

# DKS Group Human Rights Policy

We believe that respecting human rights is essential for the DKS Group (DKS Co. Ltd. and its group companies; hereafter referred to as the “DKS Group”) to fulfill its social responsibilities and realize our Company Credo, “Contributing to the nation and society through industry.” Based on this recognition, the DKS Group has established its Code of Corporate Ethics and the Declaration of Actions by Officers and Employees and is promoting initiatives to respect human rights. To respect the human rights of all people affected by the DKS Group’s business activities and fulfill its responsibilities, we hereby establish the DKS Group Human Rights Policy (hereinafter “this Policy”) based on international norms regarding human rights.

This Policy is positioned as the Group’s highest-level policy regarding human rights.

## 1. Basic Approach to Human Rights

The DKS Group recognizes that human rights are the most fundamental aspect of its business activities and respects the human rights of all people.

The DKS Group supports and respects international human rights norms, including the International Bill of Human Rights, which stipulates the fundamental human rights that all nationals of all nations should enjoy, the ILO Declaration on Fundamental Principles and Rights at Work of the International Labour Organization, and the ten principles set forth by the United Nations Global Compact (UNGC). Based on the United Nations Guiding Principles on Business and Human Rights and the Japanese Government Guidelines on Respecting Human Rights in Responsible Supply Chains, we have established this Policy and will promote efforts to respect human rights.

DKS Group complies with the laws and regulations applicable in each country and region where it conducts business activities. In addition, when there is a conflict between internationally recognized human rights and the laws and regulations of each country or region, we will pursue methods to respect international human rights norms to the maximum extent possible.

## 2. Scope of Application

This Policy applies to all officers and employees of the DKS Group (all employees, including permanent employees, contract employees, and temporary employees). We also expect our business partners (business partners and other parties directly involved in our business, products, or services) involved in the DKS Group’s corporate activities to understand and support this Policy and encourage them to respect this Policy.

## 3. Key Human Rights Issues

The DKS Group recognizes the following human rights issues as particularly important social responsibilities and strives for their improvement and resolution.

1) Prohibition of Forced Labor and Child Labor

We prohibit child labor, forced labor, and human trafficking within the DKS Group and its supply chain.

2) Prohibition of Discrimination and Harassment

We do not engage in discrimination or harassment based on race, nationality, gender, religion, creed, birth, age, physical or mental disability, sexual orientation, social status, etc.

3) Occupational Safety and Health

We strive to maintain a safe and hygienic workplace environment, continue to evolve work standards that prioritize safety, health, and well-being, and aim to improve productivity.

4) Freedom of Association and Right to Collective Bargaining

We respect workers' freedom of association and the right to collective bargaining.

5) Working Hours

We comply with laws and regulations regarding the working hours applicable in each country and region and strive to reduce excessive working hours.

6) Wages

We aim to pay wages that exceed the minimum wage applicable in each country and region. Furthermore, we aim to pay appropriate wages based on the principle of equal pay for equal work, regardless of employment status, such as permanent, contract, or part-time employees, provided the job duties are the same.

7) Protection of Privacy

We respect the right to protect personal privacy and handle all information with the utmost care for legitimate business purposes.

8) Human Rights Issues in the Supply Chain

Recognizing that compliance with laws and respect for human rights are important not only for the DKS Group but also within the supply chain, we practice responsible procurement.

#### 4. Human Rights Due Diligence

The DKS Group will build a human rights due diligence mechanism based on the "Guiding Principles on Business and Human Rights" and the "Guidelines on Respecting Human Rights in Responsible Supply Chains." We implement human rights due diligence to identify, prevent, and mitigate potential or actual negative impacts on human rights caused by the DKS Group's business activities, evaluate the effectiveness of our efforts, and explain and disclose information on how we have addressed them.

In the course of implementing human rights due diligence, if it becomes clear that our

corporate activities have caused or contributed to negative impacts on human rights, the DKS Group fulfills its responsibility to respect human rights by responding appropriately to correct the situation, taking mitigation measures, and implementing preventive measures to ensure that similar negative impacts are not caused or contributed to in the future. Even if our corporate activities have not caused or contributed to negative impacts, if it becomes clear that our business, products, or services are directly linked to negative human rights impacts, we will strive to prevent or mitigate such negative impacts by exerting influence on or providing support to the companies causing or contributing to them.

#### 5. Remedy

If it becomes clear that the DKS Group has caused or contributed to negative impacts on human rights, we will work to remedy the situation through appropriate procedures.

The DKS Group will also enable appropriate remedies by establishing or participating in a grievance mechanism.

#### 6. Dialogue

The DKS Group engages in dialogue and consultation with relevant stakeholders to prevent and mitigate any actual or potential negative impacts on human rights.

#### 7. Education

The DKS Group will provide appropriate education to ensure that this Policy is correctly understood by officers and all employees and is entrenched in the business activities of the DKS Group.

#### 8. Explanations and Information Disclosure

In order to explain our fulfillment of the responsibility to respect human rights, the DKS Group will disclose information on its efforts to respect human rights on its website and through other channels.

This Policy was approved by the Board of Directors in March 2025.

March 24, 2025  
DKS Co. Ltd.  
President & CEO YAMAJI Naoki