

M3 Group Basic Policy on Human Rights

1. Basic Approach

M3 Group (which refers to the Company and its affiliates, etc.¹, as defined in the “Code of Conduct” stated below; the same shall apply hereinafter) has declared in the “M3 Group Code of Conduct” (hereinafter referred to as “Code of Conduct”), which is a code of conduct to be observed by each and every director, officer and employee of M3 Group, that it will not discriminate based on factors that are unrelated to the legitimate business interests (“2.1 Equal Employment Opportunity”), that it will not permit the use of any form of forced or involuntary labor (“2.2 No Forced Labor / Child Labor”) and that it will adopt sound labor and employment practices (“2.3 Sound Labor and Employment Practices”).

This Policy is based on international norms and standards related to human rights, such as the United Nations’ “International Bill of Human Rights²” and “Guiding Principles on Business and Human Rights,” as well as the “Core Labor Standards” established by the International Labor Organization (ILO) and clarifies M3 Group’s approach to respecting human rights as set forth in the Code of Conduct. It applies to all directors, officers and employees of M3 Group.

M3 Group’s business objective is “making use of the Internet to increase, as much as possible, the number of people who can live longer and healthier lives, and to reduce, as much as possible, the amount of unnecessary medical costs.” Respecting the rights of others and acting ethically are essential elements in achieving this.

2. M3 Group's Basic Policy on Respect for Human Rights

M3 Group respects the human rights of all people, including workers, and conducts its corporate activities as follows.

- Responsibility for Respecting Human Rights

Responses regarding human rights are incorporated into the M3 Group's compliance promotion system under the commitment of the Board of Directors and the Management Committee.

- Compliance with Laws and Regulations

M3 Group will comply with the laws and regulations of the countries and regions in which it operates and will also respect international human rights standards to the greatest extent possible.

- Education

To ensure that this Policy is firmly established and effectively implemented throughout all business activities, M3 Group will provide appropriate education to all directors, officers and employees employed by M3 Group.

- Consideration for Human Rights

If, in the process of identifying and assessing human rights risks and addressing priority issues, it is found that M3 Group is having a negative impact on human rights in its business activities,

¹ It refers to (1) M3, Inc. (2) any company in which M3, Inc. directly or indirectly holds a majority of the outstanding voting shares or equity interests and (3) any other company that the Board of Directors of M3, Inc. decides to include in the scope of the Code of Conduct as appropriate.

²The “International Bill of Human Rights” consists of the “Universal Declaration of Human Rights,” which was adopted by the United Nations General Assembly, the two “International Covenants on Human Rights” (the “International Covenant on Economic, Social and Cultural Rights” and the “International Covenant on Civil and Political Rights”), and the First Optional Protocol and Second Optional Protocol to the International Covenant on Civil and Political Rights.

or if it is revealed that it has been involved in such activities, appropriate measures will be taken to correct the situation.

- Dialogue and Consultation with Stakeholders

M3 Group will strive to engage in dialogue with stakeholders in a variety of ways and will also take appropriate initiatives, including holding hearings with outside experts, to ensure that its business activities do not have a negative impact on human rights in the countries and regions in which it operates.

- System for Receiving Consultation

M3 Group responds to internal reports and consultations regarding human rights from all directors, officers and employees employed by M3 Group based on the M3 Group Basic Policy on Hotline System through internal discussions and investigations.

- Information Disclosure

Information about initiatives to respect human rights based on this Policy will be disclosed on the M3, Inc. corporate website or other media.