

**Notice Regarding Formulation of the DOWA Group Human Rights
Response Roadmap and Action Plan**

DOWA HOLDINGS CO., LTD. (14-1, Sotokanda 4-chome, Chiyoda-ku, Tokyo; Capital: 36.4 billion yen; President: SEKIGUCHI Akira; "the Company") hereby announces that it has formulated a DOWA Group Human Rights Response Roadmap (hereinafter referred to as "the Roadmap") and Action Plan, to further strengthen its response to human rights issues and ensure respect for the human rights of all stakeholders involved in its business activities.

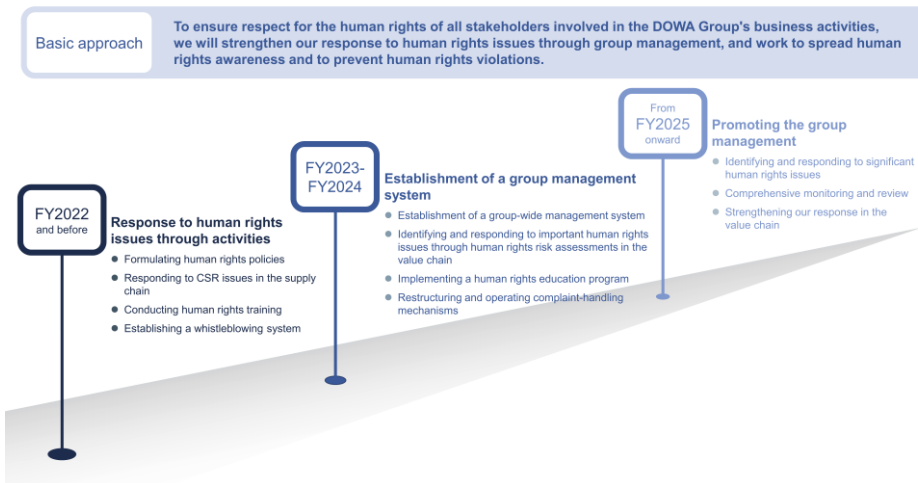
The DOWA Group regards respect for human rights as one of its most important management issues. In addition to its existing efforts to address human rights issues to date, in September 2023, the Group began working to establish a group-wide management system to systematically address human rights issues on a group-wide basis. The Group has established the Roadmap as a medium-term process for responding to human rights issues through group management based on this system.

Under the Roadmap, from FY2023 through FY2024, the Group is conducting risk assessments regarding human rights to identify significant human rights issues, and working to establish a management system for comprehensive monitoring and review. From FY2025 onward, we will engage in full-scale group management to address significant human rights issues and work to expand our response to human rights issues to include our value chain.

At the same time, the Group has developed a specific action plan based on the Roadmap and the UN Guiding Principles on Business and Human Rights established by the United Nations. With this plan, the Group will steadily implement a series of group management activities, including the expansion of human rights education and the restructuring and operation of its complaint-handling mechanisms.

In accordance with the Roadmap and action plan, we will strengthen our response to human rights issues through group management, to fulfill the Group's responsibility to respect human rights by promoting human rights awareness and preventing human rights violations.

[DOWA Group Human Rights Response Roadmap]



[DOWA Group Human Rights Response Action Plan]

		FY2022 and before	FY2023-FY2024	From FY2025 onwards
1. Policy Commitment	a) Establishment of policies and system	Formulating a human rights policy	Continuously developing and operating a group-wide policy and system	
		Formulating a CSR procurement policy and guidelines Formulating a responsible minerals procurement policy Building a sustainability promotion structure	Creating a dedicated management system for response to human rights issues	Engaging in activities to respond to human rights issues group-wide Creating an activity system for each business location Transitioning to full-scale activities
2. Human Rights Due Diligence	b) Assessment of impacts on human rights	Investigating human rights risks in advance	Assessing human rights risks in the value chain, identifying and responding to important human rights issues	Identifying significant human rights issues Responding to significant human rights issues
	c) Supply chain management	Grasping the state of human rights response and communicating with suppliers using the Supplier SAQ Responding to conflict minerals and responsible mineral procurement	(i) Domestic offices Identifying key raw materials and supply chains	
	d) Conducting education and training	Conducting human rights training	Creating education programs Developing a grade-specific education system	Rolling out human rights training across the Group Implementing a grade-specific education system
	e) Implementation of monitoring	Assessing human rights risks utilizing risk assessments at each business site Monitoring response to human rights issues utilizing CSR procurement Monitoring state of remedies	Monitoring and reviewing comprehensively using a dedicated management system for response to human rights issues	
	f) External disclosure	Collecting information on human rights issues and communicating the response on an ongoing basis		
	3. Remedies	g) Establishment of complaint-handling mechanism	Establishing an internal reporting system Establishing an external reporting desk (Responsible mineral procurement)	Restructuring and operating complaint-handling mechanisms

[Strengthening and Promoting Our Response to Human Rights Issues through Group Management—DOWA Group Human Rights Response Roadmap and Action Plan—]
 (released on December 13, 2023)

https://www.dowa-csr.jp/content/files/DOWA_hr_roadmap_en.pdf

[Reference]

The Group's initiatives for Human Rights Issues

<https://www.dowa-csr.jp/en/esg/social/human-rights>

Contact for inquiries

DOWA HOLDINGS CO., LTD.
<https://ir.dowa.co.jp/en/ir/contact1.html>