Shimizu Group Human Rights Policy

The Shimizu Group works to establish a corporate culture that respects human rights. We do this to ensure that each and every officer and employee respects diversity, unique character, and individuality, and does not discriminate on the basis of ethnicity, religion, nationality, age, sex, gender identity, sexual orientation, or disability. Furthermore, our officers and employees do not engage in harassment that damages the dignity of any individual, and do not tolerate such acts by others. We also respect the freedom of association and the right to engage in collective bargaining, and prohibit child labor and forced labor in any form.

We work to promote respect for human rights and have developed this policy to serve as a guide to fulfill our responsibility related to human rights, in line with the United Nations Guiding Principles on Business and Human Rights.

- 1. Scope of Application
 - This policy applies to all officers and employees of Shimizu Corporation and its consolidated subsidiaries.
 - We also engage with our supply chain to seek their compliance with this policy.
- 2. Respecting and Complying with Standards and Laws and Regulations We respect international human rights standards such as those expressed in the International Bill of Human Rights*, and the International Labour Office (ILO) Core Labour Standards. As a signatory to the United Nations Global Compact, we also comply with its Ten Principles.

We comply with national and regional laws and regulations in the countries or regions where we conduct business activities. If the laws and regulations of a country or region in which we conduct business differ from international human rights standards, we endeavor to follow the higher standard. If we encounter a conflict, we seek ways to respect international human rights standards.

* The International Bill of Human Rights refers to three internationally-recognized human rights documents: the Universal Declaration of Human Rights and its corresponding two international treaties, namely the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. They are considered as internationally-agreed common standards for all people and all nations, and sets out fundamental human rights to be universally protected.

3. Responsibility to Respect Human Rights

We work to fulfill our responsibility to respect human rights by not infringing on the human rights of others through our business activities and addressing adverse impacts on human rights, should they occur. Where we identify that a business partner in our supply chain is involved in an adverse impact on human rights, we will actively engage with that supplier to promote respect for human rights.

We conduct human rights due diligence to identify, prevent, and mitigate adverse impacts on human rights. Where we identify that we have caused or contributed to an adverse impact on human rights, we work to provide appropriate remedy.

In addition to our existing education and training on discrimination issues, we will provide education and training on various domestic and international human rights issues, to ensure that our officers and employees understand and practice this policy. We also regularly disclose our efforts related to respect for human rights and engage in dialogue and discussion with relevant stakeholders.

Enacted: December 18, 2018