

Human Rights Policy

We at the Mitsubishi HC Capital Group recognize that conducting business with the utmost respect of human rights is a major challenge, and we will fulfill our responsibilities in this regard across all our business activities.

We prohibit all forms of discrimination based on race, ethnicity, nationality, place of origin, social status, social origin (family origin), gender, marital status, age, language, disability, health status, religion, thoughts and beliefs, property, sexual orientation, gender identity, and differences in occupation or form of employment. Through dialogue and collaboration with relevant stakeholders, we will exclude exploitative labor practices such as modern slavery, forced labor, human trafficking, and child labor, from the businesses and supply chains of the Mitsubishi HC Capital Group.

We will address human rights risks relevant to our businesses earnestly and appropriately to fulfil our obligations to respect human rights in a manner expected of global companies, aiming to realize a society that respects human rights.

We will realize a flexible working style and respect a diversity of values, and strive to create a comfortable working environment in which each and every individual can demonstrate their maximum potential.

We guarantee freedom of association and collective bargaining rights and equal pay for equal work.

1. Global Standards to be Respected and Upheld

We respect the human rights described in the International Bill of Human Rights, the Ten Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the ILO Declaration on Fundamental Principles and Rights at Work, the Children's Rights and Business Principles, and other international standards.

Furthermore, based on the Guiding Principles on Business and Human Rights, as a corporate group that operates its businesses globally, we will uphold and respect internationally recognized standards relating to human rights, and concurrently comply with associated laws and regulations. Where there is a contradiction between internationally recognized standards, or the like, and the laws and regulations of a country or region in which we operate, we will seek methods to maintain respect for the international standards.

2. Role

This human rights policy complements the Mitsubishi HC Capital Group Code of Ethics and Code of Conduct. The policy clarifies our commitment to conduct business activities while fulfilling our responsibilities to respect human rights. As such, the policy has been approved by the Executive Committee and reported to the Board of Directors.

3. Scope of Application

This human rights policy will apply to all persons engaged in duties at any Mitsubishi HC Capital Group company. Additionally, we will actively require customers, partners, and suppliers to uphold

and practice this human rights policy. Furthermore, if the measures we take to ensure this are deemed insufficient or inappropriate, and they are confirmed to contribute to violating human rights, we will take the appropriate action to rectify these measures.

4. Human Rights Due Diligence

Based on the Guiding Principles on Business and Human Rights, we have created a human rights due diligence framework, and are continuing to make efforts to evaluate and identify human rights risks in our business activities and supply chains, take measures to prevent and mitigate such risks, assess the effectiveness of these measures, and disclose relevant information.

5. Relief Measures, etc.

In addition to not violating human rights ourselves in our business activities and services we provide, we will take action to ensure our stakeholders, including customers, partners, and suppliers, do not violate human rights. Furthermore, if it is determined that we have caused a human rights violation or have engaged in or contributed to such a violation, we will act to provide relief and rectify the situation.

Specifically, based on the internal reporting system, we will make efforts to prevent improper actions on a global basis. We are also working to provide relief for and rectify situations of human rights violations by anticipating risks of incidents present at our Company and across the supply chain and establishing an independent third-party human rights reporting hotline.

6. Communication, Dissemination, Education and Awareness-Raising

We will communicate, disseminate, and provide appropriate education, awareness-raising and talent development so that this human rights policy is incorporated in all business activities.

7. Dialogue with and Information Disclosure to Stakeholders

We will hold dialogue and discussions with relevant external stakeholders on measures for potential and real impacts on human rights. Furthermore, we will disclose our efforts that are based on this human rights policy on our corporate website, etc., and work to obtain the understanding of stakeholders.

8. Governance and Administration Framework

Determination of the necessity of revisions, etc. to this human rights policy will be subject to approval by the Executive Committee, then reported to the Board of Directors.

Established: 22 September, 2022

Revised: 20 May, 2026