

# Snow Peak Human Rights Policy

The Snow Peak Group, consisting of Snow Peak, Inc. and its subsidiaries and affiliates (hereinafter referred to collectively as “Snow Peak”), believes that the source of our corporate value is the positive impact we have on all of our stakeholders and the value we continually provide to them, in accordance with our mission statement, “The Snow Peak Way”(Please refer to “Reference” at the end of the document.). To achieve this, we recognize that the first step is to ensure that the human rights of all people involved in Snow Peak's business activities are protected and respected. Therefore, we have established this “Snow Peak Human Rights Policy” (hereinafter referred to as the “Policy”) to promote human rights initiatives for our employees, business partners, and supply chain, which has the full commitment of our management team, including top management, and the approval of our Board of Directors.

## **Snow Peak Human Rights Policy**

Snow Peak is committed to fulfilling its corporate responsibility to respect human rights in accordance with The Snow Peak Way. To this end, we have established the Policy based on the United Nations Guiding Principles on Business and Human Rights, and will always strive to manage our business and act in harmony with the international community.

## **Our Approach to Human Rights**

Snow Peak declares that it will continuously conduct human rights due diligence and avoid causing or contributing to negative impacts on human rights in its value chain.

To fulfill the above commitment, Snow Peak will respect the human rights established in the internationally recognized principles including the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. Snow Peak will respect such human rights principles based on its strict compliance with the laws and regulations of the countries and regions in which it operates.

## **Scope of Application of the Snow Peak Human Rights Policy**

The Policy applies to all executives and employees (hereinafter referred to collectively as “Personnel”) of Snow Peak. Snow Peak also expects its suppliers, distributors, and other business partners to understand and support the contents of the Policy and will continue to encourage them to respect the Policy. In addition, Snow Peak requests that its trading partners, e.g., manufacturers, suppliers, distributors, and other trading partners, understand and comply with the Snow Peak Partner Code of Conduct, which includes standards for

respecting human rights, and we will promote our commitment to respect human rights by working in partnership with such trading partners in a collaborative manner.

### **Human rights issues that Snow Peak considers important**

Snow Peak has identified the following human rights issues that should be prioritized in its business processes, including development, procurement, manufacturing, distribution, and sales, and will address them through appropriate procedures:

#### **1. Prohibition of Discrimination and Other Unjust Treatment**

Snow Peak shall not tolerate any discrimination based on age, disability, ethnic origin, gender, marital status, nationality, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by the Laws and international norms.

#### **2. Prohibition of Forced Labor and Child Labor**

Snow Peak does not tolerate any form of forced labor or child labor, including slavery or human trafficking. The term “child” refers to a person younger than 15 years of age or the local legal minimum age for employment, whichever is higher.

#### **3. Prohibition of harassment**

Snow Peak will not tolerate harassment of any kind, whether mental or physical or any behavior that is harmful to others.

#### **4. Providing a safe working environment**

Snow Peak is committed to creating a safe and secure work environment where employees can work in good mental and physical health, and achieve a harmonious work-life balance.

#### **5. Respect for freedom of association and collective bargaining**

Snow Peak respects the rights of employees to form labor unions, to join or not to join labor unions, and to bargain collectively with the head office, business sites, and affiliated companies in Japan and overseas.

#### **6. Education and Awareness**

Snow Peak will provide appropriate education and training to ensure that the Policy is understood by all Personnel of Snow Peak, and will also promote activities to ensure that the Policy is understood by our manufacturers, suppliers, distributors and other trading partners.

## **7. Responsibility Structure**

The department heads of each department of Snow Peak Inc., who have been delegated authority by the President and CEO, are responsible for promoting respect for human rights. The Board of Directors of Snow Peak Inc. will make decisions on matters that are important to fulfilling our commitment to respect human rights. The President and Representative Director of each entity in Snow Peak will report to the Board of Directors of Snow Peak, Inc. on the status of execution of the matters decided, and the Board of Directors of Snow Peak, Inc. will monitor and supervise the progress.

## **8. Human Rights Due Diligence**

Snow Peak will minimize any negative impact on human rights by continuously conducting human rights due diligence. Snow Peak will establish a human rights due diligence mechanism to assess the impact of its own activities on human rights and will work to avoid or mitigate the cause of any negative impacts that are identified. Snow Peak will also work to ensure that the Policy is respected in relation to any impacts on human rights that Snow Peak's business, products, or services may have with individuals through the business relationships they have with Snow Peak.

## **9. Remedies**

Snow Peak will take appropriate measures if it becomes clear that its business activities have directly caused negative impacts on human rights or have indirectly caused negative impacts on human rights through its business relationships while also taking into consideration its need to take care of any whistleblowers.

## **10. Dialogue and Consultation with Stakeholders**

Snow Peak will continue to improve its human rights initiatives in accordance with the Policy through dialogue and consultation with various stakeholders.

## **11. Information Disclosure**

Snow Peak will disclose the process, results, and progress of its human rights initiatives through its website and other means.

## **12. Human Rights Policy Development Process and Review**

The Policy has been decided by Snow Peak, Inc.'s Board of Directors. We will periodically review and revise the content of the Policy to ensure that it appropriately addresses human rights issues that change in response to social trends and the business environment.

\* Reference

The Snow Peak Way

At Snow Peak, we treasure every individual's initiative.

By joining forces in absolute trust, we work to achieve global leadership, elevating the essential life values inspired by being with nature.

We are always evolving, always innovating, always creating new approaches.

Our philosophy is that we are all users, so we provide customers with rich experiences that inspire us all.

We are committed to having a positive impact on the planet.

Established: December 13, 2023

Snow Peak, Inc.

Tohru Yamai

Representative Director, Chairperson, President and CEO