

Nippon Steel Group Human Rights Policy

1. Commitment to respecting human rights

The Nippon Steel Group supports and respects internationally-recognized human rights (freedom of association, right to organize, right to collective bargaining, the elimination of forced or compulsory labor, the abolition of child labor, the elimination of discrimination in respect of employment and occupation, and a safe and healthy working environment, etc.) expressed in the “International Bill of Human Rights” and “ILO Declaration on Fundamental Principles and Rights at Work” by the International Labour Organization (ILO) and “Guiding Principles on Business and Human Rights” by the United Nations.

Based on the recognition that respect for all human rights is the prerequisite of corporate activities, the Nippon Steel Group promotes its business activities with high ethical standards while taking utmost care for respecting human rights based on the “Nippon Steel Corporation Group Code of Conduct”, which was established in consideration of corporate social responsibilities.

2. Scope

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

3. Compliance with applicable laws and regulations

The Nippon Steel Group complies with laws and regulations of the countries and regions in which the Group promotes 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 establishes a system for human rights due diligence to identify, prevent and mitigate adverse human rights impacts and seeks to promote continuous practice and improvement of the 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 on 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 respect for human rights in its business activities.

8. Information disclosure

The Nippon Steel Group appropriately discloses information regarding its initiatives concerning respect for human rights and their progress through the 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 the compliance with this policy.

Nippon Steel Corporation

April 1, 2024