

Nippon Steel Group Human Rights Policy

1. Commitment to respecting human rights

The Nippon Steel Group supports and respects internationally recognized human rights (e.g., freedom of association, the right to organize, the right to collective bargaining, the elimination of forced or compulsory labor, the abolition of child labor, the elimination of discrimination with respect to employment and occupation, and a safe and healthy working environment) as expressed in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work by the International Labour Organization (ILO) as well as the Guiding Principles on Business and Human Rights by the United Nations. Based on the recognition that respect for all human rights is a prerequisite of corporate activities, the Nippon Steel Group carries out its business activities with high ethical standards while making the utmost effort to respect human rights based on the Nippon Steel Corporation Group Code of Conduct, which was established in consideration of our corporate social responsibilities.

2. Scope

This policy shall apply to all officers and employees of the Nippon Steel Group. The Nippon Steel Group also requests that all stakeholders, including suppliers, understand and support this policy.

3. Compliance with applicable laws and regulations

The Nippon Steel Group complies with the laws and regulations of the countries and regions in which the Group carries out business activities. In regions where internationally recognized human rights are not appropriately protected by laws and regulations, the Group strives to respect internationally recognized human rights to the fullest extent possible.

4. Human rights due diligence

The Nippon Steel Group has established a system for human rights due diligence to identify, prevent, and mitigate adverse human rights impacts, and seeks to promote continuous implementation and improvement of this system.

5. Remedial actions

In the event that it is revealed that the Nippon Steel Group has caused or contributed to an adverse human rights impact in its business activities, the Group strives to take appropriate measures towards remediation thereof.

6. Education

The Nippon Steel Group strives to provide appropriate ongoing education to its officers and employees regarding respect for human rights.

7. Dialogues and discussions with stakeholders

The Nippon Steel Group strives to promote dialogues and discussions with internal and external stakeholders regarding the Group's initiatives for respecting human rights in its business activities.

8. Information disclosure

The Nippon Steel Group appropriately discloses information regarding its initiatives on respect for human rights and their implementation progress through its website and other means.

9. Promotion system

The Nippon Steel Group periodically discusses at and reports to the Corporate Policy Committee and the Board of Directors of Nippon Steel Corporation regarding compliance with this policy.

Nippon Steel Corporation

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