



Anti-harassment Guidelines

Article 1. Purpose

1. These Anti-harassment Guidelines (“the Guidelines”) set forth necessary matters concerning measures to prevent and eliminate harassment at NS United Kaiun Kaisha, Ltd. (“the Company”), with the objective of maintaining a good workplace environment so that employees can fulfill their potential at work.
2. Workplace harassment constitutes socially unacceptable behavior that can unfairly impair the personal dignity of workers, inhibit the workers from exercising their abilities effectively and hinder good order in the workplace and proper business execution, a situation that may affect the reputation of the Company.
Speech and behavior based on gender role consciousness can cause or result in sexual harassment. Negative speech and behavior regarding pregnancy and childbirth, etc. can cause or result in harassment related to pregnancy, childbirth, and taking childcare or other leave. You must not engage in such conduct and should consider your speech and behavior at work from the other person’s perspective, with the aim of creating a harassment-free comfortable workplace.

Article 2. Definitions

In the Guidelines, “harassment” refers to the descriptions given in any of the following items.

1. Sexual harassment

- (1) One employee engages in unwelcome verbal or physical sexual conduct towards the other employee (the harasser and the victim can be of either sex and also of the same sex, and this kind of conduct may involve disrespectful or discriminatory speech and behavior towards LGBT persons related to their sexual identity and sexual orientation ; the same applies hereinafter), and the victim suffers detriment or discomfort as a result. Sexual harassment is divided into the following two types:
 - (i) Quid pro quo sexual harassment
The victim of this type of sexual harassment unreasonably suffers disadvantage with respect to employment conditions, such as dismissal, demotion, salary cut, and refusal of renewal of the employment contract, depending on the person’s response to unwelcome verbal or physical sexual conduct.
 - (ii) Hostile environment sexual harassment
The victim of this type of sexual harassment unreasonably suffers significant interference with work as a result of unwelcome verbal or physical sexual conduct bringing about a hostile work environment in which the person’s work performance is severely affected.

(2) The following are examples of major forms of sexual harassment.

- (i) Unwelcome jokes, teasing, and questions of a sexual nature
- (ii) Browsing, distribution, and posting of lewd images
- (iii) Other forms of offensive language and acts of a sexual nature
- (iv) Spreading rumors of a sexual nature
- (v) Unwanted touching of a person on any part of their body
- (vi) Sexual speech and behavior that can reduce the work motivation of employees, etc. and interfere with work performance
- (vii) Unwelcomed requests for sexual favors and dates
- (viii) Mistreatment of subordinates or other employees who have rejected advances of a sexual nature

2 Power harassment

An employee takes unfair advantage of his/her higher professional status or higher position in the hierarchical relationship to inflict unreasonably severe mental or physical distress to a-employee or create a hostile work environment. The following are examples of major forms of power harassment.

- (i) Physical assault, injury (physical attack)
- (ii) Intimidation, slander, insults, violent language (mental attack)
- (iii) Isolation, keeping out of the loop, ignoring (separation from relationships)
- (iv) Allocation of intentionally meaningless tasks or unmanageable workload, unnecessary disruption of job performance (excessive demand)
- (v) Assignment of intentionally irrational duties, unreasonably low-level tasks relative to professional competence and experience, or no jobs at all for no fair reason (undervalued demand)
- (vi) Overt invasion of personal privacy (violation of individual rights)

3. Harassment related to pregnancy, childbirth, childcare and family care leave, etc.

A worker engages in conduct that causes mental or physical distress or mistreatment to the target worker in association with her or his partner's pregnancy, childbirth or childcare and using leave or other benefits for these reasons. The following are examples of major forms of this type of harassment.

- (1) A worker engages in verbal or physical conduct that can inhibit his/her subordinate or colleague from using leave or other benefits for reasons of pregnancy, childbirth or childcare.
- (2) A worker harasses his/her subordinate or colleague in association with the person using leave or other benefits for reasons of pregnancy, childbirth or childcare.
- (3) A worker harasses his/her female subordinate or colleague in association with her pregnancy or childbirth, etc.
- (4) A worker engages in conduct that suggests the possible mistreatment, such as dismissal, of his/her subordinate in association with the person using leave or other benefits for reasons of pregnancy, childbirth or childcare.

- (5) A worker engages in conduct that suggests the possible mistreatment, such as dismissal, of his/her female subordinate in association with her pregnancy or childbirth, etc.

4. Caregiving harassment

A worker engages in conduct that causes mental or physical distress or mistreatment to the target worker in association with his/her family caregiving and using leave or other benefits for this reason. The following are examples of major forms of this type of harassment.

- (1) A worker engages in verbal or physical conduct that can inhibit his/her subordinate or colleague from using leave or other benefits for reasons of family caregiving.
- (2) A worker harasses his/her subordinate or colleague in association with the person using leave or other benefits for reasons of family caregiving.
- (3) A worker engages in conduct that suggests the possible mistreatment, such as dismissal, of his/her subordinate in association with the person using leave or other benefits for reasons of family caregiving.

5. Customer Harassment

“Customer harassment” refers to conduct by customers, etc., in the workplace that:

- (1) consists of words or actions by customers.
- (2) exceeds what is considered socially acceptable in light of the employees’ duties and other relevant circumstances.
- (3) harms the employees’ working environment.

All three elements, (1) through (3), must be met.

6. Sexual Harassment Against Job Applicants, etc.

This refers to conduct in which sexually related words or actions by employees employed by the employer interfere with job applicants’ job-seeking activities or related activities.

7. Other types of harassment

A worker engages in conduct deemed to fall into any of the above items in association with nationality, ethnic origin, age, race and ethnicity and mental or physical disability (except for cases involving reasonable consideration), and other factors.

Article 3. Responsibilities of the Company and Employees

1. The Company will take necessary measures to prevent harassment in the workplace in order to create and maintain a harassment-free, healthy and comfortable workplace environment. The workplace here includes all the places where work is performed and places outside working hours that are regarded as substantially an extension of the workplace.
2. Employees must not engage in harassment nor tolerate harassment committed by other employees.

3. Persons in managerial or supervisory positions are responsible for ensuring a healthy and comfortable workplace environment, and must strive to prevent harassment and take prompt and appropriate response in case a harassment-related issue arises, as part of their duties.
4. The Guidelines apply to all people working for the Company, including regular, temporary, contract, and part-time employees. (including those who were our company or temporary employees within one year)
5. In the case of harassment related to pregnancy, childbirth, and childcare and family care leave, etc., the harasser can be a supervisor or colleague of female workers in the pre-birth or postpartum period as well as male and female workers using childcare leave and other programs.
6. In the case of sexual harassment, superiors, colleagues, customers, and employees of business partners, etc., can become either the harasser or the victim, both of which can be of either sex and also of the same sex. Also, sexual harassment can result from conduct of a sexual nature regardless of the victim's sexual identity or orientation.

Article 4. Disciplinary Action

Employees identified as having committed harassment may face disciplinary action based on Article 63 (16) of the Onshore Personnel Work Regulations or Article 2(8) of the Seafarers' Reward and Punishment Regulations.

Article 5. Harassment Consultation Desk

1. The Company establishes the following contact desk for consultation (including complaints) regarding workplace harassment, and the officer in charge shall be the Director responsible for General Affairs Group.

“Anshin Hotline” (operated by S.P. Network Co., Ltd.)

Telephone : +81-120-991-198 (Monday–Friday 9:00–18:00; closed on weekends, public holidays,
and the year-end/New Year holidays)

Email : anshin@e-goiken.com

(available 24 hours a day, 365 days a year; accessible via mobile email)

Online form : <https://form.run/@nsunited-kaiun-egoiken>

Postal mail : Daiwa Ogikubo Tower, 1-2-1 Kamiogi, Suginami-ku, Tokyo, Japan

2. In accordance with the Helpline Regulations, the Company has also established internal and external helpline channels.

Article 6. Response to Harassment Consultations

1. The Director responsible for General Affairs Group shall instruct the relevant department to prepare response manuals and provide necessary training. The overall process shall follow the separately prescribed "Procedure After Receiving Consultation/Complaint."
2. Not only victims of workplace harassment, but all employees may report to the harassment consultation desk regarding power harassment, sexually related conduct, or conduct related to pregnancy, childbirth, childcare leave, nursing care leave, or other matters that adversely affect the working environment.
3. The consultation desk shall receive reports and provide a summary to the Director responsible for General Affairs Group. Based on such report, the Director shall appoint a person responsible for investigation, who shall, with due consideration for privacy, hear facts from relevant parties including the alleged perpetrator, the victim, supervisors, and other employees as necessary.
4. Employees who are requested to participate in the interviews described in the preceding paragraph may not refuse such request without justifiable reason.
5. In accordance with the response manual, the investigation officer shall report findings to the Director responsible for General Affairs Group. The Director shall then, in consultation with the General Affairs Group, determine appropriate measures for resolution. Such measures may include disciplinary action under Section 4, reassignment of the perpetrator, and other steps necessary to improve the victim's working conditions and environment.
6. In handling consultations and complaints, the privacy of all parties shall be protected, and no disadvantageous treatment shall be imposed on any person for making a consultation or cooperating in fact-finding.

Article 7. Obligation to prevent Recurrence

When a workplace harassment incident occurs, the Director responsible for General Affairs Group shall take appropriate measures to prevent recurrence, including re-communicating relevant policies and procedures, conducting training programs, and analyzing the root causes of the incident.

The Guidelines are effective from January 1, 2017.

The revision of this Guideline shall be made upon approval by the Director responsible for General Affairs Group.