

Promote Responsible Business



Human Rights, Bribery

Approach to Human Rights Policy and Human Rights Risks

AEON's unwavering basic philosophy is, "pursuing peace, respecting humanity, and contributing to local communities, always with the customer's point of view as its core." To honor this philosophy we will comply with all relevant laws and regulations, while dealing with all people honestly and sincerely through proper behavior. The AEON Code of Conduct was enacted in April 2003 on the basis of these values. In September 2014, AEON made clear its stance on human rights and the work environment, producing AEON Human Rights Policy in support of the AEON Code of Conduct.

AEON MALL respects human rights by following this philosophy and these policies. The company aspires to create an organization that allows all people, regardless of their gender or nationality, to participate in the development of the company. We strive to create workplaces that enable all employees to perform to the highest level of their abilities. We view our response to human rights risks as an important foundation for human resources development and for maximizing employee capabilities, engaging in related measures.

AEON Code of Conduct

► https://www.aeon.info/en/company/code_of_conduct/



AEON Human Rights Policy

► <https://www.aeon.info/en/humanrights/humanrightspolicy/>



AEON Code of Conduct—Our Commitment

1. AEON people are always grateful to the many other individuals who provide support and help, never forgetting to act with humility.
2. AEON people value the trust of others more than anything else, always acting with integrity and sincerity in all situations.
3. AEON people actively seek out ways to exceed customer expectations.
4. AEON people continually challenge themselves to find new ways to accomplish the AEON ideals.
5. AEON people support local community growth, acting as good corporate citizens in serving society.

Implementation Framework for Human Rights Initiatives

AEON MALL identifies responsible business as a materiality, aiming to create societies in which human rights are respected by all. To help fulfill our responsibility to respect human rights by preventing, mitigating, and remedying negative impacts on human rights in our corporate activities, the ESG Promotion Subcommittee, which consists of managers of departments that take proactive measures, conducts studies and discussions of issues. The ESG Promotion Committee, chaired by the president & CEO, makes decisions based on information from the subcommittee.

In August 2021, the ESG Promotion Committee formulated *Guidelines for Sustainable Transactions*. We are publicizing this document through external briefings and internal education.

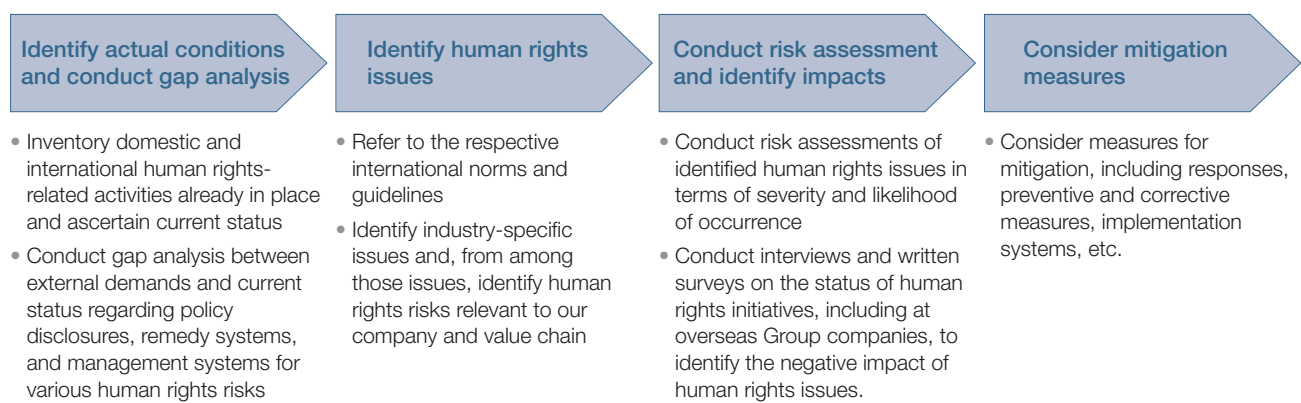
In addition, in October 2021, the president & CEO delivered a message at the Store Association meeting. In his message, the president stated that the purpose of establishing the Guidelines for Sustainable Business Transactions for mutual and sustainable development through fair business dealings.

Human Rights Due Diligence Implementation

At AEON, all AEON People (executives and employees) gain a deeper understanding of human rights, and, based on the AEON Human Rights Policy, strive to create a society that respects human rights. The AEON Human Rights Policy clearly describes a human rights due diligence process. In

accordance with the AEON guidelines, AEON MALL began implementing this initiative in 2020. As described in the United Nations Guiding Principles on Business and Human Rights, we will continue our efforts to build a sustainable value chain in our role as a leader in ensuring human rights.

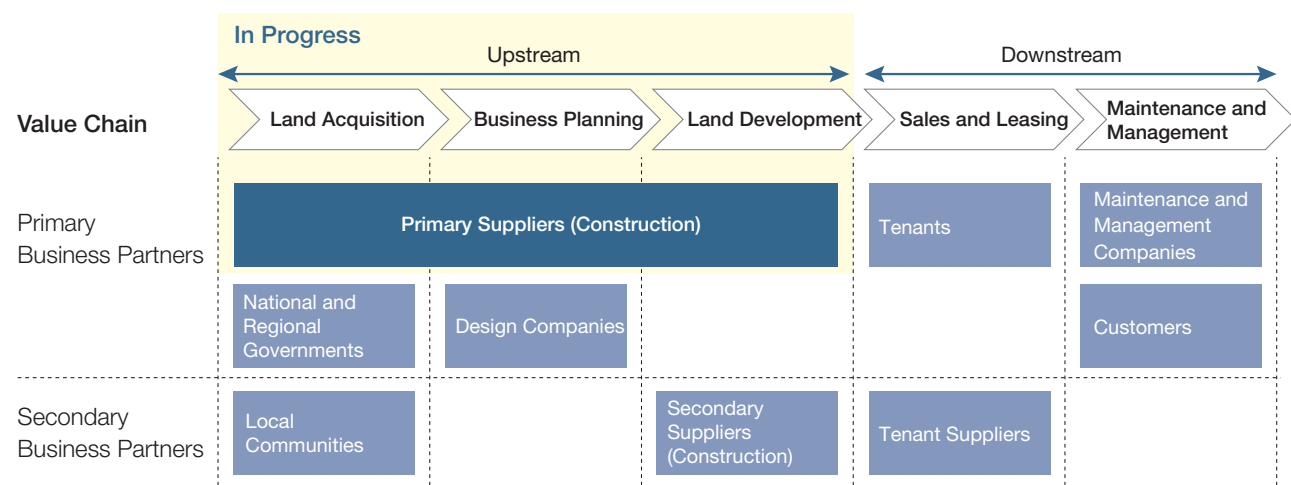
Human Rights Due Diligence Implementation Process



Implementation Scope Related to Human Rights Due Diligence

During fiscal year 2021, we are conducting human rights due diligence, mainly focusing on the upstream portion of our value chain. In the future, we intend to expand the scope of implementation to include downstream contractors and

tenants. Here, we plan to confirm the status of compliance with our Guidelines for Sustainable Transactions throughout the value chain, as well as examine measures to address and mitigate negative impacts.



Issues and Corrective Actions Identified Through Human Rights Due Diligence (Upstream)

As a result of human rights due diligence, we assessed and identified the scope of human rights risks in our company and the upstream supply chain. Based on the risks identified, we plan to consider future initiatives and expand the scope of human rights due diligence.

Based on our philosophy that the Customer Comes First, we recognize the importance of human rights in our

relationships with customers. We plan to continue training all AEON people to share the AEON Code of Conduct which has continued to evolve since 2003. This code of conduct instills in us the value that everything we do is for the benefit of our customers, and we will continue training programs that emphasize this idea.

Scope	Explanation of Scope	Corrective Actions and Future Initiatives
Human rights in the workplace	AEON People are our most important asset. We create safe, secure, and comfortable work environments for our employees so they can maximize their potential. For example, we must understand the actual state of occupational health and safety, harassment, and abuse in the workplace, making improvements immediately when problems are recognized.	<ul style="list-style-type: none"> · Implement measures to reduce total working hours · Encourage leave utilization · Establish Compliance Department · Implement periodic education on human rights · Implement training on mental health issues
Human rights in relationships with business partners	We seek mutual prosperity as equal partners through fair transactions. For example, we must prevent complicity in human rights abuses and associated negative impacts by preventing bribery. We must also reduce the risk of human rights violations by ensuring transparency in our supply chains.	<ul style="list-style-type: none"> · Conduct periodic internal bribery risk surveys and risk identification · Provide training on basic stance toward suppliers · Establish guidelines for sustainable business practices and publish internally and externally through information briefings, etc.
Human rights in relationships with local communities	As a corporate citizen, we contribute to the development of local communities and the enhancement of lifestyles and culture. We must oppose bribery and not aggravate human rights issues. We must also consider human rights risks in our procurement practices, and build healthy relationships with local communities.	<ul style="list-style-type: none"> · Conduct periodic internal bribery risk assessments and risk identification · Establish guidelines for sustainable business practices and publish internally and externally through information briefings, etc.
Human rights in relationships with customers	We provide safe and secure products and services, treating all customers fairly and equitably.	<ul style="list-style-type: none"> · Provide regular training on human rights · Provide training on personal information protection

Corrective Actions (1) Human Rights Training

AEON MALL provides human rights training to all employees every year, aiming for 100% participation. We also provide employees with a handbook that lists both internal and external help desks. This handbook provides clear information about respect for human rights, prevention of discrimination, and other matters in the context of the AEON MALL employment rules.

In December 2021, we held compliance training for executives on the topic of *Business and Human Rights*. The president and representative director delivered a message to the participating executives, reiterating the importance of thinking about potential risks and turning unexpected risks into expected risks.

In addition, we conducted an e-learning course on *Business and Human Rights* for all employees in June 2022.



Major Training

- AEON Code of Conduct training (all employees, annually)
- Executive compliance training (executives; as needed)
- Information security education programs (personal information protection training; all employees, annually)
- AEON disabled individuals training (all employees, as needed)
- Mental health and front line training (department heads, as needed)

Corrective Actions (2) Formulation of Guidelines for Sustainable Transactions, Information Sessions

■ Guidelines for Sustainable Trade

Review international norms on human rights and labor and human rights issues in the industry, and identify those items that are particularly important for our business. We will share this information with the Aeon Group and our suppliers and ask them to comply with it. We will also strive to manage and reduce human rights risks in the supply chain by monitoring the status of implementation. For more information on the guidelines, please visit our website.

Guidelines for Sustainable Trade

- | | |
|-------------------------|--|
| 1. Laws and regulations | 8. Freedom of association and the right to collective bargaining |
| 2. Child labor | 9. Health and safety |
| 3. Forced labor | 10. The environment |
| 4. Working hours | 11. Commercial transactions |
| 5. Wages and benefits | 12. Local community |
| 6. Abuse and harassment | 13. Integrity and transparency |
| 7. Discrimination | 14. Engagement |

Guideline details

▶ <https://www.aeonmall.com/en/esg/society/02/>

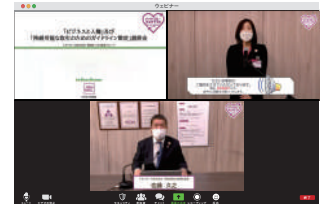


■ Briefing Sessions for Suppliers to Raise Awareness of Human Rights

We held an online information session for business partners on the formulation of our Human Rights Policy and Guidelines for Sustainable Trade (held for construction-related business partners in December 2021 and for specialty store companies in June 2022). At the beginning of the session, the executive in charge of the project delivered a message stating our desire to work in partnership to achieve mutual and lasting development. A topic expert then provided an explanation of

the current status of Business and Human Rights, followed by an explanation of the formulation of the Guidelines for Sustainable Trade provided by the ESG Promotion Group under our Strategy Department.

We will continue to request compliance with the Guidelines for Sustainable Trade to create societies in which human rights are respected by all throughout the value chain.

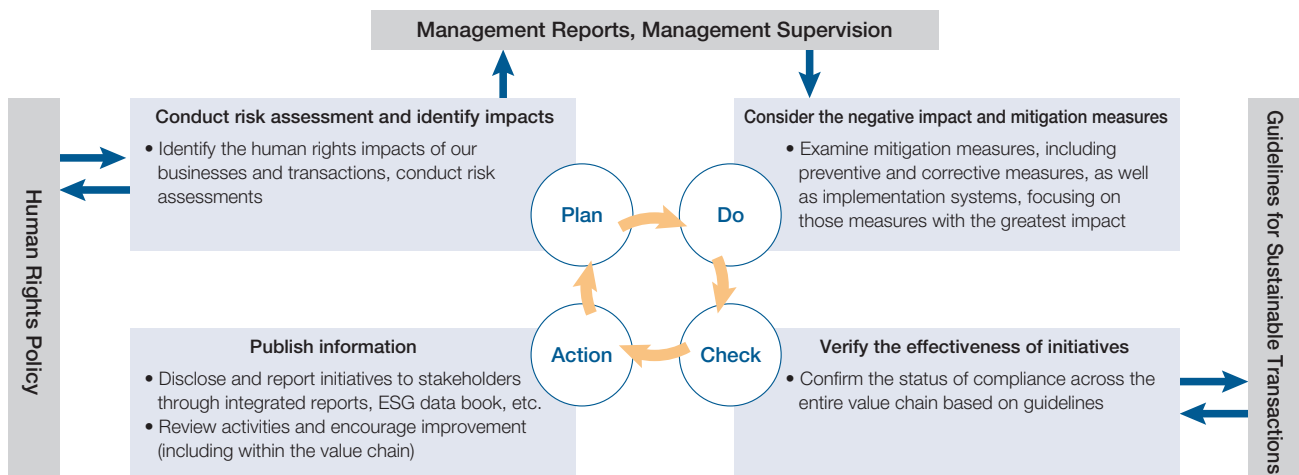


Human Rights Due Diligence Post-Implementation Roadmap

Based on the results of human rights due diligence, we will formulate corrective plans and establish a PDCA cycle to address human rights risk mitigation on a regular basis. We will

continue to disclose our progress in our integrated report and other communications.

Human Rights Due Diligence-Centric PDCA Cycle for Risk Reduction



Initiatives Against Bribery

Please refer to our Compliance on P.88 for more.