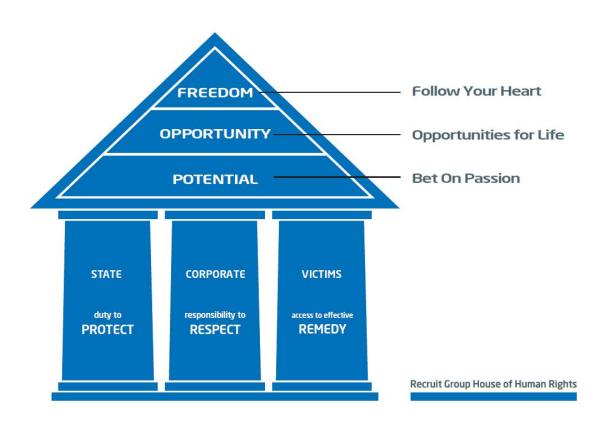
Recruit Group Human Rights Policy ~creating a brighter world where all individuals can live life to the fullest ~



Recruit Group Human Rights Policy creating a brighter world where all individuals can live life to the fullest ~

The basic principle of the Recruit Group is "creating a brighter world where all individuals can live life to the fullest." This core principle informs our central message of "Follow Your Heart," to create a world where individuals and businesses can focus on what really matters to them. People and organizations reveal their greatest strengths when they are free to pursue their internal motivations—their ambitions, dreams, desires, and passions. Empowered to follow these motivations, people and organizations will blossom and come to realize their full potential, and people's well-being is ensured; ultimately, the better our future becomes.

In 1960, we established a new magazine business in Japan to bring together and address the needs of two specific groups: companies that were looking for people to recruit, and students who were looking for jobs. With an ambition of "providing various job opportunities to enable each university student to freely choose," our first service was created. Since our foundation, we have been nurturing this concept and expanding our wide range of services. By turning social changes into opportunities and utilizing emerging new technologies including Artificial Intelligence (AI), we aim to evolve our services to optimally match individual users and enterprise clients much faster, surprisingly simpler and closer than ever before to better meet their changing needs.

On the other hand, social changes (i.e. globalization) and evolution of technology increased the disparity between those who can leverage technology to process complex information and those who cannot. They may have been the barrier for minorities and socially vulnerable groups to participate in the economic system. Global governance gaps create risks of human rights abuses by companies. In order to realize a world where no one is left behind, one of the most important contributions companies can make is to meet their responsibility to respect human rights throughout their operations, in line with international standards.

In such a global society where companies are expected to fulfill social responsibilities, the Recruit Group aims to "create a brighter world where all individuals can live life to the fullest." The Recruit Group envisages to contribute to an inclusive society where not only "people," our source of strength, are respected and protected, but also their potential is used to its full extent, and to respect and embrace each other's differences to bring about unexpected innovations. This human rights policy forms a foundation for the Recruit Group to respect human rights in order to prepare for a world where all individuals realize larger freedom.

In addition to this human rights policy, each Strategic Business Unit (SBU) develops detailed principles and policies related to their operations.

- < Each SBU's Principle and Policies>
- -HR technology SBU: Indeed's Principles on Algorithms and Fairness
- -Media & Solution SBU: Personal Data Policy (Japanese Only)
- -Staffing SBU: RGF Staffing Human Rights Policy

1. Commitment to Respecting Human Rights

The Recruit Group strives to help people stay honest and true to themselves and decide what to do in life - in other words, to help create a society where everyone can pursue larger freedom. We do that by striving to give optimum choices and to sincerely address any negative impacts our corporate activities might have on human rights. That is what we believe we should do to fulfill our human rights responsibility expected by the international standard.

We respect and strive to promote human rights in accordance with the UN Guiding Principles on Business and Human Rights throughout our businesses. The Recruit Group recognizes the human rights which are announced in the International Bill of Human Rights (*1), and the human rights which are declared in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (*2) as internationally recognized and minimum human rights. We are committed to respect human rights of all people including vulnerable populations and marginalized groups, and to work to help them realize their rights. We do not tolerate any forced labour, human trafficking, child labour, discrimination, harassment, unsafe working conditions, bullying or victimisation. In our corporate activities, we strive to not cause or contribute to discrimination and human rights violations based on class, race, color, sex, language, religion, gender, age, political or other opinion, national or social origin, nationality, property, sexual orientation, gender identity, disability, birth or other status. We are committed to ensuring equal opportunity, and to respecting decent work that lets people choose their own life path. We also committed to carefully identifying risks and to respecting and protecting human rights against violations caused by environmental impacts and unconscious bias and of rights such as freedom of expression and privacy that may be caused by the development of science and technology.

We strive to adhere to all applicable laws and regulations in each market in which we operate. Where national law and international human rights standards differ or where they are in conflict, we will seek to respect internationally recognized human rights. We also aim to meet stakeholders' expectations, which are subject to change with time, in relation to respect for human rights.

- *1. International Bill of Human Rights consists of Universal Declaration of Human Rights, International Covenant on Civil and Political Rights and International Covenant on Economic Social and Cultural Rights.
- *2. Rights at Works refers to freedom of association and the right to collective bargaining; the elimination of all forms of forced or compulsory labor; effective abolition of child labor; and the elimination of discrimination in respect of employment and occupation.

2. Scope of Application

In this human rights policy, all officers, employees and temporary workers of the Recruit Group (namely, Recruit Holdings Co., Ltd. and its consolidated subsidiaries) (including jobseekers, candidates, seconded employees, self-employed workers, and all other persons who work temporarily for our clients through our staffing businesses) are protected and are expected to act in accordance with this policy.

We will continue to communicate this policy to all people who are within the scope of application in an easy-to-understand manner. With this human rights policy, the Recruit Group aims to not cause or contribute to human rights violation within our value chain.

As advisory bodies to the Recruit Holdings Board of Directors, the Sustainability Committee, Compliance Committee, and Risk Management Committee have oversight on various initiatives and policies to assimilate compliance culture by engaging with stakeholders inside and outside the Recruit Group. In this whole process, respect for human rights is discussed and we take various practical measures to prevent direct and indirect involvement in human rights violations. Under the Board member who is responsible for the Recruit Group's sustainability, the department that is responsible for sustainability in Recruit Holdings takes the lead in implementing the policy.

Officers and employees of the Recruit Group are protected against human rights violations in our business operations, and are expected to implement this policy to prevent direct and indirect involvement in human rights violations in our business operations and relationships. We educate our employees about measures needed to prevent human rights violations revealed through due diligence in accordance with this human rights policy.

Temporary workers of the Recruit Group (including jobseekers, candidates, seconded employees, self-employed workers, and all other persons who work temporarily for our clients through our staffing businesses) are protected against human rights violations in business operations, and are expected to prevent direct and indirect involvement in human rights violations. We expect them to respect this human rights policy.

The Recruit Group continuously seeks ways to continually improve our services to ensure respect for the human rights of individual users of our services. We expect enterprise clients, and business partners (such as suppliers and third parties) to act in accordance with human rights policy. We strive to enhance our existing participation in collaborative initiatives and other such mechanisms in order to address adverse human rights impacts associated with our business partners - including enterprise clients - and to exercise our leverage to this end.

3. Commitment to Implementing Human Rights Due Diligence and Social Impact Management

The Recruit Group strives to undertake human rights due diligence in accordance with the UN Guiding Principles to identify, assess, prevent, mitigate and account for negative impacts on human rights associated with our business activities. With the results from human rights due diligence, we are committed to adopting programs to address business - specific human rights issues.

In order to create a world where people can pursue larger freedom, we will strive to assess the social impact our businesses have and to leverage the insights gained from the results to prevent or mitigate adverse impacts and to maximize positive impacts.

4. Whistleblower System and Grievance Mechanism

The Recruit Group companies have established grievance mechanisms such as inquiry pages and whistleblower systems through which all stakeholders (i.e., employees, temporary worker registrants for our staffing services, and individual users of our services) can raise issues or grievances regarding human rights. In order to respond to potential impacts on human rights, the Recruit Group aims to confirm facts, settle issues, consider preventative measures, and effectively follow up after any measures are implemented. We are committed to remedying affected parties where it has been identified that we have caused or contributed to human rights impacts.

To assess human rights risks and consider countermeasures, the number of reports on human rights violations made through the whistleblower system and its trends are regularly reported to and discussed at the board of directors. In cases where there are risks that may lead to severe violations, countermeasures are also discussed.

5. Accountability

The Recruit Group takes various measures to respect human rights including the following measures:

Traceability and Transparency

The Recruit Group has confronted social "disses" – dissatisfaction, disruption, and disquiet – and has created businesses to change negatives into positives. We strive to engage with our stakeholders to ensure that no one is left behind. We incorporate their perspectives into our service development to improve inclusiveness. We also seek to ensure traceability, and to pursue increased transparency in our decision-making process and thereby bring clarity to our judgements.

After our services are launched, we strive to sincerely listen to the feedback from our users, and to provide relevant explanations when requested. When risks are identified in our business operations, we seek to probe into the case, and to disclose the measures taken to prevent recurrence.

We proactively conduct stakeholder dialogues with not only individual users and but also external experts so that we can offer users "Opportunities for life. Faster, simpler and closer to you" through our services.

Reliability & Safety

The Recruit Group is establishing information management rules based on our Code of Ethics, and three tasks have been set as basic principles: a) Demonstrate purpose of use and obtain approval; b) Respond to requests from relevant individuals; and c) Enforce appropriate safety controls.

Privacy

We have a Code of Ethics on safeguarding confidential and sensitive Information. Article 6 provides principles for appropriate information management. :

- 1: To protect and safeguard confidential and sensitive information that we obtain in connection with our business, regardless of whether the information is obtained from customers, other third parties, or within the Group itself. To not disclose or use such confidential or sensitive information except for its intended purpose, unless we receive consent from the applicable party.
- 2: To create and maintain systems for safeguarding the confidentiality of personal information against unwarranted and access and disclosure. To cultivate and maintain trust in the societies in which we do business, it is crucial that we maintain the confidentiality of personal information we obtain in the course of our business.
- 3: To not use non-public information for our personal benefit or any other improper purpose and to not make improper use of any information produced by the Group that has not yet been publicly disclosed, regardless of whether such use is for our own benefit or the benefit of a third party.

Accountability

The Recruit Group will strive to interact and hold discussions with relevant stakeholders in order to appropriately understand and address our impact on human rights. We will also strive to publicly communicate our progress in implementing this policy, to undertake human rights due diligence, and to assess social impacts created by our business activities. Publicly communicating on our efforts to respect human right is an opportunity to get feedback from society, and to progressively enhance our initiatives.

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