

The Nisshin Seifun Group

Human Rights Policy

The Nisshin Seifun Group (the “Group”) respects the human rights of all people involved with our Group's business. In accordance with the UN Guiding Principles on Business and Human Rights, this policy is designed to respect human rights as defined in international norms including: the Universal Declaration of Human Rights (UDHR); International Covenants on Human Rights (International Covenant on Economic, Social and Cultural Rights, and International Covenant on Civil and Political Rights); and the ILO Declaration on Fundamental Principles and Rights at Work, and to ensure compliance with applicable laws and regulations of countries where the Group operates. In the event that in some countries or regions there is a gap between local laws and international norms, the Group will make every effort to respect international norms where possible.

Scope

This policy applies to Nisshin Seifun Group Inc. and its consolidated subsidiaries. Further, based on this policy, if our business partners and other stakeholders associated with the Group's businesses are involved in actions that negatively impact human rights, our Group will encourage these partners to respect human rights and not infringe on them.

Human Rights Due Diligence

The Group will establish and continue to implement mechanisms necessary to identify potential and actual human rights risks and take actions to prevent or mitigate those risks.

Access to Remedies

If it becomes clear that the Group has caused or is involved in negative impacts on human rights, we will strive to remedy them through our appropriate internal and external procedures. In addition, we will establish and maintain grievance procedures necessary for this purpose.

Education

Our Group will periodically provide appropriate education programs to executives and employees to ensure that this policy is integrated into all the activities of Nisshin Seifun Group Inc. and its consolidated subsidiaries.

Stakeholder Dialogue

Our Group will engage in dialogue and consultation with relevant stakeholders on our measures to deal with potential and actual impacts on human rights.

Information Disclosure

Our Group will disclose information appropriately to maintain full accountability for the Group's efforts based on this policy, as well as our responses to potential and actual human rights impacts.

Establishing Appropriate Systems

Based on this policy, the Group will establish systems necessary for promoting business activities that respect human rights.

Appendix

The appendix specifies the Group's priority issues on human rights. These priority issues will be reviewed as necessary taking into account changes in the Group's business and social circumstances.

Effective Date:
December 21, 2018