



December 18, 2024

Company Name	Sun Frontier Fudousan Co., Ltd.
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## **Notice of Making Sun Frontier Group Human Rights Policy**

At the meeting of the Board of Directors held on December 17, 2024, the Company made a resolution of making Sun Frontier Group Human Rights Policy as follows.

### **【Formulating the Human Rights Policy】**

Since its founding, the Sun Frontier Group (hereinafter referred to as "our Group") has upheld "altruism" as its corporate motto and has pursued a management philosophy of "protecting all employees, pursuing both physical and mental well-being, and at the same time contributing to the advancement and development of human society with a spirit of co-creation and realizing a sustainable society." Our Group has been practicing management based on this philosophy, continuously enhancing the abilities of each officer and employee, and pursuing both economic and spiritual well-being for our officers and employees through business activities. With a spirit of "love, sincerity, and harmony," we are making daily efforts, though modest, toward realizing a sustainable society. As our Group promotes its business, we engage with numerous stakeholders, receiving their support and encouragement. To ensure the smiles of all stakeholders involved in our Group's business, concrete actions to respect human rights are indispensable. Therefore, our Group has established the following human rights policy with the aim of creating a society overflowing with the smiles of all stakeholders.

### **1.Basic Approach to Human Rights**

According to the "Guidelines for Respecting Human Rights in Responsible Supply Chains" formulated by the Japanese government in September 2022, "human rights" are defined as "the rights of all people to secure life and freedom, pursue happiness, live with dignity, and possess these inherent rights." Our Group recognizes that human rights are the natural rights that all stakeholders should enjoy. While supporting international trends and the Japanese government's initiatives on "business and human rights," we will take concrete preventive measures and corrective actions to respect human rights.

Our Group will thoroughly comply with international human rights norms such as the "International Bill of Human Rights," the "Guiding Principles on Business and Human Rights," and the "Children's Rights and Business Principles," as well as relevant laws and regulations in the countries where we conduct business activities. In the event of a discrepancy between the laws and regulations of a country and international human rights norms, we will choose to adhere to the higher standard.

### **2.Scope of Application**

This policy applies to all officers and employees of our Group (including not only regular employees but also contract employees, temporary employees, and dispatched employees, regardless of their employment status). We also expect all business partners related to our Group's business, products, and services to understand and support this policy.

### **3.Respect for Human Rights**

Our Group respects the human rights of all stakeholders.

#### **·Respect for Officers and Employees' Human Rights :**

We respect the human rights of each individual, prohibit discrimination, respect diversity, and provide a safe working environment. We comply with various labor laws, respect freedom of association and the right to collective bargaining while prohibiting child labor, forced labor, and human trafficking, taking thorough measures to eliminate these practices. Furthermore, we strive to reduce excessive working hours, pay wages above the minimum wage (living wage), and aim to create a workplace environment where employees can feel a sense of fulfillment and growth under fair working conditions such as equal pay for equal work.

#### **·Respect for Customers' Human Rights :**

We ensure the safety, health, property, and comfortable living of our customers while striving to provide products and services with higher satisfaction through dialogue with customers.

#### **·Respect for Business Partners' Human Rights :**

We consider business partners involved in our Group's business, such as subcontractors, suppliers, and construction contractors, as important partners and treat them with respect, ensuring their human rights are respected.

#### **·Respect for the Human Rights of Local Communities :**

We take sufficient care to ensure that our Group's business does not adversely impact the people of local communities and contribute to the revitalization of the local economy. We also aim to coexist and co-prosper with local communities as a member of these communities.

### **4.Governance**

The initiatives based on this policy are overseen by the officer in charge of sustainability. The progress of these initiatives is deliberated and verified by the Sustainability Committee. Important matters are regularly reported to the Board of Directors, which supervises these initiatives.

### **5.Human Rights Due Diligence**

Our Group will establish a human rights due diligence mechanism in line with the "Guiding Principles on Business and Human Rights" of the United Nations, identify adverse impacts on human rights, prevent and mitigate them, continuously evaluate the effectiveness of these initiatives, and appropriately disclose information.

### **6.Prohibition of Discrimination and Harassment**

Our Group prohibits discrimination and unfair treatment for reasons unrelated to professional qualifications or job performance, including race, nationality, social origin, religion, beliefs, gender, age, disability, sexual orientation, gender identity, medical history, marital status (including the presence of children), criminal record, and employment status. We do not tolerate any form of harassment, including sexual harassment, power harassment, and customer harassment.

Consultation desks for harassment are established within the management departments of each company in our Group. To ensure that users can consult and report with peace of mind, we maintain the confidentiality of the consultants and those who cooperated with the facts and prohibit retaliatory actions or actions that could be perceived as retaliation. This consultation desk is available to all Group employees, regardless of employment status, and to specific contractors based on the "Act on the Proper Operation of Specific Commissioned Business" (Freelance Law).

### **7.Correction and Remedy**

If it becomes clear that our Group's business activities have caused or contributed to adverse impacts on human rights, we will take corrective actions through appropriate means and establish an effective grievance mechanism to enable appropriate remedies. Additionally, if it becomes clear that our Group's business partners have caused or contributed to adverse impacts on human rights, we will encourage them to take corrective measures.

## **8.Education and Training**

Our Group will continuously provide appropriate education and training to all officers and employees to ensure that this policy is incorporated into all business activities and effectively implemented. We will also ensure that this policy is thoroughly communicated to all business partners related to our business, products, and services.

## **9.Information Disclosure**

Our Group will appropriately disclose the progress and results of our human rights initiatives through various reports and websites at least annually.

## **10.Dialogue and Consultation with Stakeholders**

Our Group will utilize the expertise of independent external organizations and engage in continuous dialogue and consultation with internal and external stakeholders regarding responses to actual or potential adverse impacts on human rights.

Established: December 17, 2024

### **Human Rights Items Considered Important by Our Group**

- **Ensuring safety, security, and health in building and town development**
- **Realizing a sustainable society through concrete initiatives conscious of environmental protection**
- **Prohibiting discrimination, harassment, and other unfair treatment in the workplace**
- **Protecting the privacy of customers, employees, and other stakeholders**
- **Respecting diversity, enhancing engagement, and providing a psychologically safe workplace environment for employees**
- **Proper operation of labor laws and promoting the physical and mental health of employees**
- **Building a sustainable supply chain and conducting fair transactions based on partnerships with cooperating companies**
- **Appropriate communication and sincere responses with stakeholders**

"Additionally, for more information on our group's sustainability initiatives, please refer to our sustainability site at <https://www.sunftt.co.jp/sustainability/en/>."