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March 17, 2025

To whom it may concern:

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Representative: Kazuaki Hakomori,  
Representative Director and President  
Stock code: 5408 (Tokyo Stock Exchange Prime Market)  
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**Notice Regarding Establishment of the NAKAYAMA STEEL WORKS Group  
Human Rights Policy**

NAKAYAMA STEEL WORKS, LTD. hereby notifies that at a meeting of its Board of Directors, held on February 28, 2025, it resolved to establish the NAKAYAMA STEEL WORKS Group Human Rights Policy. Details are as attached.

【Attachment】

## NAKAYAMA STEEL WORKS Group Human Rights Policy

1. Our commitment to respect human rights

The NAKAYAMA STEEL WORKS Group (hereinafter, “the Group”) is committed to its management philosophy, namely, “The NAKAYAMA STEEL WORKS Group creates additional value for the economic society through fair competition and continues to be of service to society.” In order to truly realize its management philosophy, the Group believes it is essential to respect the human rights of all people involved in its business activities.

To fully respect human rights, the Group supports and respects the International Bill of Human Rights, the internationally recognized human rights set forth in the ILO Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), and the United Nations Guiding Principles on Business and Human Rights.

2. Scope of application

This policy applies to all Group officers and employees (including regular employees, contract employees, temporary employees, part-time employees and dispatched employees; the same applies hereafter). In addition, the Group expects its business partners, chiefly its suppliers, and other relevant parties to understand and support this policy.

3. Compliance with applicable laws and regulations

The Group complies with the laws and regulations of each country or region in which it operates. In the event that the internationally recognized human rights are not adequately protected, the Group will to the fullest extent possible respect such internationally recognized human rights.

4. Human rights due diligence

The Group puts in place a system of human rights due diligence to identify and prevent, or mitigate negative impacts on human rights. In addition, the Group continues to conduct human rights due diligence.

5. Corrective and remedial measures

The Group will take appropriate action to correct or remedy any negative impact on human rights that may arise in its own business activities. In the event of any apparent negative impact on human rights at suppliers, business partners, and other related parties, the Group will strive to take appropriate corrective or remedial action.

6. Education

The Group will provide appropriate education pertaining to respect for human rights to its officers and employees.

7. Dialogue and consultation with stakeholders

The Group will refer to expert information and knowledge in its various efforts to implement this policy. Moreover, it will strive to hold dialogue and consultations with related stakeholders.

8. Information disclosure

The Group will appropriately disclose information pertaining to its efforts to respect human rights and the status of progress for such efforts.

9. Promotion structure

The Group puts in place its Compliance / Risk Management Committee, chaired by the president of NAKAYAMA STEEL WORKS, LTD. The Committee will promote and monitor compliance with this policy and respect for human rights. In addition, the Committee discusses and reports on important matters at the Board of Directors.

This policy has been approved at the Board of Directors of NAKAYAMA STEEL WORKS, LTD.

Kazuaki Hakomori  
Representative Director and President  
NAKAYAMA STEEL WORKS, LTD.  
Formulation date: March 17, 2025

**NAKAYAMA STEEL WORKS Group Human Rights Policy (Supplemental)**  
**Human Rights Issues Addressed by the NAKAYAMA STEEL WORKS Group**

The NAKAYAMA STEEL WORKS Group (hereinafter, the “Group”) focuses on the following human rights issues in order to respect the human rights of all people involved in its business activities. The Group will periodically review the human rights issues indicated in these supplemental materials based on changes in social requirements, including laws and regulations, and the nature, etc. of the Group’s business.

1. Prohibition of discrimination

The Group respects all human rights and does not discriminate based on race, skin color, beliefs, religion, gender, nationality, age, sexual orientation, or disability, etc.

2. Prohibition of harassment

The Group accepts diverse values and does not engage in harassment of any kind.

3. Prohibition of forced labor and child labor

The Group will not engage in any form of forced or involuntary labor and will not employ children under the legal minimum age.

4. Appropriate working conditions

The Group will comply with labor-related laws and regulations as a matter of course, adhere to the spirit of labor-related laws and regulations, and strive to maintain and improve upon safe and protected working environments.

5. Respect for freedom of association and right to collective bargaining

The Group respects the right to form labor unions and to bargain collectively in accordance with laws and regulations and labor agreements. The Group strives to build sound and good labor-management relations by establishing regular opportunities for discussions on working conditions and management issues, the workplace environment, work-life balance, and other issues, between management executives and labor union representatives.

6. Appropriate working hours and wage levels

The Group will comply with laws and regulations concerning working hours of workers, and faithfully adhere to labor agreements and work regulations. In addition, the Group will comply with legal requirements to pay wages at or above the minimum wage, and strives to maintain a wage level and provide compensation that allows employees to live with peace of mind.

7. Respect for the rights of local residents and preservation of the local environment

In the areas in which it conducts business activities, the Group respects the land rights of local community residents, access to water, safety, health, and the rights of indigenous peoples, etc. In addition, in order to prevent or mitigate the negative impact of environmental pollution on the rights of local residents, the Group will actively and continuously work to protect the environment in all aspects of its business activities.