

Respect for Human Rights

Our Approach

The Subaru Group puts people first and engages in people-oriented manufacturing. Based on the belief that respect for the rights and characteristics of individuals is an important management issue for SUBARU, the Subaru Group established its "Human Rights Policy" in April 2020. In this policy, the Group respects the human rights stipulated in international norms such as the Universal Declaration of Human Rights (UDHR), International Covenants on Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. This policy was formulated with full consideration to stakeholders' expectations, incorporating discussions with outside experts and overseas subsidiaries. It was officially established after approval by the second meeting of the CSR Committee for FYE March 2020 and reporting to the Board of Directors in March 2020. This policy is run globally and appropriately, being ready to address future environmental changes.

Human Rights Policy

Principle of Respect for Human Rights

The Subaru Group, through its automotive and aerospace businesses, puts people first and engages in people-oriented manufacturing.

Respect for the rights and characteristics of individuals is an important management issue for realizing Subaru's corporate philosophy of promoting harmony between people, society, and the environment while contributing to the prosperity of society. Based on this policy, the Subaru Group clarifies its responsibilities to respect human rights based on the United Nations Guiding Principles on Business and Human Rights.

1. Compliance with Laws and Regulations to Respect for Human Rights

(Scope and Management Structure)

- This policy applies to the Subaru Group worldwide—SUBARU CORPORATION and its all subsidiaries, expects and encourages our business partners and other stakeholders associated with our operations, including those in the supply chain, to respect human rights in accordance with this policy. To realize these goals, we have appointed Representative Director, President and CEO as a director who is responsible for leading the process of developing this Policy and assigning resources as needed for its implementation and continued improvement.

(Related Laws and International Norms)

- We will comply with the relevant laws and regulations of each country, and respect the human rights stipulated in international norms such as The Universal Declaration of Human Rights (UDHR), International Covenants on Human Rights (International Covenant on Economic, Social and Cultural Rights, and International Covenant on Civil and Political Rights), and The ILO Declaration on Fundamental Principles and Rights at Work. If the standards set forth in the international norms exceed those set forth in applicable law, we will aim to adhere to the international norms.

2. Implementation of Human Rights Due Diligence (Response to Human Rights Risks)

- We will identify potential or actual human rights risks linked to our business and establish and continuously operate mechanisms to prevent or mitigate such risks.

(Corrective Actions)

- We will strive to remedy any adverse human rights impact that we have caused or are involved in. We will also establish and maintain our grievance mechanism to do so.

(Training)

- To ensure that this policy is understood and practiced by all the members of the Subaru Group, we conduct regular training and awareness-raising programs for executives, employees, and other stakeholders to respect for human rights.

(Dialogue and Consultation)

- We engage in dialogue and consultation with relevant stakeholders in order to improve our commitment to respect for human rights.

(Information Disclosure)

- We will annually report on our commitments and the actions we have taken to respect and promote human rights pursuant to this Policy.

**Respect for
Human Rights**Quality:
Automotive BusinessQuality:
Aerospace BusinessMaking Safe
VehiclesHuman
Resources

Customers

CSR
ProcurementCommunity
Engagement

Human Rights Policy Appendix

**Priority Human
Rights Issues in
Subaru Group's
Businesses**

The Subaru Group's manufacturing is supported not only by our own factories, but also by an extremely large number of people working in the multilayered supply chains. We also have contact with a variety of people in areas such as marketing, sales, and after-sales service through distributors and dealers all over the world. In order to respect human rights, and the numerous irreplaceable lives of all those involved in the Subaru Group, we

will actively address the following as priority issues identified so far.

We will regularly review the priority issues in this Appendix based on changes in social demands, including laws and regulations, technical progress, and the business operations of the Subaru Group.

(Respect for Rights to Human Life and Property)

- In order to protect the basic rights of people and their families who interact with Subaru Group's products and services, such as drivers, passengers, and pedestrians, we aim to eliminate all traffic accident deaths that involve Subaru vehicles.
- We will promote the humanitarian use of the Subaru Group's various products and services, including disaster relief, and strive to avoid nonhumane use.

(Respect for Individuals, Diversity and Inclusion)

- We value the unique characteristics of our employees, our business partners, and the members of the communities in which we operate and strive to create an environment of diversity and inclusion.
- We will conduct our business activities with full respect for privacy, including protecting the personal information of not only our customers and employees, but also those involved with the Subaru Group.

(Zero Tolerance for Discrimination and Harassment)

- We do not tolerate any discrimination based on race, age, sex, gender identification or expression, sexual orientation, national origin, ethnicity, religion, creed, profession, disability, family relations, or any other status protected by applicable law among all persons involved in the Subaru Group. Moreover, we do not tolerate any harassment that harms human dignity.
- We will carefully consider potential human rights risks in our marketing and other communication activities, and do not tolerate expressions that are discriminatory or may adversely affect children.

(Respect for the Workers' Rights in Subaru Group and Encouraging Our Supply Chains)

- We do not tolerate child labor, forced labor, slave labor, and human trafficking.
- We do not expose young workers to hazardous work.
- We will give due consideration to the human rights of foreign workers and migrant workers.
- We respect freedom of association and the right to collective bargaining, which are fundamental workers' rights. We are committed to engagement with employees to ensure a positive

working environment.

- We will maintain a worthwhile, safe, and hygienic working environment.
- In order to promote the well-being of workers, we will pay appropriate wages more than the minimum and living wages, and manage working hours appropriately.
- We expect and encourage our supply chains to respect the rights of workers.

(Respect for the Rights of Vulnerable People in Local Communities)

- We engage in responsible procurement practices including those related to conflict minerals.
- We will give special consideration to respect for the human rights of women, children, disability, social minorities, ethnic minorities, indigenous peoples, and other vulnerable groups.

(Contributions to Respect for Human Rights)

- We will actively contribute to human rights protection worldwide through the Subaru Group's corporate citizenship activities.

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CSR
ProcurementCommunity
Engagement**Management System**

We have appointed Representative Director, President and CEO as a director who is responsible for leading the process of developing the Policy and assigning resources as needed for its implementation and continued improvement. At the Sustainability Committee*, chaired by the Representative Director, President and CEO, we hold discussions on global human rights issues and initiatives. The results of these discussions are used in submissions and reports at the Board of Directors in order to take appropriate measures.

* Renamed from "CSR Committee" in FYE March 2022.

Initiatives

Based on the belief that respect for the rights and characteristics of individuals is an important management issue for SUBARU, the CSR Committee decided to form the Human Rights Task Team in March 2019. The team was created in April 2019 and is comprised of members from the Human Resources Department, IR Department, Sustainability Promotion Department, and Procurement Planning Department. As a result of multiple discussions with outside experts and specialists, the Task Team formulated the Human Rights Policy in April 2020. It sets forth that the Subaru Group's universal sense of purpose in acting for the good of people not only applies to our customers and employees, but also extends across the entire value chain.

In consideration of this Human Rights Policy, the Subaru Group will continue managing its operations in line with respect for human rights.

Activities to Raise Awareness of Human Rights

We have been conducting SUBARU's new employee training and manager training on the theme of diversity. In FYE March 2021, we held training for manager-class employees in SUBARU's human resources departments and all employees in its procurement departments with the purpose of helping them obtain knowledge about business and human rights, a topic of substance for our businesses. Approximately 250 employees participated in this training, and when surveyed about the necessity of addressing human rights, almost all participants responded that they gained an understanding or a strong understanding of the concept.

Human Rights Due Diligence

The Subaru Group carries out human rights due diligence in accordance with the procedures stipulated in the United Nations Guiding Principles on Business and Human Rights.

In FYE March 2021, with cooperation from Lloyd's Register Japan K.K., we identified and conducted impact assessments for human rights risks in the domains of human resources (Gunma Plant) and procurement (Automotive Business). Through workshops, interviews, factory inspections, and other activities with stakeholders in each domain, we identified a number of particularly key risks. In the human resources domain, we identified forced labor among foreign workers, as well as long working hours and occupational accidents. In the procurement domain, meanwhile, we identified human rights violations among suppliers, harassment of suppliers, and responsible mineral procurement (e.g., conflict minerals, cobalt). Going forward, we will continue to mitigate risks by steadily implementing measures to combat them.

Preventing Harassment

The Subaru Group regards the prevention of discrimination and harassment as important issues, and this is expressed in the Human Rights Policy. Seeking to prevent all forms of harassment, we prohibit such behavior in our work regulations, and it is also mentioned in the Conduct Guidelines and the Compliance Manual. We have prepared the Power Harassment Explanatory Booklet, and ensure that all SUBARU employees are aware of its contents.

Also, we distribute the Power Harassment Prevention Handbook to all managers and supervisors, and make efforts to prevent harassment.

We have set up a Compliance Hotline and a Harassment Advice Line internally and externally to accept requests for consultations regarding harassment, creating an environment in which all employees, including those at group companies, can receive advice. By creating a management system in which it is easy to seek advice, we encourage carefree consultations, and attempt to detect and resolve problems at an early stage.

→ [Compliance Hotline](#)