



# Human Rights

## Basic Approach

As a corporate group with global business operations, the JXTG Group believes that an important element in striving for sustainable development is respect for the human rights of our employees and all stakeholders, and the mitigation of human rights-related risks in our business activities.

Based on this understanding, we support various international norms and we have stipulated a provision on respect for human rights in the JXTG Group Code of Conduct.

We support international norms such as the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the Fundamental Principles and Rights at Work of the International Labour Organization, among others. More specifically, we strictly prohibit forced labor and child labor, work to eliminate discrimination in employment and the workplace, and maintain communication with labor unions and employees. Through these and other efforts, we work to identify and resolve human rights issues.

## JXTG Group Code of Conduct (excerpt)

### 5. Respect for human rights

- (1) We shall not infringe on human rights through our business activities. We respect internationally-accepted human rights standards and diversity, acknowledging differences pertaining to gender, age, nationality, race, ethnicity, skin color, culture, thought, religion, belief, political opinions, sexual orientation (LGBT), and the presence or absence of disability.
- (2) We shall not engage in any type of discrimination or harassment.
- (3) We shall not engage in any forms of forced labor or child labor.
- (4) We shall not engage in business transactions which may lead to the prolongation of conflicts, human rights violations, or inhumane acts.

## Establishment of Human Rights Policy

The JXTG Group has established basic principles on respect for human rights under "5. Respect for human rights" within the Group Code of Conduct. We have requested cooperation with these efforts not only from Group companies but also other companies across our value chain. Nevertheless, we decided to establish a human rights policy to further clarify our stance and the importance of respect for human rights. Going forward, we will work to make the applicable scope of the Group Code of Conduct known to all and ensure compliance with it.

## JXTG Group Human Rights Policy

The JXTG Group conducts its business activities under the JXTG Group Philosophy, which states that we will contribute to the development of our communities and help to ensure a vibrant future through creation and innovation in energy, resources, and materials.

This policy was formulated as a guideline for promoting respect for human rights across the entire Group and fulfilling related obligations pursuant to the United Nations Guiding Principles on Business and Human Rights.

### 1. Basic Approach

The JXTG Group fully recognizes that human rights must be respected in all of the countries and regions where it conducts its business activities.

### 2. Compliance with Applicable Laws and Regulations

The JXTG Group complies with the laws, ordinances and regulations applicable in the countries and regions where it conducts its business activities. In addition, the JXTG Group will pursue a method for respecting international principles on human rights in case of a contradiction between internationally recognized human rights and the laws and regulations of each country and region.

### 3. Respect for International Norms on Human Rights

The JXTG Group supports and respects the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights), which stipulates the fundamental human rights of all people, along with international norms on human

rights such as the ILO Declaration on the Fundamental Principles and Rights at Work of the International Labor Organization, which sets forth fundamental labor rights, other conventions relating to the human rights of workers on wages and working hours, the Declaration on the Rights of Indigenous Peoples, and the Children's Rights and Business Principles. As a participant in the UN Global Compact, we support and respect the 10 principles of the UN Global Compact.

### 4. Fulfillment of Responsibility to Respect Human Rights

The JXTG Group is committed to upholding human rights. If it is determined that our business activities cause or have caused adverse impacts on human rights, we will take appropriate action to remedy such impacts in accordance with our responsibility to respect human rights. As part of our efforts, the JXTG Group will promote the following initiatives.

#### • Human Rights Due Diligence

The JXTG Group will establish and continually implement a mechanism for human rights due diligence. Human rights due diligence refers to the continuous process of conducting preventive surveys and investigations, rectifying issues using appropriate means, and disclosing the progress and results of such externally, in order to prevent or mitigate possible adverse impacts on human rights caused by the company.

#### • Dialogue and Discussions

The JXTG Group conducts in earnest dialogue and discussions with relevant stakeholders to ensure that it comprehends and addresses the impacts it has on human rights from the perspective of those affected.

### 5. Training

The JXTG Group will provide appropriate training to its officers and employees to ensure that this policy is incorporated into the business activities of all companies belonging to the JXTG Group.

### 6. Information Disclosure

The progress and results of initiatives for respect for human rights under this policy will be disclosed on our website and in reports, among other media.

### 7. Applicable Scope

This policy applies to all officers and employees of the JXTG Group. All business partners involved in the JXTG Group's business activities will be asked to cooperate with this policy.

### 8. Positioning

This policy supplements the provisions of the JXTG Group Philosophy and the JXTG Group Code of Conduct.

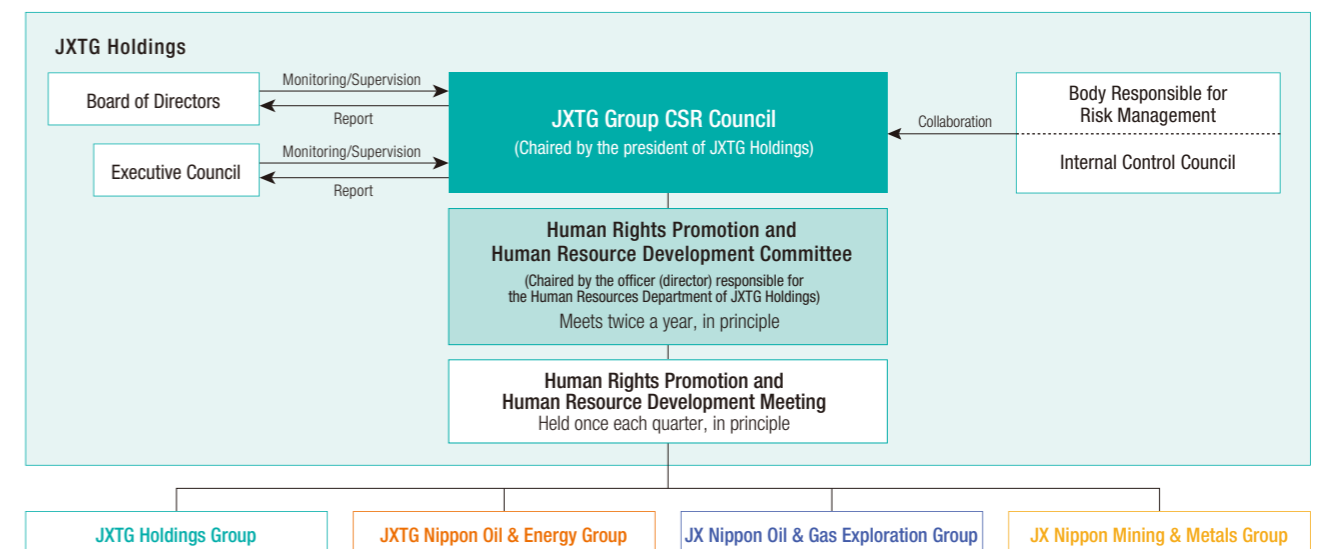
## Structure

The Human Rights Promotion and Human Resource Development Committee is chaired by the officer (director) responsible for the Human Resources Department of JXTG Holdings, and has been established under the JXTG Group CSR Council, which is chaired by the president of JXTG Holdings. The committee is responsible for deliberation on Group-wide policies and approaches to human rights. It confirms and evaluates the activities of each Group company and shares information.

Specifically, each Group company implements various measures to ensure respect for human rights, which is stipulated in the Group Code of Conduct. These measures include the implementation of human rights awareness training and human rights due diligence in accordance with the business characteristics of each company.

Group company initiatives are also shared at Human Rights Promotion and Human Resource Development meetings and are used for the improvement of business activities across the entire Group.

## Structure for Promoting Human Rights, Human Resource Development and Health



## Major Initiatives

### Participation in the UN Global Compact

The JXTG Group is a participant in the UN Global Compact. We are working to protect human rights and ensure respect for the rights of workers.

### Participation in the Global Conference on Business and Human Rights

For details, see p. 13.

### Human Rights and Compliance Hotlines

To enable us to quickly identify human rights issues and take prompt action, we have established human rights and compliance hotlines inside and outside the company (run by an external law office) for consultation and reporting by employees of the company and its contractor companies.

In addressing inquiries, we maintain the privacy of the individual (reports may be filed anonymously) to ensure that those who contact the hotlines are not subject to unfavorable treatment as a result.

### Raising Awareness of Human Rights through Training and e-Learning ♥

Group companies conduct human rights training, new employee training, rank-based training, and e-learning for all officers and employees in an effort to raise awareness of human rights and prevent human rights issues from occurring.

In fiscal 2018, in an effort to achieve a 100% participation rate in human rights training, we encouraged officer and employee participation by providing access to training materials through various means, such as the company intranet and email.



Blind soccer event

To improve awareness of and sensitivity toward human rights, we hold workshops on blind soccer. During these workshops, instructors from the Japan Blind Soccer Association coach blindfolded participants in games and other activities requiring teamwork, mutual cooperation, and communication.

### Initiatives for Human Rights Due Diligence

#### Initiatives for Employees

The JXTG Group has formulated and disclosed guidelines for the prevention of unlawful discrimination, harassment, forced labor, child labor, etc. In addition, compliance inspections are conducted in each workplace every year to ascertain compliance with these guidelines.

We also strive to ensure compliance with relevant labor laws and regulations in the countries and regions where we operate.

Employees are compensated following rules established based on relevant laws and regulations concerning minimum wage, legal benefits, etc., in each country and region.

In Japan, we hold regular negotiations with labor unions on appropriate wage levels and labor conditions, and examine the adequacy of all aspects of pay.

#### Initiatives for the Supply Chain

The JXTG Group asks the suppliers that make up our supply chain, including raw materials suppliers, logistics companies, construction companies and sales companies, to cooperate with the JXTG Group Code of Conduct.

We have established a policy on CSR procurement for purchasing the materials and equipment needed for our business activities. We regularly conduct supplier surveys to monitor the status of compliance regarding respect for human rights across the entire supply chain.

For details, see pp. 68–69.

#### Initiatives for Business Activities

The JXTG Group analyzes and assesses human rights risks in order to combat various risks in its business activities, and when necessary, we take appropriate action.

For details, see p. 21.

♥: Indicates the Group's top CSR priorities. Please see p. 9.

### Mine Development and Respecting the Human Rights of Local Residents

The development and operation of mines can have a particularly significant impact on the surrounding environment. It is therefore essential to give due consideration to the human rights of local residents and implement measures to ensure coexistence and mutual prosperity with local communities.

The JX Nippon Mining & Metals Group's Minera Lumina Copper Chile, the operator of the Caserones Copper Mine, applies a basic three-point policy for supporting local communities: respect for life, protection of the community and environment, and compliance with laws and regulations. In keeping with this policy, after the project launch in 2007, the operator began holding explanatory meetings and engaging in dialogue with the Collas, the indigenous people who live in the area around the mine site, in an effort to build up trust.

For further details, see the [JX Nippon Mining & Metals Sustainability Report 2018](#).

[https://www.nmm.jx-group.co.jp/english/sustainability/pdf/report2018\\_e\\_full.pdf](https://www.nmm.jx-group.co.jp/english/sustainability/pdf/report2018_e_full.pdf)



Explanatory meeting

### Response to the UK Modern Slavery Act 2015

JX Nippon Oil & Energy Europe Limited (JXTG Nippon Oil & Energy Group) and JX Nippon Exploration and Production (U.K.) Limited (JX Nippon Oil & Gas Exploration Group) have released statements in response to the United Kingdom Modern Slavery Act 2015, which came into effect in October 2015.

See the following websites for further details.

[http://www.eneos.eu/wp-content/uploads/2018/07/Anti-Slavery-Statement\\_FY2017.pdf](http://www.eneos.eu/wp-content/uploads/2018/07/Anti-Slavery-Statement_FY2017.pdf)

<http://www.nex.jx-group.co.jp/english/environment/compliance/active/human.html>

### Response to the South African Black Economic Empowerment Policy (BEE Policy)

JXTG Nippon Oil & Energy operates a representative office in Johannesburg, South Africa, for the purpose of gathering information. The office does not engage in sales and marketing activities. Therefore, this representative office has not obtained approval under this policy because the nature of its activities does not require it.