

PILOT Group Human Rights Policy

PILOT Group (hereinafter referred to as “the Group”) has been committed to the development of new markets and the provision of new products and services based on the Guiding Principles of PILOT Corporation, which have been the Corporate Philosophy of the Company since 1918, when the Company was established. We understand that it is our social responsibility as a company to continue to respond to the expectations of stakeholders including our customers around the world while succeeding to the technologies and traditions developed so far and coping with changes in the times and the environment. We interactively communicate with stakeholders for the solution of social challenges and respect the inborn human rights of all people in all the corporate activities of the Group.

The Group supports and respects the International Bill of Human Rights (the Universal Declaration of Human Rights and the International Covenants on Human Rights) and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO). This Policy is established based on the Guiding Principles on Business and Human Rights of the United Nations.

1. Respect for Human Rights

The Group will not violate any human rights of others and appropriately addresses the adverse impact on human rights that may affect its business activities. We act in accordance with the PILOT Group Code of Conduct with the understanding that all of the business activities of the Group are realized based on respect for human rights.

We recognize what the Group considers to be the challenges for human rights as shown below and appropriately deal with these challenges. To deal with such challenges, we comply with the matters described in "2. Compliance with Laws and Regulations in Connection with Respect for Human Rights" and review them as appropriate in light of changes, etc. in society and the business environment.

(i) Prohibition of Forced Labor

We will not demand any form of forced labor or labor against the will of workers. We employ persons who voluntarily desire to be employed and will not limit the right to leave work at their will.

(ii) Prohibition of Child Labor

We will not employ children under the minimum age for employment set forth in the conventions (the Minimum Age Convention and the Worst Forms of Child Labour Convention) and recommendations of the International Labour Organization (ILO).

(iii) Consideration for Work Hours

We comply with the laws and regulations of each country and region and appropriately manage the work hours of employees.

(iv) Appropriate Payment of Wages

We pay salaries to employees appropriately in compliance with all laws and regulations relating to wages, including minimum wage, overtime work, and legal benefit.

(v) Elimination of Inhumane Treatment

We respect the human rights of each and every employee, eliminate physical and mental abuse and harassment (such as sexual harassment and harassment by superiors), and do not provide any inhumane treatment.

(vi) Prohibition of Discrimination

We will not discriminate on the basis of race, ethnic group, nationality, religion, belief, birthplace, gender, age, disability, etc. in hiring and employment.

(vii) Freedom of Association and Respect for Right to Collective Bargaining

We respect employees' rights to organize and to bargain collectively with the management for the purpose of discussion on the work environment, wage levels, etc.

2. Compliance with Laws and Regulations Related to Respect for Human Rights

This Policy applies to all officers and employees of the Group. As a company that is a globally developing business, all officers and employees of the Group respect human rights and comply with the laws and regulations applicable in each country and region where we conduct business activities. If there is any inconsistency between internationally recognized human rights and the laws and regulations of a region in each country, we seek a way to respect the international principles of human rights.

3. Dialogue and Discussion with Stakeholders

We request suppliers, business partners, and other relevant parties of the Group to support this Policy and not to violate any human rights. If such relevant parties have an adverse impact on human rights in the supply chain, we request such parties to eliminate the impact and suspend transactions if they fail to take appropriate action. The Group conducts dialogue and discussion with the relevant stakeholders about addressing the adverse impact on human rights, including potential events.

4. Human Rights Due Diligence

The Group identifies adverse impact on human rights and appropriately addresses it through a human rights due diligence mechanism to fulfill our responsibility for respect for human rights.

5. Correction Process (Remedial Action)

If it becomes evident that any business activity of the Group has caused or has been involved in an adverse impact on the human rights, we pursue corrective and remedial actions through appropriate measures.

6. Education

We provide appropriate education and training to ensure that this Policy is understood by all officers and employees of the Group and that these efforts are promoted.

7. Information Disclosure

We disclose information on the results of risk assessment of human rights and the status of promotion of efforts appropriately and in a timely manner through the website, etc.

Shu Itoh, President & Representative Director

PILOT Corporation

Date of Establishment: January 1, 2022