

## **Suntory Group Human Rights Policy**

The Suntory Group's purpose is "To inspire the brilliance of life, by creating rich experiences for people, in harmony with nature", in order to contribute to the realization of a thriving society. The Suntory Group recognizes that it may directly or indirectly impact human rights in the course of our business activities, and in order to respect the human rights of all people involved in our business activities, the Suntory Group Human Rights Policy (hereafter, this "Policy") set out herein, will promote our efforts to respect human rights. This Policy serves as the primary guiding principle for all other human rights-related policies within the Suntory Group.

### **1. Our Approach to Human Rights**

As a member of society, the Suntory Group recognizes the importance of respecting human rights in all business activities and respects the following international human rights principles:

- United Nations (UN) Universal Declaration of Human Rights;
- ILO Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
- UN Guiding Principles on Business and Human Rights (UNGPs);
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families;
- Children's Rights and Business Principles; and
- Women's Empowerment Principles

The Suntory Group complies with relevant laws and regulations in each country or region where it operates. If laws and regulations in the countries and regions contradict the principles of international human rights, we will seek ways to respect internationally recognized human rights to the greatest extent possible. Where laws and regulations in the countries and regions differ from the international human rights principles, we strive to follow the higher standard. As a signatory to the United Nations Global Compact, we support and respect the Ten Principles of the UN Global Compact.

### **2. Scope of Application**

The Suntory Group applies this Policy to all Suntory Group executives and employees. We also require all business partners involved in our business activities, products, and services to understand and comply with the principles set out in this Policy. This Policy is incorporated in the Suntory Group's Basic Policy on Sustainable Procurement and the Suntory Group Partner Guidelines, and the specific requirements for partners are stipulated in these policies and guidelines.

### **3. Responsibility to Respect Human Rights**

The Suntory Group strives not to violate the human rights of anyone involved in our business activities and respects human rights throughout our value chain by taking appropriate measures to remediate any adverse human rights impacts.

### **4. Human Rights Due Diligence**

The Suntory Group establish a human rights due diligence system, identify our potential adverse human rights impacts, and work to prevent and mitigate such impacts. By conducting human rights due diligence, we will identify and assess themes and areas of human rights which are high risk in the value chain, and take corrective measures to remediate adverse human rights impacts. We will incorporate clauses related to the respect for human rights into our standard partner contract form, including a provision that requires partners to cooperate on human rights due diligence.

### **5. Remediation**

If it becomes clear that our business activities are causing or contributing to adverse human rights impacts, the Suntory Group will remedy the situation through stakeholder engagement and other appropriate procedures aligned with international human rights principles. We will work with partners to remedy adverse impacts which are directly linked to our operations, products, or services. We do not prevent stakeholders who are adversely impacted from using

judicial or non-judicial grievance mechanisms and will collaborate with these mechanisms as necessary to provide remedy.

## 6. Grievance and Whistleblowing Mechanisms

The Suntory Group offers various hotlines for executives and employees globally to report and consult human rights concerns. A designated contact point is also established to receive human rights concerns and inquiries from stakeholders including partners' employees, local communities, and customers. We prohibit any form of retaliation or discriminatory treatment against those who raise human rights related concerns. We will continuously review and improve our whistleblowing and grievance mechanisms to enhance their effectiveness.

## 7. Disclosure

The Suntory Group will timely and appropriately disclose the progress and results of our efforts to respect human rights on our website, etc.

## 8. Stakeholder Engagement

While implementing this Policy, the Suntory Group will take advice from independent experts and diligently engage in dialogue and consultation with internal and external stakeholders with the aim to understand and address adverse human rights impacts that arise or may arise from our business activities.

## 9. Education and Training

The Suntory Group will provide appropriate education and training to our officers and employees so that this Policy will be integrated appropriately into our business activities and implemented effectively. We will provide our business partners with education and training as necessary.

## 10. Officer in Charge

The Suntory Group will clarify the officer responsible for the implementation of this Policy and ensure its effectiveness. The Board of Directors of Suntory Holdings Limited is responsible for overseeing the compliance and implementation status of this Policy.

## 11. Important Themes regarding Human Rights

The Suntory Group has established the Suntory Group Code of Business Ethics and aims to realize a corporate group that is rewarding, and respects diversity, inclusion and human rights. We position the following items as key themes in respecting human rights.

### ● Forced labor and human trafficking

We strictly prohibit any form of forced labor including human trafficking. The labor practices※1 that may contribute to forced labor and human trafficking are also prohibited.

### ● Child labor and young workers exposed to hazardous work

We strictly prohibit employing any child under the legal working age as prescribed in the laws and regulations of the relevant country or region. We also prohibit the assignment of hazardous or night work to workers under 18. We will verify the age of newly recruited workers and provide remedial measures to children or young workers identified.

### ● Discrimination

We will build a workplace where everyone is treated fairly by respecting the rights and personalities of each individual and eliminating all forms of discrimination based on ethnicity or race, religion, sex, gender, sexual orientation, age, national or social origin, property, birth, language, disability, or other characteristics that are not relevant to a person's capacity and aptitude. We strive to accommodate requests related to employees' religious practices within reasonable limits.

### ● Inhumane treatment

We do not tolerate inhumane treatment that threatens an individual's dignity, including physical, sexual, racial, psychological, verbal, or any other form of harassment, bullying, or abuse.

## ●Freedom of association and collective bargaining

We will respect the basic rights of our employees to engage in freedom of association and collective bargaining. We will also prohibit intimidation, harassment, retaliation, and violence against trade union members and employees' representatives.

## ●Occupational health and safety

We will comply with the laws and regulations on occupational health and safety and implement an occupational safety and health management system. We will promote work styles that find balance between the professional and private lives of our employees while building a workplace that allows each person to work safely, securely and with enthusiasm in ways that are healthy, both mentally and physically.

## ●Working hours

We will appropriately manage working hours, holidays, and vacations in compliance with the laws and regulations of the relevant country or region. We strive to respect international standards where the local laws and regulations conflict with international standards or do not fully meet with them. We seek to ensure that overtime work is consensual and paid at an appropriate rate.

## ●Wages

In compliance with the laws and regulations of the country or region and other relevant provisions, we work to manage so that wages of our employees meet or surpass the statutory minimum, and overtime is compensated at the appropriate rate. We strive to pay a living wage that provides a decent standard of living for our employees and their families. Our employees are paid directly, regularly, and in full, on time, and are provided with a pay slip explaining any legitimate deductions.

## ●Rights of foreign and migrant workers

We respect foreign and migrant workers' rights as set out in the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families. We ensure appropriate working conditions and environments for foreign and migrant workers and prohibit discriminatory treatment against them.

## ●Rights of local community including indigenous peoples

We respect the ownership and use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the international norms related to the rights of indigenous peoples※2. When acquiring water, land, or natural resources, we avoid adverse impacts on the rights and access of indigenous peoples and obtain free, prior, and informed consent (FPIC) from the community as required.

## ●Rights of human rights defenders

We neither tolerate nor contribute to threats, intimidation, and attacks (both physical and legal) against human rights defenders. We will work with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels.

## ●Open-minded workplaces

We will foster an open-minded workplace that respects one another's beliefs, values, and diversity and where each and every employee can candidly express and share their views. We will also build cooperative relationships founded with unity through active communication throughout the Suntory Group.

## ●Perseverance and growth

We will realize the growth of individuals by fostering a feeling of pride and responsibility toward work in each and every individual so that they may independently persevere in achieving their goals.

※1 The labor practices that may contribute to forced labor and human trafficking include, but are not limited to, the following:

- Companies or employers retaining personal documents, collecting recruitment fees and related costs from

workers and job seekers, restricting workers' freedom of movement, not providing employment terms in written form, and requiring workers to use company-provided accommodation.

- Third-party recruitment intermediaries retaining personal identifications and collecting recruitment fees and related costs from workers and job seekers.

※2 The international norms pertaining to the rights of indigenous peoples encompass:

- International Finance Corporation Performance Standards
- ILO Convention on Indigenous and Tribal Peoples No.169

Established: 10th July 2019

Revised: 7th June 2024

A handwritten signature in black ink, appearing to read 'Niinami', with a long, sweeping horizontal stroke extending to the right.

Takeshi Niinami  
President and CEO  
Suntory Holdings Limited

This Policy has been approved by the Board of Directors of Suntory Holdings.