

JPX Group Human Rights Policy

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JPX Group's approach to human rights is based on international norms, including those set out in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. With the recognition that respect for human rights is an important factor in achieving the mission set out in our corporate philosophy, we respect the rights of all people connected to our business activities, in line with the above documents and the UN Guiding Principles on Business and Human Rights. We will also prevent and mitigate any adverse impact on human rights connected to our business while taking every care to avoid complicity in human rights violations.

Scope of Policy

This Policy applies to all JPX Group officers and employees. In addition, JPX expects all business partners to support and respect the Policy and will work with them on human rights issues.

Governance

JPX Group will harmonize its activities to this Policy by maintaining an internal, Group-wide body which will, among other things, carry out regular monitoring and report to the board of directors. To ensure transparency, JPX Group will also carry out appropriate and proactive information disclosure.

Respecting the Human Rights of Officers and Employees

JPX Group will give due regard to individual human rights and safety in the workplace, and work to ensure that employees can fulfill their potential in a pleasant and rewarding workplace free from discrimination and harassment.

Furthermore, JPX Group denounces forced labor, child labor, human trafficking, and other human rights violations in any form, and protects all rights held by workers including reasonable working conditions and social protection, freedom of association, and collective bargaining.

Stakeholder Engagement

JPX Group will promote understanding of this Policy and deepen awareness of human rights issues among its officers and employees through appropriate implementation of training programs and

Reference translation

other means. In addition, in the case of stakeholders that could have adverse impacts on human rights, JPX Group will work to improve and enhance initiatives through engagement.

Grievance Mechanism

JPX Group will maintain a line of communication via its website, available to all people connected to the Group's business activities, and will endeavor to operate this appropriately. If it becomes clear that JPX Group has caused or contributed to an adverse impact on human rights, the Group will take remedial action using appropriate means.

Definitions of Terms Used in this Policy

- "Employees" : Includes those with full time, permanent contracts as well as temporary, agency, part-time, and other types of contracts.
- "Business partners" : All corporate entities connected via contracts to the markets that JPX Group operates, including trading and clearing participants, listed companies, and the system vendors which develop, install and operate our trading systems and other systems.
- "Discrimination and harassment" : Discrimination, harassment, or bullying based on any characteristics or circumstances – not limited to those set out in Japanese law and regulation – including sex, sexual preference, or gender identity; disability or illness; *buraku* heritage; race, nationality, or origin; manner of hiring; rank; pregnancy or parenthood (including fatherhood); and care responsibilities.

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