NEC Group Human Rights Policy

April 2015
revised in July 2026

Our Approach to Respecting Human Rights

NEC Corporation and its consolidated subsidiaries (the "NEC Group") aim to fulfill the Group's Purpose of creating the social values of safety, security, fairness, and efficiency to promote a more sustainable world where everyone has the chance to reach their full potential while engaging in dialogue and co-creation with stakeholders.

The NEC Group believes that conducting corporate activities with respect for human rights is essential to fulfill its Purpose.

With this in mind, we have positioned respect for human rights as one of the Principles outlined in the NEC Way, a shared policy which expresses the behavior that we value as a company, and we clearly stipulate the requirement of respect for human rights in all situations by everyone, from NEC Group officers to employees.

The NEC Group respects fundamental human rights in every aspect of its corporate activities and will not allow any act that may be prejudicial on the grounds of race, beliefs, age, social position, family origin, nationality, ethnicity, religion, gender and sexual orientation, gender identity, or disability, or any act that may offend the dignity of any individual, such as bullying, harassment, child labor, or forced labor.

The NEC Group also recognizes its responsibility for the potential impacts that its corporate activities may have on human rights of all people, including vulnerable groups.

The NEC Group, as an ICT provider, also strives to promote data protection and privacy, respect for freedom of expression, and the proper use of new technologies. Through the development and provision of products and services that take into consideration human rights issues such as invasion of privacy and discrimination, the NEC Group aims not only to prevent and mitigate adverse impacts on society but also to maximize the social value that the NEC Group provides.

Upholding International Standards

Based on the NEC Group's approach outlined above, the NEC Group upholds international

human rights standards relevant to the NEC Group's businesses and technologies, including those established in the following documents. Where national laws in the relevant jurisdiction conflict with internationally recognized human rights, we will seek ways to respect the principles of internationally recognized human rights.

- International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights
- International Labour Organization (ILO) Core Labour Standards that consist of ten fundamental conventions in five categories: freedom of association and the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation, a safe and healthy working environment
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct
- International Labour Organization (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy

Purpose and Scope of the NEC Group Human Rights Policy

This NEC Group Human Rights Policy (this "Policy") details the NEC Group's policy for respecting human rights across its entire value chain.

This Policy applies to all officers and employees of the NEC Group, including fixed-term contract employees, temporary employees, and part-time employees. The NEC Group also encourages its suppliers, business partners, and customers to understand this Policy and share our commitment to respecting human rights.

Our Policy

Governance

This Policy is continuously reviewed by the Risk and Compliance Committee, a company-wide committee, and is updated and revised as necessary, with the results reported to the Board of Directors. The date of the most recent revision is indicated at the beginning of this policy.

In formulating and reviewing this Policy, the NEC Group incorporates insights gained through dialogue with its internal and external stakeholders specializing in business and human rights.

The CEO oversees the initiatives based on this Policy. In addition, the corporate officer in charge of sustainability promotion regularly presents status reports on initiatives to the Board of Directors, which monitors the progress of the initiatives.

Human Rights Due Diligence

The NEC Group conducts human rights due diligence based on this Policy and in accordance with the following structure and processes under the UNGPs.

a. **Identification and assessment of adverse impacts:** The NEC Group regularly identifies and assesses any actual or potential adverse human rights impacts that may occur either through its own activities or as a result of its business relationships.
b. **Actions to prevent and mitigate adverse impacts:** The NEC Group regularly identifies and assesses any actual or potential impacts, and the results of the identifications and assessments are incorporated into the process of the NEC Group's business activities to enable appropriate actions for prevention or mitigation of the adverse impacts, including education and awareness training.
c. **Assessment of the effectiveness of initiatives:** The NEC Group assesses whether the measures taken have been effective in preventing or mitigating adverse human rights impacts and considers whether more effective measures are available.
d. **Information disclosure:** The NEC Group regularly checks the progress of its initiatives, promotes improvements, and discloses the results of its human rights due diligence in a timely and appropriate manner.
e. **Dialogue with stakeholders:** In pursuing the initiatives set forth in this Policy, the NEC Group engages in regular dialogue with rights holders and their representatives who might actually or potentially be affected and other stakeholders including external experts.

Remedy and Grievance Mechanism

In the event of a violation or suspected violation of human rights, the NEC Group will immediately and accurately investigate the facts and the causes of the incidents and strive to take appropriate measures to resolve the matter.

The NEC Group has a whistleblowing system that allows stakeholders to report information anonymously. The NEC Group will keep the identity of any whistleblower and the content of any whistleblowing reports confidential. The NEC Group ensures that

whistleblowers are protected effectively against unfair treatment or retaliation of any form.

Salient Human Rights Issues

The NEC Group, together with several external experts, including non-governmental organizations from the civil society sector, identifies themes that it has assessed as having particularly significant adverse impacts of its business activities on human rights as our salient human rights issues, and reports them to the Board of Directors.

In addition, the salient human rights issues are regularly reviewed in light of the business environment and social trends. The NEC Group advances human rights due diligence and takes corrective and remedial actions when human rights violations or risks of such violations occur.

1. AI and Human Rights:
   Information and communication technology (ICT) is evolving at an ever-increasing pace and poses a risk of causing human rights abuses that could not have been foreseen in the past. The NEC Group formulated the "NEC Group AI and Human Rights Principles", a set of guidelines in relation to the application and utilization of AI and biometrics data among ICT. The NEC Group promotes initiatives in line with these principles.
2. Human rights risks related to geopolitical situations and conflicts:
   The NEC Group identifies high-risk areas related to human rights on a regular basis and as appropriate, referring to indicators of international organizations and other third parties and considering the opinions of external experts. The NEC Group works to prevent and mitigate the risk of being involved in human rights abuses in the high-risk areas.
3. Human rights in supply chains:
   The NEC Group believes that collaboration and co-creation with its suppliers are essential to creating social value. The NEC Group requests that its suppliers to understand the "Guidelines for Responsible Business Conduct in Supply Chains, " which call for, among other things, the prohibition of forced labor and child labor, consideration of working hours, and the payment of appropriate wages and allowances, and take responsible corporate actions in line with the guidelines. The NEC Group will continue to work with its suppliers to resolve human rights issues related to labor in the supply chains.
4. Employee safety and health:
   The NEC Group, in line with international standards including the ILO Core Labour

Standards, strives to ensure the safety and health of its employees, maintain, and improve a comfortable and employee-friendly workplace. The NEC Group appropriately manages working hours, strives to reduce excessive overtime, and guarantees employees' rights to leave. In addition, the NEC Group complies with statutory minimum wages and endeavors to pay wages at a living wage level that exceeds such minimum standards.

We will not tolerate any form of harassment including sexual harassment and foster a culture of inclusion and diversity.

Supporting Policies

NEC Way

<AI and Human Rights>

AI and Human Rights Principles

NEC Privacy Policy

Quality and Safety Philosophy

<Human rights in the Supply Chain>

NEC Group Procurement Policy

Guidelines for Responsible Business Conduct in Supply Chains

<Occupational Health and Safety>

NEC Group Safety and Health Policy

NEC Group Health Declaration

I&D Policy

This is a translated version of the NEC Group Human Rights policy in Japanese.