

Penta-Ocean Construction Group Human Rights Policy

The Penta-Ocean Construction Group is committed to sustainability in all aspects of our corporate activities based on our Management philosophy of “Affiliating with society”, “Creating a Nature-Rich Environment”, and “Cherishing a Pioneering Spirit”. We have formulated the Penta-Ocean Construction Group Human Rights Policy (hereinafter referred to as the “Policy”), and through corporate activities based on the Policy, we aim to contribute to the development of a sustainable society and continue to grow sustainably by earning the trust of society.

1. Basic Approach to Human Rights

The Penta-Ocean Construction Group recognizes the possibility that its corporate activities may directly or indirectly affect human rights. In order to respect the human rights of all people affected by our corporate activities, we have formulated the Policy based on our Corporate Philosophy Structure consisting of “Management Philosophy”, “Vision” and “Materiality” in practicing sustainability management, as well as “Code of Conduct”.

As a signatory to the United Nations Global Compact, we support and respect international norms on human rights, including the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

We will comply with the laws and regulations applicable in each country or region where we conduct our business activities, and if the laws and regulations of a country or region differ from international norms related to human rights, we will pursue ways to respect international norms related to human rights to the maximum extent possible.

2. Scope of Application

The Policy applies to all executive officers and employees of the Penta-Ocean Construction Group. We will also encourage our business partners, including subcontractors, and other related parties involved in our corporate activities to support the contents of the Policy and cooperate with our efforts to respect human rights.

3. Significant Human Rights Risks

We will assess the negative impact of our corporate activities on human rights and proactively address the following human rights issues that we have identified. In addition, we will periodically conduct human rights impact assessments and review the Policy in order to respond to human rights issues that may change in response to social demands and our corporate activities.

- Ensure occupational health and safety
- Prohibit discrimination, inhumane treatment, and harassment
- Appropriate working hours and proper wages
- Prohibition of forced labor and child labor
- Respect for freedom of association and the right to collective bargaining
- Prohibition of human rights violations against foreign workers, etc.
- Respect for the rights of indigenous and local residents

4. Promotion Structure

Important decisions regarding human rights will be made by the Human Rights Committee, chaired by the President and Representative Director, and various policies and specific measures based on the Policy will be established and implemented.

5. Human Rights Due Diligence

In order to fulfill our responsibility to respect human rights, we will establish and continuously implement a system of human rights due diligence. Through human rights due diligence, we will identify any apparent or potential negative human rights impacts on the Penta-Ocean Construction Group, business partners, including subcontractors, and other related parties, and strive to prevent or mitigate them. We will continuously evaluate the results of these efforts, integrate them into our internal policies and procedures, and disclose them both internally and externally.

6. Remedial and Corrective Actions

If it is found that our corporate activities have caused or contributed to a negative impact on human rights, we will promptly take remedial and corrective measures through appropriate means. In addition, we will make compliance consultation desks known both internally and externally and establish and operate a system to enhance the effectiveness of remedial and corrective measures.

7. Dialogue with Stakeholders

We will engage in ongoing dialogue and consultation with relevant stakeholders and external experts regarding our response to any apparent or potential negative impacts on human rights.

8. Education and Training

We will provide education and training necessary for all executive officers and employees of the Penta-Ocean Construction Group to have a full understanding of the Policy on a regular basis.

9. Information Disclosure

We will regularly disclose information on our efforts to respect human rights based on the Policy through our corporate report and website.

October 1, 2023



Takuzo Shimizu

President, CEO and Representative Director
Penta-Ocean Construction Co., Ltd.