

MBS GROUP HUMAN RIGHTS POLICY

We, the MBS Group, formulated the “MBS Group Compliance Charter” (the “Charter”) some time ago, and all our officers and employees have conducted their business activities with an understanding of and in compliance with the Charter as a member of the group. Furthermore, Mainichi Broadcasting System, Inc., MBS Radio, Inc. and GAORA Incorporated have respectively established their own broadcasting standards and have been conducting the broadcasting business in a manner that meets the social responsibilities and public duties of a broadcasting service. In addition to the above, in renewing its recognition of the importance of the commitment to respecting human rights, the MBS Group hereby establishes this “MBS Group Human Rights Policy” (this “Policy”) to clarify the concepts relating thereto. We will remain a corporate group trusted by society and contribute to strengthening the social awareness of human rights by meeting our responsibility to respect the human rights of all stakeholders (any person who may be affected by our business activities) in accordance with this Policy.

1. Scope

This Policy applies to all officers and employees of the MBS Group. We also encourage all business partners of the MBS Group to understand and support this Policy.

2. Support of and Respect for International Norms Relating to Respect for Human Rights

The MBS Group supports and respects international standards relating to human rights including the International Bill of Human Rights (the Universal Declaration of Human Rights and International Covenants on Human Rights) and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Furthermore, we will make efforts to meet our corporate responsibility to respect human rights in accordance with the United Nations Guiding Principles on Business and Human Rights. In case of any inconsistency between international norms and relevant laws and regulations of a country or region where we conduct business activities, we will seek to respect and place priority on international norms.

3. Respect for Human Rights Relating to Contents and Services Transmitted and Provided

Recognizing our social responsibility and public duties, the MBS Group will respect human rights in transmitting and providing any contents and services. Furthermore, we will accommodate the right to know and contribute to strengthening the social awareness of human rights through the contents and services transmitted and provided by us.

4. Respect for Human Rights in Each Process of Business Activities

In addition to the matters described in Section 3 above, the MBS Group will make efforts to prevent and mitigate adverse human rights impacts on our stakeholders in each process of our business activities, especially taking into account the following points:

(1) Respect for Human Rights of Workers

We respect the human rights of all workers associated with the MBS Group, and create a healthy and pleasant working environment.

(2) Respect for Human Rights at Business Partners

If a business partner is involved in any adverse human rights impact, the MBS Group will seek to have such business partner take appropriate actions to respect and not infringe human rights.

5. Human Rights Due Diligence, etc.

The MBS Group conducts human rights due diligence (investigation and assessment of circumstances relating to human rights) to prevent or mitigate adverse human rights impacts. If any business activity of the MBS Group is found to cause or contribute to adverse human rights impacts, we will take appropriate measures, including remediation and correction. In addition, we will make use of the expertise of external parties concerning human rights and also engage in dialogue and consult with stakeholders with the goal of taking action in support of our stakeholders.

6. Education and Awareness Building

The MBS Group will conduct necessary education and awareness building activities so that all officers and employees understand this Policy and put into practice the actions under this Policy in performing their respective duties.

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Masayuki Takayama, President
MBS Media Holdings, Inc.