

The Japan Steel Works Group's Policy Concerning Harassment Prevention

Establishment: February 1, 2026

1. Fundamental perspectives

- (1) **Initiatives for the creation of a harassment-free workplace environment:** The Japan Steel Works, Ltd., and its affiliated companies (hereinafter in this policy collectively referred to as the “**Company Group**”) are aware that harassment is a human rights problem, and the Company Group will, of course, comply with related laws and regulations and social norms, implement the measures that are reasonably necessary for prevention and elimination of harassment, and strive to create a healthy and safe workplace that is free of harassment and one in which employees are respected as individuals and employees' dignity or personality is not wrongfully disrespected.
- (2) **Prohibition of harassment:** Employees et al. must not engage in harassment, and they are to respect the human rights and personalities of other employees et al., make efforts so that a healthy and safe workplace that is free of harassment will be created, and accept and cooperate with the Company Group's measures that are implemented for the prevention of harassment.

2. Definitions

In this policy, definitions are as stated below.

- (1) **Employees et al.:** These refer to the Company Group's employees, such as officers, specialists, consultants, people who have a favorable relationship with the company, advisors, general employees, temporary employees, employees on temporary assignment, dispatched employees, contractors, people who have resigned from such a position, job seekers who are looking for employment, and students who are conducting an internship.
- (2) **Power harassment; sexual harassment; harassment related to pregnancy, childbirth, childcare leave, or caregiver leave; and harassment from a customer** are as stated below and are collectively referred to simply as “**harassment.**”
 - (i) **Power harassment:** This refers to words or actions that are used in the workplace against a backdrop of a relationship in which one person is superior, and by which the work environment of an employee who is employed in that workplace is harmed by those words or actions that exceed the scope that is necessary and appropriate for work.
 - (ii) **Sexual harassment:** This refers to an employee receiving a disadvantage for that employee's work conditions because of that employee's response to sexual words or actions used in the workplace, and to the work environment of that employee being harmed by those sexual words or actions. Sexual harassment in the workplace includes harassment against people of the same gender, and such harassment is subject to sexual harassment, irrespective of the sexual orientation or gender identity of the person who suffers damage.
 - (iii) **Harassment related to pregnancy, childbirth, childcare leave, or caregiver leave:** This refers to the work environment of an employee being harmed by words or actions related to the use of childcare leave, caregiver leave, or another system or measure related to childrearing or nursing care for a family member that is used in the workplace against an employee who is employed in

that workplace, the work environment of an employee being harmed by a supervisor's or a colleague's words or actions related to the employee's use of a system or measure related to pregnancy, childbirth, childcare leave, or caregiver leave, or the work environment of a female employee being harmed by words or actions related to pregnancy or childbirth. Words or actions that, from the perspective of the division of work or consideration for safety, can objectively be considered to be based on a work-related necessity will not fall under harassment related to pregnancy, childbirth, childcare leave, or caregiver leave.

- (iv) Harassment from a customer: This refers to words or actions that are used by a customer, transaction partner, or another person who has a relationship with the work conducted by the Company Group, that are used in the workplace, and by which, in light of the nature of the work that an employee conducts or other circumstances, the work environment of the employee is harmed because those words or actions exceed the scope that is permitted based on conventional wisdom.

3. Initiatives for the prevention of harassment

As measures for the purpose of harassment prevention, the Company Group will undertake at least the activities included in each of the items below and will continuously strive to improve those activities.

- (1) **Maintenance of a system for handling consultations and complaints:** In addition to a consultation contact point and a harassment countermeasures committee, the Company Group will establish an organization, such as a contact point for whistleblowing, and it will maintain a system for appropriately handling consultations and complaints from employees et al. concerning harassment incidents and for appropriately handling investigations of harassment incidents and have a harassment countermeasures committee plan and draft policies related to the prevention of harassment that include training etc.
- (2) **Thorough provision of information:** We will make employees et al. thoroughly aware of the prohibition of harassment through such appropriate means as establishing stipulations of that fact in internal regulations.
- (3) **Prohibition of disadvantageous handling:** The Company Group will not conduct disadvantageous handling because an employee related to a harassment incident made a consultation or complaint, cooperated with an investigation, or conducted other handling. The Company Group will impose appropriate punishment, including disciplinary action, on an employee who engages in disadvantageous handling.
- (4) **Disciplinary action and prevention of recurrence:** For a person who engages in harassment within the company, the Company Group will take disciplinary action based on the related regulations and will also implement the appropriate measures for the purposes of improving the harassment victim's workplace environment and preventing a recurrence.

Supplementary provisions

- 1. This policy will go into effect on February 1, 2026.