

ID&E Holdings Human Rights Foundational Policy

The ID&E Holdings Group (the ID&E Group), recognizing that respect for human rights is of critical importance to the realization of its management philosophy, “Act with integrity and contribute to society through technology and engineering,” hereby commits to conducting its corporate activities in accordance with the Tokio Marine Group’s Human Rights Policy (attached)

(attached)

The Tokio Marine Group Basic Policy on Human Rights

As our Corporate Philosophy states, with customer trust as the foundation for all its activities, Tokio Marine Group (the “Group”) continually strives to raise corporate value. The foundation for implementing this Corporate Philosophy is respect for the human rights of all people, such as customers, society (including business partners and civil society organizations), employees, shareholders and investors, and future generations, and we are committed to respecting human rights across all of our business activities. The “Tokio Marine Group Basic Policy on Human Rights” (the “Policy”) is based on the Corporate Philosophy and Code of Conduct and outlines our approach to respect human rights throughout our business activities, including our entire value chain.

Each officer and employee (including temporary staff) of Tokio Marine Group companies is expected to act in line with this Policy to ensure that our business activities comply with the Group human rights commitment.

We also expect our business partners to support and practice the principles expressed in this Policy and aim to work together towards the promotion of respect for human rights.

1. Our Commitment to Respect Human Rights

Tokio Marine Group is committed to respect human rights as stipulated in the International Bill of Human Rights^{*1} and the ILO’s Declaration on Fundamental Principles and the Rights at Work^{*2}. We also support international standards such as the United Nations Guiding Principles on Business and Human Rights and the Japanese government’s Guidelines on Respecting Human Rights in Responsible Supply Chains, and will base our efforts on these principles. We are also a signatory to the United Nations Global Compact and support its ten principles.

Tokio Marine Group respects human rights in its business activities, including insurance underwriting, investment and financing, and the provision of solutions, through the signing and supporting of various other international initiatives listed in the Appendix. We also endeavor to address human rights issues, where possible, through the provision of insurance products and solutions as well as investment and financing.

•*1 The International Bill of Human Rights is the name given for the set of three documents: the Universal Declaration of Human Rights, and its corresponding two international treaties, namely the International Covenant on Civil and Political Rights,

and the International Covenant on Economic, Social and Cultural Rights.

•*2 The ILO Declaration on Fundamental Principles and Rights at Work sets forth five categories as a minimum standard to be observed in relation to labor: “freedom of association and the effective recognition of the right to collective bargaining,” “the elimination of forced or compulsory labour,” “the abolition of child labour,” “the elimination of discrimination in respect of employment and occupation”, and “a safe and healthy working environment.”

Tokio Marine Group shall comply with applicable laws and regulations in the countries and regions in which it operates. If requirements of the local laws and regulations are in conflict with internationally recognized human rights, we will seek ways to honor the principles of internationally recognized human rights while complying with local laws and regulations.

The Board of Directors of Tokio Marine Holdings are informed of the compliance status of this Policy and has overseeing responsibility of the Group’s human-rights-related efforts. The Executive Management and the Sustainability Committee deliberate on and determine policies and measures as executive bodies and promote the Group’s human-rights-related initiatives. Each department of each Group company promotes activities related to respect for human rights in a proactive manner and in cooperation with one another.

2. Our Approach to Respect Human Rights

Tokio Marine Group strives to conduct appropriate human rights due diligence to identify, assess, prevent and mitigate, and account for negative human rights impacts related to its business activities. We shall also comply with country-specific laws and regulations related to human rights due diligence, wherever applicable to our operations. Where we identify that our business activities have caused or contributed to negative impacts on human rights, we endeavor to remediate such impacts through appropriate processes and by holding dialogue with relevant stakeholders.

Tokio Marine Group recognizes that environmental issues such as climate change and the loss of natural capital, as well as the inappropriate use of technology and artificial intelligence, may have impacts on human rights. With respect to environmental and social risks, we act in accordance with our Policy to Address Environmental and Social Risks, and with respect to the use of AI, in accordance with our Basic Policy for AI Governance, and strive to prevent, mitigate, remediate and provide remedy for negative impacts on human rights.

3. Respecting Human Rights as an Employer

In order for Tokio Marine Group to protect customers and society from all forms of emergencies, it is important that employees respect the diverse values and work styles of others, find their work rewarding and work with enthusiasm with colleagues. It is also essential to gain trust from all people and society by always acting in a way to respect human rights. Tokio Marine Group shall comply with laws and regulations concerning working conditions, including working hours and wages. We provide a dynamic working

environment that is both safe and healthy and we promote training and education for our employees. Therefore, the officers and employees of Tokio Marine Group are expected to respect human rights as set out in this Policy while their human rights are also subject to protection under this Policy.

Prohibition of forced labor and human trafficking

Forced labor is not permitted, nor is any form of slave labor, including bonded labor and human trafficking.

Prohibition of child labor

We do not tolerate child labor and shall observe the minimum working age as stipulated by law. We do not allow young workers to engage in hazardous work.

Freedom of association and the right to collective bargaining

We respect fundamental rights concerning the freedom of association and the right to collective bargaining of Group employees in accordance with applicable local laws and regulations. We shall not engage in any intimidation or retaliation against union representatives or members who exercise these rights.

Prohibition of discrimination and harassment

We do not discriminate in any way based on sex, gender, sexual orientation or gender identity, age, profession, nationality, race, thought, creed, religion, social status or birth, or physical or mental disability. We do not tolerate any form of harassment, whether it be physical or mental, including sexual harassment and power harassment.

Appropriate management of working hours and payment of wages

We comply with labor-related laws and regulations and appropriately manages working hours and pays wages, salaries and remuneration. We also endeavor to pay wages sufficient to meet the basic needs of workers and their families.

Ensuring a safe and healthy working environment

We comply with occupational safety and health laws and regulations and strives to realize a safe and healthy working environment that does not impair the physical or mental health of Group employees.

Respect for diversity and promotion of inclusion

We respect the individuality and diversity of each Group employee and create an environment in which all employees can fully exert their capabilities regardless of gender, age, nationality, disability, or other attributes. Our employees are passionate and bring a challenging spirit to their endeavors and we will be purposeful in our efforts to provide them with equal opportunities for career development and ongoing personal growth.

Addressing gender pay gaps

To the extent gender wage gaps may exist, we continuously strive to address any issues and strive to ensure that all employees are evaluated and treated appropriately based on

performance, capabilities and responsibilities, regardless of personal attributes.

4. Integrating Human Rights into Our Core Business

Tokio Marine Group treats all customers fairly in the provision of its products and services and does not discriminate against any customer based on unreasonable grounds.

We strive to be trusted by all people and society by supporting customer and society in times of need. We strive not only to prevent and mitigate negative human rights impacts associated with our products and services, but also promote the human rights of all of our customers and contribute to an inclusive society by providing products and services to meet its needs for safety and security.

In compliance with applicable laws, rules and regulations as well as the Tokio Marine Group Privacy Policy, we shall safeguard private information and specific personal information, etc., including customers' information, and we shall not use such information except on a need basis to carry out our business operations, in order to avoid any breach of privacy.

Through initiatives such as the development of a human rights risk map, Tokio Marine Group recognizes that serious human rights violations may inadvertently arise in projects in which it is directly or indirectly involved through insurance underwriting, investment and financing, or the provision of solutions. Tokio Marine Group endeavors to consider environmental, social and governance (“ESG”) issues, including human rights, in its decision-making processes related to insurance underwriting, investment and financing, and the provision of solutions. Where the Group identifies that its business activities are causing or contributing to adverse impacts on human rights, it will take appropriate action as a Group to promote respect for human rights.

- Adverse impacts^{*3} on employees of the Group and business partners, as well as on the environment and local communities due to high-risk situations^{*4}

- Child labor and forced labor among our Group and business partner employees

- Violation of indigenous peoples' rights, such as forced relocation, resulting from projects

- Labor issues^{*5} in projects in which we are involved and among business partners

*3 Environmental impacts (e.g., access to water, sanitation), human rights violations by project security personnel, impacts on children's education, etc.

*4 Specific situations with a high potential for human rights violations (e.g., conflict, political instability, widespread corruption).

*5 Labor issues including forced labor, child labor, harassment, occupational health and safety, working hours, wages and treatment of foreign workers.

5. Respecting Human Rights in Our Value Chain

Tokio Marine Group aims to fulfill its social responsibility and achieve sustainable

development together with its business partners.

Tokio Marine Group expects its business partners to support and implement the principles expressed in this Policy and the Tokio Marine Group Responsible Procurement Guidelines and aims to work together towards the promotion of respect for human rights.

Tokio Marine Group also strives to prevent the occurrence of slave labor and human trafficking in its own business and value chain (supply chain) and encourages various stakeholders to work towards addressing such issues.

6. Grievance Mechanisms

Tokio Marine Group has established internal and external hotlines (whistle-blowing hotlines) where officers and employees of Group companies can report and consult on matters that may involve human rights concerns. Tokio Marine Holdings monitors the handling of the reports and provides support for the appropriate installation and operation of the whistle-blowing system, thereby establishing a mechanism that allows officers and employees of each Group company to report concerns without fear of retaliation.

Tokio Marine Group has also established grievance mechanisms that allow all stakeholders to report or consult on matters involving potential human rights concerns. Where negative human rights impacts are identified, we endeavor to remediate such impacts through appropriate processes and dialogue with relevant stakeholders.

We prohibit any disadvantageous treatment or retaliation against those who reported and those who cooperate in investigations because of such reports or consultations. In addition, we strictly manage the confidentiality of reports and consultations by being prepared to preserve the anonymity of complainants in appropriate circumstances and sharing information only to the extent necessary for effective investigations and corrective measures.

7. Education & Training

Tokio Marine Group will provide the necessary training and capacity building for the implementation of this Policy to the officers and employees of each Group company. We further endeavor to provide the latest information and tools related to human rights and foster a culture of respect for human rights.

8. Communication and Disclosure

Tokio Marine Group will continuously monitor the implementation of its Policy and make improvements as necessary to ensure its effectiveness. In addition, we regularly disclose our efforts to respect human rights both internally and externally to ensure transparency and accountability.

9. Amendment or Repeal

This Policy may be amended or repealed by the Board of Directors of the Company. Notwithstanding the foregoing, the General Manager of the Corporate Planning Department may approve minor amendments to the Policy.

This Policy was approved by the Board of Directors of Tokio Marine Holdings, Inc.

Adopted December 21, 2021

Revised February 2, 2026

(Appendix)

- United Nations Environment Programme Finance Initiative (UNEP FI), Principles for Sustainable Insurance (PSI), and Principles for Responsible Investment (PRI)
- ILO Declaration concerning Multinational Enterprises and Social Policy
- ILO Declaration on Fundamental Principles and Rights at Work
- Children's Rights and Business Principles
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- OECD Guidelines for Multinational Enterprises
- Framework Principles on Human Rights and the Environment (United Nations General Assembly Resolution)
- United Nations Declaration on the Rights of Indigenous Peoples
- Indigenous and Tribal Peoples Convention, 1989 (ILO Convention No. 169)
- Principle of Free, Prior and Informed Consent (FPIC)

Established: 15 May 2024

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