Toyo Construction Group Policy on Human Rights

Toyo Construction Group (hereinafter, the Group) has set the "devotion to customer and public society" and "company's consistent growth and employees' welfare promotion" in the corporate identity (established in 1979), as well as embraces "respect for human rights". This policy clarifies the Group's idea about respect for human rights and is developed under the UN "Guiding Principles on Business and Human Rights".

The Group will assume responsibility for respect for human rights by promoting business activities based on this policy.

1. Scope of application

This policy applies to all officers and employees (including loan employees and temporary employees) of the Group. Also, we will share this policy with clients such as suppliers and subcontractors and expect their support, and will promote respect of human rights in the entire supply chain.

2. Respect for and compliance with laws and regulations

The Group will support and respect the UN "International Bill of Human Rights", the International Labour Organization (ILO) "ILO Declaration on Fundamental Principles and Rights at Work", and the UN "Guiding Principles on Business and Human Rights", and will comply with the laws and regulations, international rules and societal norms applied in the countries and regions of our operations. Moreover, if there is any difference between the internationally recognized human rights criterion and the local laws, we will follow the higher standards, and if there is any conflict, we will pursue the way to respect the international standards for human rights.

3. Respect of human rights

The Group will address the following challenges related to business activities.

- (1) We will preserve basic freedoms of individuals.
- (2) We will respect diversity and inclusivity, and prohibit any and all discrimination on the basis of sex, age, nationality, race, thought, religion, disease, sexual orientation or gender identity, handicap, or physical characteristics, etc.
- (3) We will prohibit any act of harassment or privacy invasion.
- (4) We will eliminate child labor, forced labor and human trafficking.
- (5) We will improve safe, sanitary and healthy working environments.
- (6) We will improve appropriate working conditions by prohibition of cheap labor and consideration of living wage.
- (7) We will respect freedom of association as well as collective bargaining rights, and protect workers' rights.
- (8) In case of a human rights violation caused by suppliers or subcontractors, we will encourage them to respect and not to violate human rights, and will make efforts to improve the situation in cooperation with them.

4. Exercise of human rights due diligence

We will construct a mechanism of human rights due diligence to fulfill the responsibility for respect of human rights, and will exercise it continuously. At the human rights due diligence,

we will identify the negative effects on human rights related to the Group's business activities, prevent them appropriately, and implement mitigation measures continuously.

5. Remedy and rectification

If it is found that any of the Group's business activities causes or involves a negative effect on human rights, we will promptly remedy and rectify the situation by an appropriate means.

6. Education and training

The Group will provide appropriate education and training for all officers and employees so that this policy will penetrate into the entire business activities.

7. Dialogue and discussion

The Group will hold dialogues and discussions with related stakeholders on the human rights impact of the business activities.

8. Information disclosure

The Group will regularly disclose information regarding the measures to respect human rights under this policy, on the web site, etc.

Enactment date: April 1, 2023