

## Initiatives in Respect for Human Rights

### Basic Concept

We believe that protecting the dignity and respecting the rights of all stakeholders in our business activities is essential both to the development of a sustainable society and to our own parallel development as a sustainable business. Acting on this belief, we have established a Toho Gas Group Human Rights Policy in accordance with internationally accepted criteria, such as the United Nations Guiding Principles on Business and Human Rights. In this way, we show our commitment to contributing to the development of a sustainable society by conducting our business activities with respect for the human rights of our employees, customers, business partners, local communities, and all other stakeholders.

### Respect for Human Rights

#### Human rights policy

The Toho Gas Group is committed to preventing and mitigating adverse impacts on human rights by enhancing employee awareness of human rights while promoting efforts to prevent discrimination and harassment.

#### Toho Gas Group Human Rights Policy (Excerpt)

##### Introduction

##### 1. Our View on Respecting Human Rights

We support and respect international norms on human rights, including the United Nations "International Bill of Human Rights" and the International Labor Organization (ILO) "Declaration on Fundamental Principles and Rights at Work". We also strive to practice the United Nations "Guiding Principles on Business and Human Rights".

The officers and employees of the Toho Gas Group will promote initiatives for the respect for human rights based on this policy. We also expect our business partners to support this policy.

##### 2. Applicable Laws

##### 3. Respecting Human Rights in Business Activities

##### 4. Human Rights Due Diligence 5. Remediation

##### 6. Dialogue and Consultation 7. Education and Awareness

##### 8. Information Disclosure



Toho Gas Group Human Rights Policy

<https://www.tohogas.co.jp/lang/en/approach/eco/social/hrp/>

#### Promotion Framework

To ensure human rights due diligence, including initiatives to identify, prevent, and mitigate adverse human rights impacts of our business activities, the Sustainability Committee, comprising Toho Gas and its major affiliates, discusses, reviews, and monitors the progress of policy formulation and revision, action plans, and their implementation. This status is then reported to the Management Committee, and important matters are brought to the Board of Directors.

#### Implementation Structure Chart



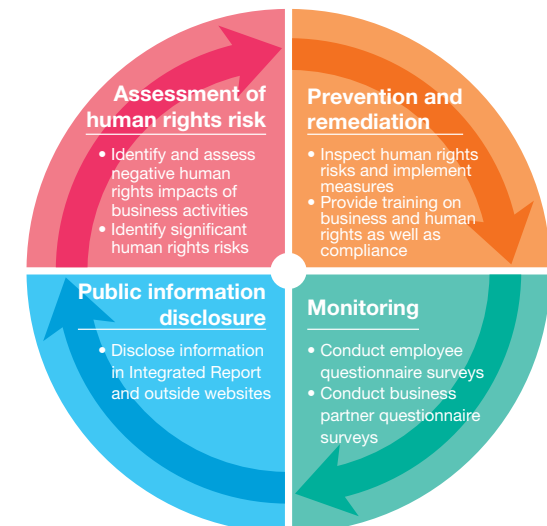
Toho Gas has signed and endorsed the Ten Principles of the United Nations Global Compact in the four areas of human rights, labor, environment, and anti-corruption, and is a member of the UN Global Compact.



#### Human rights due diligence

We established a human rights due diligence system, promoting efforts to prevent the adverse impact of our business activities and respect human rights through a continuous improvement cycle.

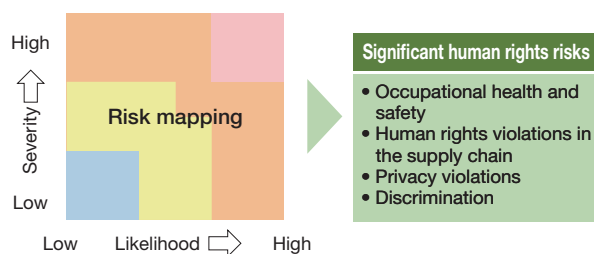
#### Details of human rights due diligence



## Initiatives in Respect for Human Rights

### Assessment of human rights risk and identification of significant human rights risks

Through discussions with internal stakeholders, we identified adverse human rights impacts (human rights risks) that should be considered during business activities and evaluated their importance in terms of severity and likelihood. Based on advice from experts, we prioritized these risks and identified the following significant human rights risks: occupational health and safety, human rights violations in the supply chain, privacy violations, and discrimination.



Identification of significant human rights risks using risk mapping

### Prevention and remediation, awareness and education

The Toho Gas Group established a human rights due diligence system to comprehensively assess overall risks, including human rights risks, in the course of business activities and to implement appropriate measures.

From among the identified significant human rights risks, we selected occupational health and safety and human rights violations in the supply chain as priority inspection items for FY2023, and we

worked to prevent and mitigate these risks by conducting internal environment inspections and various training, such as human rights awareness through e-learning and compliance, as well as making efforts in the supply chain.

### Consultation service

We established the Compliance Consultation Service both internally and outside the Company at a lawyer's office to allow direct consultation of issues including human rights in person, by email, or by phone. This service is available not only to Group employees, including dispatched staff, but also to retired employees and business partners as well.

## Human Rights Initiatives in the Supply Chain

### Efforts in the supply chain to respect human rights

We established the Toho Gas Group CSR Procurement Guidelines based on the Toho Gas Group CSR Procurement Policy to promote efforts to respect human rights together with our business partners. In FY2023, we conducted questionnaire surveys of our major business partners to check the status of their sustainability initiatives including respect for human rights, such as prohibition of forced labor, child labor, and discrimination.

### Toho Gas Group CSR Procurement Guidelines (Excerpt)

#### 1. Quality, Price, Delivery, and Maintenance Management, etc.

##### (1) Quality and Safety

We request that our business partners provide products and services that meet the quality and performance standards required by our group, which are maintained for a reasonable period of time, and that ensure safety in use and operation. We also request our business partners to strive to maintain and improve their technical level.

##### (2) Price

Considering specifications, quality, delivery, purchase quantity, and market price trends, we request our business partners to provide products and services at fair and reasonable prices.

##### (3) Delivery

In delivering products and services, we request our business partners to adhere to the delivery deadline and strive to maintain a stable supply.

##### (4) Maintenance Management & After-sales Service

We request our business partners to maintain a system that can promptly and accurately conduct inspections, maintenance, repairs, and responses to accidents and malfunctions, and that can quickly provide necessary parts and technical assistance.

#### 2. Compliance

We request that our business partners comply with all relevant laws and regulations applicable in the countries and regions where business activities are conducted, and respect societal norms and ethics.

(Omitted)

#### 5. Human Rights & Occupational Safety and Health

We request our business partners to deepen their understanding of the importance of respecting the human rights and occupational safety and health of people affected by business activities, including the prohibition of discrimination, forced labor, and child labor. We request our business partners to respect human rights and strive for proper labor management and the maintenance of a safe and healthy work environment.

(Omitted)

#### 7. Approach to Business Partners (Supply Chain Management)

We request that our business partners not only engage in CSR procurement but also encourage their own business partners to do the same.