



SPARX Group Basic Human Rights Policy

SPARX Group and its domestic and overseas subsidiaries (the “Group”) have been striving to practice ever-better investments every day since its establishment in 1989, with the vision of becoming “the most trusted and respected investment company in the world” to realize its mission “to make the world wealthier, healthier, and happier (through investment).”

To realize this mission and vision, the Group has established this policy to share with its stakeholders the Group’s approach and policies regarding the respect for human rights as it continues to fulfill its social responsibilities as a company through compliance with international norms and the laws and regulations of each country and region where it operates.

1. Establishing Systems

Recognizing that respect for human rights is an important management issue, the Group has established this policy with the approval of the Board of Directors. Based on this policy, the Executive Committee, the central decision-making body for business execution, discusses and resolves on specific initiatives regarding the respect for human rights and periodically reports the results of their implementation to the Board of Directors.

2. Compliance with International Standards and Laws

The Group respects internationally recognized human rights as expressed in the three documents comprising the International Bill of Human Rights: the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social, and Cultural Rights. The Group also respects the internationally recognized human rights as expressed in the ILO Declaration on Fundamental Principles and Rights at Work by the International Labor Organization (ILO).

It is no exaggeration to say that the Group’s business operations are all about people. The Group engages in health management and strives to promote executive and employee health to ensure the Group’s officers and employees can pursue the Group’s business in good physical and mental health. As another part of its efforts to respect human rights, the Group strives to improve how the Group’s level of acceptance of diverse human resources through training courses on harassment and unconscious biases and build an open organizational culture that ensures psychological stability.

Moreover, the Group does not tolerate forced labor, child labor, or any form of discrimination or harassment based on race, religion, gender, sexual orientation, gender identity, nationality, age, disability, or any other reason.

3. Scope of this Policy

The Group applies this policy to all Group officers and employees. The Group also encourage its clients, business partners, and other stakeholders to understand this policy and respect human rights.

4. Human Rights Due Diligence

The Group conducts appropriate human rights due diligence to identify, assess, prevent and mitigate adverse human rights impacts that the Group’s operations have caused or contributed to, or are directly linked to the Group’s business or services.

5. Remedial Measures

The Group is committed to provide remedial measures on any human rights violations that may come to light through dialogue and appropriate procedures based on international standards.

6. Engagement With Stakeholders

The Group strives to engage in dialogue with relevant stakeholders in order to understand and address the impact of its business operations on human rights and respond in a responsible manner.

7. Policy Review

The Group seeks to periodically review and revise its policies to ensure it takes more appropriate initiatives to respect human rights, reflecting changes in international human rights norms, guidelines issued by the Japanese government such as the Guidelines on Respecting Human Rights in Responsible



Supply Chains, and laws, regulations, and notices in the countries and regions where it does business.

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