

November 29, 2023

To whom it may concern:

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Notice Concerning Formulation of Human Rights Policy

To date, the Company has conducted its business activities with consideration for human rights in accordance with the Furukawa Company Group's Charter of Corporate Conduct and the Furukawa Company Group's Code of Conduct for Officers and Employees. In accordance with the United Nations (UN) Guiding Principles on Business and Human Rights, we hereby announce that we have established the Furukawa Company Group's Human Rights Policy, which was approved at a meeting of the Board of Directors held today (November 29, 2023).

Please refer to the attached document for the details of the Policy.

Inquiries

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Furukawa Company Group’s Human Rights Policy

The Furukawa Company Group conducts its business activities on a global scale under its Management Philosophy, which states that “The Furukawa Company Group will remain indispensable to society by always embracing a spirit of challenge, advancing the technologies that have underpinned the foundation of society that originated in mining development.”

We recognize that the business activities of the Group may directly or indirectly affect human rights. To ensure that all people involved in our business respect human rights, therefore, we formulated the Furukawa Company Group’s Human Rights Policy (hereinafter referred to as “the Policy”), which will guide our efforts to promote respect for human rights.

1. Respect for Human Rights

Based on the UN Guiding Principles on Business and Human Rights, the Furukawa Company Group supports and respects international norms on human rights, including the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO). Specifically, we will respect basic human rights; prohibit discrimination based on race, nationality, gender, religion, or creed; prohibit harassment and violence; promote diversity; prohibit child labor; prohibit forced labor (including human trafficking); prohibit unreasonable restrictions on movement; respect freedom of association and the right to collective bargaining; ensure occupational health and safety; prevent occupational accidents; and promote responsible procurement. We will also comply with the laws and regulations of each country or region in which we operate. Where there is a conflict between the laws and regulations of a country or region and international human rights principles, we will seek ways to respect international human rights principles.

The Policy, which is based on the Furukawa Company Group’s Charter of Corporate Conduct and the Furukawa Company Group’s Code of Conduct for Officers and Employees, states our commitment to promoting respect for human rights.

2. Scope of Application

The Policy applies to all officers and employees of the Group (including contract employees, temporary employees, part-time employees, and employees on loan from other companies). We also ask our suppliers and other partners involved in our business activities to support the Policy and respect human rights.

3. System for Promoting Respect for Human Rights

To implement the Policy, we will establish a cross-Group organization under the supervision of the Board of Directors to promote respect for human rights.

4. Human Rights Due Diligence

The Group will establish a human rights due diligence mechanism in accordance with procedures based on the UN Guiding Principles on Business and Human Rights to identify, prevent, and/or mitigate negative human rights impacts.

5. Remedy

In the event that the Group is found to have caused or been involved in behavior that negatively impacts human rights, it will take appropriate measures to remedy the situation.

6. Education and Awareness

To ensure the effectiveness of the Policy, the Group will provide appropriate education and training to its officers, and employees and will also strive to gain the understanding of suppliers and other business partners.

7. Dialogue with Stakeholders

The Group will continue engaging in dialogue and consultation with various internal and external stakeholders in an ongoing effort to enhance the Policy.

8. Information Disclosure

The Group will disclose the status of its efforts under the Policy to promote respect for human rights on its website and in other media.

The Policy was deliberated by the Risk Management Committee of the Group and approved by the Board of Directors.

November 29, 2023

Minoru Nakatogawa, President and Representative Director
Furukawa Co., Ltd.