

February 3, 2025
Diamond Realty Management Inc.

Notice Regarding Establishment of Human Rights Policy

Diamond Realty Management Inc., as a member of the Mitsubishi Corporation Group, has been making efforts to respect human rights as stipulated in its Corporate Policy of Conduct, Code of Conduct, and Social Charter, while relying on "The Three Corporate Principles" as its foundation. In 2022, we signed the United Nations Global Compact (UN Global Compact) ^{*1}, and we have stated that we will work to realize the 10 principles in the four areas of human rights, labor, environment, and anti-corruption. We have positioned human rights as one of the important management issues in our materiality of "Realizing sustainable societies". In addition, as our corporate Purpose is "We contribute to maximizing societal Well-being through real estate management," we recognize that respecting the human rights of all people involved in the real estate we manage is an important element in realizing Well-being (meaning "better living").

We are pleased to announce that we have established our Human Rights Policy in December 2024 in order to make efforts to address the issue with reorganizing and clarifying our approach to respect for human rights as described above.

We will continue to implement ESG initiatives in accordance with the 10 principles in the four areas of the UN Global Compact, and aim to contribute to the realization of an even more sustainable society.

*1: The UN Global Compact is the world's largest sustainability initiative, bringing together the United Nations and the private sector (companies and organizations) to build a sound global society. It is a voluntary initiative that encourages companies and organizations to act as good members of society and achieve sustainable growth by demonstrating responsible and creative leadership. Companies and organizations that sign up to the UN Global Compact continue to work towards achieving the 10 principles related to the protection of human rights, the elimination of unfair labor practices, environmental responsiveness, and the prevention of corruption, based on the commitment of the top management of the company and organization.

1. Commitment to Respecting Human Rights

Diamond Realty Management Inc. is committed to "We contribute to maximizing societal Well-being through real estate management" as our Purpose. In the sense of better living, real estate is an important asset that provides safety and security in people's lives and production activities, and we believe that the ideal living space and society will be realized when respect for human rights is instilled among all stakeholders, including all executives and employees who manage and use such real estate.

We have now established a new Human Rights Policy (hereafter, "this Policy") as a guideline for further strengthening and promoting our efforts, while also reaffirming the importance of respecting human rights. This Policy clearly demonstrates our commitment to respecting human rights for our stakeholders, and we will work to achieve our Purpose and enhance our corporate value through sustainable and responsible corporate activities.

*1: Well-Being: Physical, mental and social fulfillment. i.e., "living well". Maximizing Well-being means "living better".

2. Scope (of a document)

This policy applies to all officers and employees of Diamond Realty Management Inc.

3. Outreach to stakeholders

We recognize our responsibility to respect human rights in the business we conduct, and we expect all stakeholders to understand and support this policy and to promote our efforts jointly to respect human rights.

4. Support and respect for international norms

We support the international norms on human rights listed below.

We comply with the laws and regulations of the countries and regions in which we operate. If there is a conflict between internationally recognized human rights standards and the laws and regulations of the country or region in which we operate, we will seek ways to respect internationally recognized human rights standards.

- Guiding Principles on Business and Human Rights: encourages all nations and companies, regardless of size, industry, location, ownership, or organizational structure, to commit to the protection and respect of human rights.
- The International Bill of Human Rights (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights): provides common standard of achievements for all people.
- ILO Declaration on Fundamental Principles and Rights at Work: defines basic rights at

work, established by the International Labor Organization (ILO).

- The OECD Guidelines for Multinational Enterprises: provides international guidelines that set forth the "responsible corporate behavior" expected of multinational enterprises.
- The 10 principles of the UN Global Compact: incorporates universal values on human rights, labor, environment, and anti-corruption.

5. Human Rights Due Diligence

In order to respect the human rights of our stakeholders, we continuously conduct and monitor human rights due diligence to identify, prevent and mitigate any actual or potential negative human rights impacts that we cause or facilitate through our business activities or that are directly related to our business or services due to our business relationships, paying special attention to those who are vulnerable and often excluded in society.

6. Human rights issues related to business activities

We recognize the following as the main human rights issues for our stakeholders involved in our direct business activities and value chain and we are committed to solve issues related.

(1) Harassment

We prohibit harassment of any kind.

(2) Bribery and corruption

We prohibit any fraudulent, illegal, breach of trust, or bribery practices.

(3) Risks related to diversity and equality

We aim to realize a society in which all individuals with diverse values and personalities are respected and play an active role fairly, without discrimination, gender, or restrictions on freedom of expression.

(4) Safe and healthy working environment

We take care to create a working environment that does not pose any physical or mental health risks.

(5) Invasion of privacy

We take appropriate measures to prevent the leakage of personal information.

(6) Right of access to remedies

We work to establish processes to ensure that victims receive appropriate redress when human rights violations occur.

(7) Excessive and unreasonable working hours

We are committed to taking action to prevent the occurrence of long working hours.

(8) Human rights issues related to the environment and climate change

We recognize that the degradation of the global environment may have a negative impact on human rights, and in the conduct of our business, we give due consideration to the global environment, including measures to combat climate change and the preservation and restoration of natural capital, including biodiversity.

(9) Forced labor



We employ all employees at their own free will and do not force them to work.

(10) Violation of the rights of indigenous and local peoples

We respect the rights and culture of indigenous and local peoples as stipulated in the laws and international agreements of the countries and regions in which we operate, and work to ensure that our business activities do not cause or encourage land grabbing or other rights violations.

7. Revision

When it becomes clear that our business activities have caused or contributed to negative impacts on human rights, we will work through due process to remedy the situation. If there is a direct link between our business or services and negative human rights impacts due to our business relationship, we will investigate the facts and take appropriate corrective action.

8. Access to Remedies

We are committed to establishing remedial and corrective mechanisms to respond appropriately if we are approached about a case or problem involving human rights violations caused by our business activities. In the actual operation of the mechanism, we pay close attention to prevent any disadvantages, such as retaliation, to those who consult with us.

9. Education and awareness

We educate and enlighten all officers and employees in an appropriate and effective manner to ensure that this policy is widely understood and established.

10. Disclosure of information

We ensure appropriate disclosure and transparency of our human rights efforts and progress.

11. Stakeholder Engagement

We are committed to implementing and improving our commitment to human rights in accordance with this policy, while engaging in dialogue with relevant stakeholders.

12. Management and Promotion System

Our human rights initiatives are overseen by the Sustainability Executive Officer, who has jurisdiction over sustainability measures and reports to the Sustainability Committee and the Board of Directors as appropriate.

Enacted: December 23, 2024

Outline of Diamond Realty Management Inc.

Head Office: 16-1, Hirakawa-cho 2-chome, Chiyoda-ku, Tokyo

Businesses Services: Real estate asset management business, advisory & consulting services

Shareholder: Wholly owned by Mitsubishi Corp.

Representative: Hisashi Ishiwata, President and CEO

Establishment: October 2004

For Comments or Inquiries on this Press Release

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