

Daiki Aluminium Industry Group Basic Policy for Responsible Procurement

In all business activities, the Daiki Aluminium Industry Group (hereinafter the "DIK Group") shall take into consideration compliance with laws and social norms for the supply chain as a whole, conservation of the environment and resources, and respect for human rights and shall promote fair and equitable procurement activities. Furthermore, we shall fulfill our social responsibilities as a sustainable company together with our suppliers and other business partners while building mutual trust with them.

The aim of this basic policy is to convey the standards of conduct that officers and employees of the DIK Group (including employees, part-time workers, contract employees, and all others in positions requiring them to follow the instructions and guidance of the DIK Group) should adhere to when procuring raw materials, products, equipment, services, and other necessities for the business activities of the DIK Group from business partners.

1. Compliance with laws and social norms

(1) Legal compliance

We shall ensure proper understanding of the purpose of relevant laws, regulations, and social norms not only in Japan but also in countries in which we conduct business activities and shall comply with them.

(2) Fair trade

We shall respect fair trade practices, endeavor to treat all customers, business partners, and competitors fairly, and not disadvantage others by fabricating or concealing information, abusing confidential information, misrepresenting material facts, or other unfair actions.

(3) Prohibition of giving and accepting improper benefits, bribery, and other similar acts

We shall comply with laws concerning insider trading, bribery, and other similar acts and shall not leak important undisclosed company information or engage in any acts of bribery.

(4) Exclusion of anti-social forces

From the standpoint of social responsibility and corporate defense, we shall not have any business or other relationships with anti-social forces. In the unlikely event that we are unaware that a party is an anti-social force and, contrary to the will of the DIK Group, we become involved in any relationship with the party, we shall immediately terminate the relationship once we determine or suspect that the party is an anti-social force.

(5) Prevention and early detection of fraud

To ensure that violations of laws, etc., including matters related to accounting and accounting audits, and acts considered or suspected to be unethical are promptly reported to the appropriate personnel, we shall establish internal rules and take appropriate punitive, remedial, recovery, and other measures to redress the misconduct as well as to protect the privacy of whistleblowers and protect them from suffering any disadvantageous treatment.

2. Human rights and labor

Based on the DIK Group Human Rights Policy and DIK Group Code of Ethics, we shall respect human rights throughout our supply chains, including those attributable to the DIK Group's business activities and services/products, and maintain healthy and comfortable working environments by complying with the following rules.

- (1) We shall not subject anyone to discrimination or harassment based on nationality, race, ethnicity, gender, age, religion, creed, social status, or disability.
- (2) We shall not make use of forced labor, child labor, or labor obtained through inhumane treatment or human trafficking.
- (3) We shall comply with all laws and regulations applicable to remunerations paid to employees (including minimum wages, overtime, and other benefits and deductions, including statutory benefits).
- (4) We shall appropriately manage working hours (working hours and holidays that do not exceed legal limits and leaves stipulated by law).
- (5) We shall respect the freedom of association and right to collective bargaining as means of conducting labor-management consultations concerning working environments, wage levels, and other matters.

3. Environment

Based on the DIK Group's basic philosophy and basic policies concerning the environment, we shall contribute to the development of society and promote continuous improvement for protection of the global environment by providing valuable products through our corporate aluminium recycling and smelting activities.

- (1) We shall establish and operate an organization that can act on a company-wide basis to promote conservation activities for the global environment.
- (2) We shall accurately assess the impact of our corporate activities on the environment, establish environmental objectives and action targets to the extent technically and economically possible, and strive for continuous improvement to

protect the global environment.

- (3) In addition to complying with environmental laws, regulations, accords, etc., we shall establish our own standards and continuously strive to achieve even higher targets.
- (4) We shall promote reduction of the use of hazardous substances, conservation of resources and energy, and reduction and recycling of waste in all corporate business areas.
- (5) By providing environmental education to all employees and raising their environmental awareness, we shall enhance their understanding of the environment and encourage them to actively participate in environmental activities.
- (6) We shall conduct environmental audits to check our activities and endeavor to maintain and enhance our environmental management standards.
- (7) We shall inform all employees of the details of implementation of our environmental conservation activities and disclose them publicly as necessary.

4. Responsible procurement of minerals

In accordance with the Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas issued by the Organization for Economic Co-operation and Development (OECD), we shall not use minerals unfairly sourced in conflict-affected and high-risk areas, or their processed products, as they are used to fund the activities of armed groups that commit inhumane acts and there are concerns about involvement in human rights abuses, bribery, and environmental destruction in those areas.

5. Cooperation with business partners

To build responsible supply chains, we shall share this basic policy with our business partners and work with them to implement a variety of measures while striving to identify challenges.

6. Raising awareness of this basic policy

We shall raise awareness of this basic policy by periodically publicizing it and providing in-house training.

7. Review of this basic policy

This basic policy shall be reviewed every five years, in the event of any changes in related laws or regulations, or in the event of any significant impacts on our business due to changes in the environment or society surrounding the DIK Group.

This policy was approved by the Board of Directors of the Company and endorsed by the president.

August 8, 2023

Shigenori Hayashi

President

Daiki Aluminium Industry Co., Ltd.