

## **Axcelead Group Human Rights Policy**

Effective September 1, 2024

The Axcelead Group established our purpose to build a healthy future for people worldwide through a groundbreaking healthcare platform, and we aim to contribute broadly to society by promoting impact management.

Through management based on this purpose, we recognize that our business activities may impact the human rights of not only our executives and employees, but also, various business partners and stakeholders. We are committed to respecting the human rights of all individuals involved in our business activities. To promote this initiative and fulfill our responsibility to respect human rights, we have formulated the Human Rights Policy in accordance with the United Nations Guiding Principles on Business and Human Rights.

### **1. Basic Principles**

As our values place "Respect for Diversity" at the highest level, we respect the diversity, dignity, and individuality of not only our executives and employees, but also, all business partners and stakeholders. We do not tolerate any form of unreasonable discrimination based on birth, nationality, race, creed, religion, age, gender, gender identity, sexual orientation, disability, or any other characteristic, or any harassment that damages individual dignity.

Furthermore, we respect the rights to freedom of association and collective bargaining, prevent all forms of child labor or unfairly forced labor, and strive to provide a safe and healthy working environment.

### **2. Respect for and Compliance with Norms and Laws**

We support and respect international human rights norms, including the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We also comply with the laws and regulations of the countries and regions where we conduct business. In cases where local laws differ from international human rights norms, we adhere to the higher standard, and in cases of conflict, we seek ways to respect international human rights norms.

### **3. Scope of Application**

This policy applies to all executives and employees of our group. We also require our business partners, including suppliers, to support this policy.

4. Responsibility to Respect Human Rights

In our business activities, we fulfill our responsibility to respect human rights by ensuring that we do not infringe on the human rights of others, and by taking corrective actions when we cause or contribute to negative impacts on human rights. In cases where negative impacts on human rights by our business partners, including suppliers, are suspected to be related to our business activities, we will actively seek them to ensure respect for human rights.

5. Education and Training

We will continue to provide education and training to all executives and employees working in our group to ensure that this policy is widely communicated, understood, and consistently implemented and practiced.

6. Responsibility and Reporting Channels

We will clearly designate an executive responsible for implementing this policy, and establish and operate internal and third-party reporting channels for any violations of this policy. We also prohibit any disadvantageous treatment of whistleblowers as a result of their reports.

7. Information Disclosure and Dialogue

We will disclose information about our efforts to respect human rights in a manner both timely and appropriate. Additionally, we will engage in timely and appropriate dialogue and consultation with relevant business partners or stakeholders.

Axcelead, Inc.  
Executive Officer, CSO  
Masamichi Sato

Handwritten signature of Masamichi Sato in black ink.