Outline of JFE Group's Human Rights Initiatives

At JFE, we view respect for human rights as both a corporate social responsibility and a foundation of our business. In our Standards of Conduct, to which we strictly adhere, our determination to prevent discrimination in all operations is clearly expressed: "Respect all employees and members of the general public as individuals and refrain from any discrimination in corporate activities."

In order to maintain a steadfast focus on human rights initiatives, we established the JFE Group Compliance Committee under the Group's Sustainability Council, both of which are chaired by the president of JFE Holdings.

Compliance matters, including cases of human rights violations, are reported to the JFE Group Compliance Committee and regularly reported to the Board of Directors of JFE Holdings for guidance and oversight.

Based on this system, the JFE Group Human Rights Basic Policy clearly demonstrates our commitment to respect human rights. This policy serves as a code of conduct for each Group company, including its officers and employees. The policy also requires all stakeholders, including those in our supply chain, to respect and protect human rights.

In accordance with the United Nations Guiding Principles on Business and Human Rights, JFE began conducting human rights due diligence in fiscal 2021, examining the Company and each of its operating companies and other Group companies to identify and correct any human rights risks. Subsequently, to further strengthen efforts to respect human rights throughout the JFE Group and its supply chain, we revised the Group Human Rights Basic Policy in fiscal 2022 to specify in Section 10.(4) that we would strictly avoid the use of forced labor and child labor in all countries where we operate. Our operating companies JFE Steel, JFE Engineering and JFE Shoji have revised their procurement guidelines in line with this policy to ensure that each company transparently states that it prohibits the use of forced labor and child labor.

Regarding surveys of human rights risks in our supply chain, after considering possible methods as well as the scope and priorities, we conducted such a survey among our suppliers to ensure their respect for human rights in fiscal 2023. Since then, we have gradually expanded the survey to include Group companies in Japan, and going forward we plan to further expand the scope to include companies overseas.

■JFE Holdings, Inc. Basic Policies Standards of Conduct <u>JFE Group Standards of Business Conduct | JFE Holdings, Inc. (jfe-holdings.co.jp)</u> JFE Group Initiatives on Human Rights <u>Human Rights | JFE Holdings, Inc. (jfe-holdings.co.jp)</u>

Operating Company Related Policies
JFE Steel Procurement Guideline
<u>https://www.jfe-steel.co.jp/en/company/pdf/procurement-guidelines.pdf</u>
JFE Engineering Corporation Procurement Policy
<u>Procurement Policy | JFE Engineering Corporation (jfe-eng.co.jp)</u>
JFE Shoji Corporation Sustainability Policy
<u>Policy | JFE Shoji Corporation (jfe-shoji.co.jp)</u>

Overseas Group company Related Report JFE Shoji Power Canada Inc. <u>S211 (jfeshojipower.com)</u>