

INFRONEER Group Human Rights Policy

The INFRONEER Group is developing its business with a wide range of national and international partners with the mission that 'We challenge status quo of existing infrastructure businesses and deliver the most suitable service globally with innovative ideas'.

We hereby establish the INFRONEER Group Human Rights Policy (hereinafter referred to as the 'Human Rights Policy') and act in accordance with the Human Rights Policy in all processes of our business and fulfil our responsibility to 'respect people's innate rights'.

◆ 1. Basic concept

The INFRONEER Group is aware of the possibility of directly or indirectly affecting human rights in its own business activities. As the basis of the Group's business, this policy clearly demonstrates our commitment to respecting the human rights of all people involved in our business.

We conduct our business activities in respect of the 'International Bill of Human Rights' adopted by the UN, the 'ILO Declaration on Fundamental Principles and Rights at Work' adopted by the International Labour Organization (ILO), the 'Children's Rights and Business Principles' formulated by UNICEF, and the 'UN Guiding Principles on Business and Human Rights.' As a signatory to the UN Global Compact, we also support and put into practice its ten principles.

The INFRONEER Group complies with the laws and regulations applicable in the respective countries and regions in which it conducts its business activities. In cases where there is a conflict between internationally recognized human rights and the laws and regulations of the country or region in which we operate, we will seek ways to respect the principles of internationally recognized human rights.

* The International Bill of Human Rights is the collective name for three documents: the Universal Declaration of Human Rights, and the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights, which treaty-organised it. The Universal Declaration of Human Rights

sets out fundamental human rights to be universally protected as common standards to be achieved by all peoples and all nations.

*This ILO Declaration establishes freedom of association and the right to collective bargaining, the prohibition of forced labour, the effective abolition of child labour and the elimination of discrimination in employment and occupation as the minimum standards to be observed at work.

*The Children's Rights and Business Principles, developed by UNICEF, the UN Global Compact and Save the Children, are the first comprehensive set of principles outlining a range of activities that companies can undertake in the workplace, marketplace and community to respect and promote children's rights.

*The UN Guiding Principles on Business and Human Rights, endorsed by the UN Human Rights Council in 2011, provide international guidance on the behaviour expected of states and companies in addressing negative human rights impacts related to their business activities.

◆2. Scope (of a application)

Our Human Rights Policy applies to all directors and employees (including part-time , fixed-term, and temporary employees) of the INFRONEER Group (INFRONEER Holdings Inc. and its consolidated subsidiaries and associated companies).

To fulfil our commitment to respect for human rights, we expect all our business partners, including our suppliers, to understand and support this policy.

We share our human rights policy with our suppliers and aim to respect human rights throughout our supply chain.

◆3. Respect for human rights through business activities

We fulfil our responsibility to respect human rights by addressing the following human rights issues relevant to our own business activities

- Harassment: eradicate all forms of harassment (sexual harassment, power harassment, maternity harassment, moral harassment, etc.).
- Discrimination: respect the human rights and diversity of individuals, and eliminate all form of discrimination based on gender, age, nationality, race, ethnicity, ideology, creed, religion, social status, family origin, disease, sexual orientation or gender identity, and disability.
- Forced and child labour: do not engage in forced or child labour, and do not tolerate any form of modern slavery, including human trafficking.
- Freedom of association and collective bargaining: respect the rights of freedom

of association and collective bargaining in accordance with the applicable laws and regulations in the countries and regions where we conduct business activities. Seek ways to respect these rights by establishing alternative means of dialogue with employees, in the unlikely event that freedom of association and the right to collective bargaining are restricted by national or regional laws that do not meet international human rights standards.

- Occupational health and safety: provide a safe and healthy working environment.
- Working hours and wages: respect the principle of equal pay for equal work, pay adequate wages above the minimum wage and above the living wage, and form responsible working practices through proper working time management.
- Community impact: understand the potential impact of business activities on local communities, including indigenous peoples, and work in harmony with local communities.
- Creating an inclusive society: Contribute to the creation of an inclusive society by supporting the independence of socially disadvantaged people who are vulnerable to human rights violations in collaboration with diverse stakeholders.

◆4. Governance structure

The Board of Directors of INFRONEER Holdings Inc. is responsible for overseeing compliance with the commitment to human rights and its efforts.

◆5. Ongoing implementation of human rights due diligence

We conduct due diligence to identify, prevent and mitigate negative human rights impacts related to the business activities of the INFEONEER Group, in accordance with the UN Guiding Principles on Business and Human Rights.

◆6. Remedies and rectification

If it becomes clear that we have caused or have been involved in negative impacts on human rights through our own business activities, or through our business partners such as suppliers and subcontractors, we will work to remedy and rectify the situation through appropriate means.

◆7. Dialogue and consultation with stakeholders

We engage in dialogue and consultation with relevant stakeholders on responses to potential and actual negative impacts on human rights at appropriate times to improve our efforts to respect human rights.

◆8. Education and training

Appropriate training and education is provided to all officers and employees to ensure that the human rights policy permeates the INFRONEER Group and is effectively implemented throughout corporate activities.

◆9. Disclosure of information

The progress of the initiatives is regularly disclosed on the INFRONEER Holdings website and in the Integrated Report, etc.

Adopted by resolution of the Board of Directors of INFRONEER Holdings Inc. at its meeting on 23 June 2022

Revised by resolution of the Board of Directors of INFRONEER Holdings Inc. at its meeting on 9 August 2024

Revised by resolution of the Board of Directors of INFRONEER Holdings Inc. at its meeting on 26 March 2026

INFRONEER Holdings Inc.
Director, Representative Executive Officer and President
Kazunari Kibe