

Mitsuuroko Group aims to improve corporate value to all stakeholders and achieve sustainable growth. We maintain a basic corporate governance approach to construct an optimized management structure and perform appropriate and healthy company operations. We will continue to promote governance reforms to accelerate decision-making, strengthen the supervisory function of management, and secure the transparency of company actions. We will take initiatives to strengthen risk management and improve compliance.

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# **Corporate governance**

# Governance

## **Basic approach**

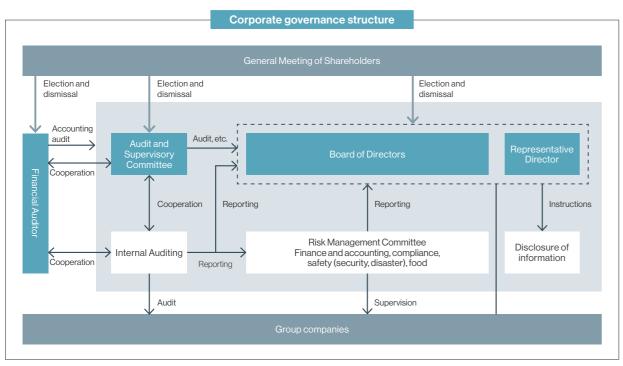
Mitsuuroko Group's basic approach on corporate governance is to develop a system to ensure the appropriateness of the Group's operations in accordance with the Companies Act, the Regulations for Enforcement of the Companies Act, the Financial Instruments and Exchange Act, other laws and regulations, and the code of corporate conduct of financial instruments exchanges. The purpose of this system is to ensure compliance with laws and regulations and social ethical norms, to ensure that Mitsuuroko Group's business is conducted in good faith and with transparency to customers, business partners, shareholders, etc., and to fulfill the Group's social mission in business activities.

#### Corporate governance structure

In June 2015, we shifted to a company with audit and supervisory committee and established a Board of Directors, Audit and Supervisory Committee, and Financial Auditor.

The Company has improved the effectiveness of auditing and supervision through auditing by Directors who are Audit and Supervisory Committee Members with voting rights on the Board of Directors, and further strengthened the supervisory function of the Board of Directors.Furthermore, the management participation of five External Directors, including three Directors who are Audit and Supervisory Committee Members, enhances the supervisory function of the Board of Directors with respect to business execution and ensures the appropriateness and transparency of the decisionmaking process.

With regard to the Board of Directors, by holding meetings at least once a month, we are always striving to share management issues and have established a system that enables us to take action to resolve issues as soon as possible. We are also working to build a more advanced governance system by appointing diverse human resources as Directors, including foreign nationals and physicians, to incorporate multifaceted perspectives and utilize AI, IoT, and other technologies. Moreover, in addition to appointing Directors to be responsible for the business in each segment of Mitsuuroko Group, and giving them the authority and responsibility to establish a legal compliance system and a risk management system for each Group company, the head of Finance & Control also promotes and manages these systems across the Group.



### Areas where Directors are expected to excel in

The Company aims to improve corporate value to all stakeholders and achieve sustainable growth. We maintain a basic corporate governance approach to construct an optimized management structure and perform appropriate company operations. We have composed a balanced Board of Directors by electing diverse human resources based on their knowledge,

actions.

		Area or skill expected to excel in							
Name	Position and responsibilities	Corporate management/ Management strategy	Financial accounting/ Capital policy	Human resources/ Personnel development	Legal/ Risk management	Auditing	Internal controls/ Governance	Overseas	Society/ Environment
Kohei Tajima	Representative Director, President and Chief Executive Officer General management	•	•	•	•		•	٠	•
Kazuhiro Kojima	Director Assistant to the President (Group Functions), Corporate Secretary, Finance & Control, Corporate Affairs, Others (operational and system support)	•	•		•	٠	•	٠	•
Takashi Matsumoto	Director Assistant to the President (Group Synergy), Energy Solutions Business	•		•	•		•	٠	•
Manabu Sakanishi	Director Power & Electricity Business	•		•	•		•		•
Jun Kawakami	Director Mobility Business, Others (leasing)	•					•		•
Motoyasu Omori	Director Foods Business	•					•		•
Goh Wee Meng	Director Chief Technology Officer, Chief Information Officer, Global Chief Inclusion & Diversity Officer, Global Planning, ICT Planning (planning, maintenance, promotion of information infrastructure), and Inclusion & Diversity	•		•			•	٠	•
Katsuhisa Yanagisawa	Director External	•	•			٠	•		•
Kaori Matsui	Director External Independent	•	•			٠			•
Hideo Sugahara	Director External Independent Audit and Supervisory Committee Member, tax accountant	•	•		•	٠	•		•
Yoshiyuki Kawano	Director External Independent Audit and Supervisory Committee Member, physician	•	•		•	٠	•		•
Kei Tajima	Director External Audit and Supervisory Committee Member	•	•		•	•	•		•

#### **Remuneration, etc. for Directors**

#### Policy on determining the remuneration, etc. for Officers

At the Board of Directors meeting held on January 20, 2021, the Company passed a resolution for a policy on determining the remuneration, etc. for each individual Director (excluding Directors who are Audit and Supervisory Committee Members; the same shall apply hereinafter).

In addition, the Board of Directors has confirmed that the method of determining the remuneration, etc. as well as the amounts determined for each individual Director in the current fiscal year are consistent with the aforementioned policy, and are therefore judged to be in line with the policy. The contents of the policy on determining the remuneration, etc. for each individual Director are as follows.

experience, and capabilities as we aim to accelerate decision-making, strengthen the supervisory function of management, and secure the transparency of company

The Company expects that each Director will excel particularly in the following fields and skills.

#### Basic policy

The basic policy of the Company is to determine the remuneration of Directors such that it is suitable and appropriate in light of Directors' roles and responsibilities, taking into consideration the business performance of the Company. Specifically, remuneration for Executive Directors consists of basic remuneration and a "Board Benefit Trust (BBT)," which is a form of performance-linked stock remuneration. Remuneration for External Directors, who are primarily responsible for supervisory functions, consists solely of basic remuneration in light of their duties.

#### Policy on determining basic remuneration (monetary remuneration)

Basic remuneration for the Company's Directors consists of fixed monthly remuneration and is determined after comprehensively taking into consideration such factors as remuneration levels at other companies, the business performance of the Company, and the levels of employee salaries, in addition to the positions, responsibilities, etc., of Directors.

## Corporate governance

#### Governance Policy on determining performance-linked remuneration, etc. and non-monetary remuneration, etc.

At the 107th Ordinary General Meeting of Shareholders held on June 28, 2016, a resolution was adopted in relation to a "Board Benefit Trust (BBT)" as a form of performance-linked stock remuneration for Directors (excluding External Directors and Directors who are Audit and Supervisory Committee Members: hereinafter, referred to as the "Eligible Directors" in this and the following paragraph) (furthermore, the trust established based on this plan is hereinafter referred to as the "Trust"). As set forth in the resolution, Eligible Directors are granted several points for each fiscal year, determined after taking into consideration their position, the degree of achievement of business performance targets (the degree of achievement of the target for profit before income taxes on the consolidated statement of income), and other factors, in accordance with the Officer Share Benefit Regulations (the maximum total number of points granted to Eligible Directors per fiscal year shall be 100,000 points). Furthermore, when granting the Company's shares, etc., the points granted to Eligible Directors are converted at a rate of one share of the Company's common stock per point (however, in the event of a share split, gratis allotment of shares, consolidation of shares, etc., in relation to the Company's shares, the conversion ratio shall be reasonably adjusted according to the ratio thereof, etc.). The number of points for the Eligible Directors to be used as the basis for the granting of the Company's shares, etc., is calculated by aggregating the points granted to the

Eligible Directors through the time of their retirement and then multiplying the result by a predetermined coefficient set for each reason for retirement (hereinafter, the points thus calculated are referred to as the "confirmed number of points"). If an Eligible Director retires and satisfies the beneficiary requirements set forth in the Officer Share Benefit Regulations. he or she will be granted a number of the Company's shares corresponding to the "confirmed number of points" from the Trust after their retirement, when he or she completes the prescribed beneficiary confirmation procedures; provided, however, that in cases when the requirements provided for in the Officer Share Benefit Regulations are satisfied, the Eligible Director in question shall be paid cash equivalent to the market value of a certain percentage of the Company's shares, in place of the granting of those shares of the Company. The amount of remuneration, etc., to be received by Eligible Directors shall be based on the amount obtained by multiplying the total number of points granted to each Eligible Director by the book value per share of the Company held in the Trust, at the time the points are granted (however, in the event of a share split, gratis allotment of shares, consolidation of shares, etc., in relation to the Company's shares, the conversion ratio shall be reasonably adjusted according to the ratio thereof, etc.). In addition, if deemed appropriate, this amount shall be added to any money paid in accordance with the provisions of the Officer Share Benefit Regulations.

#### Policy on determining the ratio of the amount of basic remuneration (monetary remuneration), performance-linked remuneration, etc., or non-monetary remuneration, etc., for the amount of individual remuneration, etc., for each Director

In addition to basic remuneration, Executive Directors receive performance-linked stock remuneration (BBT), classified as performance-linked remuneration, etc., and non-monetary remuneration, etc. However, the ratio of basic remuneration, performance-linked remuneration, and nonmonetary remuneration is not set in advance given the nature of performance-linked stock remuneration (BBT), such as the fact that, as described in "Policy on determining performancelinked remuneration, etc. and non-monetary remuneration, etc." above, a number of points (a maximum of 100,000 points per fiscal year) are granted to Eligible Directors in

accordance with the Officer Share Benefit Regulations for each fiscal year, taking into consideration their positions, the degree of achievement of business performance targets, and other factors, and a number of the Company's shares, etc., that is equivalent to the confirmed number of points at the time of retirement is granted, as well as the fact that this plan was introduced in place of the payment of retirement benefits. However, basic remuneration shall be the principal remuneration for Executive Directors. Remuneration for External Directors consists solely of basic remuneration, as described in the "Basic policy" on the previous page.

#### Matters concerning the determination of the contents of remuneration, etc. for individual Directors

Of remuneration, etc., for individual Directors, decisions concerning the specific amount of basic remuneration are delegated to the Representative Director and President, based on a resolution of the Board of Directors. This authority covers the setting of payment standards according to positions, responsibilities, etc., and the amount of basic remuneration for each individual based on such standards. To ensure that the Representative Director and President appropriately exercise this authority, the Representative Director shall make decisions concerning the establishment of payment standards in accordance with positions, responsibilities, etc., after consulting with and receiving reports from independent External Directors.

Furthermore, the specific content of performance-linked stock remuneration (BBT) for individual Executive Directors is determined in accordance with the Officer Stock Benefit Regulations.

\*2 The indicator of performance-linked remuneration is "profit before income taxes" in the that indicate of parameters in the consolidated statement of the consolidated statement of income. This is allow all Directors to promote a way of management that gives consideration to the continual improvement of the corporate value of the Group, by sharing returns with shareholders with the cost of capital in mind. The target value for the indicator of performance-linked remuneration in fiscal vear ended March 31. 2023 was ¥4.700 million. while the actual value was ¥11,678 million. The target value for profit before income taxes in fiscal year ending March 31, 2024 is ¥12,000 million. \*3 At the 106th Ordinary General Meeting of Shareholders held on June 26, 2015, the amount of

emuneration for Directors (excluding Directors who are Audit and Supervisory Committee Members) was resolved to be no more than ¥300 million per year (note that salary for employees is not included). The number of Directors at the conclusion of this General Meeting of Shareholders was nine (including two External Directors). In addition, separately from this at the 107th Ordinary General Meeting of Shareholders held on June 28 2016 a resolution was p to adopt "Board Benefit Trust (BBT)" as performance-linked stock remuneration for Directors other than External Directors. The number of Directors (excluding External Directors and

Total amount of remuneration, etc. for FY2022

Officer category	Total remuneration (millions of yen)	Basic remuneration (millions of yen)	Performance- linked stock remuneration (millions of yen)	Number of officers (Persons)
Total number of Directors (excluding Audit and Supervisory Committee Members)	314	275	39	9
(External Directors)	(14)	(14)	(-)	(2)
Directors who are Audit and Supervisory Committee Members	21	21	_	3
(External Directors)	(21)	(21)	(-)	(3)
Total	335	296	39	12
(External Directors)	(35)	(35)	(-)	(5)

Directors who are Audit and Supervisory Committee Members) at the conclusion of this General Meeting of Shareholders was seven. The conditions for allocating performance-linked stock remuneration are as described in "Policy on determining performance-linked remuneration, etc

and non-monetary remuneration, etc. above. 4 At the 106th Ordinary General Meeting of Shareholders held on June 26, 2015, the amount of remuneration for Directors who are Audit and Supervisory Committee Members was resolved to be no more than ¥100 million per year. The number of Directors who are Audit and Supervisory Committee that + Hoot million per year. The hindbe of Directors wild be a could all objective Committee Members at the conclusion of this General Meeting of Shareholders was three. '5 The Board of Directors has passed a resolution that the remuneration for each Director be determined by Representative Director and President Kohei Tajima, as stated in "Matters concerning the determination of remuneration, etc. for each individual Director" above, for the reason that Representative Director and President is eligible for evaluating the divisional performance that each Director undertakes, after considering the performance, etc. of the entir Group. Also, the total amount of performance-linked stock remuneration is reported to the Board of Directors every year through the company's performance as soon as it is confirmed according to the prescribed rule

#### Cross-shareholdings

#### Policy on cross-shareholdings

The Company's policy is to hold shares that contribute to improving corporate value over the medium- to long-term, after comprehensively considering their importance in relation to its business strategy, relationships with business partners, and other factors. Each year, the Board of Directors carefully examines the significance of acquiring and holding each individual stock and their profitability based on the cost of capital, etc., thus regularly verifying the appropriateness of holding these stocks. Furthermore, the Company has established a policy of selling any stocks that it is unable to recognize the rationality of holding as a result of verifying the significance and purpose of holding them and will take steps to reduce the number of such shares that it holds.

#### Evaluation of the effectiveness of the Board of Directors

The Company has conducted self-evaluations of the effectiveness of the Board of Directors in the form of guestionnaires to Directors.

The Company endeavors to ensure objectivity by seeking advice from attorneys and other experts as appropriate in relation to the preparation of the questionnaire and the analysis of evaluation results.



#### Status of the risk management system

Mitsuuroko Group has established the "Risk Management Committee" as a subordinate body of the Board of Directors to ensure the early detection and resolution of various problems related to legal compliance and to develop the systems required to implement and supervise internal control over legal management and compliance with laws, regulations, and social norms (compliance) in the midst of a risk environment that is becoming increasingly diverse and complex as our business portfolio evolves. In addition, the Group has established a reporting system to ensure that compliance-related information is accurately and promptly reported to the department in charge of compliance, and it will constantly develop. improve, and appropriately operate the Compliance Hotline so that all Group employees can use it properly to communicate information without employees or outsiders receiving disadvantageous treatment because of such a report. The Risk Management Committee evaluates risks, recognizes issues, and implements operational improvements based on the recognition of

#### 2 Standard for exercising voting rights for crossshareholdings

The Company appropriately exercises voting rights based on a comprehensive assessment of whether to vote for or against each proposal, taking into consideration factors such as the establishment of appropriate corporate governance structure, the improvement of the corporate value of the investee over the medium to long term, and the impact on the Company. If necessary, we will discuss the content of proposals, etc., with issuers

#### Summary of evaluation results for FY2022

According to the results of the questionnaire, the Board of Directors of the Company in FY2022 was evaluated to be effective. The Company will work to improve the recognized issues in the future.

larly <sup>-</sup> ated ts -	Effective operation in an atmosphere that encourages straightforward and unrestricted discussion.
	An environment in which External Directors feel comfortable expressing constructive opinions, and do so when necessary.
	It has an appropriate composition of members that ensures the knowledge, ability, experience, and diversity necessary to fulfill the roles and responsibilities of the Board of Directors.
	Its agenda items contain sufficient content for deliberation in light of the level of importance of the matters to be discussed.
	Its cross-shareholdings are appropriately examined.
	Important risks are reported to the Board of Directors in a timely and accurate manner and the Board of Directors is aware that these issues are being addressed appropriately by the management team.
	The results of the audit of the effectiveness of the internal control system are reported in a timely and appropriate manner.
	The content and volume of materials used and the timing of prior distribution and explanation should be considered more carefully.
iized s	Important management and business strategies should be reviewed from a more multifaceted and sustainability-oriented perspective.
	Business portfolio reviews and capital and human resource investments should be more strategically implemented and such implementations checked.
	A more appropriate system should be established to promote constructive dialogue with shareholders.

issues with regard to events that may affect the achievement of the objectives set for each business process by the general managers of each division regarding all operations of Mitsuuroko Group, and it formulates an internal control implementation plan with the approval of the Board of Directors. In addition, it supervises the progress of the plan, and in cooperation with the Audit and Supervisory Committee and the Internal Auditing, it determines policies for the design and improvement of the overall internal control system. Regarding issues related to the development and operation of internal control over financial reporting, the Head of the Finance & Control performs cross-group review and coordination, and reports to the Board of Directors on the annual plan for internal control over financial reporting and its results in light of changes in the environment.

In addition, the Company has established the "Food Quality Control Committee" to manage risks related to food guality, laws, and regulations, and to manage risks related to safety in cooperation with each department.

Introduction

<sup>\*1</sup> The amount of the above remuneration, etc. includes the provisions for share awards of ¥39 million that was recorded in fiscal year ended March 31, 2023.

# **Risk management**

## **Basic approach**

Mitsuuroko Group has established risk management rules and is developing and operating a risk management system for all of its businesses.

The Group will ensure the continuity and stable development of its business through risk management practices.

We also place the highest priority on ensuring the quality and safety of our products and services, and strive in good faith to eliminate or reduce obstacles to the interests of our customers, business partners, shareholders, investors, local communities, and other stakeholders, as well as those of all officers and employees of the Group.

We are aware of our responsibility as a supplier of products and services that are widely used throughout society, and we consider it our social mission to stably supply such products and services. In the spirit of compliance, we will adhere to various laws and regulations, the Charter of Corporate Ethics, and other codes of conduct and rules, and each of us will autonomously consider what is ethically correct conduct and act according to our value judgment.

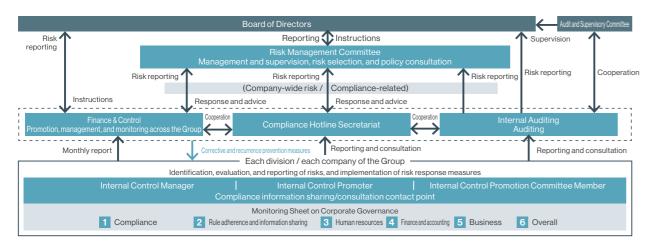
#### Promotion system and process of risk management

For the purpose of promoting compliance and risk management, the Group has set up a "Risk Management Committee" to supervise the risk management of the entire Group, and Finance & Control promotes and manages these across the Group. The Group has appointed an "Internal Control Manager," "Internal Control Promoter," and "Internal Control Promotion Committee Member" for each department to disseminate information related to compliance in each department, and to serve as a consultation contact point for employees on-site. Regarding the risk management process, Finance & Control promotes and manages risk across the entire Group, and reports monthly to the Board of Directors risks reported by the Group to prevent problems before they occur. With regard to detected risks, if a Companywide response is deemed necessary, taking into consideration the monetary impact and importance of the risk, the Risk Management Committee discusses the response, and the Board of Directors makes a final decision on the matter and considers and implements specific measures to address it.

#### Monitoring

Through the Monitoring Sheet on Corporate Governance, Finance & Control visualizes the risks that should be focused on and their priorities by accurately identifying risks for the entire Group and selecting risks that need to be addressed in a focused manner. It manages the risks related to matters such as compliance, rule adherence and information sharing, human resources, finance and accounting, and business, and report monthly to our Board of Directors to prevent problems before they occur. Throughout the year, the Company monitors risks, mainly those of particular importance, and when necessary, related departments and Internal Auditing conduct investigations to take corrective measures and prevent recurrence.





#### Main business risks

Risks that may affect the Group's stock price, financial position, and business performance include the following. Recognizing the possibility of these risks, the Group

Risks	Relevant businesses	Degree	
RISKS	Relevant businesses	of impact	
1. Demand trend	Energy Solutions Business	Large	Demand for petroleum products (hea when temperatures are cooler. As su Group's business performance.
2. Product procurement	Energy Solutions Business / Power & Electricity Business	Large	The cost of sales of petroleum produ due to changes in crude oil prices an electricity market prices through ele conditions, etc., which may affect the made to hedge transactions using fu necessary, but these risks cannot be
3. Sales strategy	Energy Solutions Business / Power & Electricity Business	Medium	The Group's core businesses are the petroleum products, LPG and related renewable energy such as wind pow retail for general households. Compe freedom of choice in energy and maa number of customers and drop in sal
4. Disasters etc.	Energy Solutions Business / Power & Electricity Business	Very large	Each of the Group's business sites in and other facilities. Although the Cor regulations, inspects facilities throug earthquake or other disaster could c
5. Investments etc.	All businesses	Medium	In order to strengthen its manageme in Japan and overseas, and enters in etc., we make decisions after giving o the possibility of recovering the invest performance of the investee deterion circumstances, and the possibility of certain level, we may incur a partial o and business performance of the Gro
6. Non-current assets	All businesses	Medium	The Group owns a number of busine and are recognized as generating su the possibility of recovering the value Group's earnings situation may affec
7. Laws and regulations	All businesses	Medium	There are a wide variety of laws and thusiness operations. The Energy Soo High Pressure Gas Safety Act, the Fi Business is subject to various regulat public organizations. Furthermore, in the future, we may be of greenhouse gas emission regulative emissions reduction efforts and deca Violations of laws and regulations ap activities due to penalties, compensa addition, significant capital investme tightening of regulations, or the estat
8. Overseas Business	Overseas Business	Large	The Group conducts overseas busin to risks inherent in overseas busines economic, and social conditions in ea hinder the continuation of our busine
9. Spread of COVID-19	Foods Business / Living & Wellness Business	Large	A decrease in customers due to a ter and the hot bath facilities and bowling profitability.

#### Risk factor by business segment

Risk description	
Fluctuation in cost of sales due to crude oil prices, CP <sup>1</sup> /MB <sup>2</sup> of LPG, and exchange rates     Impact of COVID-19 on logistics infrastructure     1 Contract Price: Contracted import price;     2 Mont Belvieu: US-produced LPG price index	Living Wellne Busine
Policy risks associated with changes in administrative policy and impact on system development     Necessity of procuring low cost power and developing power sources to achieve competitiveness in electric power sales     Impact of power outages caused by natural disasters on IPP business	
Impact of increased costs from obligation to offer non-fossil energy     Capacity contributions at the start of the capacity market	
Damage to brand image and impact on business performance in event of quality-related accident at franchised stores of store brands     Risk of decreased sales due to closing of stores in conjunction with the spread of COVID-19	Other
	Fluctuation in cost of sales due to crude oil prices, CP <sup>-1</sup> /MB <sup>-2</sup> of LPG, and exchange rates     Impact of COVID-19 on logistics infrastructure     '1 Contract Price: Contracted import price;     '2 Mont Belvieu: US-produced LPG price index     Policy risks associated with changes in administrative policy and     impact on system development     Necessity of procuring low cost power and developing power     sources to achieve competitiveness in electric power sales     Impact of power outages caused by natural disasters on IPP     business     Drop in electricity unit selling price caused by intensified competition     Impact of increased costs from obligation to offer non-fossil energy     Capacity contributions at the start of the capacity market     Damage to brand image and impact on business performance in     event of quality-related accident at franchised stores of store brands     Risk of decreased sales due to closing of stores in conjunction with

strives to avoid their occurrence and to respond to them when they do occur.

#### **Risk description**

eating oil) and LPG, the Group's core products, generally increases such weather conditions can cause net sales to fluctuate and affect the

ducts, LPG, and electricity, the Group's core products, may fluctuate and CP of LPG, trends in foreign exchange rates, and wholesale lectricity supply crunch caused by inclement weather and international he Group's business performance. To mitigate these risks, attempts are futures and other instruments and to diversify procurement sources as be completely avoided.

he Energy Solutions Business, which sells household energy such as ted equipment, and the Power & Electricity Business, which generates wer generation and biomass power generation and conducts electricity petition among competitors for customers is intensifying due to greater aximum price curtailment, among other factors, and a decrease in the sales prices due to these factors may affect the Group's profitability.

includes petroleum product and LPG storage facilities, power plants, ompany conducts periodic inspections in accordance with laws and ugh a voluntary safety system, and makes periodic repairs, a major I cause a leakage accident or damage to assets.

nent base, the Group establishes subsidiaries or affiliated companies into capital tie-ups with external parties. With regard to investments, g due consideration to investment risks, etc., and periodically check estment value. However, if the financial conditions and business iorate due to changes in the business environment or unforeseeable of recovering the investment decreases, or the stock price falls below a lor total loss on our investment, which may affect our financial condition aroup.

ness fixed assets, all of which are essential to the conduct of its business sufficient cash flow in the past and present. Although we regularly check lue of our investments, future trends in land prices and changes in the ect our financial position and business performance of the Group.

d regulations that the Group must comply with in the course of its solutions Business and Power & Electricity Business are subject to the Fire Service Act, and the Electricity Business Act, etc., while the Foods lations under food-related laws and quality inspections by external

be subject to various legal restrictions, such as the introduction ations and carbon taxes, amid the global demand for stronger  $\rm CO_2$  acarbonization.

applicable to the Group may hinder the continuation of our business isation for damages, or damage to the Group's reputation, etc. In nent may be required in the future in the event of major revisions or tablishment of regulations that are currently unforeseeable.

siness in Asia, and in addition to foreign exchange risks, we are subject ess in general, such as unforeseen circumstances arising from political, each country, and changes in various laws and regulations, which may ness and affect our financial position and business performance.

temporary shutdown of operations at the stores of the Foods Business ling alleys of the Living & Wellness Business may affect the Group's

#### **Risk description** · Fluctuations in real estate market Obsolescence of property in commercial facilities (Decline in competitiveness) · Delayed response to deterioration of owned real estate (Decline in ness competitiveness and increase in repair costs) · Risk of decrease in SPA EAS and Hamabowl customers due to the spread of COVID-19 Risks in exchange rates Unforeseen circumstances arising from political, economic, social and other conditions in each country Changes in various laws and regulations • Risks inherent in Overseas Business in general Risk receivables for lease customers arising from economic conditions, monetary policies, or the spread of COVID-19 Impact of leakage of personal information (including specific personal information) on business performance, etc · Risk of system outage due to system failure Natural disaster risk and insurance underwriting risk of each

# Compliance

## **Basic approach**

Mitsuuroko Group has declared to society that it would give consideration to the global environment, comply with relevant laws and regulations, and enhance environmental preservation. We have also advocated the need for ethics by stating in our corporate philosophy that we consistently

conduct our business with integrity.

In the future, we will continue to contribute to the sustainable development of society as "a Lifestyle Producer" by striving for sincere management and business activities based on high ethical standards, always from the perspective of corporate social responsibility, as well as activities that take into consideration environmental preservation and resource conservation.

#### Mitsuuroko Group Standard of Conduct

Mitsuuroko Group has established the "Charter of Corporate Ethics" as a code of conduct to be observed by the Company and its officers and employees in the course of the various corporate activities of the Group companies

The officers and employees of each Group company take the initiative in practicing the normative behaviors set forth in the Charter of Corporate Ethics as their important role and are making utmost efforts to ensure that they are firmly established within the Group.

In addition, in the event of a conflict with this Charter of Ethics, officers and employees take responsibility for resolving the problem, investigating the cause, and improving operations to prevent recurrence.

#### Charter of Corporate Ethics

1 Comply with laws, regulations, and other social norms, and conduct fair and sound corporate activities Mitsuuroko Group will conduct its corporate activities in accordance with laws and regulations, social norms, and social good sense.

In addition, Mitsuuroko Group will not associate with any individuals or groups that may adversely affect social order or the sound activities of the Company.

#### 2 Provide safe and high-quality products and services

We will develop safe and high-quality products and services based on our rich experience and knowledge and provide them to consumers and business partners.

3 Respect the personality and individuality of employees and create a comfortable and fulfilling work environment

Mitsuuroko Group will value the independence and creativity of each and every employee and foster a corporate culture in which they are fully utilized in its corporate activities.

Mitsuuroko Group will protect workplace safety and the health of its employees, respect human rights, and ensure a healthy work environment free from discrimination.

#### 4 Respect the position of stakeholders

Mitsuuroko Group will strive to maintain sound and positive relationships with a wide range of society, including customers, business partners, employees, and shareholders.

5 Contribute to the preservation of the global environment and the creation of a prosperous and livable society Mitsuuroko Group will be aware that it receives various benefits from the Earth, including the resources necessary for its business activities, and that it is the Group's responsibility to preserve the global environment in a better state

#### **Compliance Handbook**

Mitsuuroko Group publishes the "Compliance Handbook," a combination of the "Charter of Corporate Ethics" and the "Code of Conduct Casebook," which explains the code of conduct stipulated according to the Charter of Corporate Ethics in an easy-to-understand manner. In order to enhance the understanding of the Charter of Corporate Ethics, we have sought to make it easier to comprehend the necessary actions needed to be taken by officers and employees by giving specific examples from daily life in understandable ways. For this reason, 50 of the 100 cases in the handbook have been converted into easy-to-read manga cartoons.



#### Compliance reporting system

For the purpose of preventing and early detection of organizational or individual violations of laws and regulations, as well as fraudulent activities, we have established a "Compliance Hotline," which includes Legal, Internal Auditing within the Company, and an outside law firm. In response to reports and consultations on violations from the Company employees, business partners, etc.,

#### Compliance training

Mitsuuroko Group regularly conducts compliance training by rank and theme.

Content of training	Target	Frequency of implementation	Content of training	Target	Frequency of implementation
IT compliance training	All officers and employees	Once a year	New management training	Newly appointed managers	Once a year
Group management compliance training	Management	Once a year	Training for managers in charge of safety	Managers in charge of safety	Once a year
Training for supervising officers	Supervising officers	Twice a year	Group new employee training	New employees	Once a year
Group company accounting training	Accounting managers	Twice a year			

#### Issuance of information security cards

For the purpose of responding quickly and minimizing damage in the event of loss of personal or internal information, we have issued an "information security card" that describes how to respond in the event of loss of documents or business equipment containing personal information, etc., as well as compliance-related matters, and we have all employees of the Group, including subcontractors, carry this with them at all times.

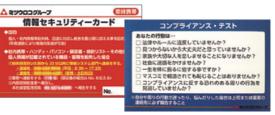
#### Implementation of education on compliance and harassment

We have produced an educational DVD on compliance based on case studies, and together with the DVD on harassment, we are conducting education on compliance by having all officers and employees of the Group watch it during the compliance small group activities that we have been conducting on a regular basis. In addition, in order to continuously educate all employees of Mitsuuroko Group about compliance and to strengthen their awareness of compliance, we regularly distribute a "Compliance Newsletter" on the company intranet every week, featuring news of public interest and familiar examples.



we protect the informants, investigate the facts responsibly, and take corrective and recurrence prevention measures, as necessary. The information on where to report to the Compliance

Hotline is posted on the information security card that is carried by all employees at all times and is known and shared by all employees.



# Compliance

#### Prevention of bribery

Based on our management philosophy and "Charter of Corporate Ethics," the Group promotes sincere corporate activities based on high ethical standards, always from the perspective of corporate social responsibility. The Group aims to conduct measures to prevent bribery in its corporate activities by establishing and spreading awareness of the Charter of Corporate Ethics, employment rules, Compliance Rules, and risk management rules, etc.

We have enacted and announced Mitsuuroko Group Basic Policy on Prevention of Bribery, promoted efforts to prevent bribery across the Group with a mindset of fair play, and realize further improvement of corporate value by fulfilling our corporate social responsibility in order to gain the trust of stakeholders and the general public.

#### Operation structure for prevention of bribery

Head of Legal shall be responsible for managing prevention of bribery. The Presidents of each Group company are also responsible for making their officers and employees comply with this basic policy.

Regarding approval of entertaining, gift-giving, and donations in Overseas Business, and approval of agreements and confirmation of due diligence results related to hiring third parties, each department, the President of each company, and the finance and accounting department and the legal affairs department of Mitsuuroko Group shall confirm.

When we become aware of a violation of this basic policy or suspicion thereof, we will report it immediately to the manager in charge of legal affairs, the manager of the Internal Auditing, or the compliance hotline in or outside the Company. We have spread awareness of this reporting structure.

The Company performs regular self-inspections of the status of compliance with this basic policy and the Internal Auditing executes controls and prevents risks beforehand by regularly conducting audits related to the compliance and operation of this basic policy.

If by chance a violation of this basic policy is discovered, the Company will proceed in accordance with company regulations and cooperate with investigations by supervising departments.

#### Education and spreading understanding

The Company has been aiming for education and spreading understanding of the prohibition on bribery in compliance training and internal materials. Because there are different restrictions on overseas transactions from those in Japan, the Company shall thoroughly spread awareness of the prohibition of bribery in and outside Japan and further expand the scope of training. Also, the Internal Auditing shall take efforts to execute controls and extract risks beforehand through regular audits.

#### 1 Basic policy

Mitsuuroko Group promotes business activities based on its Charter of Corporate Ethics and management philosophy of "As a Lifestyle Producer, we consistently conduct our business with integrity and from the customer's perspective."

In accordance with laws and regulations and their intentions, we prohibit the entertaining or gift-giving to public officials, etc.

We aim to conduct measures for the prevention of bribery by establishing and spreading awareness of the Charter of Corporate Ethics, employment rules, Compliance Rules, and risk management rules, etc. The Group enacted a basic policy related to prevention of bribery overseas and in Japan as it

conducts global business.

We understand that it is the duty of each Mitsuuroko Group company, officer, and employee to comply with this basic policy. As such, we make the following declaration

In accordance with our Basic Policy on Prevention of Bribery, we shall comply with the laws applied in each country and region and not engage in bribery of foreign officials.

By clarifying the policies that are the foundation of this basic policy, we promote efforts to prevent bribery across all of Mitsuuroko Group with a mindset of fair play, and realize further improvement of corporate value by fulfilling our corporate social responsibility in order to gain the trust of stakeholders and the general public.

#### 2 Compliance of applied laws and regulations

We understand that corruption and bribery are unacceptable and comply with Japanese Penal Code, the Unfair Competition Prevention Act, the National Public Service Ethics Act, and the National Public Service Ethics Code.

We also comply with the laws, regulations, and restrictions applied in each country and region where we conduct corporate activities and do not bribe foreign public officials, etc.

We shall not perform any actions that may lead to suspicion of bribery.

- 1. Japan: Unfair Competition Prevention Act (Article 18), Penal Code (Articles 197 and 197-4)
- 2. US: Foreign Corrupt Practices Act (FCPA)
- 3. UK: UK Briberv Act 2010
- 4. Other similar laws based on or related to treaties for the prevention of bribery of foreign officials in international trade

Mitsuuroko Group Basic Policy on Prevention of Bribery

#### 3 Prohibited actions (1) Prohibition of bribery

In corporate activities, the Company shall not offer, promise, or grant a bribe to anyone, whether they be a private citizen or a public official, either in or outside Japan, directly or through a third party, such as a proxy, consultant, or associate under contract. The Company shall not perform any action that may be suspected of bribery from society. Bribery refers to the granting and receipt of items of monetary value, or other improper interests, or the promise, demand, request, or approval thereof.

(Notes) In the cases of charitable business, political contributions, and donations for sponsored activities, actions are also prohibited if they are in fact equivalent to bribery or improper granting of interests.

> Also, officers and employees are prohibited from instructing, suggesting, or supporting bribery of a third party such as an agent, advisor, consultant, or subcontractor hired in order to collect and analyze information, secure orders for Mitsuuroko Group, or otherwise request cooperation for the purpose of promoting business, or to request services for which Mitsuuroko Group has received orders.

#### (2) Prohibition of accepting bribes

The Company shall constantly maintain a stance of loyalty and fairness and shall not request, promise, nor receive bribes from business partners either in or outside of Japan by using our business position. Also, the Company shall not perform any action that may be suspected of accepting bribes from society.

4 Review and management of payment records

In order to prove that we do not engage in bribery, we review all payments to third parties within a logical degree of detail, record transactions accurately and surely in accounting books, and preserve these records internally for a set period. In all circumstances, off-balance-sheet transactions are strictly prohibited.

#### 5 Education

The Company performs training related to compliance that includes education of this basic policy and regular case studies for officers and employees in order to comply with the prohibition of briberv.

We perform regular self-inspections of the status of compliance with this basic policy and cooperate with investigations of supervising departments in each country and region. We will perform reviews as needed of this basic policy and compliance procedures.

## 8 Audit

The Internal Auditing performs appropriate audits related to compliance and operation of this basic policy, extracts risks and issues related to prevention of bribery, executes controls, and prevents risks beforehand.

# Introduction

# **ESG** Data

#### 6 Compliance system, reporting, and internal reporting system

The responsibility of preventing bribery, including the execution and review of this basic policy, lies with the Head of Legal. The Presidents of each Group company are also responsible for making their officers and employees comply with this basic policy. Also, when we become aware of a violation of this basic policy or suspicion thereof, we will report it immediately to the manager in charge of legal affairs, the manager of the Internal Auditing, or the hotline in or outside the Company.

Mitsuuroko Group has established and spread awareness of a reporting and consultation hotline with an external attorney in order to guickly identify and correct compliance issues, including bribery. Violations to this basic policy will be subject to punishment in accordance with various regulations.

#### Cooperation with monitoring and investigations by supervising departments

# Compliance

#### Tax policy

Mitsuuroko Group has always complied with the tax laws applied in each country and region it operates in and pays appropriate taxes. However, to increase awareness of tax compliance and tax transparency throughout the entire Group and further enhance tax governance, we have formulated the "Mitsuuroko Group Tax Policy." As we

expand our business globally, going forward, we will fulfill our corporate social responsibility and further improve our corporate value through adhering to this Tax Policy, complying with the tax laws applied in each country and region, and paying appropriate taxes.

#### Mitsuuroko Group Tax Policy

#### 1 Basic policy

Mitsuuroko Group promotes business activities based on its Charter of Corporate Ethics and management philosophy of "As a Lifestyle Producer, we consistently conduct our business with integrity and from the customer's perspective."

We recognize that transactions that lack legitimate business purposes or economic rationality hinder tax transparency and may damage the Group's business and brand value as well as the interests of stakeholders, including local communities and business partners. As we expand our business globally, we will fulfill our corporate social responsibility and further improve our corporate value through adhering to this Tax Policy. complying with the tax laws applied in each country and region, and paying appropriate taxes.

#### 2 Tax compliance

We will always report income and pay taxes in compliance with the laws and regulations applied in each country and international standards such as the Action Plan on Base Erosion and Profit Shifting (BEPS). In addition, we will not engage in tax evasions or opaque tax administration that hinders the sound development of the world economy.

#### 3 Tax governance and human resources development

The Group CFO is responsible for the development and maintenance of the tax governance of the entire Group as well as the development of human resources responsible for the enhancement of tax governance. We have formed a system for managing tax risks globally, assigning employees with expertise in matters concerning taxation to Finance & Control (F&C). We have also put a framework in place for addressing the Group's tax-related concerns in which the F&C and each Group company work together and the issues are reported to the Group CFO and resolved. Whenever tax-related matters of significant importance arise, the CFO reports them to the Board of Directors.

In addition, the F&C gathers the most up-to-date information concerning taxation through means such as participation in training sponsored by external specialists. It then conducts workshops for the accounting (tax) departments of each Group company based on the advice they have received from the external experts, educating employees on tax compliance as necessary. In this way, we foster and strengthen the human resources who handle the Group's tax matters, ensuring the appropriateness of tax governance.

#### 4 Response to transfer pricing taxation

For international transactions within the Group, we comply with the tax laws of each country and the Organization for Economic Co-operation and Development (OECD) Transfer Pricing Guidelines. ensuring transfer pricing transactions are carried out appropriately and in accordance with the arm's length principle. In addition, to avoid double taxation, we enter into an advance pricing agreement with tax authorities, working to reduce tax risk.

#### 5 Response to anti-tax haven rules

We will not use tax havens for the purpose of tax avoidance without economic rationality. If, in light of the taxation systems of each country, anti-tax haven rules apply to schemes necessary for our business operations, we will report on such matters and pay taxes appropriately.

#### 6 Minimizing tax risk

If deemed necessary due to uncertainties or other concerns regarding the interpretation of laws and regulations, we will receive advice from external experts such as tax consultants and legal advisors wherever necessary, and we will work to minimize tax risk through making appropriate judgments after adequate research, evaluation, and consideration of the various choices. Furthermore we will confirm important tax-related issues with tax authorities in advance to clarify the handling of taxation.

#### 7 Tax cost optimization (tax planning)

Through strengthening governance as outlined above and utilizing means such as preferential tax systems and tax exemptions that are recognized under the laws and regulations of each country within the scope of normal business activities, we will optimize tax costs and improve our corporate value.

#### 8 Relations with tax authorities

We will form and maintain transparent, sound, and positive relations with tax authorities by responding to their requests in an appropriate, honest, and timely manner, and obtaining advance rulings as necessary.

#### Anti-corruption

#### 1 Relationship between compliance and risk

In conducting business, there are various risks as mentioned above. The matter is not as simple as it's safe if the risk does not materialize, but rather we should identify these risks, prepare the counter measures and put them into practices so we can operate and develop our business better. However, failure to identify risks or to act against the procedures established to avoid or minimize risks may lead us to noncompliance and corruption in business activities. We do not engage in noncompliant behavior to avoid risk; we engage in compliance to avoid risk and continue our business.

Risks that can be avoided through compliance include (1) financial misconduct (embezzlement, fraud, etc.), (2) harassment, (3) workplace accidents, and (4) acts in violation of laws and regulations.

#### 2 Risk management system / Risk assessment

We have established a risk management system based on our Risk Management Rules, and identify risks through monitoring and internal control operations. In addition, we have established internal and external compliance hotlines to encourage employees to report incidents that they may be uncomfortable discussing with their supervisors or the company, thereby helping to identify risks at an early stage. We also strive to detect risks by closely monitoring industrial safety and employee health and mental health at the new

Mitsuuroko Healthcare Center, which opened in October 2023 Any risks discovered are ultimately reported to the Risk

Management Committee and the Board of Directors in an effort to mitigate such risks.

#### 3 Guarantee of fairness / Prohibition of illegal activities (Prevention of corruption)

In conducting our business, we are committed to promoting corporate activities with integrity and



preventing corruption in accordance with our management philosophy and Charter of Corporate

For example, having a relationship with a particular political group may lead to interest-driven business practices, and there is a risk that we may not be able to realize the "more fulfilling lifestyles" to all of our customers. In addition, the attempt to profit from bribery (in particular, giving a bribe) is widely regarded as a criminal act in Japan and abroad, and profiting from such criminal acts is never permissible. Furthermore, any attempt to gain an unfair advantage by taking tax measures that violate tax obligations (Article 30 of the Constitution of Japan) will not only lead to disregard for the law in Japan, but may also render the company untrustworthy in its overseas business activities. As a company, we will promote our business activities with integrity by prohibiting the support of any particular political parties through endorsements or donations, and by establishing the Basic Policy on Prevention of Bribery and Tax Policy and applying them to our domestic and overseas business activities.

#### 4 Disciplinary actions

Even with risk mitigation and anti-corruption measures in place as described above, violations may still occur. In such cases, the Risk Management Committee plays a central role, and the Compliance Hotline Secretariat, the Internal Auditing, and Finance & Control collaborate to verify the facts and conduct other investigations. Based on the facts identified there, the Risk Management Committee will take the necessary disciplinary action. While some cases may result in severe penalties that include termination of employment, it also serves to deter employees from committing violations by making them aware that they will ultimately be disciplined in accordance with internal rules.

# Cybersecurity

## **Basic approach**

Governance

As an infrastructure business operator that supplies energy and services related to everyday lifestyles, the Group considers cybersecurity an important issue in the fulfillment of our social responsibility and has positioned it as one of its key management issues.

Under the leadership of management, we ensure security in our customer service information systems, protect the information assets that have been entrusted to us, and promote stable supply of energy and security.

While transactions via the Internet and smartphones have increased with the rapid development of digital technology in recent years, cyber risk is also growing due to the advancement and sophistication of cyber attacks.

In light of changes in the environment such as the recent use of digital technology and increased threat of cyber attacks, we are working to strengthen cybersecurity measures within our various operations and businesses, such as the Energy Solutions, Power & Electricity, Foods, and Living & Wellness businesses.

### Information security targets

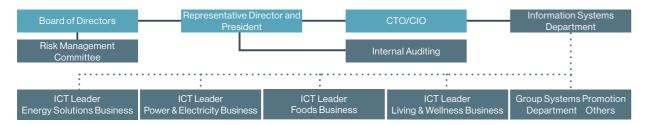
To reduce cyber risk, we maintain defense in depth and detection measures, actively developing human resources in security measures and sharing information with other companies to improve our knowledge and expertise through working with external organizations

that handle cybersecurity, as well as analyzing and responding to new cyber attack methods. We will constantly endeavor to reinforce our approach to cybersecurity to provide safer and more secure services to our customers.

### Cybersecurity response system

We have established the Risk Management Committee as a subordinate body of the Board of Directors as well as the Information Systems Department under the CTO / CIO. Through this framework, we manage the information security governance of the entire Group. The Risk Management Committee and the Board of Directors receive reports on the status of the Group's security

measures on a regular basis. Aiming to prevent cybersecurity incidents and minimize the damage or impact caused if they occur, each department and the subsidiaries that support the Group's business work together to build an information security promotion system and ensure cybersecurity.



### Practices to ensure cybersecurity

As initiatives to ensure cybersecurity, we secure the budget and human resources for technical countermeasures such as those for preventing the unauthorized access of systems. In addition, since IT measures alone are not sufficient to counter increasingly sophisticated cyber attacks, we conduct periodic e-learning training (once a year) and unannounced drills on countermeasures against targeted e-mails for the Group's officers and employees, including contract employees and the employees of business partners, working to strengthen the information security of the entire organization.

### Strengthening the sharing of information with Group companies

To make sure that our security policy is applied to all Group companies, we monitor the status of security measures of each company of the Group while ensuring security tools and operations meet a certain standard, working to strengthen governance and improve security across the entire Group.

# Personal information protection

## **Basic approach**

The Group deeply acknowledges the importance of privacy in respect to our customers' personal information. When handling personal information for our operations, all officers and employees comply with relevant laws and regulations as well as the internal rules that the Group has established. We thereby ensure that we respect our customers, meet their expectations, and build trust. In addition, we pay special consideration when handling the personal information of children and seek to obtain their parents' consent in the process.

### **Privacy policy**

Mitsuuroko Group Holdings Co., Ltd. and each Mitsuuroko Group company handle the personal information of customers as outlined below.

#### 1 Purpose of use

Each Mitsuuroko Group company acquires and uses the personal information of customers only for purposes such as publishing it on official websites or reasons which we notify our customers about. Each Mitsuuroko Group company will not acquire or use personal information for purposes other than the above without the consent of the customer.

#### 2 Provision of personal information to third parties

Each Mitsuuroko Group company will not entrust or provide the personal information of customers to third parties, except upon the customers' consent or when we are legally obligated to so do after a receipt of request from judicial or governmental authorities. Even after customers give their consent, we ensure confidentiality agreements are in place to protect personal information in the event that we disclose, entrust, or provide personal information to third parties, and we do our upmost to protect the personal information of our customers.

#### 3 Shared use of personal information

Regarding the following personal information, each Mitsuuroko Group company may share the information below for the purposes described in " 1 Purpose of use" or for the purposes of use outlined below

- 1 Basic customer information including name, age, gender, address, phone number, and contract numb
- 2 The details and usage status of services and products provided by each Mitsuuroko Group company to customers, and the status of transactions
- 3 Results of various surveys conducted by each Mitsuuroko Group company

4 Details of inquiries from customers

The responsibility of managing information for shared use lies with the respective Mitsuuroko Group companies that have acquired the personal information

### Initiatives for protecting personal information

Each Mitsuuroko Group company is conducting the following activities to ensure that the privacy policy is complied with.

1	We conduct educational activities and training for all officers	3 Wei
	and employees to ensure compliance with laws, regulations, and other standards concerning personal information.	cont infor
	and other standards concerning percentarinerination.	

2 We appoint a personal information supervisor who understands and complies with the matters specified in the internal rules of the Company. Their responsibilities include conducting training, implementing safety measures, and thoroughly communicating information to ensure that all of those who are engaged in the handling of personal information, including its acquisition and use, understand and comply with the internal rules.

#### Purposes of use

For proposals and information regarding products, services, campaigns, events, etc. provided by each Mitsuuroko Group company

For surveys, research and development to improve the quality of products and services provided by each Mitsuuroko Group company

For the conducting of surveys about the products and services provided by each Mitsuuroko Group company

For proper execution of business management operations as a group, such as understanding and managing various risks

#### 4 Implementation of security measures for personal information

Each Mitsuuroko Group company has established internal rules and will take reasonable safety measures to protect the personal information entrusted to us by our customers from loss, destruction, unauthorized leakage to the outside, falsification, and unauthorized access.

In addition, we may delete the personal information of customers when we judge that the purpose of use has been achieved and it is no longer necessary to keep the personal information

#### 5 Inquiries from customers regarding personal information

When we receive a request from a customer to disclose. correct, add or delete, suspend the use, etc. of the customer's own personal information managed by us, we will confirm the identity of the customer before honoring these requests and taking appropriate actions promptly.

request the cooperation of our business partners and ntractors whenever necessary for the protection of personal ormation

4 We improve the privacy policy, internal rules, and the management of personal information protection as necessary in accordance with changes in laws, regulations, and the social environment

5 We ensure this privacy policy can be accessed at all times by customers via means such as our company website and company brochures



# Appropriate information disclosure

## **Basic approach**

As a company conducting business with a mission to benefit society, we consider the timely and appropriate provision of information to all our stakeholders as a matter of importance. To enable customers to use the Group's products and services safely, securely, and comfortably, we proactively and appropriately disseminate company information as well as information on the safety and use of our products and services.

#### Appropriate information disclosure

#### Mitsuuroko Group website

To gain the understanding of our customers, we promptly and appropriately share information on our website, such as company information, various information that concerns the lifestyles of customers, and information related to products and services.



#### Appropriate disclosure of information in compliance with laws and regulations, and our voluntary standards

We regularly offer necessary information to our customers whenever they contemplate the products or services offered by the Group. In addition to complying with the Act against Unjustifiable Premiums and Misleading Representations, we have established a checklist to ensure appropriate advertising and representations of our products or services. We cooperate with the Representations Officer when producing flyers, catalogues, or pamphlets, working to thoroughly provide correct information.

In addition, we work to enable customers to use products and service safely, acting in accordance with the prescribed guidelines on methods for appropriate provision of information established by the Ministry of Economy, Trade and Industry in conjunction with the full liberalization of the electricity and gas retail market.

#### Timely disclosure system overview

#### 1 Timely disclosure policy

The Company's basic policy is to disclose necessary information to stakeholders in a timely and appropriate manner. The Company will disclose "decisions," "occurrences," and "financial information" in a timely manner, as determined by the Board of Directors, in accordance with the provisions set forth by the Tokyo Stock Exchange.

#### 2 Timely disclosure system

#### 1 Decisions

The departments in charge of disclosure in Finance & Control (Finance & Control, Financial Planning & Analysis and Finance & IR Team) confirm in advance whether decisions made by management meetings (the Board of Directors and the Management Committee) of the Company and its subsidiaries are subject to timely disclosure. If the decision is subject to timely disclosure. then, after a management meeting makes a decision, the departments in charge of the disclosure will promptly disclose the information in accordance with the instructions of the Head of Finance & Control, who is the manager responsible for disclosure

#### 2 Occurrences

If any events that should be disclosed in a timely manner occur at the Company and its subsidiaries, the departments in charge of disclosure in Finance & Control confirm whether the occurrence is subject to timely disclosure, after persons in charge promptly notify the Head of Finance & Control. If the occurrence is subject to timely disclosure, then, after a decision has been made concerning disclosure by a management meeting of the Company or its subsidiaries, it will be promptly disclosed by the departments in charge of disclosure in accordance with the instructions of the Head of Finance & Control.

#### 3 Financial information

After a decision has been made by a management meeting (the Board of Directors and the Management Committee) of the Company or its subsidiaries, financial information is promptly disclosed by the departments in charge of disclosure in accordance with the instructions of the Head of Finance & Control, who is the manager responsible for disclosure

#### 3 Handling of timely disclosure information

Timely disclosure information is strictly controlled in accordance with the Company's Information Management Regulations. In addition, the Company makes thorough efforts to prevent insider trading in accordance with the Regulations for Prevention of Insider Trading.

# Supply chain management

## **Basic approach**

As a group that is close to our people's lives, supporting their daily lives through products and services, we believe that it is important to fulfill our social responsibility through working not alone but together with all of our business partners.

Striving to form relationships of trust with all of our business partners, we have set out our approach to the provision of products and services and the way in which we build relations in our Charter of Corporate Ethics.

#### Charter of Corporate Ethics (extract)

#### Provide safe and high-quality products and services We will develop safe and high-quality products and services based on our rich experience and knowledge and provide

them to consumers and business partners.

#### Publication of "Declaration of Partnership Building"

Guided by our "Charter of Corporate Ethics," we will promote sincere corporate activities based on high ethical standards, always from the perspective of corporate social responsibility, and thoroughly ensure transactions respect human rights by complying with "Mitsuuroko Group Human Rights Policy."

#### **Declaration of Partnership Building**

We declare that we will focus efforts on the following matters in order to build new partnerships by promoting collaboration and mutual prosperity with supply chain and value-creating business operators.

#### 1 Mutual prosperity throughout the supply chain, and new collaboration transcending business scales, affiliations, etc.

We will increase added value throughout the supply chain by reaching out, through our direct suppliers, to their suppliers (from "Tier N" to "Tier N+1"), and we aim to create mutual prosperity with our business partners through collaboration that goes beyond existing trade relationships and business scales, etc. From the perspective of work style reform or ensuring business continuity in times of disaster, we will support our business partners by helping them to introduce telecommuting systems, advising them on business continuity planning (BCP), or providing other forms of assistance. While deepening collaboration among companies, we will also work to reduce CO<sub>2</sub> emissions, increase energy efficiency, and contribute to local communities.

In addition, we will advance health-focused management initiatives, which include sharing know-how, joint training, and joint health promotion events

#### 2 Compliance with "Promotion Standards"

We will comply with the desirable trade practices set forth for main contractors and subcontractors ("Promotion Standards" prescribed in the Act on the Promotion of Subcontracting Small and Medium-sized Enterprises), actively working to correct trade practices and business customs that obstruct the partnership building.

#### 1 Method for determining prices

We will not demand unreasonable cost reductions. When determining transaction prices, we will consult with subcontractors if requested to do so, and fully discuss prices to ensure that appropriate profit for subcontractors is included, taking into consideration factors such as rises in labor costs. When concluding agreements that include determined transaction prices, we, as the main contractor, will state and issue the terms of the contract in writing.

#### 2 Terms of payment by bill, etc.

In principle, payments will be made in cash.

3 Intellectual property and know-how

We will not request our subcontractors enter unilateral nondisclosure agreements, or take advantage of our trading position to demand disclosure of know-how or transfer of intellectual property rights without compensation

#### 4 Work style reform and relations

To enable our subcontracting business partners to carry out work style reforms, we will not place orders that have tight delivery deadlines with or make sudden changes to the specifications of jobs without compensating them appropriately. When disasters or other such events occur, we will not impose unilateral trading burdens on subcontractors, and upon the resumption of operations, we will continue business relationships to the best of our ability.

#### 3 Other matters

We will uphold our "Charter of Corporate Ethics" and the "Mitsuuroko Group Human Rights Policy," conducting business that is fair and respectful of human rights.

#### Respect the position of stakeholders

Mitsuuroko Group will strive to maintain sound and positive relationships with a wide range of society, including customers, business partners, employees, and shareholders.

We will continue to carry out corporate activities that are fair and respect human rights, building more positive and mutually prosperous relationships with our business partners with an aim to increase the added value of the entire supply chain and realize sustainable growth.





Items		Disclosures	Disclosure location
GRI 2: Ge	neral D	isclosure Matters (2021)	
	2-1	Details of the organization	SUSTAINABILITY REPORT 2023         P. 106: Company Profile           BUSINESS REPORT 2023         P. 62: Company Information           Website         Company Information
t.	2-2	Entities covered by the organization's sustainability report	SUSTAINABILITY REPORT 2023 P. 3: Editing Policy, P. 106: Company Profile Website Editing Policy/Company Profile
Organization and reporting practice	2-3	Reporting duration, reporting frequency, contact	SUSTAINABILITY REPORT 2023 P. 3: Editing Policy Website Editing Policy/Company Profile
	2-4	Revisions and corrections of information	_
	2-5	External assurance	SUSTAINABILITY REPORT 2023 P. 105: Independent Assurance Report Website Independent Assurance Report
	2-6	Activities, value chain, other trading relationships	Securities Report/Quarterly securities report (114th Securities Report, P. 6-7) SUSTAINABILITY REPORT 2023 P. 5: Model of Value Creation BUSINESS REPORT 2023 P. 9: Model of Value Creation Website Philosophy/Vision/Model of Value Creation
2. Business activities and Iabor	2-7	Employees	Securities Report/Quarterly securities report (114th Securities Report, P. 12-13) BUSINESS REPORT 2023 Financial Data (Main financial data for 11 years, P. 57) SUSTAINABILITY REPORT 2023 ESG Data (Social data, P. 101) Website ESG Data (Social data)
	2-8	Labor other than employees	SUSTAINABILITY REPORT 2023 ESG Data (Social data, P. 103) Website ESG Data (Social data)
	2-9	Governance structure and composition	Securities Report/Quarterly securities report (114th Securities Report, P. 40-41) SUSTAINABILITY REPORT 2023 P. 11: Sustainability management promotion system, P. 75: Corporate governance (Corporate governance structure) SUSTAINABILITY REPORT 2023 ESG Data (Governance data, P. 104) BUSINESS REPORT 2023 P. 49: Corporate governance Website Corporate governance
	2-10	Nominating and selecting the highest governance body	Securities Report/Quarterly securities report (114th Securities Report, P. 40-41) SUSTAINABILITY REPORT 2023 P. 75: Corporate governance (Corporate governance structure) BUSINESS REPORT 2023 P. 50: Corporate governance (Management team) Website Corporate governance
	2-11	Chair of the highest governance body	Securities Report/Quarterly securities report (114th Securities Report, P. 40) SUSTAINABILITY REPORT 2023 P. 75: Corporate governance (Corporate governance structure) BUSINESS REPORT 2023 P. 50: Corporate governance (Management team) Website Corporate governance
3. Governance	2-12	Role of highest governance body in supervision of impact management	Securities Report/Quarterly securities report (114th Securities Report, P. 40) SUSTAINABILITY REPORT 2023 [P. 75: Corporate governance (Corporate governance structure) BUSINESS REPORT 2023 [P. 50: Corporate governance (Management team) Website Corporate governance (Corporate governance report)
	2-13	Delegating responsibility of impact management	SUSTAINABILITY REPORT 2023         P. 11: Sustainability management promotion system, P. 24: Environmental risk management (Environment-related governance and risk management system)           Website         Sustainability promotion system           Website         Environmental management (Environmental management promotion system)
	2-14	Highest governance body's role in sustainability reporting	SUSTAINABILITY REPORT 2023         P. 11: Sustainability management promotion system, P. 24: Environmental risk management (Environment-related governance and risk management system)           Website         Sustainability promotion system           Website         Environmental management (Environmental management promotion system)
	2-15	Conflicts of interest	SUSTAINABILITY REPORT 2023 P. 75: Corporate governance Website Corporate governance

Items		Disclosures	Disclosure location
	2-16	Communicating critical concerns	Securities Report/Quarterly s SUSTAINABILITY REPORT system), P. 79: Risk managem Website Corporate gover Website Risk managemen
	2-17	Collective knowledge of highest governance body	SUSTAINABILITY REPORT excelin) BUSINESS REPORT 2023 in) Website Corporate govern
	2-18	Evaluating the highest governance body's performance	SUSTAINABILITY REPORT Board of Directors) BUSINESS REPORT 2023 of Directors), P. 53: External D Website Corporate govern
	2-19	Remuneration policies	Securities Report/Quarterlys SUSTAINABILITY REPORT 2 BUSINESS REPORT 2023 Website Corporate govern
	2-20	Process for determining remuneration	Securities Report/Quarterlys SUSTAINABILITY REPORT BUSINESS REPORT 2023 Website Corporate govern
	2-21	Annual total remuneration ratio	_
	2-22	Announcement on strategies for sustainable development	SUSTAINABILITY REPORT
	2-23	Policy announcement	SUSTAINABILITY REPORT BUSINESS REPORT 2023 BUSINESS REPORT 2023 Website Climate change in
	2-24	Practices of policy announcement	SUSTAINABILITY REPORT BUSINESS REPORT 2023 Website Climate change in
Strategies, policies, practices	2-25	Corrective process of negative impacts	_
	2-26	Mechanisms for seeking advice and raising concerns	SUSTAINABILITY REPORT Website Risk managemen Website Compliance
	2-27	Compliance with laws and regulations	SUSTAINABILITY REPORT BUSINESS REPORT 2023 Website Compliance
	2-28	Associations with memberships	SUSTAINABILITY REPORT
5. Stakeholder	2-29	Approach to stakeholder engagement	SUSTAINABILITY REPORT
engagement	2-30	Labor agreement	Securities Report/Quarterly s
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#### GRI 3: Material Topics (2021)

3-1	Process for determining material topics	SUSTAINABILITY REPOR Website Materiality
3-2	List of material topics	SUSTAINABILITY REPORT BUSINESS REPORT 2023 Website Materiality
3-3	Management of material topics	SUSTAINABILITY REPOR Website Sustainability pr

ly securities report (114th Securities Report, P. 41-45) **T 2023** P. 78: Corporate governance (Status of the risk management ement ernance

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RT 2023 P. 76: Corporate governance (Areas where Directors are expected to

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 P. 17: Management Policy and Strategy of Mitsuuroko Group e initiatives

P. 79: Risk management, P. 81: Compliance

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P. 17: Stakeholder Engagement

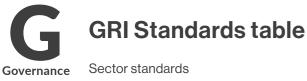
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rly securities report (114th Securities Report, P. 12)

RT 2023 P. 13: Identification and Review of Materiality

RT2023 P. 13: Identification and Review of Materiality, P. 15: Materiality & KP 23 P. 37: Materiality

RT 2023 P. 11: Sustainability management promotion system promotion system



#### Items **Disclosures Disclosure location** GRI 11: Petroleum/Gas (2021) SUSTAINABILITY REPORT 2023 P. 25: Climate change initiatives SUSTAINABILITY REPORT 2023 ESG Data (Environmental data, P. 99) 11-1 Greenhouse gas (GHG) emissions Website Climate change initiatives (TCFD) Website ESG Data (Environmental data) SUSTAINABILITY REPORT 2023 P. 31: Response to climate change SUSTAINABILITY REPORT 2023 P. 49: Stable supply of energy/electricity SUSTAINABILITY REPORT 2023 P. 53: Disaster prevention measures Climate-related adaptation, resilience, and 11-2 transition Website Response to climate change Website Stable supply of energy/electricity Website Disaster prevention measures SUSTAINABILITY REPORT 2023 P. 41: Prevention of environmental pollution (Management of chemicals and contaminants) 11-3 Emissions Website Prevention of environmental pollution (Management of chemicals and contaminants) Website ESG Data (Environmental data) SUSTAINABILITY REPORT 2023 P. 46: Biodiversity conservation (Activities to protect and nurture the forests around water collection sites), P. 67: Local communities (Activities to protect and nurture the 11-4 Biodiversity forests around water collection sites) Website Biodiversity conservation SUSTAINABILITY REPORT 2023 P. 41: Prevention of environmental pollution (Management of chemicals and contaminants) 11-5 Waste SUSTAINABILITY REPORT 2023 ESG Data (Environmental data, P. 100) Website Environmental risk management (Management of chemicals and contaminants) Website ESG Data (Environmental data) SUSTAINABILITY REPORT 2023 P. 45: Water security SUSTAINABILITY REPORT 2023 ESG Data (Environmental data, P. 100) 11-6 Water and wastewater Website Water security Website ESG Data 11-7 Closure and rehabilitation Preservation of assets and management of SUSTAINABILITY REPORT 2023 P. 79: Risk management 11-8 critical incidents Website Risk management SUSTAINABILITY REPORT 2023 P. 59: Health-focused management SUSTAINABILITY REPORT 2023 ESG Data (Social data, P. 103) 11-9 Occupational health and safety BUSINESS REPORT 2023 P. 46: Health-focused management Website Health-focused management Website ESG Data (Social data) SUSTAINABILITY REPORT 2023 P. 57: Respect of human rights SUSTAINABILITY REPORT 2023 P. 59-62: Health-focused management SUSTAINABILITY REPORT 2023 P. 63-65: Inclusion & diversity 11-10 Employment practices Website Inclusion & diversity Website Health-focused management SUSTAINABILITY REPORT 2023 P. 57: Respect of human rights SUSTAINABILITY REPORT 2023 P. 63-65: Inclusion & diversity Non-discrimination and equal opportunity SUSTAINABILITY REPORT 2023 ESG Data (Social data, P. 101-103) 11-11 Website Respect of human rights Website Inclusion & diversity Forced and compulsory labor and modern SUSTAINABILITY REPORT 2023 P. 57: Respect of human rights 11-12 slavery Website Respect of human rights Securities Report/Quarterly securities report (114th Securities Report, P. 12) SUSTAINABILITY REPORT 2023 P. 18: Communication with employees / Communication methods and means SUSTAINABILITY REPORT 2023 P. 59: Health-focused management Freedom of association and collective 11-13 SUSTAINABILITY REPORT 2023 P. 57: Respect of human rights bargaining SUSTAINABILITY REPORT 2023 ESG Data (Social data, P. 103) BUSINESS REPORT 2023 P. 46: Health-focused management Website Health-focused management Website ESG Data (Social data) SUSTAINABILITY REPORT 2023 P.5: Model of Value Creation 11-14 BUSINESS REPORT 2023 P. 17: Management Policy and Strategy of Mitsuuroko Group Economic impacts BUSINESS REPORT 2023 P. 9: Model of Value Creation

tems		Disclosures	<b>Disclosure location</b>
	11-15	Local communities	SUSTAINABILITY REPOR SUSTAINABILITY REPOR Website Stakeholder En Website Local communi
	11-16	Land and resource rights	_
	11-17	Rights of indigenous peoples	SUSTAINABILITY REPOR Website Respect of hum
	11-18	Disputes and public safety	SUSTAINABILITY REPOR Website Risk manageme
	11-19	Anti-competitive behavior	SUSTAINABILITY REPOR BUSINESS REPORT 2023 Website Compliance
	11-20	Anti-corruption	SUSTAINABILITY REPOR SUSTAINABILITY REPOR Website Compliance Website Compliance (Pr
	11-21	Payment to government	_
	11-22	Public policy	_

#### Standards for each item

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Items		Disclosures	<b>Disclosure location</b>
Economic			
Economic Performance	201-1	Direct economic value generated and distributed	Securities Report/Quarter BUSINESS REPORT 202
	201-2	Financial implications and other risks and opportunities due to climate change	SUSTAINABILITY REPOR
(2016)	201-3	Defined benefit plan obligations and other retirement plans	Securities Report/Quarter
	201-4	Financial assistance received from public government	_
Market Presence	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	_
Presence (2016)	202-2	Proportion of senior management hired from the local community	_
Indirect Economic Impacts (2016)	203-1	Infrastructure investments and services supported	SUSTAINABILITY REPOR Website Stable supply of Website Local commun
	203-2	Significant indirect economic impacts	_
Procurement Practices (2016)	204-1	Proportion of spending on local suppliers	_

RT2023 P. 17: Stakeholder Engagement RT2023 P. 67: Local communities Engagement nities

RT 2023 P. 57: Respect of human rights man rights

RT 2023 P. 79-80: Risk management nent

RT 2023 P. 81-86: Compliance 23 P. 29: Compliance

RT 2023 P. 81-86: Compliance RT 2023 P. 83-86: Compliance (Prevention of bribery)

Prevention of bribery)

erly securities report (114th Securities Report, P. 2-3, 39) 23 P. 57: Financial Data

DRT 2023 P. 25: Climate change initiatives (TCFD) nge initiatives (TCFD)

erly securities report (114th Securities Report, P. 98-99)

DRT 2023 P. 49: Stable supply of energy/electricity, P. 67: Local communities y of energy/electricity unities



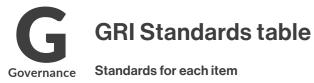
# **GRI Standards table**

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Economi	с			
Anti- corruption (2016)	205-1	Operations assessed for risks related to corruption	SUSTAINABILITY REPORT 2023 P. 83-86: Compliance (Prevention of bribery) Website Compliance (Prevention of bribery)	
	205-2	Communication and training about anti- corruption policies and procedures	SUSTAINABILITY REPORT 2023 P. 83-86: Compliance (Prevention of bribery) Website Compliance (Prevention of bribery)	
	205-3	Confirmed incidents of corruption and actions taken	-	
Anti- competitive Behavior (2016)	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	-	
Taxes (2019) -	207-1	Approach to tax	SUSTAINABILITY REPORT 2023 P. 85: Compliance (Tax policy) Website Compliance (Tax policy)	
	207-2	Tax governance, control, and risk management	SUSTAINABILITY REPORT 2023 P. 85: Compliance (Tax policy) Website Compliance (Tax policy)	
	207-3	Stakeholder engagement and management of concerns related to tax	SUSTAINABILITY REPORT 2023 P. 85: Compliance (Tax policy) Website Compliance (Tax policy)	
	207-4	Country-by-country reporting	-	

#### Environmental

Raw Materials (2016)	301-1	Materials used by weight or volume	-
	301-2	Recycled input materials used	SUSTAINABILITY REPORT 2023 P. 41: Promotion of resource cycle Website Promotion of resource cycle
	301-3	Reclaimed products and their packaging materials	_
302-4	302-1	Energy consumption within the organization	SUSTAINABILITY REPORT 2023       P. 33: Response to climate change (Initiatives of operating companies)         SUSTAINABILITY REPORT 2023       ESG Data (Environmental data, P. 99)         Website       Response to climate change (Initiatives of operating companies)
	302-2	Energy consumption outside of the organization	SUSTAINABILITY REPORT 2023         P. 31: Response to climate change (Controlling customer CO <sub>2</sub> emissions)           Website         Response to climate change (Controlling customer CO <sub>2</sub> emissions)
	302-3	Energy intensity	-
	302-4	Reduction of energy consumption	SUSTAINABILITY REPORT 2023       P. 31: Response to climate change         SUSTAINABILITY REPORT 2023       ESG Data (Environmental data, P. 99)         Website       Response to climate change         Website       ESG Data
	302-5	Reductions in energy requirements of products and services	-
Water (2018) 303-3 303-4	303-1	Interactions with water as a shared resource	SUSTAINABILITY REPORT 2023 P. 45: Water security Website Water security
	303-2	Management of water discharge-related impacts	SUSTAINABILITY REPORT 2023 P. 45: Water security Website Water security
	303-3	Water withdrawal	-
	303-4	Water discharge	SUSTAINABILITY REPORT 2023 ESG Data (Environmental data, P. 100) Website ESG Data
	303-5	Water consumption	SUSTAINABILITY REPORT 2023 ESG Data (Environmental data, P. 100) Website ESG Data

ms		Disclosures	Disclosure location
3	04-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	SUSTAINABILITY REPORT 2023 P. 46: Biodiversity conservation (Activities to protect and nurture the forests around water collection sites), P. 67: Local communities (Activities to protect and nurture the forests around water collection sites) Website Biodiversity conservation
304-2 (2016) 304-3	04-2	Significant impacts of activities, products, and services on biodiversity	_
	04-3	Habitats protected or restored	SUSTAINABILITY REPORT 2023 P. 46: Biodiversity conservation (Activities to protect and nurture the forests around water collection sites), P. 67: Local communities (Activities to protect and nurture the forests around water collection sites) Website Biodiversity conservation
304-4		IUCN Red List species and national conservation list species with habitats in areas affected by operations	_
3	05-1	Direct (Scope 1) GHG emissions	SUSTAINABILITY REPORT 2023       P. 25: Climate change initiatives         SUSTAINABILITY REPORT 2023       ESG Data (Environmental data, P. 99)         Website       Climate change initiatives (TCFD)         Website       ESG Data
30	05-2	Indirect (Scope 2) GHG emissions	SUSTAINABILITY REPORT 2023         P. 25: Climate change initiatives           SUSTAINABILITY REPORT 2023         ESG Data (Environmental data, P. 99)           Website         Climate change initiatives (TCFD)           Website         ESG Data
30 sions 016)	05-3	Other indirect (Scope 3) GHG emissions	SUSTAINABILITY REPORT 2023         P. 25: Climate change initiatives           SUSTAINABILITY REPORT 2023         ESG Data (Environmental data, P. 99)           Website         Climate change initiatives (TCFD)           Website         ESG Data
30	05-4	GHG emissions intensity	-
305-5	05-5	Reduction of GHG emissions	SUSTAINABILITY REPORT 2023         P. 25: Climate change initiatives           SUSTAINABILITY REPORT 2023         ESG Data (Environmental data, P. 99)           Website         Climate change initiatives (TCFD)           Website         ESG Data (Environmental data)
30	05-6	Emissions of ozone-depleting substances (ODS)	-
30	05-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	SUSTAINABILITY REPORT 2023 P. 41: Prevention of environmental pollution Website Prevention of environmental pollution
3	06-1	Waste generation and significant waste-related impacts	SUSTAINABILITY REPORT 2023         P. 41: Prevention of environmental pollution           SUSTAINABILITY REPORT 2023         ESG Data (Environmental data, P. 100)           Website         Prevention of environmental pollution           Website         ESG Data (Environmental data)
30 ste 20)	06-2	Management of significant waste-related impacts	SUSTAINABILITY REPORT 2023         P. 41: Prevention of environmental pollution           SUSTAINABILITY REPORT 2023         ESG Data (Environmental data, P. 100)           Website         Prevention of environmental pollution           Website         ESG Data (Environmental data)
	06-3	Waste generated	SUSTAINABILITY REPORT 2023 ESG Data (Environmental data, P. 100) Website ESG Data (Environmental data)
306-4 306-5	06-4	Waste diverted from disposal	_
	06-5	Waste directed to disposal	SUSTAINABILITY REPORT 2023 ESG Data (Environmental data, P. 100) Website ESG Data (Environmental data)
er	08-1	New suppliers that were screened using environmental criteria	_
nental nt (2016) 30	08-2	Negative environmental impacts in the supply chain and actions taken	SUSTAINABILITY REPORT 2023 P. 29: Environmental impact of the value chain Website Environmental impact of the value chain



items		Disclosures	Disclosure location
Social			
	401-1	New employee hires and employee turnover	SUSTAINABILITY REPORT 2023         ESG Data (Social data, P. 101-102)           Website         ESG Data (Social data)
Employment (2016)	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	_
	401-3	Parental leave	SUSTAINABILITY REPORT 2023         P. 63-65: Inclusion & diversity           SUSTAINABILITY REPORT 2023         ESG Data (Social data, P. 102)           Website         Inclusion & diversity           Website         ESG Data (Social data)
Labor Relations (2016)	402-1	Minimum notice periods regarding operational changes	_
	403-1	Occupational health and safety management system	SUSTAINABILITY REPORT 2023         P. 59-62: Health-focused management           SUSTAINABILITY REPORT 2023         ESG Data (Social data, P. 103)           BUSINESS REPORT 2023         P. 46: Health-focused management           Website         Health-focused management           Website         ESG Data (Social data)
	403-2	Hazard identification, risk assessment, and incident investigation	SUSTAINABILITY REPORT 2023       P. 53: Disaster prevention measures         SUSTAINABILITY REPORT 2023       P. 59-62: Health-focused management         SUSTAINABILITY REPORT 2023       P. 79: Risk management         SUSTAINABILITY REPORT 2023       P. 40: Enhancement of safety and disaster response measures         BUSINESS REPORT 2023       P. 40: Enhancement of safety and disaster response measures         BUSINESS REPORT 2023       P. 46: Health-focused management         Website       Disaster prevention measures         Website       Risk management         Website       Risk management         Website       Risk management         Website       ESG Data (Social data)
	403-3	Occupational health services	SUSTAINABILITY REPORT 2023         P. 59: Health-focused management           BUSINESS REPORT 2023         P. 46: Health-focused management           Website         Health-focused management
	403-4	Worker participation, consultation, and communication on occupational health and safety	SUSTAINABILITY REPORT 2023 ESG Data (Social data, P. 103) Website ESG Data (Social data)
4	403-5	Worker training on occupational health and safety	SUSTAINABILITY REPORT 2023       P. 59: Health-focused management         SUSTAINABILITY REPORT 2023       P. 66 Training system         SUSTAINABILITY REPORT 2023       ESG Data (Social data, P. 103)         BUSINESS REPORT 2023       P. 46: Health-focused management         Website       Health-focused management         Website       ESG Data (Social data)
	403-6	Promotion of worker health	SUSTAINABILITY REPORT 2023         P. 59: Health-focused management           SUSTAINABILITY REPORT 2023         ESG Data (Social data, P. 103)           BUSINESS REPORT 2023         P. 46: Health-focused management           Website         Health-focused management           Website         ESG Data (Social data)
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	_
	403-8	Workers covered by an occupational health and safety management system	SUSTAINABILITY REPORT 2023         P. 59: Health-focused management           SUSTAINABILITY REPORT 2023         ESG Data (Social data, P. 101, 103)           BUSINESS REPORT 2023         P. 46: Health-focused management           Website         Health-focused management           Website         ESG Data (Social data)
	403-9	Work-related injuries	SUSTAINABILITY REPORT 2023 ESG Data (Social data, P. 103) Website ESG Data (Social data)
	403-10	Work-related ill health	_
	404-1	Average hours of training per year per employee	SUSTAINABILITY REPORT 2023 ESG Data (Social data, P. 103)
and Training (2016)	404-2	Programs for upgrading employee skills and transition assistance programs	SUSTAINABILITY REPORT 2023 P. 66: Human resources development Website Human resources development
	404-3	Proportion of employees receiving regular performance and career development reviews	_

Items		Disclosures	<b>Disclosure locat</b>
Diversity and Equal Opportunity (2016)	405-1	Diversity of governance bodies and employees	SUSTAINABILITY F SUSTAINABILITY F BUSINESS REPOR Website Inclusion Website ESG Dat
	405-2	Ratio of basic salary and remuneration of women to men	Securities Report/Q
No Discrimination (2016)	406-1	Incidents of discrimination and corrective actions taken	_
Freedom of Association and Collective Bargaining (2016)	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	
Child Labor (2016)	408-1	Operations and suppliers at significant risk for incidents of child labor	_
Forced or Compulsory Labor (2016)	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	_
Security Practices (2016)	410-1	Security personnel trained in human rights policies or procedures	_
Rights of Indigenous Peoples (2016)	411-1	Incidents of violations involving rights of indigenous peoples	_
	412-1	Operations that have been subject to human rights reviews or impact assessments	_
Human Rights Assessment (2016)	412-2	Employee training on human rights policies or procedures	SUSTAINABILITY F SUSTAINABILITY F Website Respect Website Human r
	412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	_
Local Communities (2016)	413-1	Operations with local community engagement, impact assessments, and development programs	SUSTAINABILITY F SUSTAINABILITY F BUSINESS REPOR Website Stakeho Website Local co
	413-2	Operations with significant actual and potential negative impacts on local communities	_
Supplier	414-1	New suppliers that were screened using social criteria	_
Social Assessment (2016)	414-2	Negative social impacts in the supply chain and actions taken	_
Public Policy (2016)	415-1	Political contributions	_
Customer Health and	416-1	Assessments of the health and safety impacts of product and service categories	SUSTAINABILITY F Website Safety as
Safety (2016)	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	_
Marketing and Labeling (2016)	417-1	Requirements for product and service information and labeling	_
	417-2	Incidents of non-compliance concerning product and service information and labeling	_
	417-3	Incidents of non-compliance concerning marketing communications	_
Customer Privacy (2016)	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	_
Socioeconomic Compliance (2016)	419-1	Non-compliance with laws and regulations in the social and economic area	_

Y REPORT 2023	P. 63-65: Inclusion & diversity
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ORT 2023 P. 47:	Promotion of diversity
ion & diversity	
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 P. 40: Contribution to local communities

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