved Through Business Transactions

GRI 2-24/403-8/414-2

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 Minerals 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 NOF Group Corporate Code of Ethics, or involve human rights abuses, to avoid them becoming severe or prolonged. To this end, we have established contact points for whistle-blowing 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/governance/hotline)

<https://www.nof.co.jp/csr/governance/hotline>

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