

## Kyoei Steel Group Human Rights Policy

Fully recognizing that the human rights of every individual stakeholder involved in our business activities must be respected, we in the Kyoei Steel Group are committed to promoting respect for human rights across the entire Group. As guidelines to fulfill our commitments, we have established this Human Rights Policy (hereinafter, the “Policy”) based on the International Bill of Human Rights (the “Universal Declaration of Human Rights” and the “International Covenants on Human Rights”), the International Labour Organization (ILO)’s “Declaration on Fundamental Principles and Rights at Work,” and the “United Nations Guiding Principles on Business and Human Rights.”

### 1. Scope of Application

This Policy applies to all officers and employees (all members, including directors and regular and contracted employees) of the Kyoei Steel Group. In addition, we also expect all of our business partners and suppliers to understand and support this Policy and adopt a similar policy, and we will work with them to promote respect for human rights.

### 2. Responsibility to Respect Human Rights

We work to fulfill our responsibility to respect human rights by not infringing on the human rights of every individual stakeholder involved in our business activities and appropriately addressing adverse impacts on human rights, should they occur in our business activities. If we identify that a business partner or supplier is involved in any adverse impact on human rights, we will actively engage with that business partner or supplier to appropriately take corrective measures. The Kyoei Steel Group has established a section responsible for the implementation of this Policy (Risk & Compliance Coordination Section, Human Resources & General Affairs Dept.) to promote activities to instill this Policy throughout the Group.

### 3. Compliance with Applicable Laws and Regulations

We comply with human rights-related laws and regulations not only in Japan but also in all the countries and regions where we conduct business activities, fully respect international human rights standards, and actively promote respect for human rights.

### 4. Education

We provide education and training appropriately to our officers and employees to ensure that they understand and practice this Policy.

## 5. Human Rights Due Diligence

In order to fulfill our responsibilities to respect human rights, we establish measures for human rights due diligence and continuously implement them, pursuant to the procedures set forth in the “UN Guiding Principles on Business and Human Rights.” (Human rights due diligence refers to a continuous process for companies to identify, prevent and mitigate actual and potential adverse human rights impacts on society by preventively investigating and finding out the actual situation, appropriately taking corrective measures, and externally disclosing their progress and results.)

## 6. Dialogue and Consultation

As part of efforts to promote respect for human rights under this Policy, we endeavor to conduct meaningful dialogues and consultations in good faith with our stakeholders by utilizing the expertise of independent external professionals regarding human rights.

This Policy was signed by the President & Representative Director after approval of the Board of Directors of Kyoei Steel, Ltd.

April 1, 2022

Kyoei Steel, Ltd.