

Basic Policy on Human Rights

We, the ValueCommerce Group (the Company and its subsidiaries), are committed to maintaining a safe and secure work environment and to respecting the human rights and individuality of each employee.

1. Our Human Rights Commitments

All the executives and employees of the ValueCommerce Group (hereinafter referred to as "We"), will contribute to the development of a sustainable society by respecting human rights in all aspects of our corporate activities.

We have set forth this approach in this Basic Policy and pledge to comply with the points stated therein.

2. References and Scope of Coverage

In accordance with international human rights principles*, we will strive to understand and respect the culture and customs of the countries and regions in which we operate in all of our business activities, and we will not engage in discrimination or human rights abuses. We also ask our suppliers, business partners, and others to respect human rights in accordance with these principles and to refrain from any infringements therein.

3. Emphasis on Diversity; Prohibition of Harassment

We respect everyone as an individual and do not tolerate discrimination or disadvantageous treatment regardless of political beliefs, ideology, religion, gender, gender identity, sexual orientation, physical characteristics, illness, age, nationality, race or ethnicity, etc. We promote a work environment where diverse human resources can play an active role by providing equal opportunities for recruitment, evaluation, training, assignment, salary increase and promotion, and promotion to management. We will not tolerate discrimination or harassment of any kind, and will continue efforts to prevent these discrimination and harassment through regular employee training and other means.

4. Prevention of Forced Labor and Child Labor

From the viewpoint of protecting fundamental human rights, we prohibit all forced labor and child labor, and conduct our business activities in compliance with this stance as a matter of policy.

5. Control of Working Hours and Wages

We shall establish in our work regulations, in accordance with the Labor Standards Act and labor-management agreements, rules regarding appropriate working hours and rest periods, overtime, late-night work, holidays, and leaves of absence. We shall also establish payroll regulations that comply with legal requirements regarding minimum wage, legal benefits and deductions, overtime, etc., and we ensure that wages are paid directly to employees.

6. Respect for Freedom of Association and Exercise of the Right to Collective Bargaining

We respect the right of individual employees to form labor unions of their own volition and to choose to participate or not to participate, and we allow them to exercise their right to effective collective bargaining. The company will negotiate in good faith through constructive dialogue with its representatives.

7. Employee Safety and Health

We are committed to maintaining a safe and healthy work environment by taking into consideration the physical and mental health of our employees, complying with laws, regulations, and rules related to safety and health, and responding appropriately to health risks.

8. Freedom of Expression and Protection of Privacy

We are also aware of the freedom of expression and protection of privacy in telecommunications, internet and social media communications, and will take the utmost care to ensure that there is no infringement of said freedoms and protections. Furthermore, we will treat all customers fairly and equitably, and provide them with safe and convenient services.

9. Initiatives and Systems for Respecting Human Rights

We will create a system of effective countermeasures against violations of human rights by establishing appropriate reporting channels to prevent human rights violations. In order to assess the human rights impact of our business activities, we will conduct human rights due diligence and continuously monitor and report these impacts to appropriate parties. If any negative impact on human rights should occur through our business activities, we will respond appropriately with fair and equitable remedial measures to mitigate or eliminate said impact.

10. Communication

The promotion of human rights initiatives is overseen by the ESG Promotion Project under the ValueCommerce Risk Management Committee, which includes the CEO, to promote the dissemination of this Basic Policy to all executives, employees, and external stakeholders, and to actively promote human rights awareness and activities.

11. Revision and Abolition of this Policy

The Board of Directors of ValueCommerce may revise or abolish this Basic Policy.

*The Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Children's Rights and Business Principles, and the Eight Fundamental Conventions of the ILO Declaration on Fundamental Principles and Rights at Work.

Established on September 26, 2022