

Astemo Human Rights Policy

Introduction

We at Astemo are committed to the MISSION of contributing to a sustainable society and improved quality of life by providing world-leading advanced mobility solutions. Respect for human rights is a key part of our VALUES and is essential to realize our VISION.

Astemo strives to uphold the highest standards of human rights across our global operations, recognizing internationally accepted human rights principles and ensuring that all stakeholders are treated with dignity and respect.

This policy aims to protect and promote human rights within Astemo and its global operations, and serves as the sole global Policy on Human Rights in the Astemo Group Corporate Regulations and Standards.

Scope

This policy applies to all employees of Astemo group and its subsidiaries worldwide, including temporary and outsourced staff.

Astemo also expects our business partners, including suppliers and contractors, and other stakeholders to respect human rights, and we will take appropriate action if these expectations are not met.

Policy Framework

The Astemo Human Rights Policy is built upon the following frameworks:

- United Nations Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work; and
- Universal Declaration of Human Rights, The International Covenant on Civil and Political Rights, and The International Covenant on Economic, Social, and Cultural Rights

Commitments

We are committed to ensuring comprehensive protection and promotion of human rights across all our activities, particularly following human rights:

- **Promoting Diversity and Inclusion and Non-Discrimination:** We are committed to fostering an inclusive workplace where diversity is valued and all individuals are treated equally, regardless of origins, gender, age, religion, ethnicity, ideology, beliefs, sexual orientation, social status, family origin, disease, disabilities, or other characteristics. Furthermore, we commit to protect socially vulnerable groups, such as women and children;
- **Eliminating Forced Labor:** We strictly prohibit the use of forced labor;
- **Eliminating Child Labor:** We strictly prohibit the use of child labor in any form;
- **Respecting Freedom of Association and Collective Bargaining:** We recognize and respect the rights of employees to freely associate and engage in collective

bargaining. We will work to ensure that these rights are respected throughout our operations; and

- **Ensuring Safe Working Conditions:** We are committed to ensuring safe and healthy working conditions for all employees. This includes compliance with all relevant health and safety regulations and continuous improvement of workplace conditions.

Governance Structure

A Chief Human Resources Officer is appointed as the person in charge of human rights to continue to promote efforts to respect human rights in accordance with this policy. Necessary actions to promote respect for human rights are approved by the Sustainability Committee, and the results and status of human rights initiatives are reported to the Executive Committee if necessary.

Grievance Mechanism

We provide accessible and confidential channels for reporting human rights concerns, including a whistleblower hotline and grievance procedures. All reports will be handled transparently and promptly, ensuring protection against retaliation. Our grievance mechanism includes:

- Multiple reporting channels (e.g., online, hotline, email, in-person) to ensure accessibility for all stakeholders;
- A clear and transparent process for handling grievances, including timelines and communication with the reporter;
- Protection for whistleblowers to ensure that individuals can report concerns without fear of retaliation; and
- Regular reviews to ensure its effectiveness and accessibility.

Training and Awareness

Astemo will implement comprehensive training programs for all employees and business partners to raise awareness of human rights issues and our policy commitments. This includes:

- Mandatory training for all employees on human rights principles and our specific policy commitments;
- Additional training for managers to ensure they understand their specific responsibilities regarding human rights; and
- Providing resources and materials to support ongoing education and awareness, including annual promotion of International Human Rights Day (December 10).

Response to Conflicts between International Human Rights Standards and National Laws

In the case where there is a gap between the national and international human rights standards exist, we will refer to the higher standard of the two. In the case of a conflict

between national and international human rights standards, we will strive to respect international standards to the greatest extent possible.

Due Diligence

Astemo will conduct regular human rights impact assessments and take appropriate measures to identify, prevent, and mitigate adverse human rights impacts. This includes:

- Conducting comprehensive risk assessments to identify potential human rights risks in our operations and supply chain.
- Taking appropriate corrective actions to prevent and mitigate adverse human rights impacts by, among other things, ensuring that our business partners comply with our human rights standards through audits and assessments; and
- Monitoring the effectiveness of corrective actions.

Astemo will regularly evaluate the performance of the process mentioned above and improve it to ensure compliance with our commitments, and make amendments to the Human Rights Policy when applicable, to ensure continuous compliance with the policy framework.

Stakeholder Engagement

Astemo will actively engage with external experts and stakeholders, including employees, communities, and NGOs, to gain insights, understand their concerns and perspectives, and obtain feedback on our human rights performance.

Reporting and Transparency

Transparency in our human rights efforts is key to maintaining trust and accountability. We commit to regular public reporting on our human rights performance through our annual report. Our reporting will include:

- Detailed information on our human rights policies and practices;
- Updates on the implementation of our policy commitments and the results of our due diligence activities;
- Case studies and examples of how we have addressed human rights issues in our operations and supply chain; and
- Feedback from stakeholders on our human rights performance and any areas for improvement.

The enactment of this policy has been approved by the Executive Committee of Astemo, Ltd., on October 22, 2025.

Enacted December 10, 2025,
Kohei Takeuchi, Representative Director, President, CEO,
Astemo Limited.

Kohei Takeuchi