NYK Group Human Rights Policy

November 24, 2022

Nippon Yusen Kabushiki Kaisha and its group companies ("NYK Group"), has set "Bringing value to life." as its basic philosophy. In our Management Policy^{*1}, as a good corporate citizen that carries out its business activities together with society, we are committed to positively confront the tough issues that challenge our society, such as concerns involving the preservation of our natural environment, as we work for the betterment of the world that we inhabit. In order to truly contribute to the realization of a sustainable society, we understand that we must respect the human rights of all individuals affected by our business activities.

As a guideline for fulfilling this responsibility, the NYK Group hereby establishes the "NYK Group Human Rights Policy" ("Policy"), based on the Guiding Principles on Business and Human Rights adopted by the United Nations Human Rights Council in June 2011, and will promote every effort to respect human rights.

1. Basic Stance on Human Rights

The NYK Group supports and respects the United Nations International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social, and Cultural Rights), which stipulates the fundamental human rights of all persons and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work*, as well as other international treaties and declarations related to the protection of human rights, including conventions on workers' human rights such as wages and working hours, the OECD Guidelines for Multinational Enterprises and the United Nations Declaration on the Rights of Indigenous Peoples. As a signatory to it, we also support and respect the Ten Principles of the United Nations Global Compact.

The Policy is a commitment by NYK Group to respect human rights based on the NYK Group Mission Statement*2, the NYK Business Credo*3, the NYK Code of Conduct*4, and related internal policies and regulations, in order to fulfill our responsibility to respect and preserve the human rights of our stakeholders.

*This includes respect for the International Labour Organization's Core Labour Standards: the effective abolition of child labour, the elimination of all forms of forced or compulsory labour, the elimination of discrimination in

^{*1} Management Policy - https://www.nyk.com/english/profile/mission/

^{*2} NYK Group Mission Statement - https://www.nyk.com/english/profile/mission/

^{*3} NYK Business Credo - https://www.nyk.com/english/profile/mission/

^{*4} NYK Code of Conduct - https://www.nyk.com/english/profile/charter/

respect of employment and occupation, freedom of association and the effective recognition of the right to collective bargaining, and a safe and healthy working environment.

2. Scope

This Policy applies to all executives and employees of the NYK Group. We also ask our suppliers, contractors, agents and other parties involved in our business and supply chain to comply with the Policy.

3. Responsibility to Respect Human Rights

The NYK Group understands that our business activities may unintentionally cause adverse human rights impacts, whether directly or indirectly. We will fulfill our responsibility to respect human rights by not violating the human rights of individuals affected by our business activities, and by taking appropriate steps to implement remedies where our business activities may cause or contribute to any adverse impacts on human rights.

In the case where an adverse impact on human rights caused by our business partners or other parties is suspected to be linked to our business, products, or services, we will take appropriate steps to prevent such an impact reoccurring with relevant parties.

4. Human Rights Due Diligence

The NYK Group is establishing a human rights due diligence system in accordance with the United Nations Guiding Principles on Business and Human Rights to identify, prevent, and mitigate any adverse human rights impacts that we may have on our stakeholders.

Dialogue and Consultation

In the process of implementing the Policy, the NYK Group will apply the expertise of independent third parties on human rights, and will engage in dialogue and consultation with our stakeholders.

6. Education and Training

The NYK Group provides education and training to our executives and employees to ensure effective integration of the Policy into our business activities, and will work to gain understanding on the Policy from our business partners and other parties.

7. Remedy

If it becomes clear that any of the NYK Group's business activities have adverse human rights impacts, whether directly or through our involvement with business partners or other parties, we will work to remedy such impacts through dialogue and appropriate procedures in accordance with the United Nations Guiding Principles on Business and Human Rights and other international standards.

8. Responsible Executive Officers

The NYK Group will entrust an executive officer with the responsibilities of implementing the Policy and supervising its implementation status.

9. Information Disclosure

The NYK Group will disclose the progress and results of its efforts to respect human rights on its website and through other media.

10. Compliance with Applicable Laws and Regulations

The NYK Group complies with applicable laws and regulations in the jurisdictions within which it operates. Where there is a conflict between internationally recognized human rights principles and the laws and regulations of a country, we will seek ways to respect internationally recognized human rights principles in our operations to the maximum extent possible.

The Policy has been approved by the NYK Group's Board of Directors and signed by the President, Representative Director, President and Chief Executive Officer.

November 24, 2022

Hitoshi Nagasawa
President,
Representative Director,
President and Chief Executive Officer
Nippon Yusen Kabushiki Kaisha