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#### Fuji Oil Group Human Rights Guidelines

#### About this Guideline

In April 2017, the Fuji Oil Group established "the Fuji Oil Group Human Rights Policy". In the spirit of "work for people" as expressed in the Fuji Oil Group Management Philosophy, the policy sets the basis for respecting and protecting human rights of those within the Group and its supply chains, who can be impacted by the Group's business activities.

"The Fuji Oil Group Human Rights Guidelines" are intended to function as specific guidelines, in order to address and manage for human rights issues within the Group's workplaces and employees based on the Group's human rights policy, and in order to achieve the purpose that the Group's global business activities consistently fulfil! its responsibility of respecting and protecting human rights. In the event of any discrepancy between the content of these Guidelines and the domestic laws applicable in the countries or regions where the Fuji Oil Group conducts its business activities, the Fuji Oil Group will strive to pursue measures to respect the intent of these Guidelines to the maximum extent possible without conflicting with the domestic laws therein.

#### **Scope of Its Application**

These Guidelines apply to all employees and officers of the Fuji Oil Group.

#### Guideline

#### **1.** Non Discrimination

The Fuji Oil Group shall prohibit discrimination of any kind, including but not limited to race, color, gender, religion, political opinion, national origin, social origin, age, disability, illness, participation in labor unions, and sexual orientation in all aspects of employment such as hiring, compensation, promotion, discipline, termination, retirement, and so on.

### 2. Occupational Safety and Health

The Fuji Oil Group has established the "Basic Safety and Health Policy" to protect the lives of all Fuji Oil Group employees and all people working within the Group's facilities. The Fuji Oil Group strives to provide safe and sanitary workplaces for all workers' operations and complies with all applicable laws and regulations regarding their occupational health and safety.

To prevent the occurrence of accidents and health hazards, the Fuji Oil Group shall take appropriate measures by regularly identifying occupational health and safety hazard risks in the workplaces on the half-way established risk management system. To promote occupational safety and health, the Fuji Oil Group shall provide safety training and make utmost efforts to engage in discussion with its employees.

### 3. Working Environment

- The Fuji Oil Group shall provide its workers with remuneration and working conditions in accordance with all applicable laws and regulations, including those related to minimum wages, overtime, maximum working hours, welfare, overtime payment, and leaves.
- The Fuji Oil Group prohibits any harassment and violence at its workplaces.
- The Fuji Oil Group, in accordance with the laws and regulations of each country/region, shall recognize the right of its employees to participate in or to initiate labor union activities on their own choice without any fear of intimidation and/or reprisal. We shall strive to have constructive discussion with the labor unions.

### 4. Forced Labor<sup>1</sup>

• The Fuji Oil Group prohibits all forms of forced labor and ensures freedom of movement for all workers. In addition, the Fuji Oil Group shall ensure that all

<sup>&</sup>lt;sup>1</sup> Forced labor means "any work or service which is forced under threat of punishment, and a worker does not voluntarily offer to do so". This is based on the ILO Convention No.29.

workers shall not bear any of their hiring and/or retaining costs, and shall provide all workers with information regarding their employment conditions/ work environment in advance by presenting in a way that is properly understood.

### 5. Child Labor<sup>2</sup>

The Fuji Oil Group prohibits the use of any form of child labor; respects the rights of children for their education, safety and health; does not employ children under the age of 18 in hazardous condition and night duty; does not employ children under the minimum age specified by International Labor Organization(ILO) and by each country's labor law.

### 6. Information Security and Privacy

• The Fuji Oil Group shall establish the management system to appropriately protect personal/confidential information and to prevent information leakage.

### 7. Diversity, Equity and Inclusion (DE&I)

The Fuji Oil Group removes barriers perceived by those who have disadvantages and provides environments/opportunities for all of them to be successful. The Fuji Oil Group also strives to make the power of diversity<sup>3</sup> workable by fostering the corporate culture, in which all employees feel a sense of belonging, and in which their voices are being heard and valued.

### 8. Remediation Mechanisms

• The Fuji Oil Group shall provide a fair and transparent remediation mechanism to accept concerns originated by negative impacts from its employees and

<sup>&</sup>lt;sup>2</sup> Child labor means "work which takes away a child's opportunity to be educated, harms the child's upbringing, or is done prematurely". Please refer to ILO Conventions No.138 and 182 for further details.

<sup>&</sup>lt;sup>3</sup> Diversity refers to the ways in which people differ from each other; including (but not limited to) gender. race, career, different point of views, age, disability, religion, national origin, LGBTQ1+, and so forth.

officers. The remediation mechanisms include but is not limited to whistleblower system and grievance mechanism. The Fuji Oil Group shall strive to ensure that the remediation mechanisms are recognized widely. In the handling of concerns and complaints, the Fuji Oil Group shall prohibit retaliative actions against contacted persons and strive to keep a constructive discussion with the utilizers of the remediation mechanisms.

### Reference

References of the Fuji Oil Group Human Rights Guidelines are below; (English page)

- Fuji Oil Group Human Rights Policy https://www.fujioilholdings.com/pdf/en/about/human right/20210401 en.pdf
- International BiH of Human Rights
   <u>https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights</u>
- Universal Declaration of Human Rights
   <u>https://www.ohchr.org/en/universal-declaration-of-human-rights</u>
- International Covenant on Civil and Political Rights
   <u>https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx</u>
- International Covenant on Economic, Social and Cultural Rights <u>https://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx</u>
- UN Guiding Principles on Business and Human Rights
   <u>https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR\_EN.pdf</u>
- ILO Declaration and Conventions

   ILO Declaration on Fundamental Principles and Rights at Work
   <u>https://www.ilo.org/declaration/lang--en/index.htm</u>
   -Forced Labour Convention (No.29)
   <u>https://normlex.ilo.org/dyn/nrmlx\_en/f?p=NORMLEXPUB:12100:0::NO::P1</u>
  - 2100\_ILO\_CODE:C029

-Minimum Age Convention (No.138)

https://normlex.ilo.org/dyn/nrmlx\_en/f?p=NORMLEXPUB:12100:0::NO:121

00:P12100\_INSTRUMENT\_ID:312283:NO

- Worst Forms of Child Labour Convention (No.182)

https://normlex.ilo.org/dyn/nrmlx\_en/f?p=NORMLEXPUB:12100:0::NO:121 00:P12100 INSTRUMENT ID:312327:NO

ILO-IOE Child Labour Guidance Tool for Business

https://www.ilo.org/resource/training-material/ilo-ioe-child-labour-guidancetool-business-how-do-business-respect

- OECD Guidelines for Multinational Enterprise
   https://mneguidelines.oecd.org/mneguidelines/
- Ten Principles of the UN Global Compact https://www.unglobalcompact.org/what-is-gc/mission/principles
- GRI (Global Reporting Initiative) Standards <u>https://www.globalreporting.org/standards</u>
- Engagement & Remedy Guidelines
   <u>https://www.bhrlawyers.org/en-erguidelines</u>