

Social

Human Rights Summary

Basic approach

The Daigas Group respects human rights as basic rights inherent to all. The Group supports the international standards on human rights and promotes activities and programs to protect the human rights of its stakeholders. We comply with the applicable laws and regulations of the countries and regions where we operate. In the Medium-Term Management Plan 2026, we have positioned maintaining and improving the soundness and flexibility of management foundation as one of our material issues and set respect for human rights as an indicator to accelerate initiatives.

Theme	Items to be addressed	Specific initiatives
Respect for human rights throughout the value chain ➤ P.096 Human rights due diligence ➤ P.097 Human rights awareness promotion ➤ P.100	• Management regarding respect for human rights • Human rights due diligence • Encouragement of suppliers • Promoting human rights awareness activities for Daigas Group officers and employees Materiality Maintain and improve the soundness and flexibility of management foundation	Policy and promotion system [Based on the Daigas Group Human Rights Policy, we support international human rights-related norms and comply with laws and regulations of the countries and regions where we operate, promoting activities and programs to protect the human rights of its stakeholders. Initiatives undertaken in FY2025.3 • Informed our suppliers of our procurement policy and conducted a sustainability questionnaire • Provided human rights awareness training to Daigas Group officers and employees KPIs based on the materiality Respect for human rights FY2025.3 materiality result Implemented human rights due diligence

Respect for Human Rights throughout the Value Chain

Policy and Principle

The Daigas Group supports and respects international standards for human rights, including the International Bill of Human Rights (Universal Declaration of Human Rights and the International Covenants on Human Rights) and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We also promote human rights initiatives in accordance with the UN Guiding Principles on Business and Human Rights, the UN Children's Rights and Business Principles, and other relevant principles.

Establishment of policies and regulations

The Daigas Group has stated that human rights are to be respected in the Daigas Group Charter of Business Conduct, which expresses the Daigas Group's corporate stance, and the Daigas Group Code of Business Conduct, which serves as a code of conduct for officers and employees. It also established the Daigas Group Human Rights Policy in April 2021 and have disseminated the policy since then. In addition to the Daigas Group Procurement Policy, which is aimed at respecting human rights throughout the supply chain, we have also established various regulations related to occupational health and safety, etc.

We identify and assess the negative impact of our business activities on human rights and take steps to prevent or mitigate such risks under the Daigas Group Human Rights Policy. The Daigas Group Code of Business Conduct, which incorporates the 10 principles of the UN Global Compact, contains "respecting human rights" and "providing safe and secure workplace" as the first and second items respectively. The Code eliminates discrimination and bans harassment against all stakeholders in all countries and regions.

We will also demand that our suppliers and other parties concerned respect human rights and not infringe on them.

Daigas Group Human Rights Policy



▶ Daigas Group Human Rights Policy

The Daigas Group established the Daigas Group Human Rights Policy in April 2021. This Policy is based on the Daigas Group Corporate Principles and the Daigas Group Charter of Business Conduct and has been approved by the Board of Directors of Osaka Gas.

Prohibition of child labor and forced labor

The Daigas Group conducts self-inspections using G-RIMS, a system for managing risks related to daily business activities, in each one of its organizations and affiliated companies to confirm that there are no labor issues such as child labor or forced labor. In order to prevent child labor, the Group thoroughly verifies the age of employees when they are hired. Furthermore, in order to prevent forced labor, the Group does not retain employees' passports or any other important documents that could restrict their freedom of movement.

Consideration for occupational safety and health

The Daigas Group not only complies with all applicable laws and regulations related to safety and health but also has established its original rules, including the Daigas Group Safety & Health Promotion Regulations. The Group has also established the Daigas Group Safety and Health Council to discuss and share information on measures to prevent occupational accidents and promote health maintenance, thereby working to improve the levels of workers' safety and health throughout the Group.

In March 2021, we issued the Daigas Group Declaration of Health and Productivity Management to summarize our stance toward health and productivity management, based on the idea that ensuring safety and maintaining and improving physical and mental well-being are key to all operations.

Based on the Declaration of Health and Productivity Management, we also established the Daigas Group Action Guidelines "7 Rules for Being Healthy" to encourage employees to live healthy lifestyles, and we provide guidance to organizations and individuals at the Health Development Center, as well as lifestyle advice to employees at health checkups.

Encouraging suppliers to comply with laws and regulations regarding human rights

To ensure respect for human rights throughout the supply chain, the Daigas Group strives to encourage its suppliers to understand the concept of human rights and follow international human rights standards through the Daigas Group Procurement Policy and the Daigas Group Procurement Policy for Suppliers.

From the end of FY2025.3, we started gradually requesting that business partners sign a "Memorandum on Human Rights Protection Initiatives," and raised awareness of human rights among our business partners in order to promote respect for human rights throughout our supply chain.

Major requests

Respect for Human Rights

Respect the human rights of all those involved in corporate activities according to international human rights standards, and prevent direct or indirect infringement of human rights, including discrimination, harassment, and other inhumane treatment, due to corporate activities throughout the supply chain.

Fair Working Conditions

Comply with international labor standards and related laws and ordinances to appropriately pay employees, manage their working hours, and give them days off; to prevent any kind of discrimination at the workplace, forced labor, or child labor; and to respect the rights of workers (including technical intern trainees, other workers from abroad and immigrant workers), such as the freedom of association and the right of collective bargaining.

Contribution to Environmental Conservation

Reduce the environmental burden of business operation and products and services. [Examples: Reduce greenhouse gas emissions by saving energy and using low-carbon and/or decarbonized energy; promote green purchasing; use resources (water resources, raw materials, etc.) in a sustainable way; promote resource recycling; prevent air, water and soil pollution; and conserve biodiversity]

Ethical Corporate Management

Respect free and fair competition and prevent misconduct.

Protect intellectual property rights; disclose information appropriately; maintain confidentiality; safeguard privacy, including that of personal information; procure minerals responsibly; conduct responsible marketing activities; and never have any relationships with antisocial groups.

Human Rights Due Diligence

Policy and Principle

In accordance with the United Nations Guiding Principles on Business and Human Rights, the Daigas Group is committed to establishing systems in order to respect the human rights of all people affected by the Group's business activities, and proactively disclose its initiatives in this area. We integrate the human rights due diligence system, established in accordance with the Daigas Group Human Rights Policy, into our business processes and conduct ongoing evaluations.

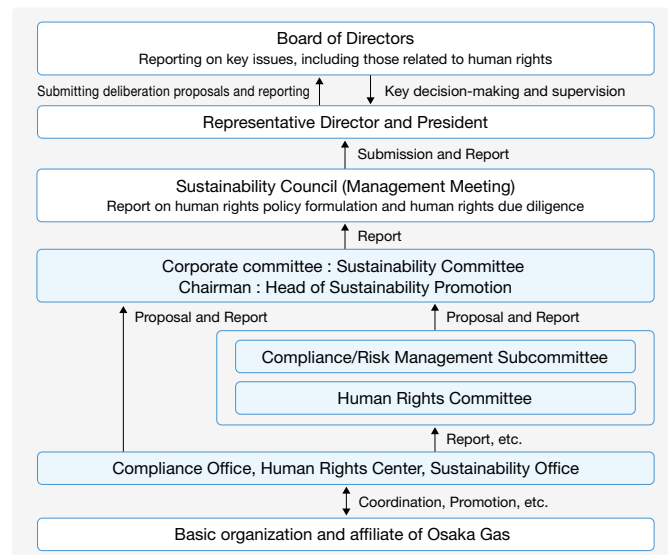
System for Carrying Out Human Rights Due Diligence

The Human Rights Center in the Human Resources Dept., Compliance Office and Internal Control Planning Team in the General Affairs Dept., and the Sustainability Office in the Corporate Strategy Dept. work together to promote human rights due diligence.

A member of the Human Rights Committee is appointed to each organization to be responsible for formulating plans, monitoring results, and overseeing implementation to prevent human rights violations. In addition, the Board of Directors, which makes decisions on and supervises the important business activities throughout the Daigas Group, supervises matters involving human rights issues. At the Sustainability Council (Management Meeting), which is held three times a year, executives discuss activity plans and activity reports related to sustainability issues, including human rights issues, and submit reports to the Representative Director and President.

In addition, the Group also has the Sustainability Committee, chaired by the Head of Sustainability Promotion (Director and Senior Executive Officer), who supervises the Group's sustainability activities, and consisting of the heads of related organizations. The Sustainability Committee is held three times a year in principle for cross-organizational deliberation, coordination, and supervision of issues and planning, promotion related to human rights due diligence.

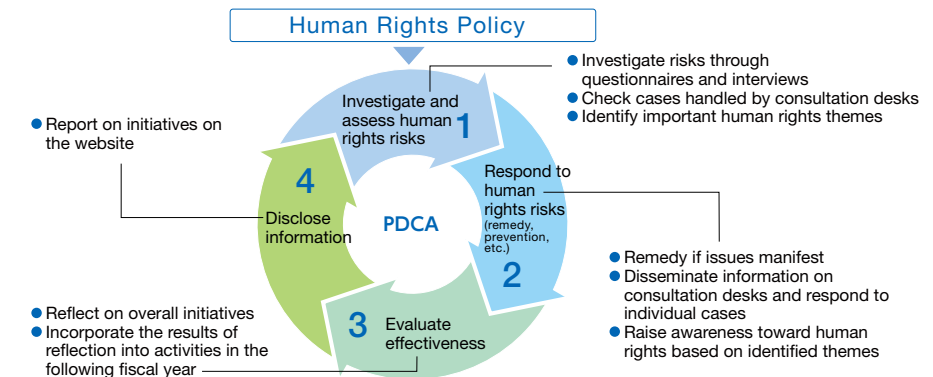
System for Carrying Out Human Rights Due Diligence



Human Rights Due Diligence Cycle

We have built a cycle in which human rights risks that may arise from our business activities are investigated and identified, the identified human rights risks are addressed through corrective and remedial measures, education and awareness-raising activities, etc., and the effectiveness of these measures are evaluated and linked to improved initiatives.

Human Rights Due Diligence Cycle



Results of Initiatives in FY2025.3 (Results of Human Rights Due Diligence)

Identification of key human rights risks (process)

By reference to the dual axes of the seriousness of each potential human rights infringement and the likelihood of it occurring, we identify key human rights risks that the Daigas Group needs to consider in the course of its business activities and establish a priority order for addressing them.

In FY2025.3, we continued to conduct checks through the “G-RIMS,” a self-inspection tool, a compliance survey of employees to see how well they understood compliance, and questionnaire surveys targeting major business partners of the Daigas Group. In addition, we undertook efforts to gradually expand the scope of our investigation, including starting to conduct questionnaire surveys targeting major suppliers and conducting on-site audits by adding the confirmation of human rights risks to the existing quality audit framework.

The investigation results showed no serious risks related to human rights.

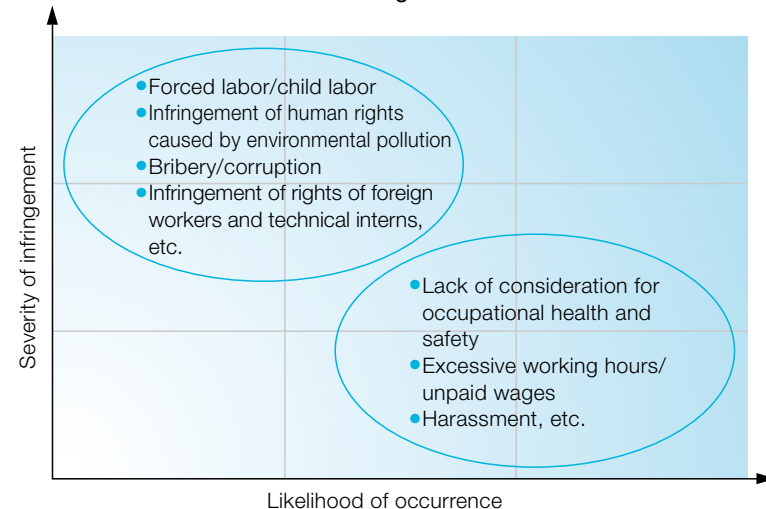
■ Identification Process

1. Confirm the likelihood of occurrence and seriousness of human rights infringements based on the results of the human rights risk investigation and human rights consultations.

2. Conduct a discussion among internal stakeholders and evaluate each item of human rights risks using the matrix shown in the figure below.

3. Consult with experts to identify the Group's significant human rights risks.

■ Matrix Assessment of Human Rights Risks



Identify important human rights themes (assessment)

Based on the FY2025.3 investigation results and discussions with experts, we identified important human rights themes that the Daigas Group should consider in the course of our business activities. As a result, no human rights violations in FY2025.3 that violated our Ethics code were identified. Meanwhile, our Compliance Desk (internal reporting system) received one consultation related to human rights. Based on the details of the consultation, we implemented measures such as internal training and information dissemination initiatives to promote respect for human rights.

Among the human rights risks that may occur in the course of the Group's business activities, 14 items were identified as significant human rights risks (human rights risks with a relatively high likelihood of occurring). Such risks include forced labor, child labor, and bribery/corruption in the international business, and infringement of the rights of foreign workers or technical interns in the domestic business, in addition to lack of consideration for occupational health and safety, infringement of human rights caused by excessive working hours or unpaid wages, and harassment. We take various measures to prevent and mitigate these risks, under relevant policies and other systems.

In addition, in response to concerns raised during last fiscal year's discussions with external experts regarding compliance with working-hour limits in the construction industry, we confirmed the situation at three relevant Group companies. Furthermore, we undertook efforts to identify and address human rights risks at our overseas subsidiaries by conducting on-site inspections at our investee in the city gas business in India.

In addition, during discussions with experts, recommendations were made regarding the importance of assessing human rights risks by business in the value chain, and continuing to conduct surveys, investigation, and audits in areas identified as those with key human rights risks.

Going forward, we will continue to identify significant risks and review human rights issues through human rights risk assessments and dialogue with experts. We also assess human rights risks in new businesses. For example, we investigate the status of legal compliance concerning labor standards and health and safety as part of due diligence for M&A deals. We thus confirm that serious human rights risks do not exist in companies joining the Group.

■ Identified Human Rights Themes and Classification of Entities of Rights

		Entity of rights				Relevant policy
		Group employees	Customers	Local residents and others	Suppliers	
Daigas Group's important human rights risks	Forced labor	●*1			●	Daigas Group Human Rights Policy
	Child labor	●*1			●	Daigas Group Human Rights Policy
	Lack of consideration for occupational health and safety	●			●	Occupational health and safety
	Infringement of human rights caused by excessive working hours or unpaid wages	●			●	Occupational health and safety
	Discrimination on the basis of disability, race, nationality, gender, etc.	●		●		Daigas Group Diversity Promotion Policy
	Discrimination based on one's origin	●		●		Daigas Group Human Rights Policy
	Harassment	●		●	●	Daigas Group Code of Business Conduct
	Infringement of the rights of foreign workers or technical interns	●*2			●	Daigas Group Human Rights Policy
	Infringement of rights to privacy	●	●	●		Initiatives to protect personal information
	Infringement of the rights of indigenous peoples or local residents			●		Daigas Group Code of Business Conduct
	Human rights problems caused by environmental pollution			●		Daigas Group Environmental Policy
	Defective quality of products or services, and inappropriate provision of information		●			Daigas Group Code of Business Conduct
	Bribery/corruption	●*1		●	●	Daigas Group Code of Business Conduct
	Procurement of conflict minerals			●	●	Daigas Group Procurement Policy

*1 Overseas subsidiaries, *2 Domestic subsidiaries

Stakeholder Engagement Program

Since FY2026.3, Osaka Gas has participated in the Stakeholder Engagement Program (Human Rights Due Diligence Workshop) hosted by Caux Round Table Japan. In this program, companies, NGOs, NPOs, academics, and other experts discuss human rights due diligence as required by the United Nations Guiding Principles on Business and Human Rights, to gain a deeper understanding of human rights issues.

Consultation Desks for Human Rights

The Daigas Group accepts consultations on human rights from not only employees but also customers, the local community, suppliers and all other stakeholders, and is careful to make sure that people who seek consultations do not suffer any disadvantages. Information on consultation desks is provided to employees through channels such as the intranet and posters and to external stakeholders via our website.

■ Consultation Desks

Employees	- Human rights promoters are assigned to each organization, including key affiliated companies, as an initial point of contact. - The Human Rights Center provides consultation services (for officers, employees, and temporary employees of all Group companies). - The Compliance Desks accept requests for consultation and reports concerning compliance with laws, regulations, and internal rules (for officers, employees, and temporary employees of all Group companies).
Customers, local communities, etc.	Customer Centers accept inquiries.
Suppliers	Consultation and reports are accepted at the consultation/reporting desk on the website.



▶ Consultation/reporting desk

Human Rights Awareness Promotion

Principle and Outline

The Daigas Group holds that human rights ought to be accorded the maximum respect in all circumstances. All officers and employees must be keenly aware of this, and acquire and act on correct knowledge pertaining to human rights. In expanding its business globally, the Group pays careful attention to compliance with local and national laws and regulations, respect for human rights and other international norms, local culture and customs, and the interests of stakeholders. Accordingly, it offers human rights training and conducts educational activities aimed at improving awareness and instilling knowledge of human rights issues.

System for Promoting Human Rights Awareness

To promote human rights awareness throughout the Daigas Group, Osaka Gas has established a “Daigas Group Human Rights Committee” headed by the director (Director and Senior Executive Officer) responsible for the Human Resources Department. This committee decides the activity policy with regard to human rights.

Based on this policy, the Human Resources Department’s “Human Rights Center” plans, formulates and administers numerous efforts and events such as human rights training for all job levels, human rights lectures, and human rights slogan contests, and offers cooperation and support to individual organizations. In FY2023.3, we have started training programs based on human rights themes identified as those which we should give consideration to in human rights due diligence. The top award-winning slogans are made into posters that are put up in offices to constantly remind employees of the importance of human rights.

As well, business units and major affiliates have their own “Human Rights Committee,” which relays company policies and human rights information to employees, encourages participation in outside lectures and the human rights slogan contest.

The “Daigas Group Human Rights Committee” also exchanges information and opinions with divisions in the Group, all in an effort to understand what must be done across the entire Group. Further, each business unit and major affiliate appoints a “Human Rights Awareness Promoter,” who is in charge of dealing with daily issues related to human rights.

The Daigas Group’s “Compliance Desks” and “Human Rights Center” also accept consultation and reports on all matters related to human rights. In FY2025.3, we announced the “Daigas Group Basic Policy on Customer Harassment,” while also conducting training sessions for group employees and creating a response manual.

■ System for Promoting Human Rights Awareness

Daigas Group Human Rights Committee

Members: General Manager of the department in charge of general affairs in each organization, and Managers of the Sustainability Office and the Compliance Office

Daigas Group Human Rights Executive Board

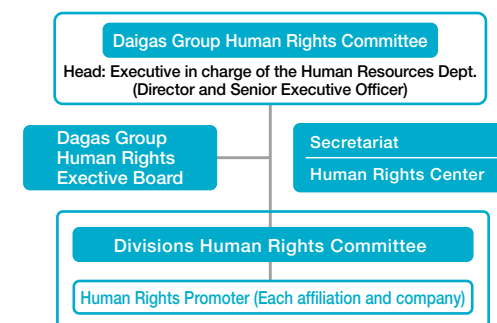
Members: Manager of the team in charge of general affairs at each organization, the Sustainability Office, and the Compliance Office

Human Rights Committees at each organization

Members: Persons in charge of general affairs, etc., including affiliated core energy business companies and related companies

Human Rights Promoters (at each organization)

Members: Persons in charge at each organization



Initiatives to Respect Human Rights for Suppliers

The Daigas Group sets up a section on human rights in its annual sustainability questionnaire for major suppliers. In FY2025.3, our overseas subsidiaries also conducted a questionnaire survey on addressing human rights targeting major suppliers and conducted on-site audits by adding the confirmation of human rights risks to the existing quality audit framework. The results confirmed that there were no problems with forced labor or child labor.

In addition, at the human rights lecture for organization heads and managers, which is held every year, in FY2025.3, we invited the participation of construction companies, service chain companies, and other partner companies, and approximately 200 people attended the lecture.

Please see [P.104](#) for more information on the details of the conducted sustainability questionnaire survey.

■ Survey on Human Rights Risks

	No. of companies surveyed	No. of companies which replied
Sustainability questionnaire	398	395
Questionnaire survey on addressing human rights, on-site audit	94	82 (of which 16 underwent on-site audits)

Implementation of Human Rights Training

Human rights training for all levels

The Daigas Group has human rights training for all job levels: officers, managers, and new recruits.

In the human rights training for new managers, participants learn about human rights issues that companies should consider. We have human rights lectures for division heads and managers led by outside experts.

Human rights training for all employees have been conducted mainly through video distribution since FY2023.3. In FY2025.3, the training was conducted under the theme of “Business and Human Rights: Companies Have a Responsibility to Respect Human Rights,” and approximately 17,200 employees across the Group participated in the training.

■ Group-wide Human Rights Training - Participants

Participants	Implementation period	No. of participants
Executives	October	24
Managers and leaders	May, June, November, December	201
Lecture for organization heads and managers	July	680
New employees	April	219
Mid-career hires	June, October, February	289
All employees	From October to December	About 17,200
Lecture for all employees	December	445
Others (HR Committee etc.)	Year around	165
Total		About 19,200

Training for human rights awareness leaders

In training for each division's human rights awareness leaders, participants take a variety of courses outside the company. In FY2025.3, a total of 158 took these courses.

■ Results of Participation in Courses outside the Company

Course name	No. of participants
Anti-discrimination and Human Rights Issues Awareness Raising (for Managers)	158
Human Rights and Anti-discrimination Awareness Raising	
Buraku Liberation/Human Rights Summer Course	
Buraku Liberation/University Human Rights Course	
Other	