

## Human Rights Policy

### ■ Purpose

Classys has established this policy to comply with the Universal Declaration of Human Rights, as proclaimed by the UN, and to implement human rights management.

### ■ Scope of Application

This policy applies to all Classys employees.

Classys shall encourage its business partners and their employees to comply with this policy or a similar level of policy.

### ■ Code of Conduct

We shall manage human rights risks that may occur in the following areas of human rights at the company-wide level and fulfill its responsibility to respect human rights.

① Anti-discrimination and Prevention of Workplace Harassment: We shall not discriminate or harass anyone on the ground of gender, race, ethnicity, nationality, religion, disability, age, marital status, pregnancy, or any other unjustifiable reason in our personnel systems, including job assignments, recruitment, and promotions.

② Prohibition of human trafficking: We support all laws aimed at preventing and eradicating slavery and human trafficking in global supply chains. We shall not allow human trafficking by all means of contracts, bonded labor, etc.

③ Prohibition of forced labor: We shall not engage in any unreasonable restriction of mental or physical liberties, such as assault, intimidation, or confinement and shall not force employees to work against their free will.

④ Prohibition of child labor: We shall comply with the minimum working age set by national and local regulations and do not expose children to hazardous working conditions under any circumstances.

⑤ Protection of vulnerable workers: We shall respect and protect the human rights of vulnerable individuals based on the principles of the Universal Declaration of Human Rights adopted by the United Nations.

⑥ Guarantee of minimum wage: We shall contribute to the stability of workers' livelihoods and the improvement of working conditions by ensuring that their wages meet the minimum level set by the laws of each country.

Wages shall be paid regularly on the designated date, and a detailed statement of earnings is provided along with it.

⑦ Guarantee of other rights: We shall ensure industrial health and safety, information security, and the protection of consumer rights.

### ■ Action Plans

① We shall operate a grievance mechanism so that grievances can be promptly and reasonably discussed and addressed. We shall not penalize those who file a complaint, victims, and cooperators on the ground that they apply for counseling or investigation and provide cooperation.

② We shall conduct human rights management education to improve awareness of human rights management among employees.

③ We shall take necessary measures for monitoring human rights risks and addressing the results through an annual organizational satisfaction survey.

## ■ Human Rights Risk Due Diligence Policy

### 1. Identification and Assessment of Human Rights Risks

- 1) **Responsible Organization:** The Human Resource Department is responsible for conducting the human rights risk due diligence.
- 2) **Risk Identification:** Identify potential human rights risks that may arise from business activities, supply chains, and product usage. Gather and analyze risk factors through stakeholder surveys, whistleblowing channels, media reports, regulatory changes, and expert interviews to pinpoint major human rights risks.
- 3) **Risk Assessment:** Evaluate risks considering their likelihood, impact, compliance, reputation, and economic effects.

### 2. Development and Implementation of Mitigation Measures

- 1) **Mitigation Measures:** Develop mitigation actions for identified risk factors, including policy improvements, training and education, monitoring systems, providing grievance mechanisms, and maintaining open online whistleblowing channels.
- 2) **Partner Collaboration:** Establish partnerships with partners to promote joint efforts to mitigate human rights risks.

### 3. Monitoring and Evaluation

- 1) **Monitoring:** Implement an ongoing monitoring system and conduct regular reviews of risks.
- 2) **Performance Evaluation:** Regularly assess the effectiveness of mitigation measures and refine mitigation measures as needed to enhance their effectiveness.
- 3) **Reporting and Disclosure:** Senior management shall review findings regularly and, if needed, escalate them to the board for discussion. Disclose the outcomes of human rights risk due diligence and improvement efforts to stakeholders transparently.

### 4. Continuous Improvement

- 1) **Incorporate Changes:** Continuously improve the human rights risk due diligence process by reflecting changes in the business environment and societal demands.
- 2) **Training and Education:** Provide employees with training and education related to human rights risk due diligence.
- 3) **Expertise:** Enhance the human rights risk due diligence process by seeking assistance from external experts as needed.