

# Noritz Group Human Rights Policy

## **I. Basic concept**

### **1. Why we respect human rights**

Noritz Group has contributed to making lives more enriching and comfortable for people around the world under the mission "The Simple Comforts of Life." As a Group whose mission is ensuring the well-being of people, respect for human rights is a prerequisite for our business activities. That is why we have placed "Respect for Human Rights" in Chapter 1 of the Noritz Group Code of Ethics, the guideline for the actions of our Group employees, and have made addressing human rights our number one priority.

On the other hand, in the business activities process where we pursue technology, innovation and comfort of living, there is a possibility of directly or indirectly causing negative impacts on human rights. We recognize this possibility and through dialogue with a wide range of stakeholders, responsibly promote respect for human rights while bringing happiness to people.

### **2. Scope of application**

This policy was resolved by Noritz Corporation's Board of Directors and applies to all officers and employees of the Noritz Group.

### **3. Collaboration with and what we expect from our stakeholders**

In order to conduct our business activities while respecting human rights, we need the cooperation not only of the Noritz Group but of all parties, including our business partners related to our business activities, such as our supply chain, and customers who use our Group's products. We ask for your understanding and cooperation regarding this policy.

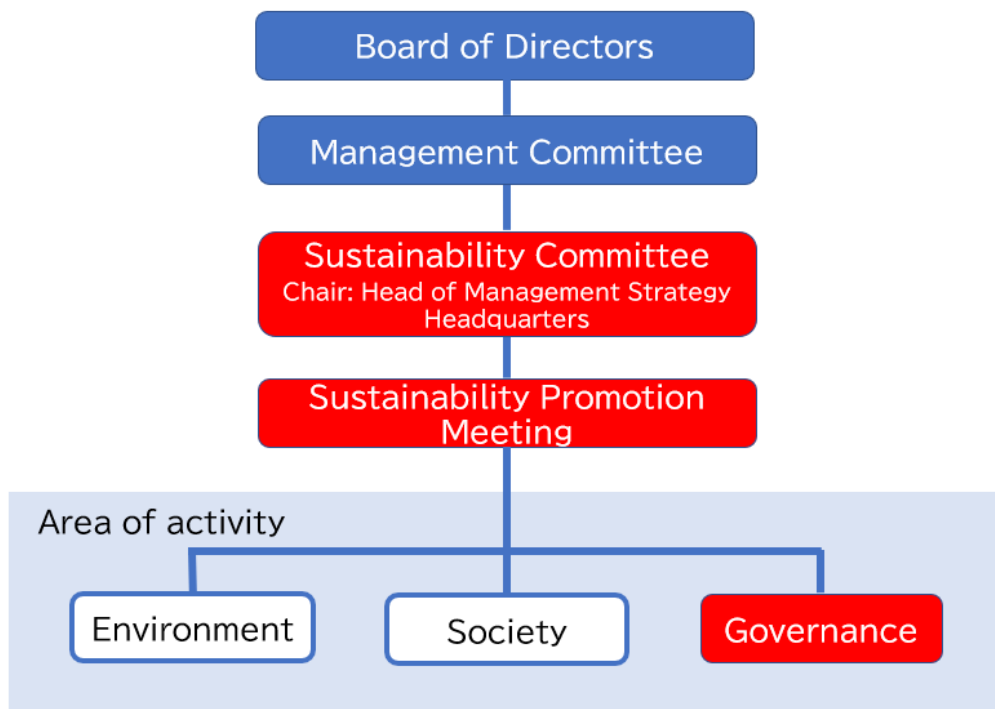
## **II. Promotion system, etc.**

### **1. Promotion system**

As a mechanism to promote sustainable business activities and continue bringing happiness, the Noritz Group has established a sustainability promotion system.

Specific initiatives based on this policy are planned and implemented by the department in charge of governance, and the status and results of the initiatives are reported, and progress is checked at the Sustainability Promotion Meeting. Matters reported and discussed at the Sustainability Promotion Meeting and notable human rights risk issues are submitted to the Sustainability Committee, which is chaired by the Head of

Management Strategy Headquarters, for discussion. Activities of the Sustainability Committee are appropriately supervised by the Management Committee and the Board of Directors, and matters discussed by the Sustainability Committee are regularly brought up for discussion and reported to the Management Committee and the Board of Directors.



## 2. Relationship to other policies, etc.

Our approach regarding respect for human rights is also described in the Noritz Group Code of Ethics and the Noritz Group Sustainable Procurement Guidelines and will be communicated and taught within the Noritz Group, and our business partners will be requested to comply with this policy and undergo training.

## III. Initiatives

### 1. Compliance with international human rights standards

All human beings have the right to be born free and equal, and no one shall violate this right.

This policy is based on the principles and policies set forth in the United Nations "Guiding Principles on Business and Human Rights," the "International Labour

Organization (ILO) Declaration on Fundamental Principles and Rights at Work," the "Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises," the "Universal Declaration of Human Rights," "International Bill of Human Rights," "ILO Core Labour Standards," etc.

In 2012, we signed the Global Compact advocated by the United Nations, where we agreed with their 10 principles in four areas (human rights, labor, the environment, and anti-corruption). We aim to conduct business activities so that both society and companies develop sustainably.

## **2. Respect for human rights**

The Noritz Group will act in accordance with the principle that all people's human rights should be respected to the utmost extent. If a business partner is found to be violating human rights, we will ask for improvement, and, if necessary, consider whether to continue business with the business partner.

### **(1) Prohibition of discrimination on any grounds**

In every aspect of our business activities, we place the highest priority on respecting and protecting the human rights of all members inside and outside of our company. Furthermore, we do not allow the discrimination or violation of human rights on any grounds, including but not limited to race, nationality, ethnicity, gender, religion, ideology, belief, age, origin, birth, educational background, physical, intellectual and mental disabilities, marital status, pregnancy status, employment status, sexual orientation or gender identity.

### **(2) Prevention of contribution to or encouragement of human rights violations**

We will take sufficient care to ensure that our business activities, products, and services do not contribute to or encourage of human rights violations of our customers or people in local communities.

### **(3) Respect for and consideration of laws and regulations, life, and culture of local communities and indigenous peoples**

We comply not only with local laws and regulations but also with international standards in countries or regions where we operate and respect the customs of local communities and the unique culture and history of indigenous peoples. In the rare event of a conflict between the laws and regulations of the country or region in question and international laws and regulations, we will seek ways to respect international human rights regulations within the scope of the laws and regulations of the country or region in

question.

(4) Prohibition of harassment

We do not tolerate any form of harassment (actions that hurt the dignity of individuals or impair the work environment and people's job performance), including sexual harassment and power harassment.

(5) Prohibition of inhumane treatment

We do not allow inhumane treatment such as abuse, corporal punishment, and harassment.

(6) Respect for freedom of association and collective bargaining rights

We respect our employees' freedom of association and rights to exercise collective bargaining.

We will also comply with labor-related laws and regulations and labor-management agreements and work to build constructive relationships through dialogue and consultation with our employees and their representatives.

(7) Prohibition of forced labor and child labor

We do not allow forced labor, child labor, slave labor, or human trafficking under any circumstances.

(8) Prohibition of discrimination in employment, human resources development, and career advancement

We provide equal opportunities in employment, human resources development and career advancement without discriminating based on race, nationality, gender, age, origin, birth, ideology/belief, religion, ethnicity, disability, sexual orientation/gender identity, and factors other than reasonable factors such as the individual's ability and aptitude.

(9) Approach to health and productivity management

In order for our employees to be able to work in a safe and hygienic workplace, and stay healthy, we perform periodic inspections of the workplace environment and formulate initiatives for improvement.

(10) Appropriate management of working hours and wages

We conform to the legal or pre-agreed working hours, appropriately manage the working

hours and leave, and fairly apply overtime pay, payment methods, etc.

(11) Working with and supporting people with disabilities

The Noritz Group has been creating jobs for people with disabilities, supporting their employment, and providing them with work, with the goal of enabling all Group employees to be aware of and proud of working with and in harmony with people with disabilities. We work to respect the human rights of people with disabilities in order to realize a society that respects diversity and allows all people to maximize their individuality and thrive.

(12) Respect for privacy

We respect and protect the privacy of individuals. We will comply with relevant laws, regulations, and company rules when handling personally identifiable information.

### **3. Exercise of human rights due diligence**

The Noritz Group exercises human rights due diligence on its employees and suppliers in order to examine the current status of possible human rights risks and to make continuous improvements by preventing or mitigating the impact of such risks.

We will appropriately address any negative impacts on human rights identified by the results of questionnaires, etc., and continuously monitor them to verify the effectiveness of the measures taken. Additionally, the status of implementation, etc. will be disclosed on a regular basis.

### **4. Corrective and remedial actions**

In the event that the Noritz Group directly or indirectly causes a negative impact on human rights as a result of its business activities, we will strive to correct and remedy such impact through appropriate investigations and responses.

### **5. Education and training**

The Noritz Group regularly conducts education and training, including human rights training for all employees and newly appointed managers, with the aim of respecting human rights throughout the value chain in all aspects, regardless of within the company or outside, when conducting business activities.

### **6. Promotion of diversity and inclusion**

The Noritz Group respects the diversity of its employees, including gender, nationality, and disabilities, and is committed to creating a workplace environment in which each

individual can maximize his or her individuality and strengths. We also create new value by acknowledging different values and ideas and by inspiring each other.

#### **7. Dialogue**

The Noritz Group will strive to strengthen its efforts to respect human rights through ongoing dialogue and discussion with relevant stakeholders.

#### **8. Disclosure of information**

The Noritz Group discloses information on this policy and a series of initiatives related to this policy in a timely and appropriate manner through its website and other means.

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