

Obayashi Corporation Statement on Modern Slavery and Human Trafficking (FY2025)

Obayashi Corporation (hereafter, the “Company”) is releasing the following statement about initiatives to prevent slavery and human trafficking in the Obayashi Group (hereafter, the “Group”) and in our supply chain in FY2025 (April 1, 2025 to March 31, 2026), based on Chapter 6, Section 54 of the UK Government’s Modern Slavery Act 2015 and Modern Slavery Act 2018 of Australia.

“Slavery” and “human trafficking” are defined in both Acts. However, because the definitions may differ depending on local circumstances, we are disclosing our initiatives in preventing all forms of modern slavery and our compliance with related laws and regulations and international norms in this statement.

Since 2019, the Company has published the statement annually based on a comprehensive review with the support of external experts provided under an advisory contract regarding due diligence on modern slavery and human trafficking in the business and supply chain.

1. The Organizational Structure, Business, and Supply Chain

1-1. Obayashi Group Business and Structure

The Company is a general construction contractor that was founded in 1892 and has its head office in Tokyo. The group has 130 subsidiaries, 26 affiliated companies, and 18,031 employees at the consolidated level (as of March 31, 2026), and operates a construction business, real estate development business, green energy business, and businesses in new areas such as PPP, etc. in 17 countries worldwide, mainly in Japan, North America, and Asia.

In FY2022, we established the Human Rights Expert Committee (Chair: Executive Officer in charge of Human Resources) and the Supply Chain Management Expert Committee (Chair: Head of the Procurement Division), and each committee manages initiatives to respect human rights across the Group and across departments, both domestically and internationally.

The Group operates its business in the following countries and regions:

U.S., Canada, Singapore, Malaysia, Thailand, Indonesia, Vietnam, Cambodia, Taiwan, Bangladesh, Sri Lanka, UK, United Arab Emirates, Qatar, New Zealand, and Australia

The company has a Europe Office and a local Group company named OBAYASHI PROPERTIES UK Limited (hereafter, “OPUK”) (established in June 2020) in London, in the UK, which operates a real estate rental and development business mainly focusing on office buildings. The company has an Australia Office in Sydney, Australia, which operates a construction business. The Group’s total consolidated net sales were 2.6 trillion yen in FY2025. The UK and Australia account for roughly 0.17% and 0.36% of total consolidated net sales, respectively. The total number of Group employees at the consolidated level includes 5 employees in the UK and 12 employees in Australia.

See the following website links for a profile of the Company and its businesses:
Company profile: <https://www.obayashi.co.jp/en/company/>
Results for reportable segments: <https://ir.obayashi.co.jp/en/ir/finance/segment.html>
Office locations: <https://www.obayashi.co.jp/en/company/group.html>
Promotion system: <https://www.obayashi.co.jp/en/sustainability/employee/humanrights.html#section1>

1-2. Overview of the Supply Chain

The Group recognizes all business partners involved in the supply chains for the Group’s entire business as suppliers, and regards each of them as its important stakeholders. Suppliers for the construction business, the main business of the Group, are divided into two main categories: labor subcontractors and suppliers of materials and equipment.

In Japan, the Company has recognized about 9,100 suppliers for our construction business, and among them we have contracted Basic Contract with 3,900 suppliers. Basic Contract is to be agreed with continuous suppliers, and it regulates common terms and conditions for all the transactions. Also, there’s an organization called Obayashi Rin-yu-kai, established by those who have been in cooperative relationships with the Company on technique, quality, and safety matters, which consists of approximately 1,200 main suppliers.

In FY2025, the value of transactions with those who contracted Basic Contract accounted for 78%, and with those who are members of the Obayashi Rin-yu-kai accounted for 53% of all supplier transactions with the Company in the construction business in Japan.

See the following website link for profile of the Obayashi Rin-yu-kai:
<https://www.rinyu-kai.com/index.html>

2. Policy on Slavery and Human Trafficking

2-1. Basic Principles

The “Obayashi Basic Principles,” which consist of the Obayashi Philosophy, Obayashi Code of Conduct, and Obayashi Three Pledges, specify contributing to the realization of a sustainable society. These principles are shared with and implemented by all officers and employees in the Group. We believe that practicing our basic principles is the very essence

of conducting our corporate activities. Based on this belief, we have clearly specified our social mission and responsibilities and are implementing many sustainability-related initiatives aimed at fulfilling CSR (corporate social responsibility) so that we will continue to be a company that is trusted by all of our stakeholders.

We have positioned respect for human rights as an important issue in fulfilling our corporate social responsibilities. The Obayashi Philosophy states that we “value each person with a stake in our business.” The Obayashi Code of Conduct specifies the guidelines for putting the Corporate Philosophy into practice: “Value every one of our associates,” “Build stronger mutual trust with suppliers,” “Build good relationships with communities,” and “Ensure strict adherence to corporate ethics.”

See the following website link for further information on the Obayashi Basic Principles:
<https://www.obayashi.co.jp/en/company/philosophy.html>

The Group has established policies and standards to promote corporate ethics and has put in place a system to ensure their thorough implementation. Furthermore, to further instill awareness of compliance—including corporate ethics—and to serve as the foundation for fostering a sound corporate culture, we have included provisions in our Articles of Incorporation regarding “compliance with laws and regulations and the practice of responsible conduct.”

See the following website link for further information on the Obayashi Corporate Ethics program:
<https://www.obayashi.co.jp/en/sustainability/ethics.html#section1>
Policies and Standards for the Establishment of Corporate Ethics:
<https://www.obayashi.co.jp/en/sustainability/ethics.html#section1-1>

2-2. Human Rights Policy

The Group supports the International Bill of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the 10 Principles of the United Nations Global Compact, and has formulated its human rights policy in accordance with the United Nations Guiding Principles on Business and Human Rights. The Obayashi Group Human Rights Policy declares the complete prohibition of any form of child labor, forced labor, or human trafficking and infringement of the human rights of migrant workers and others.

Furthermore, to prevent human rights violations against migrant workers, we conducted interviews with our Group companies and suppliers, and in fiscal year 2025, we created the “Handbook on Respecting the Human Rights of Foreign Workers” and distributed it to our employees and suppliers.

See the following website link for further information on the Obayashi Statement on Human Rights:
<https://www.obayashi.co.jp/en/sustainability/employee.html#section1>

2-3. Obayashi Group CSR Procurement Policy

The Group established the Obayashi Group CSR Procurement Policy to specify the actions aimed at realizing a sustainable society described in the Obayashi Basic Principles. It includes compliance with laws and regulations, respect for human rights, assurance of safety and health, ensuring quality, and consideration for the environment. The Basic Policy on CSR Procurement Initiatives specifies items that the Group officers and employees need to comply with in promoting CSR procurement.

The CSR Procurement Guidelines prescribe items that the Group expects its suppliers to implement and to make sure that everyone in the suppliers' own supply chains understand, in line with the Basic Policy on CSR Procurement Initiatives. Specific guidelines state that suppliers will "not discriminate . . . nor engage in harassment, or other activities that infringe upon human rights," "not engage in or permit misconduct such as the use of forced labor or child labor," "ensure equal employment opportunity, practice appropriate labor management, pay appropriate wages, and maintain and improve working environments so they are healthy and easy to work in," "guarantee freedom of association and collective bargaining rights for employees," "strive to understand and cooperate with the human rights due diligence performed by Obayashi Group companies," etc.

To ensure that suppliers are aware of our "CSR Procurement Guidelines," we conduct an annual survey to assess their compliance. We analyze each company's compliance status by assigning a score and provide feedback on the results to help them improve their practices. Furthermore, when entering into contracts with suppliers, we include clauses regarding compliance with the CSR Procurement Policy and the Obayashi Group Human Rights Policy. These clauses stipulate that if a supplier commits a serious violation of these policies and continues to do so despite requests for improvement, the contract in question will be terminated.

See the following website links for further information on the Obayashi Group CSR Procurement Policy and CSR Procurement Guidelines:

Obayashi Group CSR Procurement:
https://www.obayashi.co.jp/en/sustainability/suppliers/csr_procurement.html

Obayashi Group CSR Procurement Guidelines:
https://www.obayashi.co.jp/en/sustainability/suppliers/csr_procurement.html#section2

2-4. Obayashi Health and Safety Principles and Policies

The Group has set forth the Obayashi Health and Safety Principles and Policies based on

its belief that ensuring the safety and health of all workers at construction sites in its main construction business is of the utmost importance. Obayashi's Occupational Health and Safety Management System helps each organization clearly delineate its own Health and Safety Policy. The system manages the operational structure, plan formulation, and procedures for the entire cycle, from implementation to achievement, revision, and maintenance.

Under this Occupational Safety and Health Management System, we set annual goals and priority measures related to “improving safety and health management capabilities and strengthening training” and “promoting the creation of a health-conscious workplace environment”—both of which contribute to preventing poor working conditions that can lead to modern slavery—and implement initiatives aimed at preventing workplace accidents.

See the following website link for further information on the Obayashi Health and Safety Policies:
<https://www.obayashi.co.jp/en/sustainability/safeenv.html#section1>

2-5. Policies Formulated by OPUK

OPUK, our subsidiary in the U.K., has established the “Equal Opportunities and Dignity at Work Policy,” which outlines specific measures to ensure equal opportunities in the workplace and prevent discrimination, as well as procedures for handling complaints. Furthermore, the company maintains a zero-tolerance policy toward all forms of harassment in the workplace.

The “Grievance Policy and Procedure” applies to all employees and sets forth the types of grievances that may be filed and the procedures for handling them.

The “Whistleblowing Policy” applies to all employees, officers, consultants, contractors, temporary workers, and agency workers, and sets forth specific details regarding suspected misconduct or hazards in the workplace that may be reported, as well as the procedures to be followed after a report is made.

2-6. Policies Applicable to the Australian Office

As the Australian office is a branch of Obayashi Corporation, it conducts its business in accordance with the Obayashi Group Human Rights Policy and the Obayashi Group CSR Procurement Policy.

3. Risk Assessment and Management

In FY2019, the Group identified risks for each stakeholder group related to our business operations and, based on reports from national governments and NGOs as well as expert advice, assessed the severity and likelihood of adverse human rights impacts.

The human rights issues identified through the risk assessment as requiring priority attention (significant human rights issues) are as follows; items ① through ⑥ represent priority human rights risks affecting workers.

- ①Child labor
- ②Forced labor and human trafficking
- ③Reasonable consideration of people who are subject to discrimination or in a vulnerable position
- ④Harassment
- ⑤Poor work and living environments
- ⑥Establishment of appropriate labor conditions
- ⑦Ensuring building and structure safety
- ⑧Infringement of the lives and health of local residents
- ⑨Infringement of privacy rights

On the executive side, the Group has established the Human Rights Expert Committee, chaired by the executive officer responsible for human resources, and the Supply Chain Management Expert Committee, chaired by the head of the procurement division. The committees work on human rights due diligence, strive to solve human rights issues in the Group and its supply chain, and work to raise human rights awareness, thereby enhancing the effectiveness of human rights due diligence. Both committees promote cross-departmental efforts with the departments responsible for Human Resources and Procurement playing a central role and relevant departments working together.

Both committees annually review the progress of the human rights due diligence and each survey results such as “CSR guideline questionnaire survey”, “supplied materials traceability survey”, and “foreign technical trainees survey”, and if necessary, improve the measures.

In FY2022, we formulated a roadmap for advancing human rights due diligence across the entire Group over the medium term, and we are monitoring human rights risks at our major business divisions and Group companies.

Starting in FY2025, we will review the human rights issues to be addressed as a priority (significant human rights issues), and we plan to revise the roadmap in FY2026.

Risk assessments related to human rights issues are conducted primarily by the ESG・SDGs Department of the Corporate Strategy Division.

See the following website link for further information on human rights due diligence:
<https://www.obayashi.co.jp/en/sustainability/employee.html#section1>

4. Promotion of Due Diligence on Modern Slavery and Human Trafficking in the Business and Supply Chain

4-1. Participation in the Initiative

The Group has signed the United Nations Global Compact and participates in the activities of the Japan Network's subcommittees, working in collaboration with other companies and NGOs to mitigate human rights risks. We are also a member of the "Construction and Real Estate Human Rights Due Diligence Promotion Council," which aims to fulfill the "responsibility to respect human rights" required of companies under the UN Guiding Principles on Business and Human Rights across industry boundaries. We also participate in the "JP-MIRAI Platform for the Responsible Acceptance of Migrant workers," which aims to respect the human rights of migrant workers and improve their working and living conditions.

4-2. Human Rights Due Diligence

We interviewed the corporate divisions, departments, and personnel responsible in the Company. These interviews revealed that the Group does not employ workers of an age considered to be child labor in Japan or foreign technical trainees based on Japanese laws (hereafter, "foreign technical trainees"), and there is little risk of modern slavery. However, we still need to continue investigations into the risk of human trafficking of foreign technical trainees, forced labor, child labor, and other types of labor that could potentially be considered modern slavery in regard to workers employed by suppliers to the Group. (Detailed in "4-4 Promotion of CSR Procurement," "4-5 Traceability Surveys on Materials Procured," and "4-7 Surveys Concerning Hiring of Foreign Technical Trainees").

We conducted questionnaire and interview surveys with Administration Department (General Administration Department, Human Resources Department, Harassment Prevention Department) and Procurement Division concerning their initiatives addressing respect for human rights. We also conducted on-site surveys at construction and civil engineering sites. Throughout the survey we confirm that there is currently no obvious risk of human rights violation. Although, as a measure to accommodate migrant workers at construction sites, we will provide multilingual versions of on-site notices and work procedures, review the placement of such notices, and work to ensure that suppliers manage working hours and understand the working environment, working conditions, and actual job duties of migrant workers. We will also conduct ongoing investigations to ensure that there are no violations of laws and regulations or human rights abuses.

We have been conducting interviews with our domestic group companies since 2021. In

preparation for accepting foreign technical trainees at our group company, Obayashi Facilities from FY2025, we conducted interviews with those responsible for hiring. We have confirmed that we have completed all necessary procedures without omission. Also, we conducted training for employees of the department on topics such as human rights issues for migrant workers, easy Japanese, and cross-cultural communication.

We conducted questionnaire surveys with 19 of our overseas offices and overseas Group companies concerning their initiatives addressing respect for human rights. The survey results confirm that all overseas offices and overseas Group companies are offering human rights-related training and implementing initiatives such as language-related arrangements for officers and employees of foreign nationality and workers of foreign nationality who work at construction sites.

In FY2025, we engaged in a dialogue with OPUK regarding human rights risks in its business operations and supply chain, and confirmed that the company is implementing measures to prevent and address such risks in accordance with U.K. laws and regulations.

4-3. Grievance Mechanism

We have established a human rights-related consultation desk under the Corporate Ethics Consultation and Reporting System. We have also established a consultation desk dedicated to harassment cases.

Under this system, two consultation desks are available for reporting illegal or suspicious acts and raising various issues concerning human rights. One is an internal desk with a direct link to the Corporate Ethics Committee Secretariat and the Audit & Supervisory Board. The other is an external desk (law firm and others). For the Group's officers and employees, we post it on our intranet, advertise it on in-house posters, explain it in regular training sessions, and send an email once a year calling attention to it. For external stakeholders, we post it on our website so that anyone can check it out. We also advertise it on posters in offices and at construction sites and explain it at liaison meetings with our suppliers.

We have in place special consultation desks that provide harassment consultations, accept reports, and deal with grievances. They come in three types: an internal desk (at each of Obayashi's main offices, branches, and overseas offices as well as at each Group company), an external desk (domestic hotline), and a desk dedicated to job seekers. For the Group's officers and employees, we post them on our intranet, advertise them on in-house posters, explain them in training sessions of various kinds, and call attention to them at the time of

the annual questionnaire survey. By posting information about these consultation desks on our recruiter's website, we also enable job seekers to learn about them at any time. Furthermore, as for student job seekers, our job interviewers are required to inform them about the consultation desks.

Both desks are open to all officers and employees of the Group as well as to the Group's suppliers and other external stakeholders. We provide an environment that makes it easy for reporters to use the desks by enabling them to choose whether to report by phone, email, or by post. Any report received by a desk is dealt with promptly in accordance with its rules while ensuring that the person who has reported is protected and is not subjected to disadvantageous treatment.

We use an external consultation and reporting service called "JP-MIRAI Assist" for our migrant workers working at construction sites in Japan. JP-MIRAI Assist is offered by JP-MIRAI, a collaborative platform established in 2020 by private-sector corporations, local governments, NPOs, academics, attorneys, and various other stakeholders. This service responds to inquiries from migrant workers in Japan in easy-to-understand Japanese and 22 other languages. The service not only accepts reports involving possible human rights violations, but also offers consultation relating to everyday troubles. The Company obligates all workers to take training regarding legal compliance and laws, regulations, and international standards concerning safety and other issues before starting to work at each construction sites in Japan. It is ensured that during such training, migrant workers are thoroughly informed about the consultation and reporting desk.

In addition to the Group's consultation desks, in FY2020, OPUK established its own consultation and reporting policy and has created whistle-blowing desks in charge of general corporate ethics: an internal desk (staffed by persons in charge of whistle-blowing) and an external desk (a whistle-blowing support organization). In Australia, we have not established an Australia-specific reporting system, but we are promoting awareness and use of the Obayashi Group's Consultation and Reporting System (internal and external) through corporate ethics training.

Number of consultations and reports received in FY2025

- Corporate Ethics Consultation and Reporting Desk: 68*

*Including other issues than human rights cases, like violation of laws.

- Harassment Consultation Desk: 142

In FY2025, no report or request for consultation was received concerning activities that

might lead to slavery, human trafficking, and other violations of human rights.

See the following website links for further information on “the Obayashi Group Corporate Ethics Reporting System” and “Harassment Consultation Desks”:

Consultation Desks (Corporate Ethics Consultation and Reporting System, Harassment Consultation Desks):
<https://www.obayashi.co.jp/en/sustainability/employee/humanrights.html#section3>

Reporting Process of Corporate Ethics Consultation and Reporting System:
<https://www.obayashi.co.jp/en/sustainability/ethics.html#section1-2-3>

4-4. Promotion of CSR Procurement

The Company carries out the following surveys and inspections for member companies of the Obayashi Rin-yu-kai and major domestic suppliers, aiming to deepen the understanding and awareness of CSR procurement, and monitors the soundness of these companies on a periodic basis. Every fiscal year, we send the CSR Procurement Guidelines to member companies of the Obayashi Rin-yu-kai and major suppliers to ensure that they fully understand and comply with the Guidelines. We also conduct questionnaire surveys to determine the level of understanding of the Guidelines. We aim that the companies responding to the questionnaire surveys will account for over 70% of the total value of the Company’s procurement, and we use this as a KPI.

Since FY2022, we have expanded the content of our surveys to include the employment conditions of migrant workers and foreign technical trainees and the handling of conflict minerals and wood products procured.

-The survey response rate in FY2025 was 81%. (The respondents accounted for approximately 78% of the total value of the Company’s domestic procurement.)

-Only 47% of suppliers responded that they fully understand the contents of the CSR Procurement Guidelines, indicating that promoting better understanding among suppliers is an issue. Going forward, we will promote understanding through training and providing information via videos and other means.

- We provide feedback to each company to encourage them to improve their initiatives.

See the following website to view the survey results:
https://www.obayashi.co.jp/en/sustainability/upload/file/suppliersreport_01_en.pdf

4-5. Traceability Surveys on Materials Procured

We confirm with suppliers of materials and equipment that the quality of the goods they deliver complies with relevant laws and regulations, international standards, and other criteria. In addition, among materials that are used at construction sites in Japan, wood products and solar panel components procured overseas are considered to carry high risks of human rights violations. Therefore, we conduct annual traceability audits for these

materials to assess risks related to environmental damage, forced labor, and child labor.

See the following website to view the survey results:

https://www.obayashi.co.jp/en/sustainability/upload/file/suppliersreport_02_en.pdf

4-6. Initiatives Implemented at Construction Sites

In the construction work for which the Company accepts contracts in Japan, we confirm the required facts (gender, age, whether someone is a migrant worker, years of experience, health status, and other factors that must be considered for occupational safety) in advance for all people who will be involved in construction work. The people at high risk of having their human rights violated are thereby specified, such as minors employed within the scope permitted by law, women, people of advanced age, and migrant workers including foreign technical trainees. This information is shared among relevant employees and preventive measures are implemented, such as considering work assignments and restricting performance of hazardous work. All workers at construction sites must also undergo mandatory advance training on the laws and regulations of the country, laws and regulations pertaining to safety, and international standards. Some training programs on occupational safety provide materials and videos translated into the native languages of migrant workers.

4-7. Surveys Concerning Hiring of Foreign Technical Trainees

We have been conducting questionnaire surveys to grasp the details of the situation of hiring of foreign technical trainees by suppliers.

-Based on survey results, we held individual hearings with several of these companies in order to directly confirm the working environment for their foreign technical trainees and the specific initiatives that they are carrying out.

-The questionnaire surveys and interviews include issues related to the ILO's 11 Indicators of Forced Labour, such as working hours, payment of wages, housing accommodations, transfer restriction and fees paid for recruitment prior to departure.

-Since FY2024, we have also conducted surveys on specified skilled workers in addition to foreign technical trainees.

-The results of the FY2025 surveys show that among foreign technical trainees hired by the Company's primary suppliers (2,668 persons), approximately 34% (916 persons) have worked at the Company's construction sites.

-Approximately 40% (435 persons) of the 1,086 specified skilled workers employed by our primary suppliers have worked at our construction sites.

See the following website to view the survey results:

https://www.obayashi.co.jp/en/sustainability/upload/file/suppliersreport_03_en.pdf

4-8. Occupational Safety Initiatives

In connection with “abusive working and living conditions,” one of the International Labour Organization’s Indicators of Forced Labour, we believe that the risks of forced labor among migrant workers at our suppliers who cannot easily leave their jobs voluntarily will increase if there is also a poor working environment. To mitigate these risks and promote the creation of an appropriate work environment, our company has established a Central Safety and Health Committee and is working to develop systems aimed at improving the work environment. The committee meets at least twice a year to discuss and consider basic matters concerning health and safety, such as preventing occupational accidents, preventing impairment of health, and maintaining and improving health. We operate Obayashi’s Occupational Health and Safety Management System, which has systematized methods of safety management in order to ensure implementation of the following Health and Safety Principles and Policies at all our construction sites in Japan.

Obayashi’s Occupational Health and Safety Management System helps each organization clearly delineate its own Health and Safety Policy. The system manages the operational structure, plan formulation, and procedures for the entire cycle, from implementation to achievement, revision, and maintenance. Under the Occupational Health and Safety Management System, there are important goals that contribute to preventing poor working environments that lead to modern slavery—namely, to “improve health and safety management skills and provide better education” and to “promote creation of an environment that takes health into consideration.”

The Company develops specific implementation measures for achieving the goals, follows the PDCA cycle, and monitors the implementation of the measures on a periodic basis, aiming to continuously improve health and safety management activities. Twice a year (every six months), we confirm with all field offices at construction sites the level of their achievement of evaluation indicators under the Occupational Health and Safety Management System, and implement improvement measures. In addition to daily safety patrols by the Company’s employees who work at construction sites and by subcontractors, the departments in charge of safety and the departments in charge of construction carry out regular patrols, and the central officer in charge of health and safety and the health and safety officers of the head office and branch offices conduct safety patrols at construction

sites. As a specific measure to improve health and safety management skills and provide better education, we introduced in FY2022 an “interactive method of patrol,” which is considered to be effective because it helps identify potential risks and problems through dialogue at construction sites.

We will continue safety and health training for our employees and support the education of suppliers in order to prevent occupational accidents, raise awareness of safety and health, and deepen understanding of safety-related laws and regulations.

See the following website link for further information on Obayashi's Occupational Health and Safety Management System:
<https://www.obayashi.co.jp/en/sustainability/safeenv.html#section2>

4-9. Initiatives in Preventing Long Working Hours

To comply with the limits on overtime hours set forth in Japan's Labor Standards Act and to reduce total working hours, our company is implementing the following measures.

- Thorough and appropriate attendance management
- Use of ICT technology to improve work efficiency
- Reduction in overtime hours worked
- Promotion of taking vacation
- Leveling of work volume

4-10. Initiatives by Group Companies

We conducted interviews with migrant workers at two domestic group companies to discuss their working conditions, working hours, wages, and other matters, and assessed their working environment.

For the foreign technical interns accepted by Obayashi Facilities starting in fiscal year 2025, we conducted interviews four times a year to confirm that there were no issues in their work or daily lives. We also re-emphasized the availability of our Group's consultation and reporting channels (including JP-MIRAI).

See the following website link for further information on the Obayashi Group ESG materialities and KPIs:
https://www.obayashi.co.jp/en/sustainability/upload/file/esg_kpi_en.pdf

5. Effectiveness

The Board of Directors has decided on the management policy on sustainability, which also encompasses respect for human rights. Based on this policy, two kinds of committees have been established on the executive side: the Business Plan Committee and two expert

committees in the area of sustainability (the Human Rights Expert Committee and the Supply Chain Management Expert Committee). All these committees formulate policies on human rights issues, develop and implement measures to address them, assess the implementation status in each department, check the KPI performance, evaluate relevant efforts, and improve them for better effectiveness. In addition, the Sustainability Committee, established under the Board of Directors, studies policies on how to address sustainability issues, including human rights issues, provides relevant reports to the Board of Directors, and assesses the status of implementation at the business execution departments.

The chairpersons of the expert committees in the sustainability field, the frequency of committee meetings, and the main topics brought up for discussion in FY2025 are as follows:

5-1. Human Rights Expert Committee

Chairperson: Executive officer responsible for human resources

Frequency of meetings: One regular meeting a year and special meetings as necessary

Main topics brought up for discussion in FY2025 (held in June and December):

- Implementation of human rights due diligence
- Harassment Complaints Received in Fiscal Year 2025
- Diversity and Inclusion Initiatives, etc.

5-2. Supply Chain Management Expert Committee

Chairperson: Head of the procurement division

Frequency of meetings: At least one regular meeting a year

Main topics brought up for discussion in FY2025 (held in September and February):

- Securing Skilled Workers and Improving Their Working Conditions
- Consideration and implementation of policies to address various issues in domestic and international supply chains
- Implementing measures to deepen the understanding and awareness of CSR procurement policy
- Revision of payment terms for suppliers
- Dealing with Migrant workers at Construction Sites

6. Training on Modern Slavery and Human Trafficking

6-1. Promoting Awareness of Human Rights

The Group concentrates on raising awareness of human rights among its officers and employees. We have established the Human Rights Expert Committee, which is chaired by the executive officer in charge of personnel. This committee prevents infringement of

human rights, ascertains human rights issues, and resolves such issues. It also promotes initiatives aimed at increasing awareness of human rights.

Every fiscal year, we provide education concerning basic knowledge on human rights during training sessions for newly hired employees and rank-specific training sessions. In FY2025, we provided all of the Group's officers and employees in Japan with online training on "Human Rights Issues at the Obayashi Group, Including the Supply Chain", the participation rate was 94.5%. (96.1% attendance rate for FY2024). During these training sessions, we make thorough efforts to fully familiarize our officers and employees with our CSR procurement policy and human rights policy and our consultation desks.

The Harassment Prevention Department, a specialized unit, plays a central role in raising awareness of harassment. Under our Harassment Prevention Guidelines, we are working to prevent harassment by communicating the corporate policy on harassment, defining each type of harassment, and providing information on the specific response when a harassment incident occurs to all officers and employees.

At the Group companies as well, awareness campaigns are being conducted in a similar manner, primarily through the harassment consultation desks established at each company. Furthermore, every fiscal year, we provide all of the Company's officers and employees with online training on the subject of harassment. The participation rate in FY2025 was 87.5%. (99.1% attendance rate for FY2024)

In Australia, we distribute human rights awareness training materials that include the Obayashi Group Human Rights Policy and the Obayashi Group CSR Procurement Policy to all employees every year to raise awareness of human rights.

We also conduct regular training for our suppliers. In FY2025, we provided training relating to human rights and CSR procurement for member companies of the Obayashi Rin-yu-kai (222 companies participated in the training). In addition, we provided training videos on human rights and CSR procurement when conducting the CSR procurement guideline survey. We will continue to educate suppliers to further improve their understanding in the future.

See the following website link for further information on Obayashi Group initiatives on human rights:
<https://www.obayashi.co.jp/en/sustainability/employee.html#section1>

6-2. Compliance Training

The Group has established a corporate ethics program and set up a "Corporate Ethics

Committee,” chaired by the President—who serves as the Chief Ethics Officer—to ensure thorough compliance with corporate ethics standards. As one of these initiatives, the committee has mandated that all officers and employees of the Group undergo compliance training every year. This training provides an opportunity to make officers and employees aware of their own actions from a corporate ethics perspective. Additionally, this is intended to help them acquire abilities to root out illegal conduct and corporate ethics violations within the Company and its supply chain.

For corporate ethics training KPI, we have set our goal for employees taking the training by FY2025 as 100%, and we have achieved 100% in FY2025. (100% attendance rate for FY2024) We will continue to promote compliance education to ensure that compliance awareness takes root in our corporate culture.

See the following website link for further information on the Obayashi Corporate Ethics program:

<https://www.obayashi.co.jp/en/sustainability/ethics.html>

7. Cooperation with Domestic, Overseas, and Group Companies

We formulated operating rules on management through alliances between each company and the managing department and business division at headquarters from March FY2019. Such operating rules not only apply to the Company itself, but also to the businesses of Group companies in Japan and overseas. The local office and local Group company of the UK business and the local office of the Australian business covered by this Statement continually share information between the local office and the managing department and business division at headquarters in Japan. They strive to form timely, appropriate alliances with a wide range of individual Group companies through our networks in Japan and overseas, in addition to alliances with Obayashi, when necessary.

In FY2025, we conducted in-person interviews with OPUK, and we plan to conduct online interviews with the Australian office in FY2026.

In addition to sharing management policies and goals, the Company also works to strengthen alliances between Group companies by having top management from Group companies in Japan and overseas participate in the regularly scheduled executive officers’ meetings along with the executive officers. We are also working to strengthen the network between locations through regular business reporting meetings and liaison meetings held by Group companies in each overseas region, mainly in our North American Regional Headquarters and the Asia-Pacific Regional Headquarters.

At executive officers' meetings, we offer training on such topics as "harassment prevention" and "diversity and inclusion" and also explain the importance of initiatives aimed at respecting human rights. In FY2025, we invited an external instructor to conduct training on "Business and Human Rights." Moreover, those responsible for human resources at the main Group companies in Japan participate in the Company's Human Rights Expert Committee to share awareness of human rights issues and launch joint initiatives aimed at preventing human rights violations.

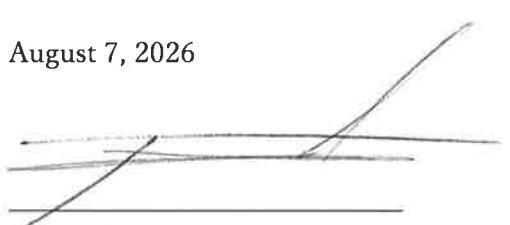
The Human Rights Expert Committee and the Supply Chain Management Expert Committee will work together to take the lead in implementing specific initiatives with a view to strengthening cooperation throughout the Group and promote respect for human rights and human rights due diligence.

8. Future Initiatives

We plan to review the "Priority Human Rights Issues" which first identified in FY2019 and also revise the human rights due diligence roadmap formulated in FY2022.

This statement has been approved by Board of Directors of Obayashi Corporation on August 7, 2026.

August 7, 2026



Toshimi Sato
Representative Director
President and CEO
Obayashi Corporation