

Human Rights Policy

This Human Rights Policy is designed to ensure that JTB and its Employees respect and protect the human rights of all people in accordance with the United Nations Charter, the Universal Declaration of Human Rights, international standards^{*1}, and the JTB Group Mission, and will not tolerate any human rights violations (zero tolerance). This Policy aims to prevent human rights violations within JTB and to ensure swift remedies are taken should any occur. The purpose of this policy is to create a common understanding of what JTB considers to be human rights violations and to raise awareness among Employees of their rights and responsibilities with regard to this issue.

The Human Rights Policy consists of the following separate policies

- (1) Anti-Discrimination and Anti-Harassment Policy
- (2) Anti-Slavery and Human Trafficking Policy
- (3) DEIB (Diversity, Equity, Inclusion, and Belonging) Policy

JTB expects understanding and cooperation regarding respect for human rights from all of our business partners as well as JTB Employees, and aims to contribute to the shared goal of promoting respect for human rights in society through our business activities.

We conduct human rights due diligence^{*2} to identify, assess, prevent, and mitigate human rights issues related to our business activities, and periodically disclose the results on our website to ensure transparency.

We have established multiple hotlines for internal and external stakeholders who may be directly affected by JTB's business, enabling them to consult or file

¹ International standards include the UN Guiding Principles on Business and Human Rights, the International Covenants on Human Rights, and the Ten Principles of the United Nations Global Compact.

² This due diligence was introduced for JTB Employees in 2023 and extended to domestic group companies in 2024. Going forward, it will gradually be expanded to include overseas group companies and business partners within JTB's supply chain.

complaints (“filings”) related to human rights. We respond to such filings in good faith and strive to ensure that appropriate remedies are provided. If any issues with JTB are identified through these initiatives, we will work to address them. Furthermore, we strive to engage in dialogue with relevant stakeholders to appropriately identify and address adverse impacts on human rights in our operations.

JTB is working to ensure the JTB Group Policy, including our Human Rights Policy, is effectively implemented by providing education and training to Employees.

The Chief Compliance Officer (CCO) is responsible for human rights initiatives, and progress is reviewed by the Management Committee and the Board of Directors.

Preamble Revised on June 20, 2025

ANTI-DISCRIMINATION & ANTI-HARASSMENT POLICY

This Global Anti-Discrimination & Anti-Harassment Policy (“**Policy**”) is formulates the common understanding of what JTB considers discrimination and harassment, and aims to raise awareness among its employees of their rights and responsibilities pertaining to the issue.

DISCLAIMER: This Policy provides the general guidelines of JTB’s expectations governing employee conduct and is not intended to and does not create a contract between JTB and its employees. JTB reserves the right to add, change, or delete any provision herein, and make exceptions deemed appropriate in its discretion.

I COMMITMENT TO A POSITIVE WORK ENVIRONMENT FREE OF DISCRIMINATION AND HARASSMENT

JTB is firmly committed to the principle of equal employment opportunity and to providing a professional work environment in which every employee, job applicant, customer, vendor, delivery or service personnel, and the public is treated with respect. JTB will take immediate and appropriate action to prevent and correct employee behavior that violates this Policy.

JTB WILL NOT TOLERATE ANY AND ALL FORMS OF DISCRIMINATION OR HARASSMENT BY AND BETWEEN EMPLOYEES AND MEMBERS OF THE PUBLIC.

EACH AND EVERY EMPLOYEE IS RESPONSIBLE FOR MAINTAINING A POSITIVE WORK ATMOSPHERE THAT IS FREE OF DISCRIMINATION AND HARASSMENT.

EMPLOYEES FOUND TO HAVE VIOLATED THIS POLICY (AFTER APPROPRIATE INVESTIGATION) WILL BE SUBJECT TO DISCIPLINE, UP TO AND INCLUDING IMMEDIATE TERMINATION OF EMPLOYMENT.

II. DEFINITION OF DISCRIMINATION AND HARASSMENT

“Discrimination” in the workplace occurs when equally qualified individuals are treated differently based on “personal characteristics” that are unrelated to their ability to perform the required work, *e.g.*, race/color, national origin/ancestry, sex/gender identity/sexual orientation, religion/belief, disability, age, marital status, etc.¹ (Explanation for each of these personal characteristics is set forth in Section IV below.)

“Harassment” is one form of discrimination that occurs under the following two circumstances:

(1) **“Abuse of Power (Quid-Pro-Quo) Harassment”** occurs when an individual who has the authority to grant or deny “tangible job benefits” (*e.g.*, employment, promotion, pay rise, benefits, etc.) or impose “adverse employment actions” (*e.g.*, discipline, pay cut, demotion, termination, etc.) to/upon the victim

- (a) asks the victim to do/not do something based on reasons that are irrelevant to the job function, and
- (b) based on the victim’s answer, grants or denies the victim a tangible job benefit or foregoes an adverse employment action For example, statements like “You will get the program coordinator job if you only hire people who are [of a certain religion],” “I will not give you a pay rise unless you have an affair with me,” are typical abuse of power harassments.

DISCLAIMER: JTB recognizes that each country has a different set of personal characteristics protected under its laws. As it is impossible to list all of them, this Policy sets forth some of the fundamental personal characteristics which JTB considers irrelevant to an individual’s ability to perform most jobs. Conflict with Law of each country: That being said, JTB also understands that laws pertaining to discrimination vary significantly among countries. Thus, JTB will not hold employee in violation of this Policy if adherence to its provisions would constitute violation of each country’s law or differentiation based on a certain personal characteristic is permitted thereunder.

(2) **“Hostile Work Environment Harassment”** occurs when there is unwelcome, unsolicited conduct that has the purpose or effect of:

- (a) violating the dignity of the victim; or
- (b) creating a work environment that a reasonable person would consider offensive, uncomfortable, hurtful, demeaning, degrading, belittling, humiliating, embarrassing, intimidating, hostile, abusive, threatening, or

annoying. Hostile work environment harassment can occur between anyone regardless of their position; the harasser can be the victim's manager, a manager in another department, a coworker, a customer, vendor, delivery or service personnel, etc. Moreover, the victim does not have to be the individual specifically targeted by the harasser; it can be anyone affected by the unwelcome, unsolicited conduct.

IV. JTB'S NO DISCRIMINATION POLICY

It is JTB's policy to provide equal employment opportunity in conformance with all applicable laws and regulations to individuals who are qualified to perform the necessary job requirements. As such, JTB strictly prohibits making "employment decisions," however small, based on an individual's "personal characteristics" that are not job-related and necessary to the operation of the business.

"Employment decisions" means decisions that pertain to any aspect of employment. This includes without limitation decisions as to: conditions listed on job postings; recruitment process; applications and hiring; compensation; employee benefits (including granting breaks and approving leave); placement (including assigning workstations); job training; performance reviews; promotions; disciplinary actions; termination; and any other term, condition, or privilege pertaining to employment. The following table lists some examples of personal characteristics that shall not be used as a basis for employment decisions unless such requirement is job-related and necessary to the operation of the business.³

Personal Characteristic	Individuals Shall Not Be Discriminated Based On Their
Race/Colour	<ul style="list-style-type: none">• Race;• Characteristics associated with a certain race (e.g., hair texture, skin color, or certain facial features), etc.;• Conditions which predominantly affect a certain race;• Pigmentation, complexion, and/or skin shade or tone, etc.• Cultural practices or characteristics often linked to race

³ See *Disclaimer* at fn 1.

	<p>or ethnicity (e.g. cultural dress, manner of speech); etc.</p> <p><u>Note:</u> Race/Colour discrimination can occur between persons of different races or ethnicities and between persons of the same race or ethnicity.</p>
National Origin/Ancestry	<ul style="list-style-type: none"> • Birthplace; • Ancestry; • Culture; • Surname associated with a certain national origin; • Linguistic characteristics common to a certain ethnic group; • Accent; • Foreign citizenship (with work authorisation); etc. <p><u>Note:</u> National Origin/Ancestry differs from race or citizenship.</p>
Sex	<ul style="list-style-type: none"> • Sex; • Pregnancy, childbirth, or a related medical condition; • Lactation; • Gender identity (including transgender/intersex status); • Sexual orientation, (heterosexuality, homosexuality, bisexuality); etc.
Religion/Belief	<ul style="list-style-type: none"> • Religious beliefs; • Religious observances and practices, including teaching a religion class, not working on a holy day, attending a religious convention, wearing a religious symbol, etc. <p><u>Note:</u> “Religion” includes not only traditional organised religions, (e.g., Buddhism, Christianity, Hinduism, Islam, Judaism), but also other sincerely held religious, ethical or moral beliefs, (e.g., believers, atheists, agnostics).</p>

Disability	<p>Individuals who have the skill, experience, education, or other requirements to perform the essential functions of the job (with or without reasonable accommodation) cannot be treated unfavourably because of:</p> <p>(1) Disability (a physical or mental condition that substantially limits a major life activity, <i>e.g.</i>, walking, talking, seeing, hearing, learning, etc.);</p> <p>(2) History of disability (<i>e.g.</i>, cancer that is controlled or in remission);</p>
	<p>(3) Belief by others to have a physical or mental impairment, even if s/he does not have such an impairment; or</p> <p>(4) Known association or relationship (<i>i.e.</i>, spouse, child, volunteer work, etc.) with a disabled individual.</p>
Age	<p>☐ Chronological age.</p> <p><u>Note:</u> Employment decisions may be made based on how many years an employee has worked for JTB (<i>i.e.</i>, seniority), even though that may correlate with age.</p>
Marital Status	<p>☐ Marital status, history (<i>e.g.</i>, single, engaged, married, divorced, widowed, separated, etc.).</p>
Across the Board	<ul style="list-style-type: none"> • Stereotypes and assumptions about the abilities, traits, or performance of individuals of a certain personal characteristic (<i>e.g.</i>, People of certain nationality must be good at maths), or non-conformance thereto (<i>e.g.</i>, a woman being too muscular/aggressive, when men are allowed to be that way; making fun of men who like sewing, etc.); • Marriage to or association with individuals of a certain personal characteristic; • Membership in or association with organisations or groups based on a certain personal characteristic; • Attendance or participation in schools, places of worship, etc. generally associated with a certain personal characteristic; etc.

Other	Each country has a different set of personal characteristics protected under its laws. <u>Employees must refer to their own Employment Handbook or anti-discrimination/antiharassment rules and policies</u> to determine what characteristics are protected under the laws of their countries.
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V. JTB'S NO HARASSMENT POLICY

JTB will not tolerate any form of harassment by and between employees (including managers), job applicants, customers, vendors, delivery or service personnel, and/or members of the public, regardless of whether or not such conduct constitutes unlawful harassment under applicable local law. JTB prohibits any and all forms of harassment not only in the workplace, but at any location where JTB employees are present, whether during or outside normal working hours.

EACH AND EVERY EMPLOYEE MUST:

- (1) TREAT OTHERS WITH DIGNITY AND RESPECT, AND
- (2) NOT MAKE THEM FEEL UNCOMFORTABLE

A. Forms of Hostile Work Environment Harassment

Hostile Work Environment Harassment may occur in **Verbal, Non-Verbal, and Physical** forms, which includes but is not limited to: jokes; comments; intrusive questioning about a person's domestic circumstances, relationships; slurs; epithets or name calling; ridicule or mockery; innuendo; gossip; insults or put-downs; negative stereotyping; intimidation or threats; unfair allocation of work; exclusion from normal work place/class conversation or activities; objects or pictures; graffiti; electronic, visual, written or graphic material circulated within or posted within the workplace; interference with work performance; gestures; physical assaults or threats; and/or other verbal non-verbal, or physical conduct; and/or incitement of others to commit any such acts.

Simple teasing, offhand comments, or isolated incidents that are not very serious, will become prohibited harassment when it is so frequent or severe that it creates a hostile or offensive work environment or when it results in an adverse employment decision (such as the victim being fired or demoted).

B. Prohibited Harassment (Non-exclusive)

1. Harassment on the Basis of Sex

a. Sexual Harassment

Unwelcome sexual advances, requests for sexual favours, and other verbal, non-verbal, or physical conduct of a sexual nature constitute sexual harassment when: (1) Used as **abuse of power (quid-pro-quo)**; or (2) Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating a **hostile work environment**. Depending on the situation, sexual harassment may include, but is not limited to, the following behaviour:

(i) Abuse of Power (Quid-Pro-Quo): Forcing, pressuring and/or

intimidating an employee into submitting to sexual conduct in return for preferential treatment. Specifically, the harasser, who has authority over the victim employee, conditions the victim's receipt of a "tangible employment benefit" or foregoes an "adverse employment action" based upon the victim's submission to sexual conduct or in exchange for sexual favours.

(ii) Hostile Work Environment Sexual Harassment

(a) Verbal conduct, e.g.:

- (1) Sexually explicit comments, jokes or innuendos;
- (2) Suggestive remarks or sounds;
- (3) Teasing or nicknames;
- (4) Unwanted comments on dress and appearance;
- (5) Sexually degrading remarks or words;
- (6) Questions about sexual conduct;
- (7) Gossip of a sexual nature;
- (8) Unwelcome flirtations or requests for dates;
- (9) Using foul or obscene language;
- (10) Demeaning comments about women/men in general;
- (11) Any sexual advance or propositioning;
- (12) Repeated attempts to establish a relationship with an individual, who

by word or conduct in any way indicates that such action is not welcome;

- (13) Leaving offensive voice-mails;
- (14) Verbal threats; etc.

(b) Non-verbal conduct, e.g.:

- (1) Sexually offensive gestures;
- (2) Downloading of pornographic or sexually exploitative and degrading material onto a computer;

- (3) Sending/circulating/displaying of materials of a sexual nature (including pornographic or suggestive posters, photographs, pictures, drawings, cartoons, objects, offensive letters, poems, e-mails, texts, etc.).
- (c) **Physical conduct**, e.g.:
 - (1) Sexual acts by force, pressure, and/or intimidation;
 - (2) Unwelcome kissing, hugging, pinching, rubbing, groping, touching;
 - (3) Leering;
 - (4) Ogling;
 - (5) Obscene gestures;
 - (6) Invasion of personal space, etc.

Sexual harassment can occur to women by men, men by women, between members of the same sex, and between individuals of all ages. For example, a fifty year-old male vendor may be sexually harassed by a 23 year-old male employee.

Sexual harassment does not have to be of a “sexual” nature and can include offensive remarks about a particular sex/gender. For example, making multiple offensive comments about women in general may constitute sexual harassment towards female individuals who hear such comments.

b. Sexual Orientation Harassment

Sexual Orientation Harassment is any behaviour pertaining to sexual orientation that, whether deliberate or otherwise, creates a hostile work environment. “Homophobia” is a term used to describe unreasonable hatred and rejection of homosexuality, and may be directed against individuals or groups of people who are/are thought to be gay, lesbian, bisexual or transgendered.

c. Pregnancy/Maternity Harassment

Pregnancy/Maternity Harassment involves harassment of a woman in the forms set forth in Section III and V. A. above, because of her pregnancy, childbirth, lactation, or a medical condition related to pregnancy or childbirth.

2. Leave Harassment

Leave Harassment involves harassment in the forms set forth in Section III and V.A. above, of an individual who takes leave of absence that is provided under applicable local law or company policy (e.g., family care leave, medical

leave, pregnancy disability leave, maternity/paternity/adoption leave, voting leave, jury duty leave, military leave, bereavement leave, etc.).

3. Age Harassment

Age Harassment may include, in addition to harassment based on chronological age in the forms set forth in Section III and V. A above, : assumptions regarding the individual's inability to learn due to chronological age (e.g., "You can't teach old dogs new tricks"); offensive remarks about a person's age (e.g., "Little Punk"); exclusion on the basis of age (e.g., limiting seminar participants to a certain age group), etc.

4. Race/Colour/National Origin/Ancestry Harassment

Racial/Colour/National Origin/Ancestry Harassment includes any behaviour pertaining to race/colour/national origin/ancestry (including citizenship and ethnic origins) that, whether deliberate or otherwise creates a hostile work environment.

5. Religious Harassment

Religious Harassment is any behaviour deliberate or otherwise, pertaining to religion, religious belief or other similar philosophical belief that, whether deliberate or otherwise, creates a hostile work environment. Religious Harassment may occur based on four factors:

- a. Affiliation:** An individual's affiliation with a particular religious or ethnic group.
- b. Physical or cultural characteristics and clothing:** An individual's physical, cultural, or linguistic characteristics (e.g., accent or dress associated with a particular religion, ethnicity, or country of origin).
- c. Perception:** The perception or belief that an individual is a member of a particular racial, national origin, or religious group, whether or not that perception is correct.
- d. Association:** An individual's association with a person or organisation of a particular religion or ethnicity.

6. Disability Harassment

Disability Harassment is any behaviour pertaining to the fact that a person has a physical or mental impairment, learning difficulty, or disfigurement, that creates a hostile work environment, whether deliberate or not.

7. Bullying/Moral Harassment/Power Harassment

JTB defines bullying/moral harassment/power harassment (collectively, "bullying") as "(a) a persistent pattern of mistreatment and offensive,

intimidating, malicious or insulting behaviour; an abuse or (b) misuse of power through means intended to undermine, humiliate, denigrate or harm the recipient.”

Bullying may be intentional or unintentional; however, where an allegation of bullying is made, the intention of the alleged bully is irrelevant; JTB will not give consideration to the alleged bully’s intention when administering disciplinary actions. Bullying can be obvious or done behind closed doors; it may be missed by superiors or known by many throughout the organisation. Negative effects of bullying are not limited to the targeted individuals, but may also lead to a decline in overall employee morale and a change in organisational culture.

JTB considers the following types of behaviour examples of bullying:

a. Abuse of Power

- (i) Setting impossible deadlines or imposing intolerable workload burdens;
- (ii) Persistent unjustified criticism;
- (iii) Public humiliation;
- (iv) Withdrawing responsibilities or decision-making powers without good reason or explanation;
- (v) Work interference (*i.e.*, sabotage, which prevents the individual’s work from getting done.)

b. Hostile Work Environment

(i) Verbal bullying:

- (a) Verbal intimidation;
- (b) Slandering, ridiculing or maligning a person or his/her family;
- (c) Persistent name calling that is hurtful, insulting or humiliating;
- (d) Using a person as the target of jokes;
- (e) Abusive and offensive remarks;
- (f) Intimidation (e.g., threats, derisory remarks).

(ii) Physical bullying:

- (a) Physical intimidation, assault or threat of physical assault, pushing, shoving, kicking, poking, tripping;
- (b) Damage to a person’s work area or property.

(iii) Gesture bullying:

- (a) Nonverbal threatening gestures or glances that convey threatening messages.
- (iv) **Unwarranted Exclusion:**
 - (a) Socially or physically excluding or disregarding a person in work-related activities.

VI. JTB'S NO RETALIATION/VICTIMISATION POLICY

"Retaliation/Victimisation" occurs when an employee is subject to "materially adverse action" due to his/her opposition to and/or report/complaint about unlawful discrimination/harassment or participation in an investigation therefor. JTB strictly prohibits any and all forms of retaliation/victimisation. "Materially adverse action" must be at the level where it would dissuade a reasonable worker from opposing/report unlawful discrimination/harassment, or participating in an investigation therefor. Examples of "materially adverse action" include, but are not limited to: negative employment actions (pay cut, change in job assignments, demotions, layoffs, termination, denial of training, fringe benefits, etc.), other actions affecting employment negatively (threats, unjustified negative evaluations, unjustified negative references, or increased surveillance), and any other actions that would serve such purpose (assault, unfounded civil or criminal charges, etc.).

VII. PREVENTION OF DISCRIMINATION AND HARASSMENT

A. Tell Harasser to Stop Unless Situation is Volatile

In many situations, harassers think they are just being funny or friendly, and do not realise how unwelcome their conduct is. In other situations, acting in such manner may be the only way the harasser knows to interact with people.

Silence suggests that the individual accepts the harassing behaviour.

(Keep in mind that people who are considerate and sensitive enough to notice someone's "frown" and stop their harassing behaviour, wouldn't be harassing people in the first place.) Therefore, unless the situation is extremely volatile, employees are encouraged to let the harasser know that his/her conduct is harassment (or unwelcome, offensive, disrespectful, making people uncomfortable, etc.) and that it must stop.

B. Duty to Report

Employees do not need to deal with discrimination, harassment and/or retaliation alone. JTB is committed to taking appropriate steps to prevent, correct, and end unlawful discrimination and/or harassment. However, this cannot be done without everyone's assistance.

Employees who believe unlawful discrimination, harassment and/or retaliation/victimisation is occurring/has occurred to them or anyone around them must immediately report the matter to their direct manager or the Human Resources Department regardless of who is engaged in the problematic behaviour before matters escalate out of control.

Employees must not delay in making such a complaint/report because receiving information at an early stage is crucial in preventing escalation and in conducting a prompt investigation to gather reliable, complete information of the alleged incident.

Employees who files incident reports/complaints based on their honest belief will not be subject to reprisal or damage to their career, reputation or employment, even if the investigation reveals that such report was wrong, or based on a misunderstanding. However, any employee who files knowingly false or untrue reports/complaints will be disciplined, including oral and/or written reprimand and/or immediate termination.

Revision History

Version	Detail	Date
1.0	Newly developed	2015/1/30
1.1	Updated in accordance with Japanese version 2018	2018/9/28
2.0	Updated in accordance with reestablishing JTB Group Policy	2023/4/01

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

1. COMMITMENT TO A WORK ENVIRONMENT FREE OF SLAVERY AND NO HUMAN TRAFFICKING

JTB maintains and promotes a corporate culture and behavior in which honesty, integrity and respect for the law are viewed as essential to achieving its desired success. We therefore require all staff at all times to act honestly and with integrity.

JTB HAS A ZERO-TOLERANCE APPROACH TO MODERN SLAVERY AND WE ARE COMMITTED TO ACTING ETHICALLY AND WITH INTEGRITY IN ALL OUR BUSINESS DEALINGS AND RELATIONSHIPS AND TO IMPLEMENTING AND ENFORCING EFFECTIVE SYSTEMS AND CONTROLS TO ENSURE MODERN SLAVERY IS NOT TAKING PLACE ANYWHERE IN OUR OWN BUSINESS OR IN ANY OF OUR SUPPLY CHAINS. WE EXPECT THE SAME HIGH STANDARDS FROM ALL OF OUR CONTRACTORS, SUPPLIERS AND OTHER BUSINESS PARTNERS.

This Policy applies to all persons working for JTB or on our behalf in any capacity, including all Employees, whether permanent or temporary, as well as to the extent provided for below, to all “Associated Persons ⁴” and their directors, officers and employees (herein collectively the “**JTB Representatives**”).

2. DEFINITIONS

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking.

⁴ An “Associated Person” includes any individual or company that acts on behalf of JTB or otherwise performs any services for or on behalf of JTB. A typical example is a sales agent, intermediary or introducer, but this can also include, for example, advisers, consultants, contractors, joint venture partners and controlled or non-controlled subsidiaries of JTB.

This Policy aims at tackling **the following types of irregularities** which could threaten the resources or the reputation of JTB:

“Slavery” (in accordance with the 1926 Slavery Convention) is defined as:

“The status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised.”

“Servitude” is defined as:

“The obligation to provide services that is imposed by the use of coercion and includes the obligation for a ‘serf’ to live on another person’s property and the impossibility of changing his or her condition.”

“Forced or Compulsory Labor” (as per ILO’s Forced Labour Convention 29 and Protocol) is defined as:

“All work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.”

As per the Modern Slavery Act 2015 (UK), an offence of **“human trafficking”** requires that a “person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.”

“Child labor” is defined as:

“Works that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.” Whether or not particular forms of “work” can be called “child labor” depends on:

- The child’s age,
- The type and hours of work performed,
- The conditions under which it is performed, and
- The policies held by each individual country.

Child labor is defined by international standards as children below 12 years working in any economic activities, those aged 12-14 engaged in more than light work and all children engaged in the worst forms of child labor (ILO).

The “**worst forms of child labor**” are very likely to constitute modern slavery and are defined by article 3 of ILO Convention No. 182 as:

- All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;
- The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

It is enshrined in the Code that JTB and all JTB employees do not participate in any form of forced or child labor (Code, art. 1-4). This Policy aims to further elaborate on that principle and what constitutes these actions.

3. SLAVERY AND HUMAN TRAFFICKING PREVENTION ACTIONS

In response to the threat of Slavery and Human Trafficking, JTB has issued this Policy, which defines modern slavery, allocates responsibilities for all employees, including management, and explains how to report suspicions of Slavery and Human Trafficking.

4. JTB REPRESENTATIVES’ RESPONSIBILITIES

JTB Representatives must have the highest standards of honesty and integrity in the exercise of their duties. As outlined in the Code, each individual JTB Representative is personally obliged to comply with applicable laws, local rules and regulations as well as with internal regulations and guidelines applicable to their jurisdiction and/or area of activity.

All JTB Representatives are responsible for:

- A. Respecting the principles and provisions of Slavery and Human Trafficking Laws; and
- B. Reporting details of any suspected slavery or human trafficking activities performed either within JTB or through JTB’s contractors, suppliers or other business partners.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this Policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. REVIEW OF POLICY IMPLEMENTATION

JTB will monitor its obligations regarding Slavery and Human Trafficking Laws in all countries where it does business. The proper implementation of this Policy and subsequent procedures will be reviewed annually, where applicable.

7. COMPLIANCE WITH THIS POLICY

You must ensure that you read, understand and comply with this Policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

You must notify your manager or the management as soon as possible if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or any tier of our supply chain at the earliest possible stage in accordance with our internal Whistleblowing Policy.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the management. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. JTB is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal.

8. SAFEGUARDS

Violations of the Policy in which JTB Representatives have been involved will result in disciplinary action, up to and including dismissal of an individual in appropriate circumstances. Disciplinary action may be taken not only against Employees who commit fraud but also against any Employees who consciously permit such violation of the law or who attempt to influence or retaliate against subordinates for reporting such violations. The business relationship with fraudulent non-officers/non-employees of JTB may also be terminated.

JTB recognizes that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible. JTB will not tolerate harassment or victimization and will take action to protect those who raise a concern in good faith.

You may use the internal Whistleblowing Policy under your name or anonymously. JTB will strive to protect an individual's identity when they raise a concern and do not want their name to be disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence.

Communications under this Policy will be treated confidentially and will not result in any disciplinary action against the person making them, even if the alleged violation proves unfounded in the subsequent internal investigation. In contrast, however, any violation of this Code by the person making such communications, and any intentionally falsified claim of such violation of the Code (such as malicious and improper accusations) will result in disciplinary action.

Utmost care must be taken to avoid committing a tipping-off offence by revealing to the individual concerned the fact that a report has been made or that an internal investigation is being undertaken.

Revision History

Version	Detail	Date
1.0	Newly developed	2019/9/13
2.0	Updated in accordance with reestablishing JTB Group Policy	2023/4/1

DEIB POLICY

(Diversity, Equity, Inclusion, and Belonging Policy)

I. INTRODUCTION

Throughout JTB's history, the company has prioritized equitable inclusion of people of all gender identities, ages, races, ethnicities, national origins, cultures, religious or political beliefs, languages, education levels, socioeconomic backgrounds, family or relationship statuses, sexual orientations, gender identity, gender expression, genetics, abilities and/or experiences. JTB's corporate culture has always embraced diversity, respected diverse values and welcomed innovation.

In April 2011, JTB implemented the JTB Group Codes of Conduct ("**Code**") to ensure consistent levels of quality service and employee conduct worldwide. The Code requires all JTB employees to adhere to the basic rules of conduct set forth therein, -

II . COMMITMENT TO DEIB (DIVERSITY, EQUITY, INCLUSION, and BELONGING)

JTB is dedicated to fostering, cultivating and preserving a culture of DEIB. JTB believes that its employees are high-performing individuals who reflect the diversity of the communities where all JTB employees work and live.

This DEIB Policy ("**Policy**"), sets out JTB's commitment to continued DEIB practices which includes recruiting and retaining employees from diverse backgrounds and experiences, creating awareness of diversity issues and benefits, and fostering a supportive environment where inclusivity is expected and prioritized.

This Policy formulates the common understanding of what JTB considers DEIB and aims to raise awareness among its employees of their rights and responsibilities pertaining to the issue.

III DEFINITIONS

“Diversity” is the collective mixture of differences and similarities that includes individual and organizational characteristics, values, beliefs, experiences, backgrounds, sexual orientation, gender identity, gender expression, preferences, and behaviors.

“Equity” is about ensuring all individuals are treated fairly and respectfully and have equal access to opportunities and resources.

“Inclusion” is the achievement of a work environment in which all individuals are ensured “Equity” and can contribute fully to the organization’s success. Without inclusive practices, a diverse environment cannot be achieved.

“Belonging” refers to employees’ sense that they are welcomed, accepted, valued, and empowered for their diverse backgrounds and experiences. An inclusive work environment helps foster a sense of belonging.

IV COMMITMENT TO A DIVERSE WORK ENVIRONMENT

JTB’s goal is to provide a working environment where all employees are included and valued for their contributions and to reflect the diversity of our clients and the communities in which we work. Outside of the obvious moral imperative of equity, research shows that diversity in the workplace can boost the quality of decision-making and encourage people to be “more creative, more diligent, and harder-working.”⁵ Accordingly, when the individuals who shape the values and activities of our organization come from a wide array of backgrounds, we believe that they are able to each bring their own unique perspectives that solves problems and enhances JTB in potentially more innovative ways.

JTB is committed to providing equal opportunity employment; creating, managing, and valuing diversity in our workforce; providing a safe work environment; and fostering a culture of belonging where all employees are included, treated with dignity and respect, promoted on their merits, and placed in positions to contribute to our future success. We are guided by the principles of honesty, integrity, trust, and respect as we work together to meet our company and client

objectives.

We embrace a diverse workforce and recognize and respect the qualities of all our employees, including, but not limited to, gender identities, age, race, ethnicity, national origin, culture, religious or political beliefs, language, education, veteran status, socioeconomic background, family or relationship status, sexual orientation, , gender identity, gender expression, medical condition, genetics, and/or disability. We also value diversity of perspective including differences in personality, life and work experience, skills, ways of thinking and working, and other characteristics that make our employees unique.

JTB's commitment to DEIB extends to all areas of our business including recruitment, job assignment, compensation and benefits, talent development, skills enhancement, promotions, employee retention, flexible work arrangements, forms of leave available to employees, policies and procedures, board appointments, and succession planning.

V JTB'S APPROACH TO DEIB

JTB is committed to DEIB by increasing our focus on recruiting and retaining employees from diverse backgrounds, creating additional awareness of diversity issues and benefits, fostering a more supportive environment where inclusivity is expected and prioritized, and embedding accountability for diversity throughout the organization.

In an effort to hold ourselves accountable and to support these corporate initiatives, JTB is in the process of creating an internal DEIB committee that will look into any suspected violations of this policy and will run company-wide trainings.

All JTB Representatives are responsible to:

- A. Maintain respectful communication and cooperation between all employees;
- B. Treat others with dignity and respect at all times; and
- C. Report details of any suspected violation of such behavior performed either within JTB or through JTB's contractors, suppliers or other business partners.

VI COMMUNICATION AND AWARENESS OF THIS POLICY

All JTB Representatives are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All JTB Representatives are also required to attend and complete annual DEIB awareness training to enhance their knowledge to fulfil this responsibility.

VII REVIEW OF POLICY IMPLEMENTATION

The proper implementation of this Policy and subsequent trainings will be reviewed annually, where applicable.

Revision History

Version	Detail	Date
1.0	Newly developed	2021/5/1
2.0	Updated in accordance with reestablishing JTB Group Policy	2023/4/1
3.0	Revised its title in accordance with DEIB promotion	2023/10/1
3.1	Adding some words : “gender identity”, “gender expression”, and “experiences”	2025/6/20