

OSG Group Human Rights Policy

OSG Corporation and all the group companies (hereinafter referred to collectively as “OSGs”) respect the “International Bill of Human Rights” (Universal Declaration of Human Rights and International Covenant on Human Rights), the International Labor Organization (ILO)’s “Declaration on Fundamental Principles and Rights at Work” and the United Nation’s “Guiding Principles on Business and Human Rights,” which define the fundamental human rights that everyone in the world should have, and establish “OSG Group Human Rights Policy” (hereinafter referred to as “Policy”). Each one of the members of OSGs shall promote activities related to human rights based on this Policy.

1 . Scope of application

This Policy shall apply to all executives and employees in OSGs. In addition, OSGs shall continuously work on all the stakeholders related to our business activities to respect and promote human rights in cooperation.

2 . Responsibility for respect for human rights

OSGs make a pledge not to abuse the human rights of the people influenced by our business activities and to take appropriate measures to correct any negative impact on human rights if those are caused related to our business activities, and thereby to fulfill our responsibilities to respect human rights. If any negative impact on human rights is caused by our stakeholders and other concerned people, OSGs shall ask them to respect human rights and prevent the infringement.

3 . Priority issues on human rights

As companies carry out sustainable business activities in a society with diversity, OSGs understand that the following are priority issues for human rights:

- Prohibiting human trafficking, forced labor and child labor
- Securing both mental and physical health and safety
- Prohibiting any form of prejudice and discrimination related to race, color, language, religion, thought, gender, age, disability, nationality, gender identity, sexual orientation, property ownership or employment status
- Prohibiting any form of harassment, bullying or unfair treatment
- Respecting freedom of association and the collective bargaining rights of workers
- Securing the minimum wage and managing adequate working hours
- Protecting personal information and privacy

4 . Human rights due diligence

In order to fulfill the responsibility to respect human rights through the implementation of the United Nation’s “Guiding Principles on Business and Human Rights,” OSGs shall establish a Human Rights Due Diligence system. Within this system, we will identify and evaluate the negative impacts on human

rights caused by our activities and take measures to prevent, mitigate and correct both potential and actual risks to human rights.

5 . Settlement of complaints and remedy

If any employee recognizes or suspects any potential violation of laws, regulations and rules applied in the country and the region as well as internal rules including Human Rights Policy, the person can report such violations to his/her supervisor or a person in charge of the internal reporting system.

OSGs shall establish appropriate and effective mechanisms for settlement of complaints, and if it becomes apparent that a person caused or is involved in an adverse impact on human rights, implement remedial actions and corrective measures through appropriate procedures and communications.

6 . Understanding, promotion and penetration

In order to ensure that this Policy is fully understood and embedded within all business activities, OSGs shall work on the education and enlightenment of executives and employees in proper and effective ways. OSGs shall share this Policy with our stakeholders and their concerned people for better understanding and penetration.

7 . Compliance to applicable laws and regulations

OSGs observe the domestic laws and regulations of each country and region where we carry out our business activities. If there are any conflicts between the internationally recognized human rights and those stated in legislation of each country, OSGs shall pursue a way to respect international human rights principles.

8 . Communication and discussion

OSGs shall utilize external expertise on human rights to communicate and discuss with concerned stakeholders regarding measures against any potential and actual impact on human rights.

9 . Disclosure of information

OSGs shall disclose the progress of our activities to respect human rights based on this Policy through our web-site and reports.

This Policy was approved by the board of directors of OSG Corporation on February 18, 2022, and executed by the President and COO.

March 1, 2022

Nobuaki Osawa, President and COO
OSG Corporation