

ALCONIX Group Human Rights Policy

Representative Director, President and CEO
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ALCONIX's corporate philosophy is to create new value and contribute to the development of society through the transactions of non-ferrous metal products. Our management principles are to comply with all laws, regulations, and corporate ethics; operate in a highly fair and transparent manner; strive to be an honest and reliable group; maintain good relationships with our shareholders, business partners, employees, and local communities; and fulfill our obligations as a good corporate citizen. We also declare our respect for human rights in our Code of Conduct, which serves as the standard for our activities, and conduct our business activities accordingly.

The ALCONIX Group understands that the Group's business activities may have an adverse impact on human rights, and has established this ALCONIX Group Human Rights Policy (hereinafter referred to as "this policy") in accordance with our management principles to ensure respect for the human rights of our shareholders, business partners, employees, local communities, and other stakeholders.

This policy applies to all officers and employees of the ALCONIX Group (including part-time and temporary workers and employees seconded to or by the Group). In addition, we expect companies in our supply chain and other business partners to support this policy, comply with it, and conduct their business activities with respect for human rights, and we aim to work together to promote efforts to respect human rights.

1. Compliance with international human rights standards and relevant laws and regulations

The ALCONIX Group supports the International Bill of Human Rights*, the ILO Declaration on Fundamental Principles and Rights at Work from the International Labor Organization (ILO), the Ten Principles of the UN Global Compact, and the UN's Guiding Principles on Business and Human Rights, and complies with the laws and regulations of each country and region in which it operates. In the unlikely event that international human rights are not adequately protected by a particular country or region's laws and regulations or their enforcement, we will nevertheless pursue ways to respect internationally recognized human rights.

* This is the collective name for the Universal Declaration of Human Rights, and two related treaties, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social, and Cultural Rights.

2. Practice of respect for human rights

The ALCONIX Group, in respecting human rights, puts the following into practice.

- We do not permit child labor or forced labor.
- We do not discriminate or violate human rights for any reason, including nationality, race, ethnicity, creed, age, sex, social status, religion, sexual orientation, gender identity, or disability.
- We are committed to the responsible procurement of raw materials and minerals.
- We respect employees' freedom of association and their right to collective bargaining.
- We comply with labor-related laws and regulations; appropriately manage employees' working hours, vacations, leaves, and wages; prevent harassment (including sexual harassment and workplace bullying) in the work environment; maintain an environment in which employees can demonstrate their abilities and creativity; and maintain and improve the work environment so that employees can continue to work in health, safety, and security.

3. Human rights due diligence

The ALCONIX Group will conduct continuous human rights due diligence; identify and assess adverse human rights impacts caused or contributed to by the Group's business activities or that are directly linked to the Group's operations, products, or services; and work to prevent or mitigate such adverse impacts.

4. Remediation and redress

The ALCONIX Group will take appropriate steps to remedy and redress the situation if it becomes clear that our business activities have triggered adverse impacts on human rights or have contributed to such adverse impacts through our supply chain or other business relationships. In addition, if it becomes clear that the Group's operations, products, or services are directly linked to adverse impacts on human rights through related parties, or if such a linkage is suspected, we will take remedial and redress measures by working with the related parties.

5. Dialogue and discussion

The ALCONIX Group will gather expert knowledge on human rights from both inside and outside the Group regarding any adverse impacts on human rights that may arise from our business activities, and will engage in sincere dialogue and discussion with all stakeholders related to the Group's businesses, including shareholders, business partners, employees, and local communities.

6. Education and training

The ALCONIX Group will continuously conduct necessary education and training to ensure that officers and employees correctly understand this policy and act in accordance with this policy in our work.

7. Regular reporting

The ALCONIX Group will, in various reports and on its website, regularly provide information on its efforts and progress in respecting human rights as outlined in this policy.