#### Sanyo Special Steel Group Human Rights Policy

We, Sanyo Special Steel Group, are dedicated on the achievement of a sustainable society by creating economic and social values through executing "Confidence-based Management," our corporate philosophy that aims to establish "confidence of society," "confidence of customers," and "confidence among people."

As a corporate entity operating globally, we recognize that all officers and employees of the Group understand and respect the significance of human rights for all people involved in our business activities to be the corporate social responsibility we should fulfill in implementing this management philosophy. For that reason, we have newly formulated the "Sanyo Special Steel Group Human Rights Policy" (hereinafter "the Policy").

#### 1. Respect for Human Rights

We understand that human rights may be affected through our business activities, such as procuring raw materials, manufacturing, selling, and distributing products, research and development, and recruitment. We are also aware that our business relationships with other stakeholders may end up impacting human rights. We will strive to neither violate human rights ourselves nor support any human rights abuse by our stakeholders, including business partners.

Supporting and respecting the "International Bill of Human Rights" and the "Declaration on Fundamental Principles and Rights at Work," we will conduct our business activities under the Guiding Principles on Business and Human Rights.

We will prohibit discrimination based on nationality, race, religion, age, gender, physical or mental disorders, gender identification, sexual orientation, and upbringing, or discrimination for any other irrational reasons. We will also strive to prohibit long working hours, harassment, forced labor, and child labor, respect freedom of association and collective bargaining rights, and ensure safety and health in the workplace.

We will comply with the laws and regulations of the countries and regions where we conduct business activities. When there are discrepancies between globally recognized human rights and the laws and regulations of the country or region, we will seek appropriate ways to respect the internationally recognized human rights to the extent possible while complying with such laws and regulations.

## 2. Scope of Application

The Policy applies to all officers and employees of the Sanyo Special Steel Group (Sanyo Special Steel Co., Ltd. and its consolidated affiliates). In addition, we will ask all our business partners, including those in our supply chain, for their understanding and cooperation.

#### 3. Human Rights Due Diligence

We will put a human rights due diligence system in place to identify/assess and prevent/reduce adverse impacts on human rights in the company, group companies, and suppliers and assess the effectiveness of their efforts.

## 4. Education

We will conduct appropriate training and awareness-raising activities to ensure all officers and employees understand and implement the Policy.

## 5. Remediation/Remedy

When we discover that our business activities have caused, contributed to, or engaged in actual and potential adverse impacts on human rights, we will work on the remediation and remedies through appropriate procedures.

# 6. Dialogue/Discussion with Stakeholders

We will continually work with stakeholders related to the Policy to improve and strengthen our commitment to respecting human rights.

# 7. Disclosure

We will disclose the progress of our efforts to respect human rights based on the Policy through our websites and other means.

The Board of Directors approved the Policy on October 31, 2023.

October 31, 2023 Sanyo Special Steel Co., Ltd. Representative Director and President Katsuhiro Miyamoto