

# Respect for Human Rights

## I. Basic Concept

The Kintetsu World Express Group (“KWE Group”) has a KWE Group Human Rights Policy based on the United Nations Guiding Principles on Business and Human Rights. Our human rights policy was established by the Kintetsu World Express Board of Directors in January 2025. As a participant in the UN Global Compact, our initiatives on respecting human rights refer to the UN Guiding Principles on Business and Human Rights (“UNGPs”), the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

Our human rights policy applies to all KWE Group directors and employees. We also seek the understanding and support of business partners and suppliers involved in KWE Group business activity and services for this human rights policy.

[KWE Group Human Rights Policy](#)

## II. Organizational Framework

The KWE Group has established a Human Rights Working Group under the KWE Group Sustainability Committee. The Sustainability Development Division, Corporate Planning & Administration, acts as the working group secretariat for action on human rights and reports regularly to executive management, under the supervision of the President & CEO. We seek advice from third party organizations with specialized knowledge and strive to ensure objectivity and validity in our initiatives.

## III. Respect for Human Rights Initiatives

### 1 Human Rights Education and Training

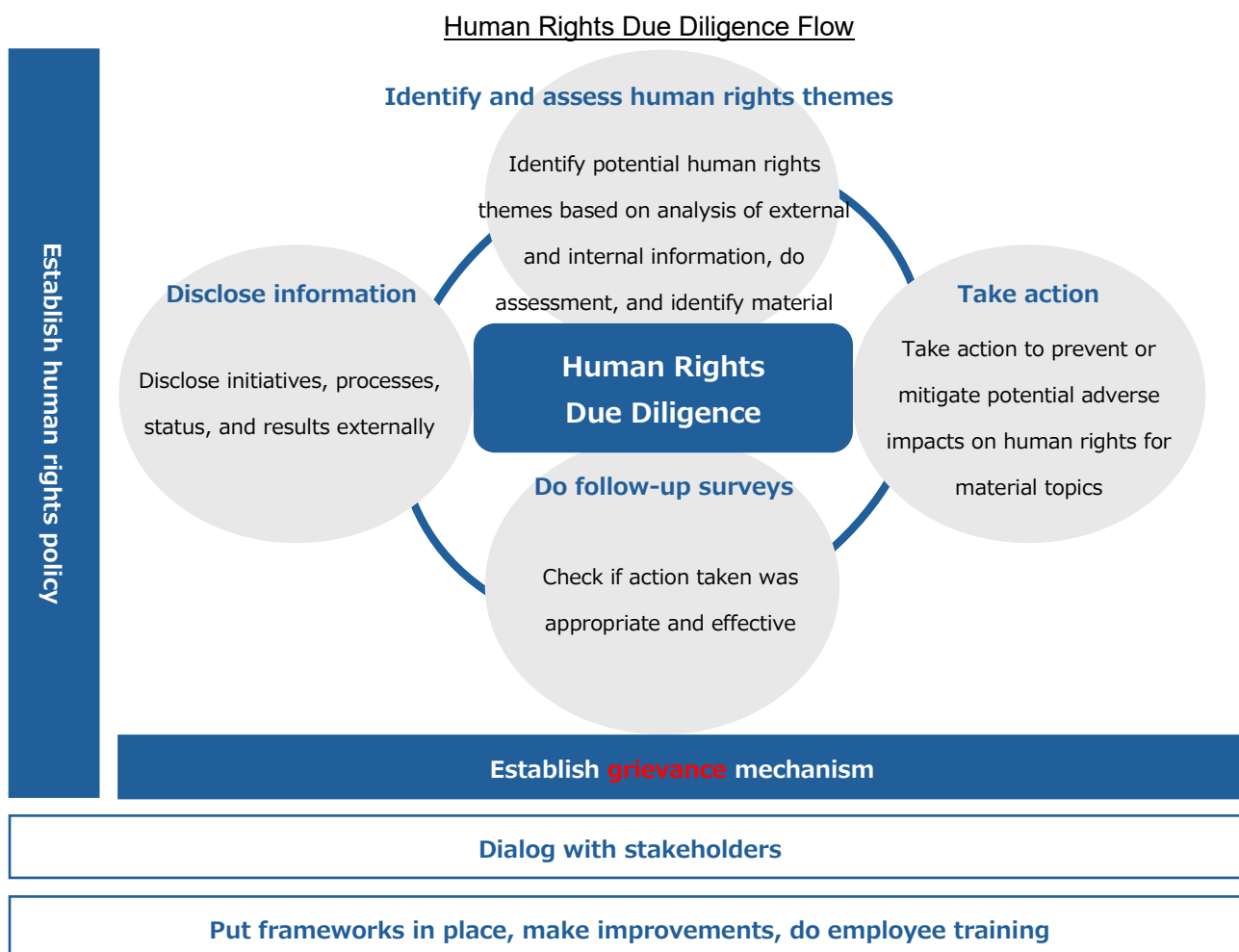
The KWE Group regularly provides education and training on business and human rights to our directors and employees. In October 2024, we held a briefing session for executive management to update them on trends in business and human rights and to motivate a stronger commitment to action on human rights issues. The session was led by Mr. Hiroshi Ishida, Executive Director, of the Caux Round Table Japan (“CRT”), a non-profit with expertise in the area, and other experts from Tokio Marine dR (“TdR”). In November 2024, we held a workshop with managers as part of human rights due diligence, which included presentations from Mr. Ishida and lecturers from TdR on global trends in business and human rights. We also provided all our employees world-wide with elearning on the topic in April 2025.

### 2 Human Rights Due Diligence

#### 2.1 Basic Concept and Approach

Through a due diligence process in line with UNGPs methodology, the KWE Group is moving ahead on building a management framework based on including an external perspective. Specifically, this ongoing

process includes identifying potential adverse impacts on human rights involving the KWE Group, taking action to prevent or mitigate those impacts after ascertaining the facts, following up on the status and results of action taken, and disclosing our progress and results externally.



## 2.2 Identify Human Rights Themes (Risk Assessment)

The KWE Group organizes and analyzes information from both external and internal perspectives and identifies risks of human rights violations in our business activities along the value chain.

We conducted surveys from an external perspective from October through December 2024. Specifically, we analyzed information gained in surveys of our locations in Japan, including information about employees and business partners and the problems they are facing, and then did a desktop survey to get an understanding of human rights risks based on objective data. To better understand the risks unique to our sectors of transport and logistics and services and the regional risks where we do business, both in and outside Japan, we included information obtained from international agencies, NGOs and other organizations, as well as surveying actual cases of human rights violations in the transport and logistics industry.

In November 2024, we held a human rights due diligence workshop attended by 18 managers from our locations in Japan in order to analyze information from an internal perspective. The workshop opened with sharing the human rights risks identified during the desktop survey with the participants. Then small groups of 4 to 5 worked to identify risks in practice by discussing what kind of risks there were, and where, in the KWE Group value chain, along with possible ways to prevent or mitigate any impacts. After review by our third party experts from CRT and TdR, the results of the small groups were shared with all the participants.

This process identified the three material human rights themes for priority action by the KWE Group shown below as potential risks of adverse impact on society. The themes were selected with consideration for three points important in developing the management process that is the basic flow of human rights due diligence: 1) the risk was indicated by the external perspective desktop survey, 2) direct dialog with the rights holders is feasible, and 3) addressing the risk within the scope of impact directly caused by our business activity is feasible.

Material human rights themes for priority action

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| <ul style="list-style-type: none"><li>• Working environment for service providers and foreign workers at warehouses in Japan</li><li>• Working environment for workers at warehouses outside Japan</li><li>• Working environment for transport company drivers</li></ul> |
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## Risk Assessment Flow

### Identify human rights risks

#### Internal perspective

##### ● Human rights due diligence workshop

Date	November 25, 2024		
Number of participants and participating departments	18 Corporate Sales, Marketing & Operation, Import Sales, Tokyo Export Operation Center Narita Satellite Office, Tokyo Import Customs Clearance Center, Tokyo Sea Freight Customs Clearance Center, Tokyo Logistics Sales Office (No. 2 Baraki Terminal, No. 4 Baraki Terminal, Narita Terminal, Oi Terminal, Misato Green Warehouse), Export Sea Freight Operation Center, Regional Sales & Marketing Center, Chiyoda Import Sales Office, Shiba Export Sales Office, Shinjuku Export Sales Office		
Description	<p>Workshop for Japan site managers</p> <p>Small groups of 4 to 5 shared information on potential human rights issues and the status of any action being taken to come to an understanding of where in the value chain the problems were occurring and discussed how the problems might be addressed.</p> <p>Each group presented a summary of their discussion of the human rights theme they thought most important, sharing human rights themes in the value chain among all the participants.</p>		

Identify human rights themes for priority action



Policy

#### External perspective

##### ● Desktop survey of human rights risks

###### Risk by sector

- CRT "Human Rights Issues by Sector v. 12"
- United Nations Human Rights Council "10 Human Rights Priorities for the Transport and Logistics Sector"
- United Nations Environmental Programme Finance Initiative (UNEP FI) "Human Rights Guidance Tool for the Financial Sector"
- TdR survey of human rights violations in the transport and logistics industry

###### Regional risks

- Walk Free "The Global Slavery Index 2023"
- Comparison of Japan site survey below and desktop survey above

##### ● Japan site survey

- Employee and business partner information
- Site issues information

Note: Japan sites in scope (13)

Tokyo Export Operation Center (Narita Satellite Office, Tokyo, Osaka), Tokyo Import Customs Clearance Center (Shipping Team, Narita Airport Customs Clearance Liaison Office, Haneda Airport Customs Clearance Liaison Office, others), Tokyo Sea Freight Customs Clearance Center, Tokyo Logistics Sales Office (No. 2 Baraki Terminal, No. 4 Baraki Terminal, Narita Terminal, Oi Terminal, Misato Terminal)

- Indicated by external perspective desktop survey
- Direct dialog with rights holders is feasible
- Start with scope of direct impact of our business activity

### Identify material human rights themes for priority action

- 1) Working environment for service providers and foreign workers at warehouses in Japan
- 2) Working environment for workers at warehouses outside Japan
- 3) Working environment for transport company drivers

### 2.3 Human Rights Theme Assessment (Impact Assessment)

Of the three themes, we decided to start with the basic flow of human rights due diligence on “working environment for service providers and foreign workers at warehouses in Japan”, due to its importance from an external perspective based on the desktop survey, the status of management of the problem, the feasibility of direct dialog, and the feasibility of addressing the direct impact. Having found that our warehouse service provider, Kintetsu Cosmos, was using foreign temporary workers from a staffing agency at the Tokyo Logistics Sales Office’s No. 2 Baraki Terminal and No. 4 Baraki Terminal, we did an impact assessment in February 2025 of possible human rights issues for these workers. Representatives from our third party advisors CRT and TdR interviewed the workers and their managers onsite at the warehouses. Group interviews were held in meeting rooms with a Nepali interpreter to check the working environment with questions based on the Dhaka Principles. The Dhaka Principles were developed by the Institute for Human Rights and Business (“IHRB”) as international principles for the responsible employment of migrant workers. In addition to the interviews, our advisors observed the workplace, including office space and break rooms.

The assessment did not find any serious cases of human rights violations. There were no problems with salary payment or work systems, and they were managed appropriately. When a worker had a problem with their work, they could bring it to their team leader and get it resolved. On the other hand, there were some issues from the perspective of respect for human rights. These included employment contracts and payslips only in the Japanese language, so that the foreign workers needed a translator or translation app to understand them, safety information posted inside the terminals not available in the workers’ languages, and having to go through the team leader to resolve their problems with work and they did not know about any third party grievance mechanism. While none of the foreign workers said these issues were a problem, we gave feedback to the service provider and started looking into how to resolve them, to improve respect for the workers' human rights.

#### Impact assessment



### Problems identified at the impact assessment and status

Problems identified at the impact assessment (February 2025)		Status (June 2025)
Language support - Employment contract	The employment contract is only in the Japanese language, so that foreign workers need a translator or translation app to understand it.	We requested our service provider to provide employment contracts in the worker's native language, and they will phase in this language support for contracts executed in the future.
Language support - Payslip	Like the employment contract, the wage payslip is only in the Japanese language, so that foreign workers need a translator or translation app.	We requested our service provider to provide payslips in the worker's native language, and they will phase in this language support for payslips issued in the future.
Language support - Workplace safety information	Safety notices posted at the workplace, such as microwave oven cautions, occupational safety and health targets, and local government flood hazard maps, are only in the Japanese language, which foreign workers may not understand.	We are looking into posting safety and health notices in multiple languages or using pictograms and phasing them in.
Access to help - Support service	When a foreign worker has a problem with their work, they take it to their leader to get it resolved. But if the worker is having trouble with their leader, they do not know where to go for help.	We are looking into setting up a support service where foreign workers can get help with their problems.

## **2.4 Next Steps**

Through impact assessment, the KWE Group has identified respect for human rights issues in the working environment for service providers and foreign workers at warehouses in Japan, and we plan to follow-up on how the issues are being addressed. We will hold repeated discussions with the rights holders as we collaborate with our service provider to make changes.

We plan to also conduct impact assessment of our other human rights themes, engaging in direct dialog with rights holders to determine if there are any actual or potential human rights violations. If we find any actual or potential adverse impacts on human rights, we will take

action to prevent or mitigate them. We will then verify the effect of the action taken. And we will share our expertise in governance from an external perspective gained through human rights due diligence with our business partners throughout the value chain.

The KWE Group will conduct human rights due diligence on an ongoing basis and disclose our progress and results externally.

### **3 Grievance Mechanism**

The KWE Group has established a global whistleblower hotline to handle grievances. All KWE Group employees worldwide can access the hotline, established in May 2023, to report known or potential infringement of laws or group policies. The hotline accepts anonymous reports in a number of languages, making it easier to share concerns and encouraging early detection and addressing of potential problems. And, as a step forward in building a strong relationship of trust with rights holders, we are considering phasing in a mechanism able to accept grievances from third parties.