## **COMSYS Group Human Rights Policy**

#### Introduction

The COMSYS Group (hereinafter referred to as "we") positions compliance with laws and the establishment of corporate ethics as critical management issues and has established the "COMSYS Group Code of Conduct" to gain society's trust and maintain sound corporate management.

We have been engaging in activities to protect human rights based on the "COMSYS Group Code of Conduct," but recognizing its importance anew and to more surely fulfill our social responsibility, we have now formulated the "COMSYS Group Human Rights Policy" (hereinafter referred to as "this Policy") in accordance with international human rights standards.

In line with our management philosophy, we will promote initiatives that respect human rights, in accordance with this Policy, to further contribute to all stakeholders, including "customers," "society," "shareholders," and "group employees."

## 1. Support for International Standards

We support international human rights norms such as the "ILO International Labor Standards," the "International Bill of Human Rights," and the "Guiding Principles on Business and Human Rights," as well as the "Children's Rights and Business Principles," and base our corporate activities on respecting the human rights of all stakeholders.

We comply with the laws and regulations applicable in each country and region where we conduct business activities. In cases where there is a conflict between internationally recognized human rights and the laws and regulations of each country or region, our group will pursue ways to respect internationally recognized human rights.

## 2. Scope of Application

This Policy applies to all officers and employees working in the COMSYS Group.

# 3. Prohibition of Discrimination and Harassment

We do not tolerate any discrimination based on race, nationality, religion, gender, age, disability, or sexual orientation. We prohibit all forms of harassment, including sexual harassment and power harassment, and strive to maintain a workplace environment that protects the dignity of employees.

## 4. Payment of Fair Wages

We comply with the laws and regulations concerning wages in each country and region. Furthermore, we strive to pay wages (living wages) that exceed the statutory minimum wage, allowing all employees and their families to maintain a healthy and culturally acceptable standard of living. Additionally, based on the principle of equal pay for equal work, we maintain a fair remuneration system according to job content and strive to establish transparent working conditions for all employees.

# 5. Ensuring a Safe and Healthy Work Environment

We strive to provide an environment where employees can work healthily and safely. We comply with labor standards laws and other regulations, and work to prevent excessive labor and reduce overtime by ensuring appropriate personnel placement and managing working hours.

#### 6. Elimination of Forced Labor and Child Labor

We do not tolerate any form of forced labor or child labor.

## 7. Respect for Freedom of Association and Collective Bargaining Rights

We respect the freedom of association and the right to collective bargaining of workers.

## 8. Human Rights Due Diligence

We will establish a regular risk assessment mechanism to identify, prevent, mitigate, and remedy potential negative human rights impacts directly or indirectly caused by our group's value chain. If we recognize that negative impacts have occurred, we will promptly take appropriate corrective and remedial measures.

We will also continuously evaluate our responses to reduce negative human rights impacts and strive for continuous improvement.

#### 9. Corrective and Remedial Measures

If it becomes apparent that our business activities have caused or contributed to negative human rights impacts, we will take appropriate measures to correct and remedy them. Furthermore, to ensure effectiveness, we will establish reporting channels that stakeholders inside and outside the company can use anonymously. We prohibit any disadvantageous treatment of whistleblowers and ensure the confidentiality of reported content and the protection of whistleblowers' personal information.

# 10. Education and Training

To ensure that this Policy is effectively implemented in all business activities, we will provide appropriate education and training to officers and employees.

## 11. Information Disclosure

We will regularly report on our human rights initiatives based on this Policy through our group website and integrated reports. We will also engage in dialogue and consultation with relevant stakeholders to continuously improve our human rights initiatives.

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Hiroshi Tanabe

President and Representative Director