

## Mitsubishi Steel Group Human Rights Policy

The Mitsubishi Steel Group's Corporate Philosophy calls for Maximizing Human Capital. This Mitsubishi Steel Group Human Rights Policy ("Policy" hereinafter) is based on the Mitsubishi Steel Group Code of Conduct, the Detailed Rules for Mitsubishi Steel Group Code of Conduct, and the Basic Policy for Sustainability, and reflects the conviction that respect for human rights is fundamental to our business activities.

Based on the fundamental position of respect for all human rights, as set forth in the Detailed Rules for Mitsubishi Steel Group Code of Conduct, we position this Policy over all other policies related to human rights and intend to fulfill our human rights obligations to all stakeholders involved in or affected by our business activities.

### 1. Respect for and compliance with international norms, laws, and regulations concerning respect for human rights

Recognizing respect for human rights as a key corporate social responsibility, the Mitsubishi Steel Group supports various international declarations on human rights, including the International Bill of Human Rights (the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. The Mitsubishi Steel Group promotes human rights initiatives based on the United Nations (UN) Guiding Principles on Business and Human Rights. The Mitsubishi Steel Group is in full compliance with the laws and regulations of all countries and regions in which we do business. In the event of conflicts between national or regional laws and regulations and international norms on human rights, we will make every effort to fulfill our obligations to internationally recognized human rights while complying with national and regional laws and regulations.

### 2. Scope

This Policy applies to all Mitsubishi Steel Group officers and employees, including permanent, contracted, and temporary employees. Additionally, all business partners, including members of the supply chain, are expected to have an understanding of and support this Policy.

### 3. Obligation to respect human rights

The Mitsubishi Steel Group recognizes the risk that its business activities may, directly or indirectly, affect the human rights of stakeholders. In addition to establishing responsible labor practices, including measures to prohibit discrimination and harassment, eliminate any use of forced or child labor, and ensure safe, healthy working environments, the Mitsubishi Steel Group will strive to prevent and mitigate any actual or potential harm to the internationally recognized human rights of all our stakeholders and to take appropriate corrective measures in response to any such harm. The Group will strive to avoid indirect involvement in human rights violations by encouraging all business partners, including any members of the Group supply chain, implicated in activities damaging to human rights, to respond appropriately and to avoid future human rights violations.

### 4. Human rights governance and promotion structure

Chaired by the Representative Director, President & CEO, the Sustainability Committee deliberates on matters such as policies and measures for responding to human rights issues within the Mitsubishi Steel Group and reports periodically to the Board of Directors on the state of compliance with this Policy and the specifics of its human rights initiatives. The Mitsubishi Steel Group promotes human rights initiatives under the supervision of the Board.

### 5. Human rights due diligence structure

To fulfill its human rights obligations, the Mitsubishi Steel Group plans to develop and establish a human rights due diligence structure that meets the requirements of the UN Guiding Principles on Business and Human Rights; identify and assess any actual or potential violations of human rights in its business activities and supply chain; and undertake sustained efforts to prevent and mitigate any such violations. In addition, to confirm the efficacy of and to continually strengthen such initiatives, the Mitsubishi Steel Group will monitor and evaluate the effects of various initiatives and disclose the details of human rights initiatives in a timely and appropriate manner.

### 6. Correction and relief

If it is determined that we have caused or furthered or are in any other way implicated in human rights violations through our business activities, the Mitsubishi Steel Group will strive to investigate the causes, take action to prevent their recurrence, and seek appropriate remedies. We will also maintain and continue to build on structures that enable sustained and effective discussion to facilitate such corrective and remedial measures.

#### 7. Dialogue and discussions with stakeholders

Based on a recognition of the importance of assessing and reviewing human rights initiatives, including identifying, assessing, and responding to any human rights violations associated with our business activities from the perspectives of the stakeholders affected, the Mitsubishi Steel Group will engage in ongoing dialogue and discussions with stakeholders and outside experts.

#### 8. Disclosure

The Mitsubishi Steel Group will disclose information on its human rights initiatives through appropriate means, including publication on its website.

#### 9. Promoting awareness of the Human Rights Policy and related training

To ensure understanding of this Policy throughout the Group, the Mitsubishi Steel Group will incorporate the spirit of this Policy in its basic procedures and implement regular and ongoing training for officers and employees as part of efforts to foster a culture in which respect for human rights plays a central role.

This Policy has been approved by the Board of Directors of Mitsubishi Steel Mfg. Co., Ltd.

Established: November 8, 2022