



The Shin-Etsu Group Human Rights Policy

Shin-Etsu Group (the "Group") engages in business based on its Business Principle, "The Group strictly complies with all laws and regulations, conducts fair business practices and contributes to people's daily lives as well as to the advance of industry and society by creating value through the provision of key materials and technologies." The foundation of this is respect for human rights. The Group respects the human rights of all individuals. All our Group companies worldwide respect human rights perpetually in accordance with the international code of conduct* and actively promote the following actions to respect human rights.

Respect for Human Rights

1. Prohibition of discrimination

We do not discriminate at all on the basis of nationality, race, ethnicity, sex, religion, personal views, beliefs, age, social status, disability, sexual orientation, gender identification, labor union participation, health, marital status, political opinion, or any other status.

2. Prohibition of damaging human dignity

We do not in any case conduct sexual harassment, power harassment, maternity harassment or any other acts that damage human dignity.

3. Protection of privacy

We protect the privacy of individuals and handle personal information properly in accordance with the applicable laws and regulations of each country.

4. Respect for basic labor rights

We respect the workers' right to organize, the right of collective bargaining, and further rights given to workers to establish, maintain, and improve trust and good cooperative relationships through dialogue between labor and management.

5. Prohibition of child labor and forced labor

We prohibit our operations in all countries and regions from using child labor in accordance with the applicable laws and regulations of each country. We also prohibit the use of forced labor.

* "International code of conduct" follows:

The Universal Declaration of Human Rights, ILO International Labour Standards, UN Guiding Principles on Business and Human Rights, UN Global Compact's 10 Principles, etc.

Activities for Respecting Human Rights

1. Human rights awareness

The people responsible for human resources in each business site and company of the Group will strive to develop the proper understanding of human rights and awareness of respect for human rights through activities including education for employees on human rights.

2. Human resources development

The Group will create an environment in which diverse individuals can work at their full capacity and equally give all employees opportunities aligned with their aptitudes to develop and utilize their abilities.

3. Working environment

The Group will make efforts to create a sound and comfortable working environment and to ensure safety.

4. Prevention of human rights infringement

The Group will make efforts to prevent the infringement of human rights in the course of business activities by conducting human rights due diligence* in accordance with the UN Guiding Principles on Business and Human Rights.

5. Measures for handling issues

If there are concerns regarding human rights infringement in our business activities, the Group will take appropriate measures promptly to resolve them.

6. Promotion of respect for human rights

The Group will encourage all people associated with the Group to comply with international standards for human rights.

* "Human rights due diligence" means:

To regularly implement the identification, evaluation, preventative/corrective measures, investigation, monitoring, and information disclosure of human rights risks in accordance with the Group's human rights policy.

Established on May 21, 2019