

## **Glico Group Human Rights Policy**

As a global company with a worldwide presence, the Glico Group believes in the importance of respecting human rights of not only the Group's own directors, officers and employees but also of all its stakeholders. Based on this belief, this "Glico Group Human Rights Policy" lays out the Glico Group's principles of actions to respect human rights, which all directors, officers and employees of the Glico Group are required to comply with. Also, the Glico Group makes a commitment to itself under its Code of Conduct that each of those directors, officers and employees should respect human rights.

In addition, the Glico Group also requests all stakeholders involved in its value chain, including, without limitation, suppliers and other business partners, to understand and support this Policy.

With this Policy, the Glico Group is engaged in initiatives to serve as a role model for realizing a sustainable society.

### **1. Respect for human rights**

- 1) The Glico Group supports international norms related to human rights, including, but not limited to, the International Bill of Human Rights (the Universal Declaration of Human Rights and the International Covenants on Human Rights) and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, as well as the United Nations Guiding Principles on Business and Human Rights. Furthermore, Ezaki Glico Co., Ltd., the ultimate parent company of the Glico Group, is a signatory member to the United Nations Global Compact, and the entire Glico Group supports its Ten Principles.
- 2) The Glico Group understands and complies with all laws, regulations and rules relevant to its activities in all countries and regions where it is engaged in business. In the event that local laws and regulations in those countries or regions differ from or conflict with internationally recognized human rights standards, or in the absence of legislations on certain human rights in those countries or regions, the Glico Group will seek ways to honor the principles of internationally recognized human rights.

### **2. Important areas related to business activities**

- 1) The Glico Group is aware that any of its business activities, including research and development, procurement and supply of goods and services, may present a potential or actual impact on human rights.
- 2) The Glico Group is aware that the following initiatives related to its business activities are important

factors in its effort to respect human rights, and thus will promote and implement such initiatives. The Glico Group will start its implementation in areas where its business activities have a major impact.

- (a) The Glico Group never permit and does not engage in forced labor or child labor, which violates the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.
- (b) The Glico Group does not discriminate any person based on age, gender, sexual orientation, gender identity, gender expression, disability, faith, race, nationality, ethnicity, religion, social status, or any other factor.
- (c) The Glico Group strives to maintain a suitable working environment that enables all employees in each country or region to demonstrate their respective diverse personalities and abilities and to achieve their personal growths.
- (d) The Glico Group respects the rights of employees regarding the freedom of association and the right to collective bargaining under the laws and regulations of each country or region.

### **3. Human rights due diligence**

- 1) The Glico Group strives to avoid causing or contributing to any human rights infringement throughout its value chain, including, by itself or through its suppliers and other business partners. The Glico Group continually conducts certain monitoring and inspection to identify, prevent or mitigate negative impacts on human rights in relation to its business activities, in line with the United Nations Guiding Principles on Business and Human Rights.
- 2) The Glico Group will build up a process to take appropriate and effective remedial measures in case of causing or contributing to human rights infringement within its own operations or its value chain, and to communicate what measures were taken.
- 3) The Glico Group believes that stakeholders' perspectives are necessary in order to identify relevant stakeholders and respond appropriately to actual or potential impacts on human rights related to its business activities. In that sense, the Glico Group will listen to the voices of stakeholders in good faith, and share with them human rights issues related to its business activities at an appropriate timing.

### **4. Hotlines and Remedial Measures**

- 1) The Glico Group recognizes the importance of internal reporting hotlines which its directors, officers and employees can use to report serious concerns to the company without fear of retaliation, when

they become aware of or suspect violations of regional or national laws, regulations and rules, or internal rules of the Group, including the Glico Group Human Rights Policy. Against this backdrop, the Glico Compliance Hotline has been set up globally to ensure that there will be no retaliation towards directors, officers and employees who file reports on issues related to human rights.

2) The Glico Group seriously considers the comments, advices and recommendations provided by customers and other external stakeholders, through a hotline established for human rights issues, and then uses them to improve its business activities including its efforts to address human rights issues.

#### **5. Awareness-raising Activities**

The Glico Group engages in activities to have all of its directors, officers and employees raise their awareness regarding each aspect of human rights. The Glico Group expects its business partners to conduct the same or similar awareness-raising activities as well.

#### **6. Monitoring and Reporting**

The Glico Group will continuously monitor the compliance status of this Policy and strives and make improvements as necessary. The Glico Group will periodically disclose necessary information such as issues identified by monitoring and related responsive measures, through websites, CSR reports, and other communication channels.

#### **7. Oversight and Responsibility for Human Rights**

President and CEO of Ezaki Glico Co., Ltd. is responsible within the Glico Group for overseeing the realization of commitments under this Policy and all initiatives related thereto.