

# Strengthening and Promoting Our Response to Human Rights Issues through Group Management

—DOWA Group Human Rights Response Roadmap and Action Plan—

DOWA HOLDINGS CO., LTD.  
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# 1. DOWA Group Human Rights Policy

Respect for human rights is the foundation for creating a prosperous society for people, and is one of our most important initiatives and indispensable to our corporate activities. In March 2022, we established the DOWA Group Human Rights Policy—based on the UN Guiding Principles on Business and Human Rights established by the United Nations—to fulfill our responsibility to respect human rights, as required of all companies.

The DOWA Group regards respect for human rights as one of its most important management issues. Under our Human Rights Policy, we established a management structure dedicated to responding to human rights issues, under the umbrella of the Sustainability Subcommittee, in September 2023. Through this management structure, we aim to strengthen and drive our response to human rights issues through group management, and to respect the human rights of all stakeholders involved in our business activities.

## ●Human Rights Policy

### 1. Position of this Policy

The DOWA Group supports the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the International Covenants on Human Rights), which stipulate basic human rights to be enjoyed by people all over the world; the ILO Declaration on Fundamental Principles and Rights at Work; and other similar internationally recognized norms concerning human rights. In addition, we have established this Policy in accordance with the UN Guiding Principles on Business and Human Rights established by the United Nations and will use our best efforts to promote respect for human rights.

### 2. Responsibility to Respect Human Rights

If any human rights are adversely affected by any business activities of the DOWA Group, or if it is revealed that the DOWA Group has exacerbated such adverse effects, the DOWA Group will fulfill its responsibility to respect human rights by taking appropriate remedial measures for correction as well as measures to prevent and/or mitigate the adverse effects.

### 3. Scope of Application

The Policy applies to all officers and employees (including permanent, contract, part-time, casual, and temporary employees) of the DOWA Group. In addition, if any human rights are directly adversely affected by any of our business partners that are involved in the DOWA Group's business activities, or if it is strongly suspected that such adverse effects are caused by the DOWA Group's business activities, we will demand that such business partners respect and refrain from breaching human rights.

### 4. Compliance with Applicable Laws and Regulations

The DOWA Group will comply with the applicable domestic laws and regulations of each country and region in which it conducts its business activities. If there is any conflict between internationally recognized principles on human rights and the domestic laws and regulations of each country or region, the internationally recognized principles on human rights will prevail, and to the extent possible, the DOWA Group will take the domestic laws and regulations of each country or region into consideration.

### 5. Human Rights Due Diligence

Pursuant to the UN Guiding Principles on Business and Human Rights, the DOWA Group will perform human rights due diligence to identify, prevent, and mitigate actual or potential adverse effects on human rights

resulting from its business activities.

#### 6. Remedy

If it is found that the DOWA Group has caused or contributed to any adverse effects on human rights through its business activities, we will work on a solution to the adverse effects by following appropriate procedures. In addition, the DOWA Group will set up a hotline in order to enable anyone who notices any adverse effects, whether actual or potential, to prevent the occurrence of, or to promptly report, any actual or potential adverse effects when they notice them.

#### 7. Education and Training

The DOWA Group will work on human rights enlightenment activities and strive to ensure that any and all officers and employees of the Dowa Group appreciate human rights and various human rights-related issues. In addition, the DOWA Group will educate and develop their knowledge so that this Policy will become firmly entrenched in all of its business activities.

#### 8. Communication and Consultation

In implementing this Policy, the DOWA Group will take advantage of external human rights experts, and will communicate and consult with any stakeholders whose human rights are adversely affected, whether actually or potentially, by any of our business activities.

#### 9. Information Disclosure

The DOWA Group will report the status of its efforts to respect human rights through its Integrated Reports and publication on its website in order to fulfill its accountability obligations regarding this Policy.

Human Rights Policy: <https://www.dowa-csr.jp/en/about/human-rights-policy>

## 2. Basic Approach for Responding to Human Rights Issues

To respect the human rights of all stakeholders involved in the Group's business activities, we will strengthen our response to human rights issues through group management, and work to spread awareness of human rights and prevent human rights violations.

Under our Human Rights Policy and management system for responding to human rights issues, we will conduct human rights due diligence and communicate appropriately with stakeholders involved in the Group's business activities. We will also engage in appropriate monitoring and conduct reviews to continuously improve the Group's management of human rights issues.

If it is found that the DOWA Group has caused or contributed to negative impacts on human rights in its business activities, we will protect the human rights of our stakeholders by taking appropriate remedies, preventive, and reduction measures to correct the situation.



### 3. Roadmap and Action Plan for Responding to Human Rights Issues through Group Management

While the DOWA Group has been responding to human rights issues through various activities to date, in September 2023, the Group began working to establish a group-wide management system to systematically address human rights issues on a group-wide basis, with the aim of further strengthening its response to human rights issues. In responding to human rights issues through group management based on this system, we have established a medium-term process referred to as the DOWA Group Human Rights Response Roadmap (hereinafter referred to as the "Roadmap").

Under the Roadmap, from FY2023 through FY2024, we are conducting risk assessments regarding human rights to identify significant human rights issues, and working to establish a management system for comprehensive monitoring and review. From FY2025 onward, we will implement full-scale group management to address significant human rights issues and work to expand our response to human rights issues to include our value chain.

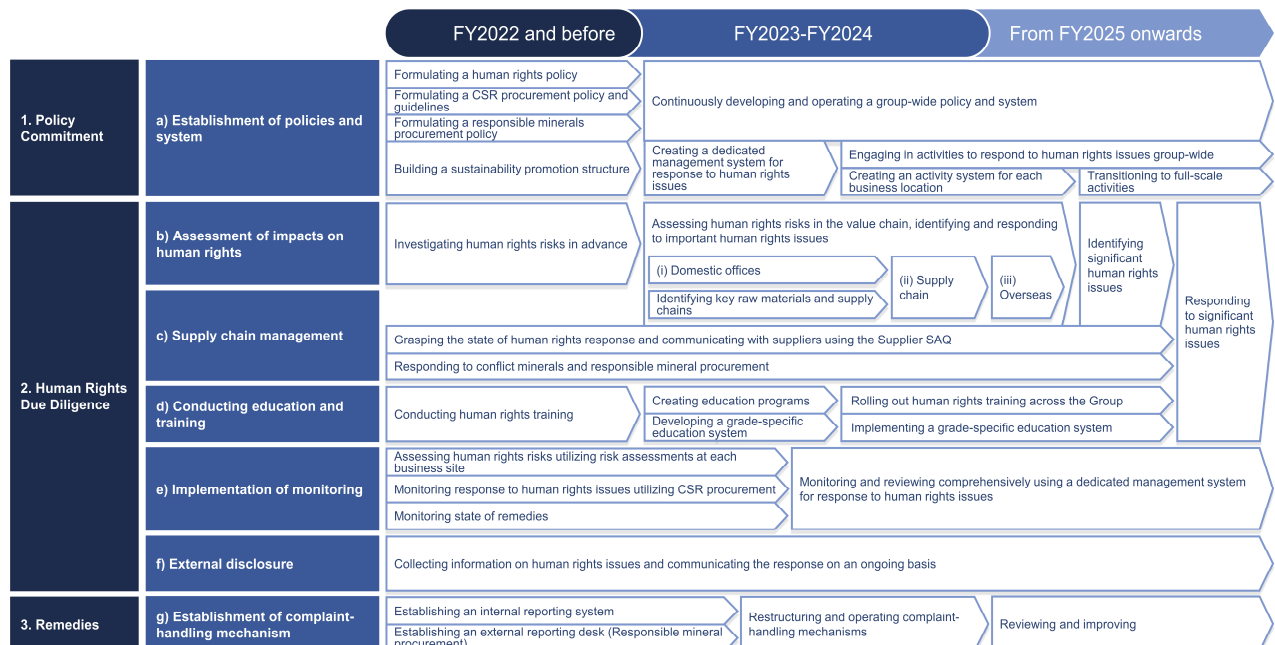
At the same time, we developed a specific action plan based on the Roadmap. The plan incorporates the three perspectives of "Policy Commitment," "Human Rights Due Diligence," and "Remedies" as outlined in the UN Guiding Principles on Business and Human Rights. Based on this plan, we will steadily implement a series of group management activities, including the expansion of human rights education and the restructuring and operation of our complaint handling mechanism.

In accordance with the Roadmap and the Action Plan, we will strengthen our response to human rights issues through group management, to fulfill the Group's responsibility to respect human rights by promoting human rights awareness and preventing human rights violations.

## [DOWA Group Human Rights Response Roadmap]



## [DOWA Group Human Rights Response Action Plan]



[For Reference]

The Group's initiatives for Human Rights Issues

<https://www.dowa-csr.jp/en/esg/social/human-rights>