



Corporate ethics and human rights

JR-West Group's approach to corporate ethics and human rights

For the JR-West Group, corporate ethics and human rights are at the foundation of our business activities. We believe that it is important to go beyond mere legal and rule compliance in order to live up to the trust and expectations of society. To this end, we established the JR-West Group Code of Conduct (hereinafter, Code of Conduct) in May 2024.

It serves as the common foundation for the JR-West Group in complying with laws and regulations and acting with sincerity as we strive to realize Our Purpose. In it, we clearly state our key values and what conduct must be ensured, such as speaking up about anything discomforting that may be experienced, working to prevent misconduct and its escalation, and having zero tolerance for any form of harassment. We strive to instill all of this in our executives and employees.

Also, we have been carrying out human rights due diligence based on the JR-West Group Human Rights Policy, which was revised in April 2023. We have identified human rights violation risks that need to be addressed as a priority and are working to prevent and mitigate any negative impacts. We will continue to work with stakeholders both inside and outside the Group as we seek to respond appropriately.

In particular, with regard to abusive customers, which is one of the human rights violations that must be addressed as a priority, we have established the JR-West Group Basic Policy on Customer Abuse and are creating an environment in which the human rights of JR-West Group employees are protected to ensure that they can work with peace of mind and in good health, both physically and mentally.

Corporate ethics and human rights efforts

● Establishment of the JR-West Group Code of Conduct

The aforementioned Code of Conduct is composed of three parts: Our Mindset, Our Commitment, and Our Executives' Mindset. The contents of each are described below.



JR-West Group Code of Conduct

■ Content of the JR-West Group Code of Conduct

Section	Target	Content (excerpt)
Our Mindset	Executives and employees	Compliance, observance of laws and regulations, mindset as an employee, four questions to ask yourself, ethics, organizational culture, importance of dialogue, whistleblowing, responsibility to speak up
Our Commitment (conduct we must ensure)	Executives and employees	1. Pursuing safety and security 2. Respecting human rights 3. Fair dealings 4. Healthy relationships with business partners, government, and others 5. Asset protection and utilization 6. Ensuring information security 7. Preserving the environment 8. Creating a pleasant working environment 9. Cutting off ties with antisocial forces 10. Proper recording and release of company information
Our Executives' Mindset	Executives	Roles, basic attitude, respect for human rights, human resource development, organization building, sincere response

Our Mindset outlines the basic values and ideas that JR-West Group employees should hold to, including compliance with laws and regulations, ethics, organizational culture, the importance of dialogue, and the use of whistleblowing hotline. Our Commitment also outlines important compliance items that all executives and employees must adhere to. Furthermore, all full-time executives of the JR-West Group have signed on to Our Executives' Mindset, which summarizes those matters that executives must comply with, and have sworn to take the lead in putting the Code of Conduct into practice.

We are also working on related efforts to ensure that each employee has a deep understanding of the Code of Conduct and is able to refer back to it in the course of their daily work.

In addition, the "Four Questions to Ask Yourself," created in 2009, was revised in conjunction with the formulation of the Code of Conduct. We revised this document in order to enable executives and employees to ask themselves questions from various perspectives when they are unsure of what to do or feel tempted by something. In addition, in light of recent trends, we

added content related to human rights violations, harassment, and awareness about the concept of integrity, which means to act with sincerity.



Four Questions to Ask Yourself awareness-raising poster

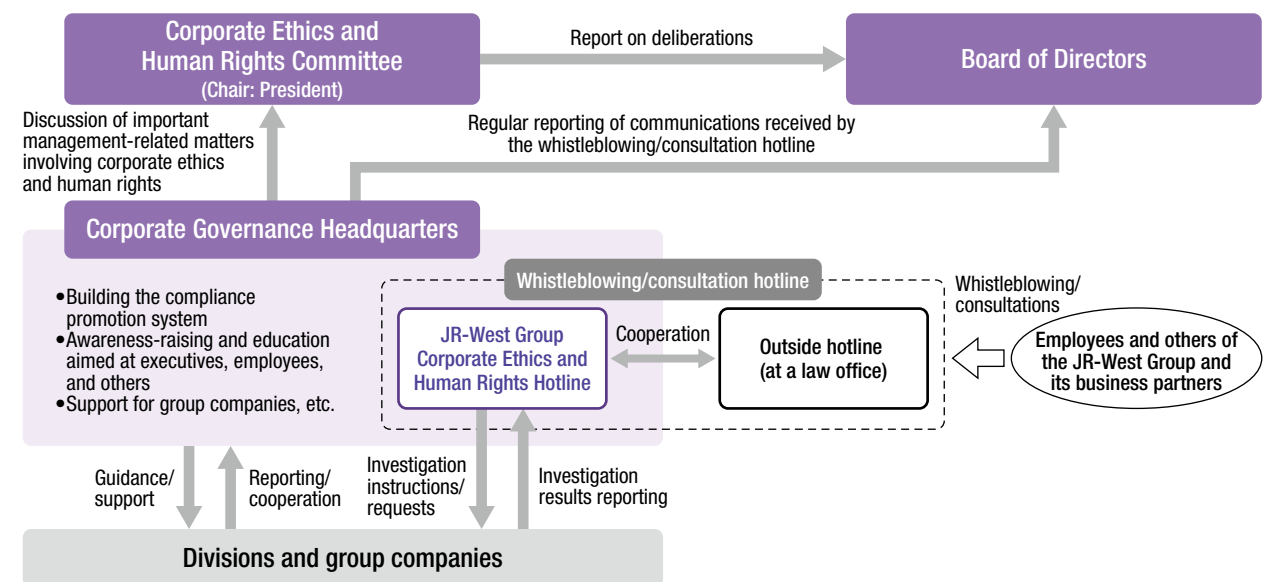
● Promotion structure

In line with our compliance promotion regulations, our Corporate Governance Headquarters plays a central role in building corporate ethics and human rights-related systems and in providing guidance and support to each department and group company. In addition, important management matters are deliberated by the Corporate Ethics and Human Rights Committee, which is chaired by the president and which

includes outside experts. The content of these deliberations is reported to the Board of Directors, who then take appropriate action to mitigate risks related to corporate ethics and human rights.

Additionally, the number of whistleblowing and consultation cases received, as well as summaries of those cases, are regularly reported to the Board of Directors.

■ Compliance promotion structure



● Education, awareness-raising

The JR-West Group believes that education and awareness-raising form an important foundation for corporate ethics and human rights. We therefore conduct ongoing efforts to this end, including rank-specific training and publishing a compliance newsletter. Such education and awareness-raising will be conducted in fiscal 2025 to help disseminate the gist of our Code of Conduct.

We believe that employees should never engage in harassment—the root of misconduct and human rights infringement—nor should they allow people around them to do so, nor do nothing about it when they see incidents of harassment. With this in mind, we hold training for whistleblowing hotline employees. This includes seminars on properly handling whistleblowing reports from employees and training to ensure that employees of all ages are kept up to date on diverse values.

● Employee awareness survey

Every year at JR-West, we conduct an employee awareness survey among all employees (approximately 50,000, including contracted workers), with the goal of monitoring the corporate culture and finding signs of misconduct. Survey results are reported to management, including at the meetings of the Corporate Ethics and Human Rights Committee in order to share compliance issues.

Problems discovered through this survey form the basis for new measures. The fiscal 2024 survey revealed a lack of dissemination of our corporate philosophy and policies. We therefore are striving to disseminate our philosophy and policies through the aforementioned educational activities and by clarifying the basis of employee actions in the Code of Conduct.

We are striving to eliminate or reduce the number of harassment cases. In addition to confirming whether harassment exists or not through this survey, we use the survey as a second whistleblower hotline by, for example, having employees detail specific incidents in written form.

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● Whistleblower system

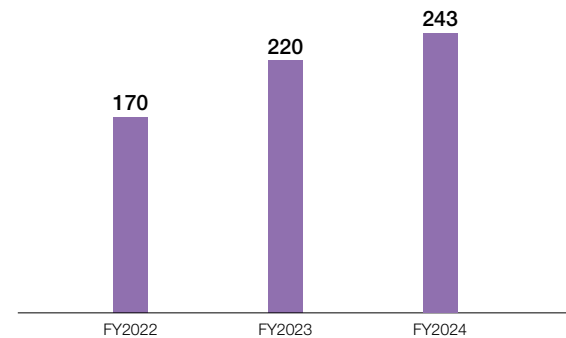
The JR-West Group has established rules for whistleblowing and consultations in order to respond appropriately to violations of laws and regulations involving executives or employees. We have set up an internal JR-West Group Corporate Ethics and Human Rights Hotline (hereinafter, “the hotline”) so that employees can report and seek advice with peace of mind. We have also set up an external hotline for whistleblowing and consultation.

In accordance with the spirit of the Whistleblower Protection Act and other laws and regulations, the Group’s whistleblowing system imposes a duty of confidentiality on those involved in handling reports and consultations in order to

thoroughly protect whistleblowers. In addition, we have strengthened the hotline’s reception and response system and strive to provide careful responses based on the wide-ranging knowledge and experience of our diverse staff. The hotline responds to reports and inquiries not only from Group executives and employees but also from all stakeholders, including business partners.

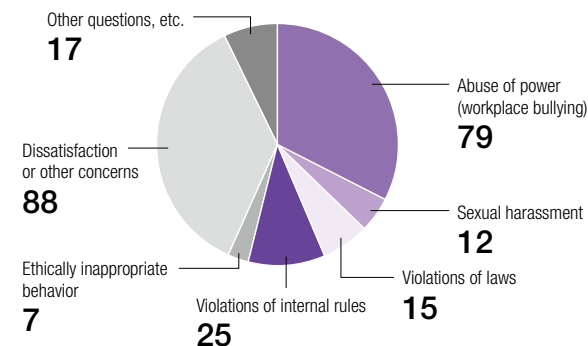
These hotlines accept reports and consultations not only regarding suspicious compliance matters but a wide range of human rights issues that arise in business activities as well. The number of reports and consultations received across the Group in fiscal 2024 was 243.

■ Number of whistleblower reports and consultations over the past three years



Note: The number of reports and consultations includes those made to the internal and external hotlines, as well as reports and consultations made to the JR-West Work-Life Balance Support and Harassment Counseling Office. Please note that these numbers differ from the number of cases that have been confirmed as fact.

■ Breakdown of whistleblower reports and consultations in FY2024



JR-West Group Corporate Ethics and Human Rights Hotline awareness-raising poster

Summary of anonymous whistleblowing and consultation cases and findings (2024) (examples)

The following are the statuses and outcomes of anonymous reports and consultations that have been handled.

Date received	Summary of matter	Relevant company	Result of investigation
DD/MM/2024	Inappropriate posting on social media	JR-West	The facts of the matter were verified and the person in question was interviewed. We gave strict instructions, including suspending access to the social media account in question.
DD/MM/2024	Abuse of power by a superior	JR-West	Under investigation
DD/MM/2024	Abuse of power by a superior	JR-West	After interviewing many people in the department, we confirmed that the allegations were largely true and took strict action.
DD/MM/2024	Personal issues between employees in the workplace	Group company	Because the issue involves a private matter of an employee, it cannot be dealt with through the hotlines. If there are any specific circumstances in which the work environment has deteriorated, such as finding it difficult to do your job, please contact us again.
DD/MM/2024	Unfair dealings by a superior	Group company	A questionnaire was administered to the executives and employees of the group company in question, and an outside lawyer conducted interviews with related parties and the individual in question. As a result, we were unable to confirm any facts that corresponded to those reported.

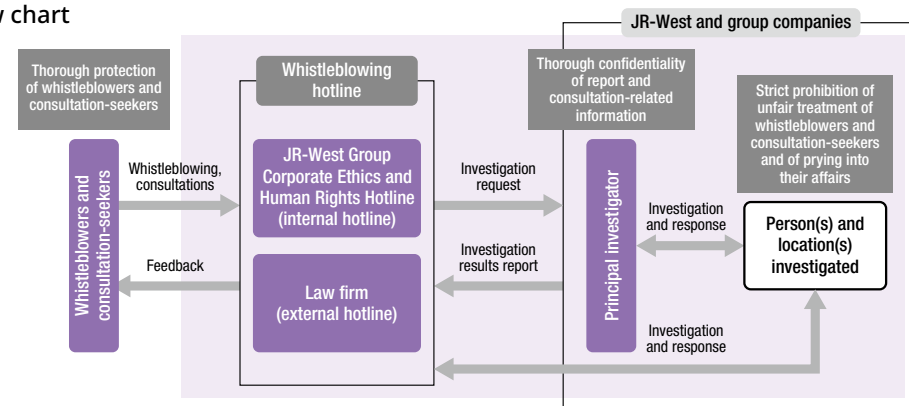
● Human rights due diligence

Based on the JR-West Group Human Rights Policy, the JR-West Group conducts human rights due diligence as a means of identifying and mitigating human rights violation risks in the course of business activities and to remedy any actual impacts.

Starting in fiscal 2024, we have been working on identifying

and mitigating risks and evaluating the effectiveness of these efforts over a roughly three-year cycle. We are now finished identifying the risks of human rights violations that require priority response and are working to prevent and mitigate negative impacts.

■ Response flow chart



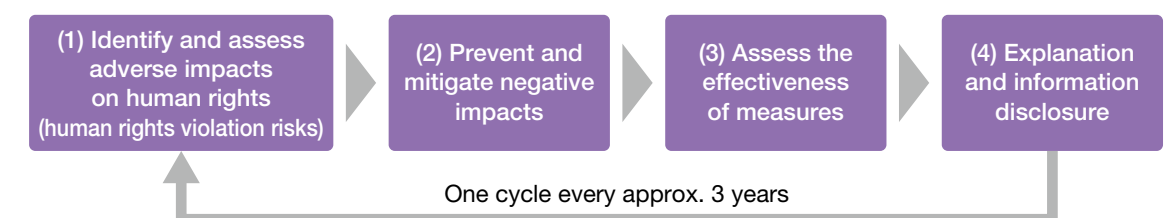
The JR-West Group strives to boost recognition and proper understanding of the whistleblowing system by conducting the aforementioned educational activities, putting up posters in workplaces, and giving all employees cards that remind them that the hotlines are always available to listen to whistleblowers and provide them with consultation. As well, information on the hotlines is continuously appearing in the in-house magazine and on the JR-West intranet.

As a way to raise trust in the whistleblowing system, hotline users are given surveys. The issues that arise from the survey regarding how the hotline handles reports and consultation

requests are used to revise the system. Investigation results on the anonymous calls to the hotlines are put on the JR-West intranet.

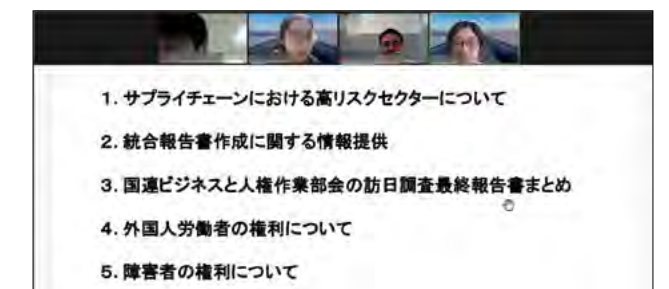
Through these efforts, our aim is for the fiscal 2026 year-end survey to show that at least 70% of survey respondents feel they can use the hotline with peace of mind and trust.

The JR-West Group works to ensure that, through proper operation, the whistleblowing system can help build a corporate culture where there is positive reinforcement and a pleasant work environment, and where misconduct is quickly discovered and remedied.



● Identifying human rights violation risks requiring priority response

The JR-West Group has created a risk map (on the next page) to identify human rights violation risks that require priority response. The risk map was created based on the human rights violation risks listed in the Ministry of Justice document, “What Companies Need to Do About Business and Human Rights Today,” and the self-assessment questionnaire prepared based on the advice of Social Connection for Human Rights (an NGO). Also, the map was created by the secretariat, using evaluation methods such as those described in the Ministry of Economy, Trade and Industry’s “Guidelines on Respecting Human Rights in Responsible Supply Chains” (and including the results of the self-assessment questionnaire) and by taking into account the advice of the NGO.

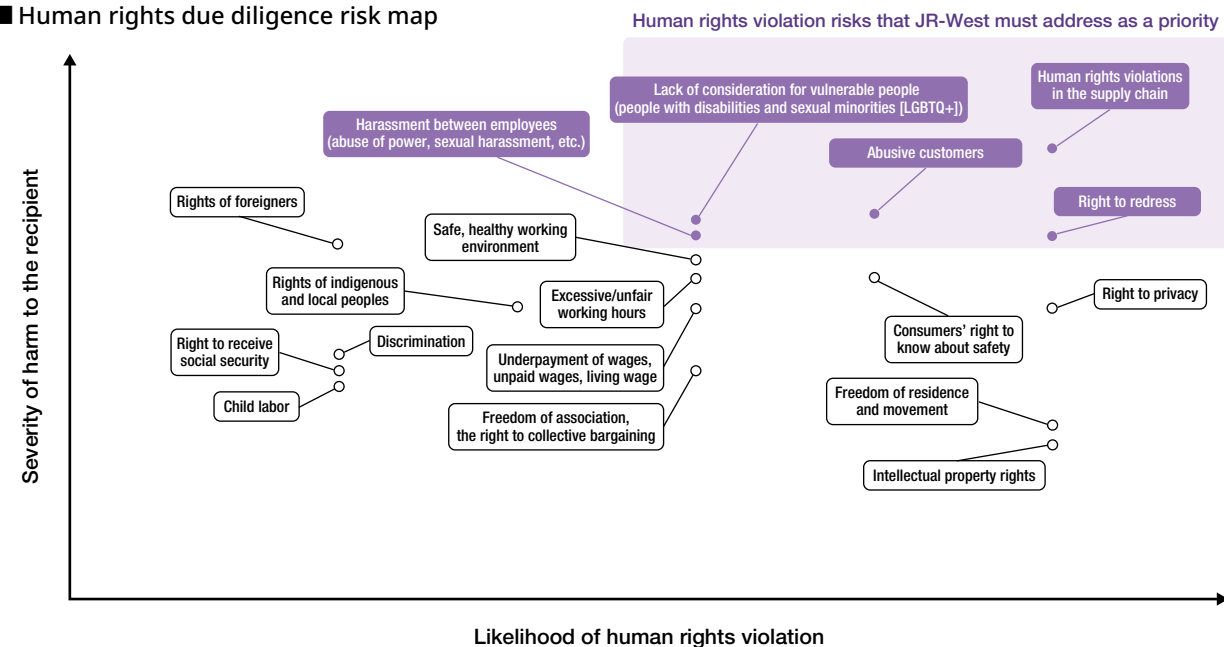


On-line dialogue with an NGO

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Based on the risk map, we identified five risks that were deemed to have a high degree of severity and likelihood of occurrence (in the purple frames in the figure below), where the responsibility was unclear and the response was deemed insufficient.

Human rights due diligence risk map



Addressing priority human rights violation risks

(1) Preventing and reducing customer abuse

In the JR-West Group, we work hard every day to provide services that satisfy our customers, humbly accepting our shortcomings and continuing to strive to make improvements. At the same time, in order to provide high-quality services, we believe it is important to protect the human rights of Group employees and to create an environment in which they can work with peace of mind and in good health, both physically and mentally. For this reason, we formulated the JR-West Group Basic Policy on Customer Abuse in March 2024 and have released it both to employees within the Group and to the general public. In the case of any verbal or physical actions that are deemed to be customer abuse, we will take firm action to

protect our employees and, if necessary, stop providing products or services to or dealing with the customer(s) in question.

In conjunction with the formulation of this basic policy, we have put in place a system that enables employees to consult with specialized lawyers. We have also distributed posters and provided video-based training to all employees in order to raise awareness and foster basic knowledge about customer abuse and the legal consultation process.

Currently, each group company is working to further improve its response to this matter by establishing necessary systems, including the specific methods and procedures for dealing with abusive customers.



JR-West Group Basic Policy on Customer Abuse awareness-raising poster

(2) Addressing human rights violations in the supply chain

The JR-West Group has formulated the JR-West Group Supply Chain Policy and has publicized it among its business partners. In addition, in order to identify the risk of human rights violations occurring among its business partners, the Group has conducted a supply chain survey of its first-tier suppliers.

Based on the results of the survey, we interviewed companies that handle important items to learn about their efforts and conducted various awareness-raising activities, which included human rights. In fiscal 2025, we are revising our supply chain survey and the target companies in order to collect information to identify high-risk materials and sectors.

With the railway sector now being added to the government's specified skilled worker program, the JR-West Group is considering the necessary measures for hiring foreign nationals. We will create an environment where employees with diverse backgrounds can thrive and utilize their respective capabilities.

(3) Preventing harassment within the company

The JR-West Group provides education and awareness-raising for all executives and employees based on the idea of "not committing, not allowing, and not ignoring" any form of harassment. We have also clearly stated our stance in our Code of Conduct and will create an environment where all JR-West Group employees can utilize their capabilities to the fullest.

(4) Improving support for vulnerable people (people with disabilities and sexual minorities [LGBTQ+])

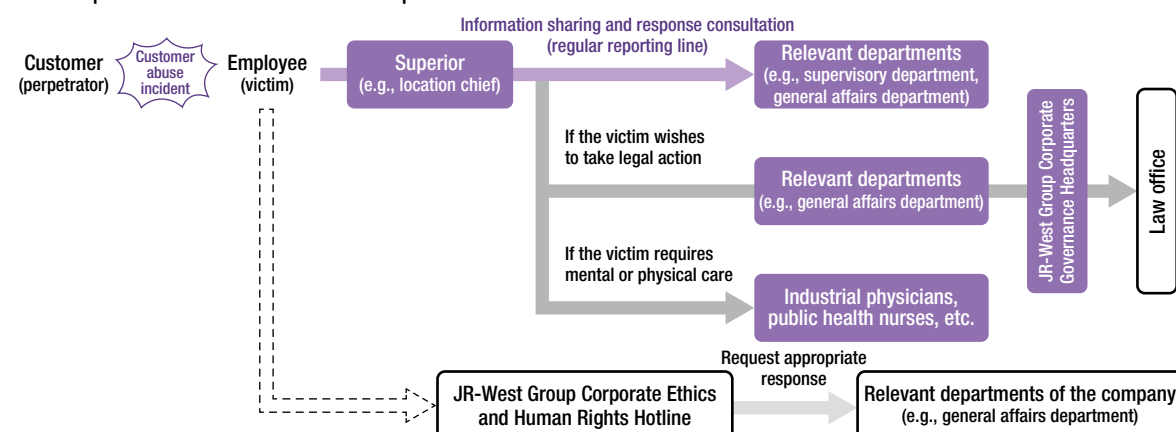
The JR-West Group is working to develop and publicize, not only from the perspective of customers but also from the perspective of diversity and securing human resources, various systems relating to people who have disabilities or are sexual minorities (LGBTQ+). However, the level of understanding among employees is still insufficient, and we believe, therefore, that it is important to continue educating and raising awareness. To that end, we will continue to provide training for managers and make efforts to raise awareness using examples of whistleblowing, such as for outing incidents, and to foster understanding among employees.

In response to the revised Act for Eliminating Discrimination against Persons with Disabilities that came into effect in April 2024, JR-West Group companies are implementing measures and updates in line with the "Guidelines for Promoting the Elimination of Discrimination against Persons with Disabilities in All Fields" revised by the relevant ministries.

(5) Establishing redress-related hotlines

The JR-West Group has established the JR-West Group Corporate Ethics and Human Rights Hotline, as well as an outside hotline, to serve as points of contact in seeking redress for human rights violations (i.e., as grievance mechanisms). For more information, see "Whistleblower system" (p.107).

General response and communication process in customer abuse incidents



Message from an outside expert

Ensuring thorough corporate ethics and promoting greater awareness of human rights are essential to achieve sustainable growth. In the case of JR-West, they have 1) established a code of conduct, 2) are implementing human rights due diligence, and 3) have established redress mechanisms, while also developing the organizations and systems to advance these efforts.

Moving forward, a repeated process of identifying risks, taking preventive and corrective measures, and providing redress in order to increase effectiveness will

be needed.

It is "people" that make the system work. Each and every employee must fully understand the importance of corporate ethics and human rights and put it into practice. To achieve this, it is essential to foster a fair and broad-minded corporate culture and an open-minded workplace where problems can be discussed openly when they arise. My hope is that this will contribute to an even stronger relationship of trust with society.



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