

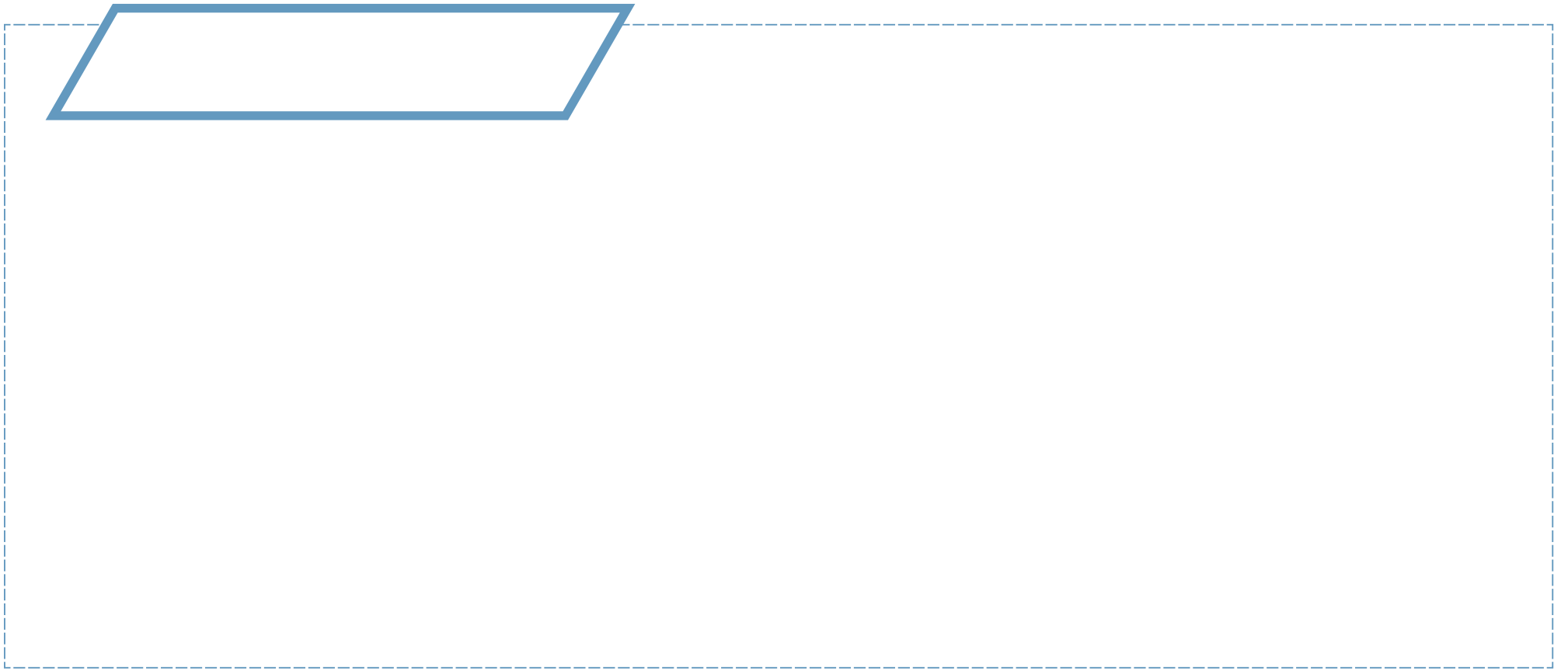
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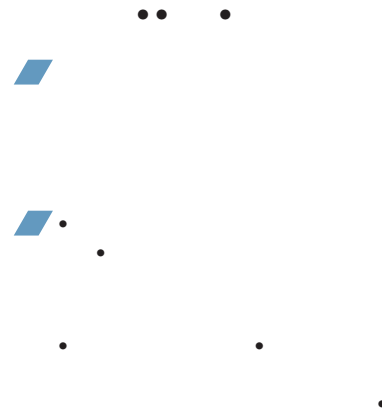


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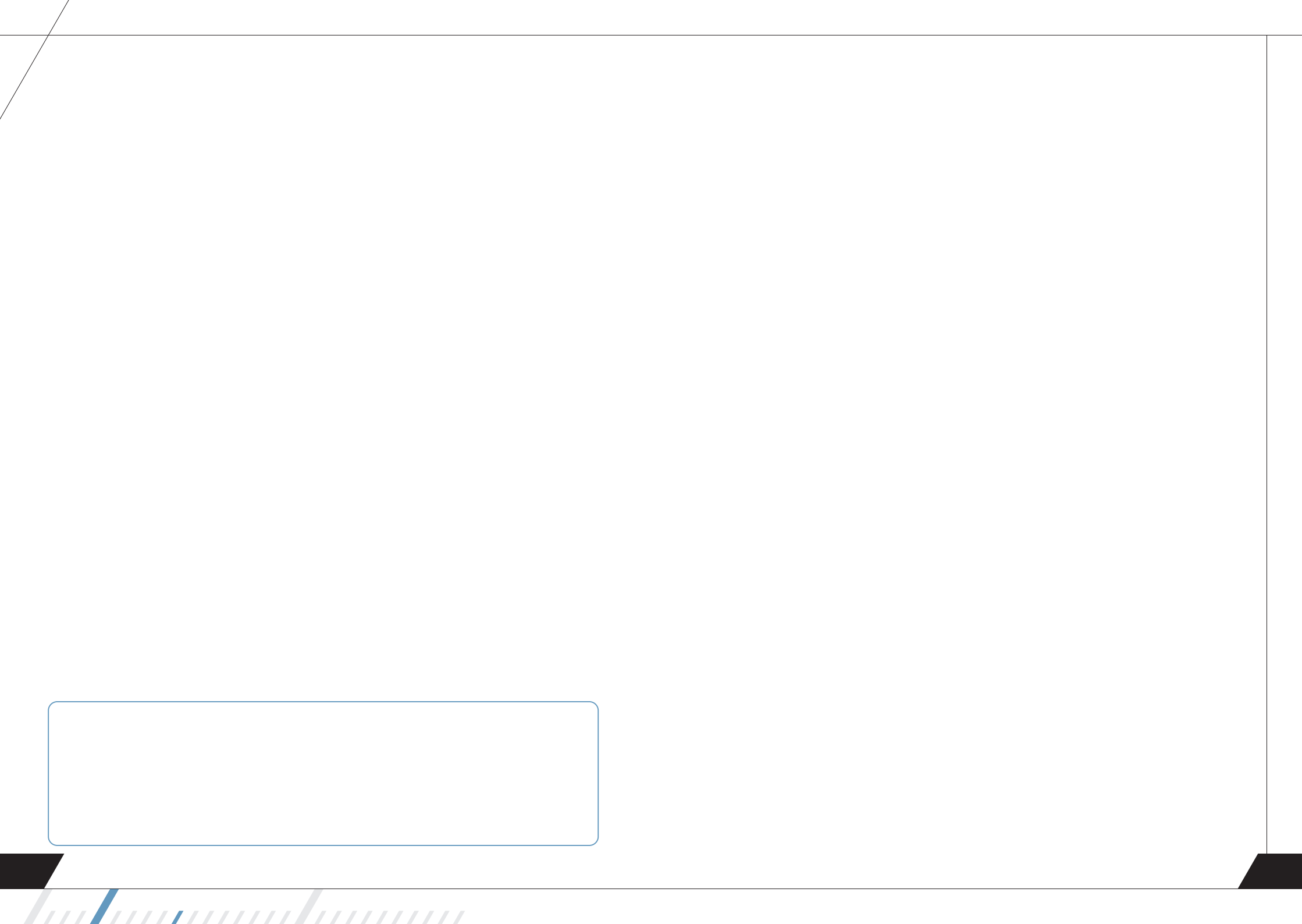


The Group is committed to strict compliance with the letter and spirit of Japan's anti-corruption laws, the United States Foreign Corrupt Practices Act ("FCPA") and other applicable laws.



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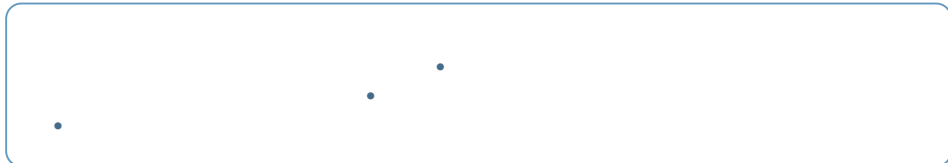
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Respect for Human Rights in Our Business Activities

We respect the human rights of all people in our business activities.

As stated in the Universal Declaration of Human Rights, human rights are “the inherent dignity and the equal and inalienable rights of all members of the human family.”

In order to respect the human rights of each and every person, we must afford

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If acts or omissions by the Group are considered by the public to display a disregard for human rights, even if these acts or omissions do not technically violate any laws or regulations, they could lead to extensive damage to the Group, such as boycotts of our products, claims for damages, or exclusions from markets.

Eliminating Unethical Use of Products and Technology

We do not provide products and technologies for unethical purposes of use.

There is now an increased expectation worldwide for corporations to take ethical responsibility when providing products and services. Unethical use may occur when products and technologies provided by a business are used for unethical purposes beyond those originally intended, such as in organized or individual crimes, human rights violations, or manufacturing of goods used for those purposes. Such

unethical uses adversely affect our stakeholders and society at large in various direct and indirect ways. To the extent possible, businesses should take reasonable steps to prevent their products and services from being used for unintended purposes by, for example, making appropriate inquiries to ascertain the recipient's intended use of the products and services when circumstances allow.

Actions to Be Taken by Individuals

- Be aware of the characteristics and nature of the Group's products and technologies as well as the ethical responsibilities associated with them.
- When providing products and technology overseas, adhere to legal requirements of the relevant countries and carefully check whether any export control measures are applicable to the products or technologies and whether provision of the products or technologies to the customer and intended use by the customer are permissible. If necessary, consult government agencies to determine whether the transaction should proceed.
- Comply with relevant national and international laws concerning export control when providing products and technologies overseas.
- When engaging new customers, conduct background checks on the customers to ascertain information, including their nationality, the nature of their activities, their shareholders, and the intended use of the relevant products and services.



Disclosure of Company Information

We will disclose corporate information in a timely and appropriate manner to enhance society's trust and understanding toward the Group.



Corporate information includes not only financial data and reports, but also other information related to the business operations of the Group, including products, technology, and compliance. Identifying and disclosing relevant and appropriate corporate information to the public in a timely and appropriate manner is necessary to maintain transparency in our business operations, to fulfill our corporate responsibilities, and to foster trust in the Group among the public.

Upon approval from management, and in accordance with company rules and procedures, the responsible department should disclose corporate information to the public through officially approved means, such as press releases and the corporate websites.

Besides making legally required information disclosures in accordance with relevant laws and regulations, there may be circumstances in which information should be disclosed voluntarily, even in the absence of legally compelled disclosure.

Furthermore, proper disclosure of corporate information sometimes requires disclosure of information that may appear unfavorable to the Group.

Information disclosure to the public should be timely, truthful, and accurate. It should present a complete and objective picture of the issue at stake and should not try to conceal facts critical to the purpose of the disclosure, even if such facts may appear unfavorable. The Group will eventually benefit from being honest and trustworthy in making proper disclosures that demonstrate its corporate accountability.

*The department responsible for disclosing corporate information should do so through official channels and procedures. Officers and employees who are not part of the department or team responsible for disclosing corporate information shall securely manage undisclosed information and seek appropriate approval, if the officer or employee believes any information should be disclosed. The officer or employee should not disclose it based solely on personal judgment. The provisions of this Section 2-6 are subject to the duty to maintain the confidentiality of business information required under Section 1-10.

The Group considers its employees to be its most important asset. The Group endeavors to create a workplace environment in which employees are



Employee safety and health

We recognize that the safety and health of our employees is a top priority and make every effort to create a safe and healthy workplace environment.

Companies are obliged to protect the health and safety of their employees. Employees should also take all measures necessary and adhere to all applicable procedures and standards to prevent work-related accidents. Respect for the life and health of human beings is one of the first core principles of the Group. We prioritize safety and health in our work environment.

We create and maintain a safe and comfortable workplace for the mental and physical well-being of all of our employees, on which the vitality of the Group's human resources depends.

Violations of laws, regulations, and company policies may cause injury or illness of employees. This not only hurts the employee, but also hurts the Group and, in turn, may result in the loss of productivity or civil, administrative, or even criminal penalties for the Group as well as individual officers or employees at fault.

Actions to Be Taken by Individuals

- Comply with laws, company policies, and regulations related to occupational health and safety.
- Employees should always pay attention to their own health and that of their co-workers. If you have a health problem or discover that a colleague may have one, do not hesitate to address it immediately. However, you must do so while respecting your colleague's privacy. Contact your supervisor or the relevant departments if you have any concerns in this regard.
- Stay vigilant and make the health and safety of yourself, other employees, and any other persons in our workplaces (such as visitors) a top priority.
- Participate in required training. Do not engage in work activities requiring special training or qualifications unless and until you have completed all relevant training and obtained all relevant qualifications.
- Do not engage in work activities when your normal ability to perform on the job is compromised due to sickness, alcohol, drugs, etc.

If you discover an unsafe or harmful situation at work, please report it immediately to your supervisor or the relevant departments.

Working with Suppliers

We engage in fair procurement activities. We cooperate with our suppliers to fulfill our social responsibilities.



Suppliers are indispensable partners who make it possible for the Group to conduct its business. The Group aims to develop and grow together with its suppliers. To this end, we must respect our suppliers and work with them to fulfill our social responsibilities.

We must ensure fair competition and unbiased assessments in giving suppliers business opportunities.

Carrying out procurement activities in accordance with the Group's policies as well as our social responsibilities, including considerations with respect to compliance, human rights, labor, occupational health and safety, and the environment is vital to the Group's business. To fulfill those responsibilities, we need to engage with every part of the supply chain and work together, not

just within the Group, but also with our suppliers who are also our business partners. Also, it is necessary that we as a business do not make purchases that could provide support for unethical or harmful activities. For example, we must avoid supporting armed conflicts or human rights abuses by procuring or using conflict minerals either directly or through our suppliers.*

*Conflict minerals commonly denotes four minerals (tin, tantalum, tungsten, and gold) produced in the Democratic Republic of the Congo and its neighboring countries. These conflict minerals are a source of funding for armed insurgents who have repeatedly committed human rights abuses, such as massacres, looting, and sexual violence. For this reason, various countries including the United States and the European Union have implemented or agreed in principle to implement restrictions on the trade of such conflict minerals.

Neglecting to cooperate to fulfill our social responsibilities may damage the trust of our customers and investors in the Group.

Actions to Be Taken by Individuals:

- ▀ Assess suppliers fairly and provide them with business opportunities accordingly.
- ▀ Do not treat suppliers unfairly or engage in any conduct that would be considered to be an abuse of bargaining position.
- ▀ When selecting suppliers, take into account not only factors like quality, price, and delivery dates, but also fulfillment of social responsibilities, such as compliance with laws and regulations, respect for human rights and safety, and protection of the environment.
- ▀ Disclose Kawasaki Group CSR Procurement Guidelines to suppliers and request their cooperation in the fulfillment of social responsibilities. Continuously monitor the behavior of suppliers and take actions to address any deviations or shortfalls in fulfillment of social responsibilities.



Kawasaki Heavy Industries, Ltd.

<https://global.kawasaki.com/en/>