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.

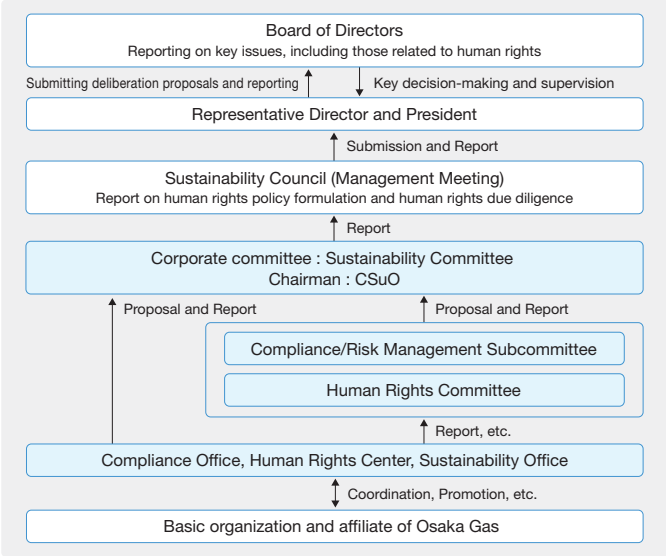
System for Carrying Out Human Rights Due Diligence

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 Chief Sustainability Officer (CSuO) (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.

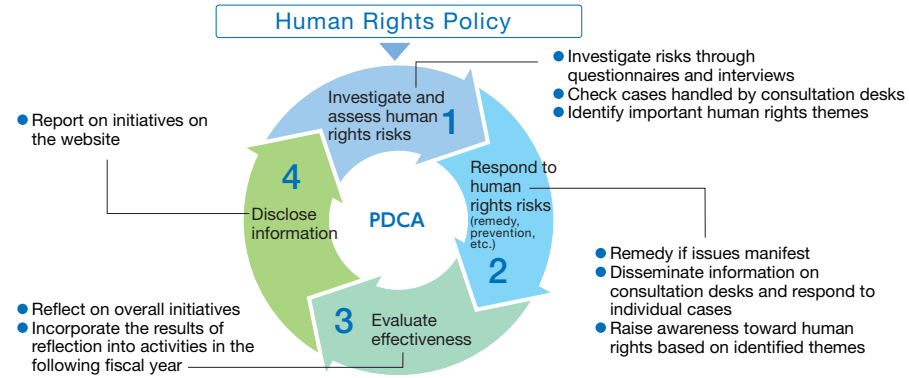
System for Carrying Out Human Rights Due Diligence



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 FY2026 (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.

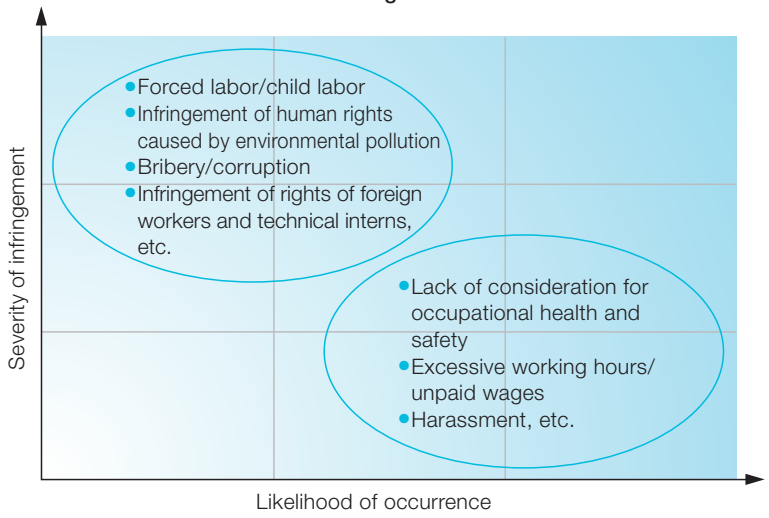
In FY2026, we continued to conduct checks through the "G-RIMS," a self-inspection tool, a compliance survey of employees to see how well they understood compliance, and questionnaire surveys targeting major business partners of the Daigas Group. In addition to questionnaire surveys for our main suppliers, we also conducted on-site audits at our existing overseas sites.

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 FY2026 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 FY2026 that violated our Ethics code were identified. On the other hand, one supplier responded to the questionnaire that, although no human rights violations had occurred to date, there were management-related issues. In addition to interviewing the company about their risk-reduction initiatives, we also requested that corrective measures be implemented to address the relevant issues.

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.

As recommended by external experts in the previous fiscal year, we organized the human rights risks in each business across the value chain and created a human rights risk map. (P.108) In addition, during discussions with experts, recommendations were made regarding the importance of continuing to conduct surveys, investigations, 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.

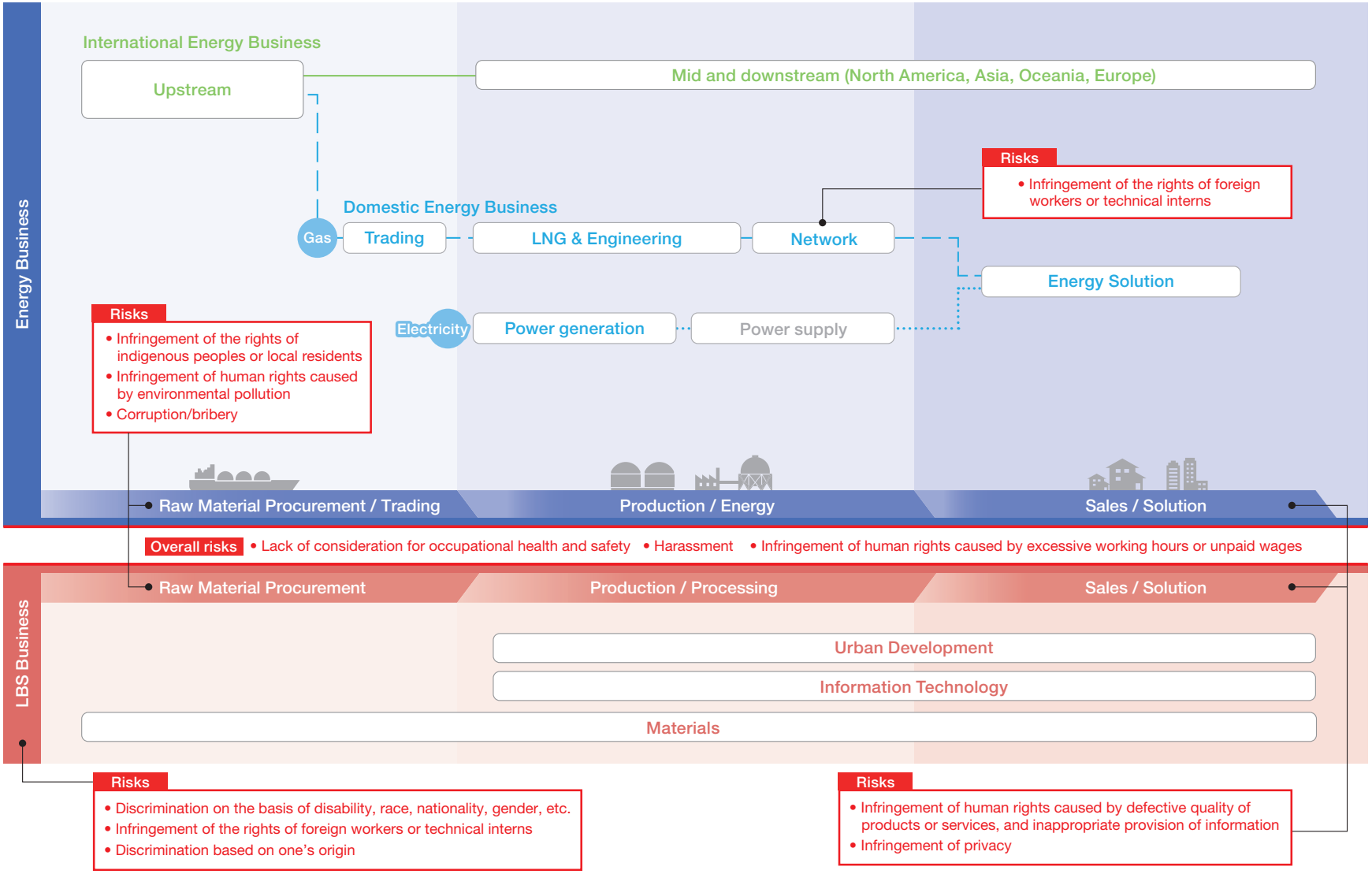
Identified Human Rights Themes and Classification of Entities of Rights

		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

Identification of Key Human Rights Risks in Businesses

We have taken stock of the human rights risks to consider in each business domain taking into account their likelihood of occurrence and potential degree of impact. Following advice from external experts, we have identified and organized the risks of particular importance.



Stakeholder Engagement Program

Since FY2026, 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.

Results of activities in FY2026

As part of the Stakeholder Engagement Program in FY2026, we participated in group work relating to important human rights issues in each industry. We will use the results from this meeting as a reference for the Group's human rights due diligence activities.

See here for meeting minutes of the Stakeholder Engagement Program in FY2026

▶ Stakeholder Engagement Program meeting minutes

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