

ESG Information on S&P Global CSA 2025

A content index of "Corporate Sustainability Assessment (CSA)" for our ESG information is as follows.
The information provided covers the performance of TEPCO and it is updated on a regular basis in each of the linked sections.

As of December, 2025

1. Governance & Economic Dimension																													
1.1.1	<p>Sustainability Reporting Boundaries The Integrated Report, a key tool for sustainability disclosure, discloses the reporting boundary in the same scope as financial reporting and in the scope of consolidation.</p>																												
1.2.1	<p>Since TEPCO employs the "Company with Nominating Committee, etc." form of corporate governance, the target share of independent directors on its Nominating Committee, Audit Committee and Compensation Committee that are incidental to the Board of Directors is 50% or higher.</p>																												
1.2.3	<p><Non-executive Chairman/Lead Director> Board of directors/supervisory board is headed by a non-executive and independent chairman and this approach has been adopted for 13 years.</p> <p>Tokyo Electric Power Company Holdings, Inc. switched to a "Company with a Nominating Committee, etc." system in June 2012 and has been promoting management reforms under a corporate structure where execution is separate from supervision. The Board of Directors is chaired by an outside directors/independent directors and comprised of people of both genders with expert knowledge and diverse backgrounds, and 46% of board members are outside directors/independent directors. Additionally, members from the Board of Directors serve as the chairs of the Nominating, Audit, and Compensation Committees, and provide supervision of executive action by executives.</p>																												
1.2.4	<p><Board Diversity Policy> We have a Board Diversity Policy in place when selecting candidates for outside directors, which references the "Standards for Independence of Outside Directors." The Board of Directors consists of a diverse group of Directors with varying backgrounds in terms of expertise and experience, etc., and the actual number of Directors elected is to be an appropriate number within the maximum number of 13 stipulated in the Articles of Incorporation among this number, regarding outside Directors, by comparing candidates against the "Standards for Independence of Outside Directors," we select candidates based on whether they fulfill the criteria for independence. The diversity mentioned in the selection policy includes gender, race, nationality, place of birth, and cultural background. The Board of Directors is committed to composing a diverse group of individuals with different genders (2 females), expertise, and backgrounds.</p>																												
1.2.6	<p><Method of resolution by the Board of Directors> The resolution of a meeting of the Board of Directors shall be effective when a majority of the Directors present at the Board meeting are present.</p> <p><Board Performance Review> TEPCO strives to improve the effectiveness of the Board of Directors, which is the cornerstone of governance, by utilizing the rich experience and wide-ranging insights of its diverse outside directors. We also evaluate the effectiveness of the Board of Directors through self-assessments such as annual questionnaires to the Directors and deliberations at Board of Directors meetings, as well as independent assessments using a third-party organization once every three years approximately.</p> <p><Board Election Process> The term of Board of Directors shall expire at the close of the Ordinary General Meeting of Shareholders relating to the last fiscal year ending within one year after their election, and Board members are elected individually.</p>																												
1.2.7	<p>Average tenure of board members is 3.62 years. *TEPCO HD, instead of a one-tier board structure, has adopted the governance structure of a Company with Nominating Committee, etc.</p> <table border="1"> <tbody> <tr> <td>Yoshimitsu Kobayashi</td> <td>4 years</td> <td>Tomoaki Kobayakawa</td> <td>9 years</td> </tr> <tr> <td>Shigeo Ohyagi</td> <td>5 years</td> <td>Hiroyuki Yamaguchi</td> <td>3 years</td> </tr> <tr> <td>Shoichiro Onishi</td> <td>5 years</td> <td>Daisuke Sakai</td> <td>2 year</td> </tr> <tr> <td>Junko Okawa</td> <td>2 year</td> <td>Momoko Nagasaki</td> <td>0 years</td> </tr> <tr> <td>Takashi Nagata</td> <td>2 year</td> <td>Toshihiko Fukuda</td> <td>3 years</td> </tr> <tr> <td>Takakazu Uchoda</td> <td>0 year</td> <td>Shigehiro Yoshino</td> <td>4 years</td> </tr> <tr> <td></td> <td></td> <td>Seiji Moriya</td> <td>8 years</td> </tr> </tbody> </table>	Yoshimitsu Kobayashi	4 years	Tomoaki Kobayakawa	9 years	Shigeo Ohyagi	5 years	Hiroyuki Yamaguchi	3 years	Shoichiro Onishi	5 years	Daisuke Sakai	2 year	Junko Okawa	2 year	Momoko Nagasaki	0 years	Takashi Nagata	2 year	Toshihiko Fukuda	3 years	Takakazu Uchoda	0 year	Shigehiro Yoshino	4 years			Seiji Moriya	8 years
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1.2.11	<p>CEO's Multiplier Calculation (Currency: Yen) $429.7 * 23,382 / 26,000,000 = 0.386$ Multiplier calculation for other executives $(429.7 * 46,886 / 26,000,000) + (429.7 * 5,097 / 26,000,000) + (429.7 * 6,215 / 26,000,000) + (429.7 * 12,304 / 26,000,000) + (429.7 * 0 / 26,000,000) / 5 = 0.233$ *The calculation is conditional on the average of disclosed compensation for executive officers.</p>																												
1.2.13	<p>TEPCO is owned by Nuclear Damage Compensation and Decommissioning Facilitation Corporation, which is 50% owned by the Japanese government, and has 50.09% of the voting rights, so the government effectively has 25.045% of the voting rights. In addition, TEPCO doesn't have any golden shares for governmental institutions.</p>																												
1.2.15	<p>The ratio between the total annual compensation of the Chief Executive Officer and the mean or median employee compensation: $32,277,778 / 8,595,666 = 3.76$ *The calculation is conditional on the average of disclosed compensation for executive officers.</p>																												

1.3.3	<p><Material Issue 1> FY2030 Target ·profit of around ¥100 billion per year from renewable energy businesses. Progress : Net income 34.9 billion yen</p> <p>·FY2030 Target2 : Develop 6 to 7 GW of new renewable energy in Japan and overseas by FY2030 Overseas hydroelectric power development of 540 MW, overseas offshore wind power development of 2.01 GW in progress</p> <p><Material Issue 2> FY2027 Target ·Human resources trained to develop new business : 2,700 by 2027 Progress: 1,723 people FY2025 Target ·Trained to promote DX : 8,000 by FY2025 Progress : approx. 6,300 people</p> <p><Material Issue 3> FY2028 Target ·Nsuring the safety/quality of the operation of ALPS treated water ocean discharge facilities Controlled generation of contaminated water Approx. 50-70m3/day Progress : Approx. 70m3/day</p> <p><Executive Compensation> At TEPCO, a Compensation Committee comprised of three outside directors discusses and assigns policies for determining the compensation of individual directors and executives, and also the compensation amounts for individual directors and executives. The compensation systems for directors and executives differ, and those individuals that serve as both directors and executives receive executive remuneration only. Executive remuneration is performance-based and the index that indicates performance includes both company and individual performance. The degree of achievement of ESG-related objectives is reflected in executive remuneration. As we aim to promote ESG-based operation, KPI pertaining to non-financial ESG performance are included in indicators for the performance-related remuneration for executives involved, and as such, achievement level, such as the aforementioned KPI, etc., is considered when the Compensation Committee determines salary. A percentage is set based on the executive's title, whether or not they have representative rights, and the duties of their position. The amount paid also reflects company performance and personal performance. Payout rate varies from 0 to 145%.</p>
1.4.1	<p><Risk Management System> Dedicated role or committee at board level for risk oversight (independent and/or non-executive board member(s)): Committee consisting of 4 out of 6 non-executive directors.</p> <p>Operational Risk Ownership (first line): Front-line employees or dedicated operational roles (e.g., risk managers, business unit heads) own and manage risks: A risk officer is assigned to each division and group company, and there is a system in place for reporting risks that materialize to the Risk Management Group. The Risk Management Group Manager manages each operational risk and reports to the Risk Management Committee as the secretariat for major risks.</p> <p>Risk Management and Compliance Oversight (second line): A dedicated role(s) or committee(s) exist(s) at the senior management or executive level, which is responsible for setting control standards and oversees compliance with them (does not include the CEO): The Representative Executive and President, who is the general manager, has created a risk management structure around the Chief Risk Officer (CRO), who is responsible for managing risks, and also a Risk Management Committee that debates how to handle risks that may have a serious impact on operation during normal times and when they manifest. There are six subcommittees dedicated to different fields under the Risk Management Committee and officers have been appointed to be in charge of these subcommittees that concentrate discussions on issues and risks for each dedicated field.</p> <p>Independent Audit Unit (third line): An internal audit function that provides independent assurance on the effectiveness of risk management and compliance processes.: The Internal Audit Office audits the effectiveness of risk management and compliance processes for all business activities. The results of major internal audits are reported to the President and the Board of Directors, etc., and the audited sections take necessary improvement measures based on the audit results.</p>
1.4.2	<p><Business risks are reviewed in the summary of financial results at the end of each fiscal year.> Business risks are reviewed in the summary of financial results at the end of each fiscal year.</p> <p><Risk Management Process Audit> Yes, we have conducted an internal audit in the last two years.The internal audit body shall audit the effectiveness of the risk management system periodically and additionally as necessary, and report the results of audit to the Board of Executive Officers, etc. The Executive Officers shall make necessary improvements based on the audit results.</p> <p><Risk Culture> Financial incentives which incorporate risk management metrics: TEPCO regards important risk management as an important management issue and has appointed a responsible officer. The degree of achievement of important management issues greatly affects the performance evaluation of the responsible officer. In addition, the responsible officer decides the line manager who will work on important management issues. The degree of achievement of important management issues will greatly affect the performance evaluation of line managers.</p> <p>Focused training throughout the organization on risk management principles: TEPCO is conducting training to improve the quality of risk scenario extraction, which is the basis of risk management. For example, the company requires all employees to take risk management training via e-learning at least once a year.</p> <p>Incorporation of risk criteria in the development of products and services: Incorporating risk criteria in the product development or approval process: Decisions about strategic investment in new areas of business are made by the Investment Committee established within TEPCO Holdings. Investment Committee makes investment decisions based on five evaluation criteria: risk, strategy, business model, management resources, and return. In particular, the Committee sets hurdles for each type of business and region that consider business risks and country risks, and makes investment decisions after evaluating the profitability and strategic advantage of each project based on those hurdles. Projects that have been invested in are monitored quarterly and investment is withdrawn if necessary..</p>

1.5.2	<p><TEPCO Group Charter of Corporate Conduct> https://www.tepco.co.jp/en/hd/about/corporate/pdf/corporate_conduct_01-e.pdf</p> <p>The following is TEPCO Group Charter of Corporate Conduct. The conduct includes corruption and bribery, discrimination, confidentiality of information, conflicts of interest, antitrust/anti-competitive practices, money-laundering and/or insider trading/dealing, environment, health and safety, and whistleblowing.</p>
1.5.3	<p><Political contributions> During the fiscal year 2019-2024, our company's expenditures on political contributions, lobbying, and other activities were zero.</p> <p><Charitable contributions and sponsorship> In order to engage in business activities rooted in the region, the TEPCO Group believes that it is important to contribute to the region such as by continually developing regional society along with the community as a member of that community, and as such we have donated to projects put forth in the FY2019 Aomori Prefecture Higashidori Village Regional Revitalization Plan. On the other hand, our charitable contributions and sponsorship for fiscal years from 2020 onwards were zero.</p>
1.5.4	<p><Codes of Conduct: Systems/ Procedures > In order to make the Code of Conduct more effective, TEPCO is taking the following actions.</p> <ol style="list-style-type: none"> 1. Responsibilities, accountabilities and reporting lines are systemically defined in all divisions and group companies. 2. A dedicated help desk has been set up. 3. Compliance linked to employee remuneration. As our company has established items related to a code of conduct in the employee evaluation system, compliance is also linked to employee compensation. 4. TEPCO has set up a corporate ethics section in its personnel evaluation process for employee assessment. 5. TEPCO has stipulated in its employment regulations that if a person is offered money or other goods in connection with his/her duties without a justifiable reason, he/she will be subject to serious disciplinary action, including "disciplinary dismissal". 6. The Corporate Ethics Committee, whose members include outside experts (one lawyer and two academics), meets about once a quarter to receive third-party certification, audit, and verification of the compliance system.
1.5.5	<p><Number of Breaches in FY 2024></p> <ul style="list-style-type: none"> - Significant Corruption or Bribery : 0 - Discrimination or Harassment : 1 - Significant Leakage of Customer Privacy Data : 0 - Significant Conflicts of Interest : 0 - Insider trading : 0
1.6.1 1.6.2	<p>Largest Contributions & Expenditures TEPCO dispatches its workforce and pays membership fees to organizations that contribute to addressing climate change issues and ESG information disclosure.</p> <ul style="list-style-type: none"> - General Incorporation Association of ESG Disclosure Study Group Annual contribution; JPY 1,500,000 (FY2024)

<p>1.6.3</p>	<p>We belong to the following organizations consistent with the Paris Agreement.</p> <p>The Federation of Electric Power Companies of Japan (FEPC) We are a member of the Federation of Electric Power Companies of Japan (FEPC), a trade association of electric power companies established to facilitate the operation of the electric utility industry in Japan. The Federation of Electric Power Companies of Japan (FEPC) is committed to "decarbonizing power sources" on the supply side and "promoting electrification" to the maximum extent possible on the demand side in order to achieve carbon neutrality. These efforts are consistent with the Paris Agreement. Similarly, we are working to develop renewable energy sources and sell electrification packages to households in a manner consistent with the Paris Agreement.</p> <p>The Electric Utility Industry Council for a Low Carbon Society (ELCS) We are committed to promoting and supporting member companies that agree to the establishment of a voluntary framework for the realization of a low-carbon society and the establishment of a carbon neutral action plan in order for the electric power industry to take effective measures against global warming, and to work independently and individually on their own action plans to achieve this goal, thereby promoting and supporting the electric power industry as a whole. The organization is a member of the Electric Utility Industry Council for a Low Carbon Society, whose purpose is "to promote effective global warming countermeasures in the electric power industry as a whole. The organization aims to achieve a national emission factor based on the government's ambitious "Energy Supply and Demand Outlook for FY2030" in order to achieve the country's overall reduction target (-46% from FY 2013). This initiative is consistent with the Paris Agreement. Since the objectives of the Council are consistent with our objectives regarding climate change, and since the carbon neutral action plan of the Electric Utility Industry Low Carbon Society Council is incorporated into the national plan to achieve the greenhouse gas reduction targets, we joined (and funded) the Electric Utility Industry Low Carbon Society Council in order to contribute to the achievement of the national targets. In joining the Council, we have decided to contribute to the achievement of the government's targets. In joining this council, we have followed the procedures for membership after examination by the General Affairs and Legal Departments in accordance with our "Basic Manual for Membership in Groups."</p> <p>GX League and the GX Promotion Agency We are participating in the "GX League," which is an industry-government-academia framework that takes on the challenge of quickly transitioning to a carbon-neutral society from the perspective of creating a virtuous cycle between the economy and the environment, with a view to achieving carbon neutrality and social change by 2050, and for which the Ministry of Economy, Trade and Industry serves as the secretariat. In FY2023, we are also participating in a working group that is discussing and reviewing a part of the rulemaking of GX-ETS, a type of carbon pricing, with the Ministry of Economy, Trade and Industry (METI), the secretariat, and other participating companies. In addition, we have invested in the establishment of the GX Promotion Agency, which will carry out operations based on the GX Promotion Act, such as supporting GX investments by private companies, collecting fossil fuel levies and specified business contributions, and administering the emissions trading system. This investment was made after explanation to and approval by the Executive Vice President, Chief Financial Officer and ESG Officer, and the President and CEO.</p> <p>Japan Climate Leaders Partnership (JCLP) We are also a member of the Japan Climate Leaders Partnership (JCLP) as a supporting member, and JCLP has published its "Recommendations for Japan's Timing Greenhouse Gas Reduction Targets and Basic Energy Plan (July 2, 2024)," which was hand delivered to the Minister of Economy, Trade and Industry. This approach is consistent with the Paris Agreement. The above recommendations call for a reduction of at least 75% in GHG emissions by 2035 (relative to 2013 levels), which is more ambitious than the 67% global reduction (relative to 2013 levels) required to limit the temperature increase to 1.5°C.</p> <p>We have established a forum to explain and report on these lobbying activities once a week to the Representative Executive Officer and Executive Vice President, who is the officer in charge of ESG. We also recognize that ESG responses, including lobbying activities, are important management issues, and the ESG Committee, chaired by the President & CEO, discusses climate-related issues on a regular basis.</p>
<p>1.7.2</p>	<p>Our procurement policies and responses to procurement challenges are overseen by the "Procurement Strategy Committee," chaired by CPO (Chief Procurement Officer) Fushimi, which also includes supplier ESG programs. The committee chair, CPO Fushimi, serves as an Executive Managing Officer of the Company and supervises these initiatives from the perspective of CPO.</p> <p>In our purchasing practices with suppliers, we ensure alignment with our Code of Conduct, namely the "Basic Procurement Policy" and the "Sustainable Procurement Guidelines." We present the "Sustainable Procurement Guidelines" to suppliers, requesting that they share its principles and comply with the guidelines. Furthermore, we have strengthened contractual provisions by adding clauses related to human rights compliance.</p> <p>The guidelines express our Group's stance of placing importance on building sound and positive partnerships with suppliers, and state our expectation that suppliers will adopt the same stance and establish a relationship of mutual trust with us as we fulfill our social responsibilities.</p> <p>In addition, personnel involved in procurement receive training on procurement operations and deepen their understanding of their roles in supplier ESG programs.</p>
<p>1.7.3</p>	<p>[Supplier Screening] We respect the following aspects in our screening process for significant suppliers:</p> <ul style="list-style-type: none"> - Environmental - Social - Governance - Business relevance (e.g. share of spend) <p>Specifically, for business relevance, we conduct financial evaluations of our procurement partners using third-party databases.</p> <p>And the methodologies for the process are follows;</p> <ul style="list-style-type: none"> - Country-specific risk: most of our suppliers are located in Japan, relatively low risk - Sector-specific risk (e.g. construction sector) - Commodity-specific risk (e.g. mineral material) <p>In terms of commodity-specific risk, we pay particular attention to information and communication equipment because incidents such as information leakage could have significant social impact. Additionally, we focus on batteries that use high-risk mineral resources such as nickel and cobalt.</p>

1.7.4 [Supplier Evaluation]
 Desk Evaluation of Suppliers (including systematic verification of evidence):
 In particular, for procurement related to nuclear operations, desk evaluations of suppliers are conducted, and procurement is made from "registered suppliers" who have passed internal evaluations. Evaluation criteria include procurement capability, reliability, technical expertise, track record, and quality management systems. The registration is valid for three years, and renewal requires re-evaluation.

On-site Evaluation:
 If any concerns arise based on the desk evaluation results, we conduct individual visits to verify the status of efforts related to the relevant items.

Corrective Actions and Improvement Plans for Suppliers:
 If an accident or violation occurs, new orders to the supplier may be canceled. However, if the corrective action plan for preventing recurrence is deemed appropriate, the suspension of orders may be lifted.

[Supplier Development]
 ESG Training:
 We provided to all significant suppliers ESG information especially human rights for supplier training when we feedback the sustainable procurement score for each supplier.

ESG Benchmarks:
 We provided the benchmarks for sustainable procurement score, in detail we plotted on the radar chart their own score, average score in all suppliers and average score in similar size suppliers for their comparison.

Supplier Support:
 We provided to the specific supplier on-site ESG lecture, the part of the supplier's improvement actions, that assisted to develop knowledge in the supplier.

1.7.5 KPIs for Supplier Screening
 The coverage and progress for our supplier screening is as follows;

Supplier Screening	FY 2024
Total number of Tier-1 suppliers	1,573
Total number of significant suppliers in Tier-1	338
% of total spend on significant suppliers in Tier-1	80
Total number of significant suppliers in non Tier-1	0
Total number of significant suppliers (Tier-1 and non Tier-1)	338

1.7.6 [Coverage and Progress in Supplier Evaluation]
 Desk Evaluation:
 Over the three-year period from FY2022 to FY2024, we requested responses to a questionnaire on sustainable procurement from a total of 1,521 suppliers, and received responses from 959 suppliers (covering approximately 90% of procurement value).
 On-site Evaluation:
 From suppliers that responded inadequately to questions on human rights, environment, and risk in the questionnaire, we selected four companies for individual visits to confirm their ESG initiatives.

[Coverage and Progress in Supporting Suppliers' Corrective Action Plans]
 We provided support, including ESG information, to all suppliers that had corrective action plans in place.

[Coverage and Progress in Supplier Capacity-Building Programs]
 We held briefing sessions for procurement partners to explain our policies and ESG themes. Key suppliers also attended these sessions.

Supplier Assessment	FY 2024
Total number of significant Tier-1 and non Tier-1 suppliers assessed via desk or on-site assessments	180
% of unique significant suppliers assessed	53.25444
Number of suppliers assessed with substantial actual/potential negative impacts	5
% of suppliers with substantial actual/potential negative impacts with agreed corrective action/improvement plan	100
Number of suppliers with substantial actual/potential negative impacts that were terminated	5

Corrective action plan support	FY 2024
Total number of suppliers supported in corrective action plan implementation	5
% of suppliers assessed with substantial actual/potential negative impacts supported in corrective action plan implementation	100

Capacity building programs	FY 2024
Total number of suppliers in capacity building programs	338
% of unique significant suppliers in capacity building programs	100

1.8.1 - Cybersecurity is supervised by the Board of Directors as an important management issue, and a Chief Information Security Officer (CISO) is appointed.
 - Cyber Security risk management is conducted by the Data System Security Subcommittee established under the Risk Management Committee, which is chaired by the President and Representative Executive Officer and consists of members of the Board of Directors. The Information System Security Subcommittee is to be chaired by the executive CISO.

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  graph TD
    Board[Board of Director] --> Risk[Risk Management Committee  
(Chair: Representative Executive Officer and President)]
    Risk --> CRO[Chief Risk Management Officer (CRO)]
    CRO --> Subcommittees[Six dedicated subcommittees  
(Subcommittee chairman: Officer in charge of each department)]
    Subcommittees --> P1[Preparedness measures]
    Subcommittees --> P2[Supply-demand countermeasures]
    Subcommittees --> P3[Nuclear preparedness measures]
    Subcommittees --> P4[Information system security measures]
    Subcommittees --> P5[Decommissioning preparedness measures]
    Subcommittees --> P6[Facility countermeasures]
  
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- We have identified eight areas of experience and insight that we particularly expect from candidates for director positions, and one of these areas relates to information security.
 "Technology" - experience and insight necessary to advance safety improvements and the utilization of digital transformation in the electric power business

2. Environmental Dimension	
2.2.1	<p>Quantified targets to address energy savings In accordance with the Energy Conservation Act, we are managing energy consumption to achieve a goal of reducing unit energy consumption by 1% or more per year.</p> <p>Actions to reduce the amount of energy use The TEPCO Group is working on energy efficiency in buildings. For example, we have renovated our office facilities, with a focus on equipment, and obtained the "ZEB Ready" (Ready for Zero Energy Buildings) certification under the "BELS (Building Energy Efficiency Labeling System)" in August 2022.</p> <p>Evaluation of progress in reducing energy consumption The TEPCO Group has implemented an environmental management system in line with ISO 14001 throughout the company and is implementing the PDCA cycle. This system aims to achieve accurate management of environmental impacts from business activities, reduce environmental risks, preserve and improve local and global environments, fulfill corporate social responsibility, and contribute to the creation of a sustainable society. We are committed to the maintenance, operation, and continuous improvement of the system. The important items in environmental issues are identified as "302 Energy" and "305 Emissions to Air" in the 300 series (Environment) of the GRI Standards.</p> <p>Use of clean or green energy We are promoting the electrification of our company's vehicles and purchasing "green power certificates" to greenify the electricity used for driving, aiming to achieve virtually zero CO2 emissions from our business EVs and giving renewable energy value to the power used for charging.</p> <p>Energy efficiency training provided to employees to raise awareness of energy consumption reduction Every year, we conduct environmental education for environmental practitioners in the TEPCO Group, covering common topics such as energy efficiency. In addition, each company provides environmental education to employees according to the characteristics of their respective businesses. To provide ongoing educational opportunities, we have developed 11 e-learning courses to support understanding of environmental regulations.</p>
2.3.1	<p>- Waste audits to identify opportunities for improving waste performance TEPCO Group has introduced ISO14001 compliant environmental management system at all our Group companies. In this system, we carry out environmental audits including waste internally.</p> <p>- Action plans to reduce waste generation - Quantified targets to minimize waste In order to reduce the burden on the environment we aim to maintain a high industrial waste recycling rate of more than 99% by the year 2030 in order to contribute to a circular economy through the management of waste.</p> <p>- Waste reduction training provided to employees Every year, we provide education to TEPCO Group environmental practitioners on laws and regulations of waste management and other Group common matters such as the waste reduction. Furthermore, each company provide its employees environmental training based on the specific characteristics of each business. We provide environmental education during the new employee training to promote environmental awareness among employees.</p> <p>- Integration of recycling programs to reduce the waste sent to landfill TEPCO has been implementing recycling programs to reduce waste. For example, in 2017, we reached a basic agreement with an other company to jointly implement a project to reduce waste through waste treatment, recycling, and biomass fuel conversion of sewage sludge.</p> <p>- Waste diversion from landfill is certified by an independent accredited body Although not certified by an independent accredited body, the amount diverted from landfill disposal is publicly available. https://www.tepco.co.jp/en/hd/about/ir/library/integratedreport/pdf/TP2025_en_web.pdf#page=107</p>
2.4.1	<p>-Water use assessment to identify opportunities for water efficiency improvements -Actions to improve wastewater quality We take continuous measurements and conduct sampling to monitor emissions released into the air and public water area from TEPCO power plant facilities and confirm that emissions are compliant with mandated environmental standards. To reduce emissions of polluting substances, we implement countermeasures concerning fuel, facilities, and operations management. We conduct risk management for soil and water pollution due to toxic substance leaks by regularly inspecting storage tanks, installing breakwaters and leak-off barriers, and preparing neutralizing agents, to prevent pollution damage. We also maintain records of products in use that contain polluting substances to ensure appropriate treatment during disposal and replacement. To address radioactive pollution incidental to the Fukushima Daiichi Nuclear Power Plant, in addition to cooperating with the government to conduct cleansing and prevent contamination to groundwater that flows below the grounds of the power plant, we also are implementing various measures to prevent polluted water from flowing into the ocean.</p> <p>-Establishment of targets to reduce water use -Actions to reduce water consumption -Application of water recycling In an effort to reduce water consumption, we are working to keep the amount of water used below the three-year average. Specifically, some of our offices reuse rainwater for toilet drainage, and every year we constantly measure the amount of rainwater reused with a water meter and report the results to the local government.</p> <p>-Awareness training provided to employees on water efficiency management programs Based on the environmental policy, we promote education for our employees on environment-related laws and regulations including water managements, as well as raising environmental awareness among our employees.</p>
2.4.5	<p>TEPCO Power Grid, Incorporated : 1 plant (Maximum output 50kW) TEPCO Renewable Power, Incorporated : 163 plants (Maximum output 9,794,108kW) The Tokyo Electric Generation Co.,Ltd. (consolidated subsidiary) : 78 plants (Maximum output 191,027kW)</p>

2.4.6	<p>- Dependency-related water risks considered in risk assessment</p> <p>We have confirmed that the supply chain that operates the hydroelectric power generation business complies with the minimum maintenance water volume stipulated by law, and evaluates that there are no compliance issues. We believe that the risks have been sufficiently reduced. Those who intend to use the running water of a river must obtain the permission of the river manager pursuant to the provisions of the Ordinance of the Ministry of Land, Infrastructure, Transport and Tourism. Regarding the construction and management of water and sewage, the responsibilities of the national government, local governments, and the people are stipulated by the Water Supply Law. When the "WRI Aqueduct Water Risk Atlas" tool was used to evaluate the baseline regulation and reputation risk of the intake area, and the water supply forecast for 2030, and this confirms that the risk is low.</p> <p>- Impact-related water risks considered in risk assessment</p> <p>We operate based in Kanto, including the capital Tokyo. With regard to the Tonegawa river and Arakawa river that flow through the area, the Cabinet Office has also made an assumption of damage if there is a flood due to a heavy rain every 200 years, and we have taken measures to reduce the damage according to that assumption. It is estimated that there will be about 1.8 million blackouts when Arakawa and Tonegawa have flooded. Assuming that the market share of our company is 70% and it takes one week to resume the supply of electricity, this would result in a decrease in the amount of electricity sold. Potential financial impact by decreasing of electricity sales is assumed below: 1.8 million houses × share ratio 0.7 × 260 kwh / month × 7/30 days × 34yen / kWh = approximately 2,598.96 million yen.</p> <p>- Assessment of future water quantities available</p> <p>According to the evaluation by WRI Aqueduct, the hydroelectric power generation area is evaluated as Medium-High at the maximum in the entire Kanto region, Yamanashi prefecture and Shizuoka prefecture, and because the maintenance flow rate is able to be secured at all hydropower stations, we judge that there is no power station located in water stressed area. We recognize that this tool will be able to evaluate in the next 20 years and this situation has not changed since last year. In the current and future prospects, we continuously collect information on the fact that power stations are not located in water stressed areas. We are confirmed that water related risks are sufficiently low by conducting the same assessment for businesses who operate power generation business in the value chain.</p> <p>- Assessment of future water quality-related risks</p> <p>By Group Environmental Policy, we mention an efficient utilization of water and reduction of environmental impacts by ensuring measures against environmental pollutions and risk management. Through our environmental management system, we ascertain emissions, consumption, and retention volumes for PCB waste, toxic substances, ozone depleting substances, and asbestos. Substances are managed appropriately in accordance with laws and we reduce emissions by promoting switching to products without toxic substances. By installing waterproof barrier and oil film detection shutoff valves etc., leakage risk is sufficiently reduced. In addition, we are taking appropriate measures not only in the power generation business but also throughout the entire value chain by strictly implementing leakage countermeasures and waste disposal. Measures of heavy rainfall, we manage and check the equipment near the river and increase the priority of replacement and detoxification treatment so as not to flow out hazardous waste when the river flood occurs.</p> <p>- Assessment of impacts on local stakeholders</p> <p>Water withdrawals are measured and monitored at all of our power plants and offices every fiscal year as INPUT/OUTPUT material flow in our environmental management system. At all of our hydroelectric power plants power plants, we submit data of yearly water withdrawals based on the agreement with national or prefectural governments depended on river manager where they are located. Total volumes of water withdrawals are always monitored by watching water level, flowmeters, and operation hours of pumps.</p> <p>- Assessment of future potential regulatory changes at a local level</p> <p>Our hydroelectric power plants are not located in water stressed areas and the risk of drought is low. Therefore, it is considered unlikely that the river law will be amended. In particular the allowable amount of water withdrawals specified at the local level in the guidelines based on this law would not be changed in 20 years, but legislative amendments may have some impact on our business, we continually watch the situation and regulatory changes, and communicate with local river management authorities. We are working on getting a situation of status change in close communications with regulators concerning water issues, especially Ministry of Environment or Ministry of Land, Infrastructure, Transport and Tourism. Results of these communications are reflected in our risk analysis. For example, in the operation of hydroelectric power stations, a status change in river basin management plan may have some impact on our facilities' operations. We maintain close communication with local river management authorities of the Ministry of Land, Infrastructure and Transport on water issues and are working on information exchange. In addition, we monitor the fact that the hydroelectric power plants are conducting water discharge with minimum flow based on the River Law, and submit annual data to the local river management authorities.</p>
2.5.6	<p>Governance b)</p> <p>< Management's role in assessing and managing climate-related opportunities ></p> <p>In the scope of not only our own direct operations but also upstream and downstream of our value chain, we appropriately manage the identification, evaluation, and response to opportunities related to climate change through the following process.</p> <p>Each fiscal year, we identify opportunities and evaluate their materiality based on the results of our analysis of the business environment. For particularly important items, we appoint a responsible officer,</p> <p>The Company sets short-, medium-, and long-term goals as action plans.</p> <p>The Board of Directors also checks the status of business execution on a quarterly basis and supervises the achievement of each goal.</p> <p>Furthermore, the ESG Committee, chaired by the President and CEO, regularly discusses climate change, and important topics are also discussed by the Board of Directors.</p> <p>< Management's role in assessing and managing climate-related risks ></p> <p>We are appropriately managing the identification, evaluation, and response to climate change risks through the following process.</p> <p>When formulating management plans for each fiscal year, each division of the Company identifies risks that may hinder the achievement of their respective action plans and business plans, and examines countermeasures against such risks. Specifically, we categorize risks from extraordinarily large to small according to the degree of impact, which is quantitatively evaluated for each factor such as "social impact," "economic loss," and "social condemnation. In the course of business operations, the Company from time to time confirms and evaluates the transformation of risks in light of changes in the internal and external environment, reviews countermeasures, and reports the results to the President and Representative Executive Officer and CRO. Furthermore, the Board of Directors confirms the status of business execution on a quarterly basis and supervises risks related to business activities.</p> <p>The effectiveness of the risk management system is audited regularly and as necessary by the internal audit organization, and the results are reported to the Board of Executive Officers, who make necessary improvements based on the audit results.</p> <p>Risk Management a), b), c)</p> <p>< Process for identifying, assessing, and responding to climate-related risks ></p> <p>We are appropriately managing the identification, evaluation, and response to climate change risks through the following process.</p> <p>When formulating management plans for each fiscal year, each division of the Company identifies risks that may hinder the achievement of their respective action plans and business plans, and examines countermeasures against such risks. Specifically, we categorize risks from extraordinarily large to small according to the degree of impact, which is quantitatively evaluated for each factor such as "social impact," "economic loss," and "social condemnation. In the course of business operations, the Company from time to time confirms and evaluates the transformation of risks in light of changes in the internal and external environment, reviews countermeasures, and reports the results to the President and Representative Executive Officer and CRO. Furthermore, the Board of Directors confirms the status of business execution on a quarterly basis and supervises risks related to business activities.</p> <p>The effectiveness of the risk management system is audited regularly and as necessary by the internal audit organization, and the results are reported to the Board of Executive Officers, who make necessary improvements based on the audit results.</p>

2.5.7	<p>We have set the achievement level of our CO2 reduction targets as a key performance indicator (KPI) for the performance-based compensation of all members of the Executive Board.</p> <p>Some of our business unit leaders, who are related to ESG and our CO2 emissions reduction target originating from the sale of power to 50% of FY2013 levels, have set performance targets, and their wages are adjusted based on the performance against those targets.</p> <p>We have established a system to recognize and reward employees who have obtained national qualifications related to climate change mitigation activities such as energy management, energy conservation, and CO2 emission reduction. This system aims to promote our efforts in addressing global warming, and includes commendations and the provision of monetary incentives.</p>
2.5.8	<p>We appropriately identify, evaluate, and manage climate change risks not only in our direct operations but also upstream and downstream in the value chain through the following process.</p> <p>Each division of Minebea identifies risks that may hinder the achievement of their respective action plans and business plans, and examines countermeasures when formulating their annual management plans.</p> <p>Specifically, we categorize risks from extraordinarily large to small according to the degree of impact, which is quantitatively evaluated for each factor such as "social impact," "economic loss," and "social condemnation."</p> <p>In the course of business operations, the Company from time to time confirms and evaluates the transformation of risks in light of changes in the internal and external environment, reviews countermeasures, and reports the results to the President and Representative Executive Officer and CRO.</p> <p>Furthermore, the Board of Directors confirms the status of business execution on a quarterly basis and supervises risks related to business activities.</p> <p>The effectiveness of the risk management system is periodically and as necessary audited by the internal audit organization, the results of which are reported to the Executive Committee and the Board of Directors.</p>
2.5.9	<p>Risks driven by changes in regulation</p> <p>< Transition Risk ></p> <p>Our electricity retail business is 100% conducted in Japan.</p> <p>In Japan, the law requires electricity retailers to "increase the ratio of non-fossil power sources in electricity sales to 44% by FY2030" and to fulfill this obligation by procuring non-fossil power sources and non-fossil certificates from the nationwide market for non-fossil value trading.</p> <p>On the other hand, the ratio of non-fossil power sources to our electricity sales in FY2024 is low at about 5%.</p> <p>Therefore, our task is to reduce the cost of procuring non-fossil certificates.</p> <p>Assuming that in 2030, the shortfall in the ratio of non-fossil power sources (44% - 5% = 39%) and the amount of electricity sold (185.2 billion kWh) were at the same level as in 2024, respectively, and the price of non-fossil certificates (contract price of 0.91 yen/kWh at the latest contract (executed on August 28, 2025)) was the same level as in FY2024, the cost of procuring non-fossil certificates is estimated to increase by a maximum of approximately 65.7 billion yen.</p> <p>Formula: 185.2 billion kWh x 39% x 0.91 yen/kWh ≈ 65.7 billion yen 173.1 billion kWh x 38% x 0.6 yen/kWh ≈ 39.4 billion yen</p> <p>The breakdown of non-fossil certificates to be procured is the designated non-fossil value certificate for renewable energy and the non-designated non-fossil value certificate. If the company is able to achieve a non-fossil ratio of 44% with its own power sources, it will no longer be necessary to procure non-fossil certificates and the financial impact will be zero.</p> <p>As mentioned above, if it is difficult to achieve a 44% non-fossil power source ratio, it is possible to achieve it by procuring non-fossil certificates, but there is a risk that procuring non-fossil certificates will incur a large amount of cost.</p> <p>To minimize this risk, it is important to expand renewable energy sources. We have set a target of developing about 6 to 7 million kW of new renewable energy power sources in Japan and abroad by FY2030, mainly offshore wind power.</p> <p>3.46 million kW (including those under development) of new power sources have been developed in total up to FY2024.</p> <p>In addition, the Company recorded 35,930 million yen in capital investment in renewable energy and other sources as administrative expenses.</p> <p>This includes hydroelectric power generation, wind power generation, and solar power generation.</p> <p>Risks driven by change in physical climate parameters or other climate-change related developments</p> <p>< Physical Risk ></p> <p>We are engaged in the electric power business mainly in the Kanto region, including Tokyo, the capital of Japan, and own a large number of facilities in a wide area.</p> <p>We own hydroelectric power generation facilities, mainly along rivers in Tochigi, Gunma, and other prefectures, totaling approximately 9.80 million kW with a book value of 353,653 million yen at 164 locations, and transmission and distribution facilities totaling 389,032 km with a book value of 3,917,712 million yen.</p> <p>For the Tone River and the Arakawa River, which run through our core operation area in the Kanto region, the Cabinet Office has compiled the following damage assumptions in the event of a flooding caused by a heavy rain that has a probability of occurring once every 200 years.</p> <p>The number of households that would experience power outages due to inundation of power facilities would be up to approximately 590,000 in the Tone River Metropolitan Wide Area Flooding and up to approximately 1.21 million in the Arakawa River Right Bank Lowland Flooding.</p> <p>In addition, power outages due to flooding of homes and apartments and power outages due to power supply interruptions to prevent secondary damage such as power leakage are assumed, so the number of homes without power is expected to increase further.</p> <p>Furthermore, according to the Global Warming Observation, Prediction and Impact Assessment Integrated Report (planned and supervised by the Ministry of Education, Culture, Sports, Science and Technology, Japan Meteorological Agency, and the Ministry of the Environment), the number of very strong typhoons is also expected to increase with global warming.</p> <p>Therefore, risks such as failure or damage of hydroelectric power plants and transmission/distribution facilities due to typhoons, heavy rains, or other natural disasters could have a significant impact on our finances, mainly through a decrease in asset value, and also through a decline in public confidence in us as a supplier of electricity, a necessity in our daily lives.</p> <p>Therefore, our major challenge is to respond to these risks.</p> <p>It is difficult to quantify the loss of public confidence in our company in the event of supply disruptions due to equipment failure or damage.</p> <p>Therefore, the financial impact of equipment damage is explained below.</p> <p>< Minimum Value ></p> <p>If there is no breakdown or damage to power facilities and the power supply can be carried out without delay, the financial impact is 0 yen.</p> <p>< Maximum Value ></p> <p>The maximum potential impact is assumed to be 4,271,365 million yen, which is the sum of the book value of our hydroelectric power plant (347,335 million yen) and the book value of our power transmission and distribution facilities (3,917,712 million yen).</p> <p>To address this risk, we are taking measures to minimize the failure or damage of facilities and to mitigate the financial impact in the event of a failure or damage of facilities.</p> <p>< Responses ></p> <p>(1) Measures to minimize equipment failure and damage</p> <ul style="list-style-type: none"> ● Raise equipment and install seawalls ● Waterproofing measures for power supply equipment, telecommunications equipment, etc. ● Other <p>Capital investment for the above measures amounts to 461.3 billion yen. This includes transmission, substation, and distribution facilities.</p> <p>(2) Measures to mitigate financial impact</p> <ul style="list-style-type: none"> ● To mitigate the negative financial impact in a single fiscal year, a provision for disaster losses has been made, amounting to 0 yen in FY2024. <p>< Calculation of expenses ></p> <p>The estimated 463.8 billion yen in response costs consists of capital expenditures and the provision for disaster losses.</p>

2.5.10	<p>Our company positions the "restart of nuclear power plants" as a key strategic opportunity in addressing climate change. Nuclear power is explicitly recognized in Japan's 7th Strategic Energy Plan as an essential decarbonized energy source to achieve both Green Transformation (GX) and energy security. For our group as well, it is an indispensable element for simultaneously ensuring stable supply, economic growth, and decarbonization. Specifically, we are advancing technical preparations to restart Unit 6 of the Kashiwazaki-Kariwa Nuclear Power Plant (output: 1.356 million kW), which serves as a cornerstone for improving profitability.</p> <p>We estimate the annual positive financial impact of this opportunity at approximately 100 billion yen per reactor, based on an assumed annual generation of 10 billion kWh and calculated using fuel prices and other factors.</p> <p>In addition, the restart is expected to reduce annual CO₂ emissions by about 3.3 million tons, making a significant contribution to achieving a decarbonized society. The estimated timeframe for this opportunity to generate a positive financial effect is within 5 years.</p> <p>Meanwhile, the current annual capital investment required to develop this opportunity is approximately 246.6 billion yen. These investments are based on the principle of prioritizing safety and are aimed at enhancing reliability and fostering coexistence with local communities. Through our nuclear power business, we will continue to contribute to achieving both decarbonization and stable energy supply, thereby helping to realize a sustainable society.</p>
2.5.11	<p>Three scenarios (IEA CPS, IEA NZE 2050, and TEPCO original scenario) were created in the scenario analysis, and physical risks were identified in RCP 2.6 and RCP 8.5. Physical risks related to climate change are integrated with company-wide risks by the Risk Management Committee, and are determined to be critical risks based on their impact and frequency of occurrence.</p> <p>The determined critical risks are overseen by the Board of Directors.</p> <p>This risk management covers all relevant areas from upstream to downstream and from short-term to medium- to long-term.</p>
2.5.12	<p>In accordance with the Disaster Prevention Basic Act, we have formulated and published our Disaster Prevention Work Plan. This plan is a company-wide plan for disaster prevention, emergency preparedness, and disaster recovery for our facilities and includes existing and new businesses. The Disaster Prevention Work Plan also includes situation-specific plans, such as flood and landslide prevention measures, and is designed to adapt to the physical risks associated with climate change.</p> <p>Specifically, the preventive measures for power facilities on page 7-13 include measures against flooding, wind damage, storm surge, snow accumulation, lightning damage, and landslides.</p> <p>In addition, we plan to conduct disaster drills at least once a year at each location, including the head office, nuclear power plants, general branch offices, power plants, and regional headquarters, depending on the situation.</p> <p>Furthermore, the following preventive measures are planned for electric facilities owned by each company to prevent the occurrence of disasters. For example, for hydroelectric power generation facilities, the following plans are made according to the water level forecast based on past disasters, actual damage, river bed rise, etc., and taking into consideration the specific characteristics of each facility: installation of waterproof walls, installation of drainage pumps, raising of equipment, installation of equipment to ensure dam communication, and sealing of buildings, etc.</p>
2.5.15	<p><u>Net-zero Strategy</u> Our comprehensive efforts for CO₂ reduction are detailed in pages 7 onwards of the document provided: https://www.tepco.co.jp/en/hd/newsroom/press/archives/2022/pdf/220428e0201.pdf</p> <p><u>Scope 3</u> Given our low share of thermal power generation, our focus on reducing Scope 3 emissions is particularly important.</p> <p><u>Scope 1&2</u> We are participating in the EV100 initiative and aiming for 100% electrification of our fleet of business vehicles (excluding special construction vehicles and emergency vehicles) by 2030, which helps reduce Scope 1 emissions. Additionally, we acquire green power certificates to offset the CO₂ emissions associated with the electricity consumed by electric vehicles, contributing to the reduction of Scope 2 emissions.</p> <p><u>Offsetting and investing in permanent carbon removal</u> On page 10 of the aforementioned URL, we have set the goal to achieve "net-zero CO₂ emissions from energy supply" by 2050. In the event that there are remaining CO₂ emissions from energy supply in 2050, we envision offsetting them through carbon credits. Furthermore, companies in which we have invested, such as JERA Co., Inc. and Japan CCS Co., Ltd., are engaged in research and demonstration projects related to CCS.</p>
2.6.1	<p><u>Public report on the process steps of our biodiversity risk assessment</u> Our group is conducting a trial implementation of the "LEAP approach" as a method for identifying and evaluating natural-related risks. This initiative is disclosed in the Biodiversity Report on page 9. https://www.tepco.co.jp/en/hd/about/ir/library/integratedreport/pdf/TP2024_BR-e.pdf</p> <p><u>Use of location-specific approach</u> In the trial implementation of the "LEAP approach," we focused on existing facilities and evaluated hydropower generation. Hydropower generation is considered to have a significant dependence on and impact on nature during the facility operation stage, and it accounts for a large portion of our group's power generation capacity. Among them, we selected pumped-storage hydroelectric power plants, which generate electricity through the circulation of water between upper and lower dams according to power demand, and evaluated them as the target. (Biodiversity Report, page 9-12)</p> <p><u>References to methodologies or frameworks used for assessment</u> In the trial implementation of the "LEAP approach," we used "ENCORE" to assess the identification of the dependence and impact relationship between business activities and nature, which is an important prerequisite for understanding risks and opportunities. (Biodiversity Report, page 13)</p> <p><u>Integration into the company-wide risk management process</u> Among the natural capital risks, themes that are relevant to the overall management of our group are discussed in the "ESG Committee" as ESG issues and reported to the Board of Directors. (Biodiversity Report, page 8)</p> <p><u>Dependency-related biodiversity risks considered in risk assessment</u> In the evaluation using "ENCORE," items such as "surface water," "maintenance of sound water circulation," and "climate regulation" were identified as having a high level of dependence in the hydropower generation business. (Biodiversity Report, page 13)</p> <p><u>Impact-related biodiversity risks considered in risk assessment</u> In the evaluation using "ENCORE," items such as "use of terrestrial ecosystems," "use of freshwater ecosystems," and "use of water resources" were identified as having a significant impact in the hydropower generation business. (Biodiversity Report, page 14)</p> <p><u>Scope of biodiversity risk assessment</u> The above risk assessment includes our own business, adjacent areas to our business, and activities upstream and downstream, as it pertains to the hydropower generation business. In addition, in our business activities, we have been conducting environmental impact assessments and other evaluations apart from the trial implementation of the "LEAP approach," and we have been conducting and publicly reporting on the evaluation scope, including areas adjacent to our business, upstream activities, and downstream activities.</p>

<Biodiversity Commitment>

Policy or Commitment aspects

In May 2024, we released the "TEPCO BIODIVERSITY REPORT 2024," which comprehensively summarizes data, initiatives, and economic evaluations related to the natural capital of the TEPCO Group, in addition to the biodiversity policy".

We are currently working on information disclosure in line with the TNFD framework, and this report aims to organize and disclose the progress of our current initiatives as of now. We will utilize this report as a communication tool to enhance engagement with all stakeholders and contribute to further improving corporate value and creating social value.

Within this report, we present the "TEPCO Group Biodiversity Policy". This policy is positioned as a commitment to realizing "biodiversity conservation" as stated in the "TEPCO Group Environmental Policy" and specifies considerations for the local community, reducing impacts in business activities, compliance with regulations, information dissemination and dialogue, and employee education.

Achievement of a net positive impact (NPI) on biodiversity

year: 2030

One of our major projects is the conservation of Oze National Park. We own roughly 40% (roughly 70% of the special protection zone) of the Oze National park and have been conducting nature protection activities with related agencies on the ground over many years. We consider this to be a symbolic project with a 60-year history and we will continue to work on and are focusing our efforts on this project that will contribute to the realization of #15 of the SDGs by FY2030.

Definition of biodiversity-related targets for priority areas to work towards no net loss

According to the various laws about the environment in regions we do business and through agreements with third parties and scientific evidence-backed environmental assessments, TEPCO Group is implementing appropriate nature conservation measures following the mitigation hierarchy to minimize the negative impact of development on biodiversity.

Commitment required of value chain to avoid operational activities near sites containing globally or nationally important biodiversity

The TEPCO Group Biodiversity Policy aims to achieve biodiversity conservation across society in collaboration with stakeholders, including business partners and value chains. The policy states that in the electricity business, efforts will be made to understand the connection with biodiversity and minimize its impact while ensuring a stable power supply. The policy also commits to complying with biodiversity-related laws and regulations and contributing to the international community.

The mission of the TEPCO Group is to provide a stable supply of power to citizens of Japan. In Japan, people live right next to areas that are important to maintaining biodiversity such as world heritage sites. We also need to do our business activities in these areas to provide those people with electricity.

While complying with environmental laws and regulations in the areas of our business, the TEPCO Group works with regional partners to minimize the damaging impact on biodiversity from development activities while promoting projects to contribute to improving the quality of life of residents. The TEPCO Group commits to contribute to the sustainable use of the natural environment into the future while giving consideration to biodiversity, which is the foundation for our economy and society.

Application of a mitigation hierarchy

In order to minimize the damaging impact on biodiversity through development activities, the TEPCO Group complies with environmental laws in our areas of business and engages in conservation measures based on the mitigation hierarchy through agreements with third parties and environmental assessments that have scientific basis to suitably conserve the natural environment.

Conducting a biodiversity risk assessment

YES * Please refer to 2.6.1

Engagement with stakeholders on biodiversity

The TEPCO Group Biodiversity Policy includes the following provisions:

(1) Striving to convey easy-to-understand information to, and engage in dialogue with, stakeholders

- Through environmental assessments, etc., we shall convey information to, and engage in dialogue with, regional communities in a suitable manner and at suitable times as we strive to form consensus.

- We shall proactively convey information on important natural capital owned by the TEPCO Group, such as the protected Oze National Park.

(2) We shall educate employees and strengthen partnerships with external parties

- We shall deepen the understanding of biodiversity amongst all TEPCO Group employees as we strive to preserve biodiversity through partnerships with regional society.

Scope of Commitment

Own Operations, Suppliers, and Partners are also included, as the entire value chain is covered by biodiversity.

In order to enlarge the scope of our commitment to avoid biodiversity loss, the TEPCO Group, of course, does not engage in illegal trapping or sampling and requires that its own operations do not threaten life in business areas without good reason, and it also requires the same actions be taken by suppliers, when entering into agreements.

In concrete terms, we have been applying the mitigation hierarchy in our direct operations to prioritize and implement conservation measures in the order of avoidance, mitigation and offset. With our suppliers, we have been working on implementing an environment management system in accordance with the aforementioned green procurement guideline, explaining the concept of the mitigation hierarchy as a conservation measure and the safety measures to be employed in development to construction companies.

Policy Endorsement

This policy endorsed by a member of entire Executive Management. A Biodiversity Information Liaison Group comprised of people from mainly the departments in charge of facilities that are highly dependent, and have a large impact on, natural capital has been established as a subcommittee of the ESG Committee. Topics pertaining to the operation of the entire TEPCO Group are discussed as ESG issues by the ESG Committee which then reports to the Board of Directors.

In December 2024, as part of environmental management activities related to biodiversity, we established the "Biodiversity WG" under the TEPCO Group Environmental Management Committee. Going forward, we will appropriately promote initiatives related to biodiversity conservation as the TEPCO Group, and advance the setting of indicators and the PDCA cycle.

2.6.3

<No Deforestation Commitment>

The TEPCO Group commitment to preventing deforestation has been publicly available. If forestry development is necessary as a result of facility construction, the TEPCO Group complies with regulations, etc. stipulated in forestry laws and ordinances for the region and implements conservation measures that prevent the loss of the multifunctional roles of forests in order to directly prevent deforestation. We also continue to conserve and maintain regional watershed protection forests like the Oze National Park. As an indirect measure to prevent deforestation, the TEPCO Group engages in Green procurement through which we strive to use products that consider forest management and the sustainability of paper and wood resources.

Extent of Policy or Commitment

End all deforestation (no gross deforestation)

TEPCO Group adheres to environmental assessments and regulations for the conservation of natural environments, such as the preservation of safety forests, during the installation, operation, and management of facilities. As a general principle, we do not engage in deforestation. We regularly confirm and report on communication, consultation, and measures with each department in accordance with the environmental management system. We set the goal each year as "complete implementation" and strive to achieve it.

In addition, TEPCO Group joined the "30by30 Alliance for Biodiversity" formed by the Ministry of the Environment and various organizations from the public and private sectors in October 2022, with the aim of achieving the international and domestic goal of conserving 30% of land and sea by 2030. In October 2023, our Oze area (Oze-ga-hara, Ozenuma, Oze-Tokura Forest) owned by our Group received certification as a "Nature Coexistence Site" designated by the Ministry of the Environment as an area where biodiversity conservation is achieved through private sector initiatives. Therefore, sustainable conservation of the natural environment, including prevention of deforestation, is ensured as a Nature Coexistence Site.

Our target is 2025.

Scope of Commitment

Own Operations, Suppliers, and Partners are also included, as the entire value chain is covered by biodiversity.

TEPCO Group owns approximately 16,334 hectares of forests and wetlands, which accounts for about 40% of the area within Oze National Park. We establish forest management plans every five years and practice sustainable forest management. In 2010, we obtained FSC® Forest Certification.

The FSC® certified forest consists mainly of approximately 77% (12,550 hectares) of land strictly protected and managed for conservation purposes, with the remaining approximately 8% (1,345 hectares) classified as production forests. Thinning is conducted in the production forests for conservation management, and the generated timber is used as material for building wooden paths to prevent damage to the precious wetlands of Oze-ga-hara, promoting local production and consumption.

The wooden paths are periodically replaced from deteriorated sections, and the discarded paths are chipped and recycled as "Oze Wooden Path Paper," which is utilized in the TEPCO integrated reports and the "TEPCO BIODIVERSITY REPORT 2024," among other publications.

Policy Endorsement

This policy endorsed by a member of entire Executive Management.

* Please refer to 2.6.2

2.6.4

<Biodiversity Exposure & Assessment>

The TEPCO Group is surveying its power station, etc., facilities to see if any of them meet the requirements for key biodiversity areas. When conducting this survey, we referred to the protected area categories designated by the International Union for Conservation of Nature (IUCN), as well as protected areas in Japan, and leveraged this basic information when examining the dependency/impact relationship that the siting of power facilities has on biodiversity.

Seven of the 56 sites on which biodiversity assessment was conducted include important biodiversity sites or sites adjacent to areas of important biodiversity. The total land area of the 7 sites is 17,123 ha.

Of the seven sites that contains important biodiversity sites or sites adjacent to areas of important biodiversity, three—Oze, Higashi-dori and Ogasawara—have biodiversity conservation management plans. Regarding the three sites, the total land area known at present is 16,784ha.

Regarding Oze, we draw some water from Lake Ozenuma and manage the land for conservation as a source of water for hydroelectric power generation.

Please see the table below for details.

	Number of sites	Area (Hectares)
a) Overall	1,896	26,289
b) Assessment	56	19,521
c) Exposure	7	17,123
d) Management plans	3	16,784

2.6.5	<p><Biodiversity Mitigating Actions></p> <p>Avoid</p> <p>The conservation of storks in Kamisu City, Ibaraki Prefecture is a good example of avoidance measures. In order to protect storks, which is a nationally protected species and also an endangered species, since October 2020, TEPCO have been working with local governments and nature conservation NGOs on a project to build artificial nesting towers for storks in order to prevent them from building nests in transmission line towers and protect this rare species. Similarly, since 2021, we have been collaborating with Noda City in Chiba Prefecture to install nests on utility poles in "Noda City Kounotori no Sato". In April 2024, we successfully achieved the first outdoor breeding of chicks in Noda City.</p> <p>Reduce / Regenerate</p> <p>Our conservation of wetlands during the construction of the Higashidori Nuclear Power Station, which is currently underway, is a good example of reduction and compensation measures. Based on our environmental impact assessment strategy, we have minimized the scope of wetlands to be modified in conjunction with development and have also established a biotope corridor as compensation in order to reduce the impact on living creatures. We continue to engage in post-surveys/environmental monitoring and regularly disclose the results of monitoring.</p> <p>Restore</p> <p>Our Ayame Daira restoration project in the Oze National Park is a good example of our restoration measures. In the Ayame Daira, wetland vegetation had been devastated by countless hikers as they trampled upon it. So, since 1969, we have been engaged in activities to restore the vegetation by planting seeds for herbaceous plants that had died off and cultivating this vegetation (natural regeneration). Today, vegetation in approximately 0.9ha of the total 1ha region of devastation has regenerated,</p> <p>Transform</p> <p>A good example of transformation is our joint project with local governments and the Ministry of the Environment to simultaneously develop biodiversity while achieving carbon neutrality. Conventionally, different approaches are taken to achieving carbon neutrality and conserving the natural environment, however, in light of the trend to approach these objectives simultaneously, the TEPCO Group has taken on new challenges. One of these challenges is a project that pertains to the carbon-free park registration of the Oze National Park. In April 2022, the local government of Katashina Village registered their region of Oze as a carbon-free park, and this spurred the TEPCO Group to utilize Oze as a national park decarbonization model that gives consideration to ecosystem conservation by, for example, promoting renewable energies/energy conservation in cooperation with the village and the Ministry of the Environment, and engaging in sustainable tourism that includes SDG-related environmental education. In addition, we are participating in the Regional Biodiversity Promotion Council for the "Minuma Tanbo(paddy fields)" area in Saitama City, where nature and farmland are integrated, creating a diverse habitat for various organisms. In 2023, we conducted a demonstration test as a grant project from the Ministry of the Environment, and we continue to collaborate with the city in the fiscal year 2024. We are studying low-cost management methods for grasslands and wetlands with the aim of conserving biodiversity in the Minuma Tanbo area. Furthermore, in Nikko City, which has been adopted as a region selected to lead decarbonization, TEPCO Group provides comprehensive energy solutions (such as the introduction of renewable energy and storage batteries, energy-saving measures, and expanding EV usage) and environmental conservation content (sustainable tourism, protection of rare plants, measures against invasive species, etc.). Issues such as revitalizing tourism, energy cost measures, enhancing resilience, and conserving the natural environment have arisen in the city. Through co-creation with local stakeholders, we aim to enhance regional value through problem-solving.</p>
2.7.5	<p>The installed capacity of power generation as of the end of FY2024 is as follows</p> <p>Nuclear power generation: 8,212MW Oil-fired power generation: 58WW Wind power generation: 21MW General hydroelectric power generation: 2,200MW Photovoltaic power generation: 30MW</p>
2.7.9	<p>TEPCO systematically positions its power generation, transmission and distribution, electricity retail, and other ancillary businesses as core operations that contribute to sustainable revenue creation. These businesses aim to deliver long-term value to stakeholders by ensuring a stable energy supply while simultaneously promoting decarbonization. Based on this approach, TEPCO considers all of its revenue streams as contributing to sustainable earnings.</p>
3. Social Dimension	
3.1.1	<p>■Paying a living wage</p> <p>The TEPCO Group Human Rights Policy includes a commitment to securing the minimum wage and supporting the living wage.</p> <p>■Avoiding or reducing overtime or excessive working hours</p> <p>The TEPCO Group Policy includes a commitment to the appropriate management of working hours and the reduction of excessive working hours.</p> <p>■Scope of commitment</p> <p>1. Scope of Human Rights Policy</p> <p>This policy applies to all officers and employees of TEPCO Group. In addition, recognizing that the operations of not only TEPCO Group but also our business partners, including suppliers, can affect the human rights of stakeholders, we require our business partners, including suppliers, to understand and support the contents of this policy, and continuously work to ensure that this policy is respected.</p>
3.1.2	<p>■Monitor working hours including overtime management</p> <p>TEPCO is implementing measures to monitor working hours, including the management of overtime.</p> <p>■Regularly engage with workers' representatives on working conditions</p> <p>TEPCO maintains regular dialogue with workers' representatives regarding working conditions, including through the annual Shunto wage negotiations and ongoing labor-management meetings.</p> <p>■Routinely monitor the gender pay gap to achieve equal remuneration for men and women</p> <p>TEPCO routinely monitors the gender pay gap as part of its commitment to achieving equal remuneration between men and women.</p> <p>■Ensure employees are taking their paid annual leave entitlements</p> <p>TEPCO verifies that employees are utilizing their paid annual leave entitlements in accordance with company policy and labor regulations.</p> <p>■Provide training or reskilling to mitigate negative effects of industrial or climate transition changes</p> <p>To promote business structure reforms aimed at balancing stable power supply with climate neutrality, TEPCO is working to develop DX talent. As a target for fiscal year 2025, the company aims to train 8,000 employees, representing 30% of its workforce.</p>
3.1.4	<p><Diversity Indicator></p> <ul style="list-style-type: none"> •Female share of total workforce: 13.7% •Females in all management positions, including junior, middle and top management:6.4% Public target for FY2035 10% •Females in junior management positions, i.e. first level of management: 6.9% •Females in top management positions: 8.8% •Females in management positions in revenue-generating functions: 6.0% •Share of women in STEM-related positions (as % of total STEM positions):5.4% •Breakdown of workforce based on other minority group(s): Yes

3.1.5	<p><Race/ Ethnicity & Nationality></p> <ul style="list-style-type: none"> •Share in total workforce (as % of total workforce) Japanese 99.756% Chinese 0.133% Korean 0.051% Vietnamese 0.018% Malaysia 0.009% Other 0.032% <p>•Share in all management positions,including junior, middle and senior management (as % of total managementworkforce) Japanese 100%</p>																
3.1.6	<p><Equal Remuneration></p> <p>•Currency: JPY-Yen</p> <ul style="list-style-type: none"> •Average Executive level (base salary only) :Women 21,360,000 Men 21,360,000 •Average Executive level (base salary + other cash incentives): Women 27,960,000 Men 27,960,000 •Average Management level (base salary only) :Women 7,200,000 Men 7,320,000 •Average Management level (base salary + other cash : Women 11,640,000 Men 12,000,000 •Average Non-management level: Women 3,720,000 Men 4,200,000 																
3.1.7	<p><Freedom of Association></p> <p>100 % of employees represented by an independent trade union</p>																
3.2.1	<p>Human Rights Commitment</p> <p>Policy coverage As mentioned in "1. Scope of Human Rights Policy," TEPCO Group Human Rights Policy covers not only our own operations (employees, direct activities, products, or services) but also our suppliers and our partners.</p>																
3.2.2	<p>[Human Rights Due Diligence Process]</p> <ul style="list-style-type: none"> - Risk identification in new business relations (mergers, acquisitions, joint ventures...) <p>When we discuss new investments in Investment Committee, we analyze and identify the risks, including human rights, related new business</p> <ul style="list-style-type: none"> - Systematic periodic review of the risk mapping of potential issues <p>At least every fiscal year, we review and revise the risk mapping for common risks (compliance, human resources, safety, supply chain (including human rights) ...) and each segment (e.g. power generation, T&D, retail...) .</p> <p>[Issues and vulnerable groups]</p> <p>The list of some of the issues that we cover in our due diligence risk identification process is as follows;</p> <ul style="list-style-type: none"> - Forced labor - Freedom of association - Right to collective bargaining - Discrimination - Harassment - Long working hours - Personal information <p>These issues are covered in the Self-Assessment on Respect for Human Rights, which is one step in our due diligence process. This self-assessment is a crucial step to identify potential human rights issues that may affect our business practices.</p> <p>We identified groups at risk of human rights as follows;</p> <ul style="list-style-type: none"> - Own employee - Women - Migrant workers - Third-party employees <p>We are strengthening measures for identified groups. For example, as follows:</p> <ul style="list-style-type: none"> - Own employees: Prevention of harassment, prevention of long working hours - Women: Improvement of the conditions of women's toilets in hydroelectric power facilities - Migrant workers: Creation of materials in the native languages of foreign workers to ensure safety in the workplace, including points to note - Third-party employees: Raising awareness to make the already established consultation desk more accessible for third-party employees 																
3.2.3	<table border="1" data-bbox="339 1720 1209 1955"> <thead> <tr> <th>Category</th> <th>% of total assessed in last three years</th> <th>% of total assessed (column A) where risks have been identified</th> <th>% of risk (column B) with mitigation actions taken</th> </tr> </thead> <tbody> <tr> <td>Own Operations (Based on FTEs (full-time equivalents))</td> <td>100%</td> <td>14%</td> <td>100%</td> </tr> <tr> <td>Contractors and Tier I Suppliers</td> <td>100%</td> <td>2%</td> <td>100%</td> </tr> <tr> <td>Joint Ventures (including stakes above 10%)</td> <td>100%</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Category	% of total assessed in last three years	% of total assessed (column A) where risks have been identified	% of risk (column B) with mitigation actions taken	Own Operations (Based on FTEs (full-time equivalents))	100%	14%	100%	Contractors and Tier I Suppliers	100%	2%	100%	Joint Ventures (including stakes above 10%)	100%	0	0
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3.2.4	<p>Human Rights Mitigation & Remediation</p> <p>[Process] Our company conducts human rights impact assessments through the following process.</p> <p>(1)Conducting a Human Rights Self-Assessment We carry out a self-assessment based on key human rights issues that companies are expected to consider, as outlined in international standards and guidelines (such as the UN Guiding Principles and OECD Guidance). (2)Interviews by External Experts Based on the results of the self-assessment, external experts conduct interviews to identify items that each department considers to be potential human rights issues. (3)We use findings from (1) and (2) to assess issues in terms of the potential, scale, scope, and irremediability of human rights violations, identify and prioritize critical human rights issues, and formulate an action plan.</p> <p>[The number of sites with mitigation plans] 7 sites, the number of departments related to international business, supply chain management and battery procurement</p> <p>[The type of remediation actions taken] Specific example from international business Based on the interview results, it was found that the human rights risk management system in overseas subsidiaries is not as robust as that in domestic subsidiaries. Consequently, we think that local communities and contractors may be particularly exposed to human rights risks. To address this issue, we have incorporated the human rights perspective into the existing business risk monitoring mechanisms and introduced a system to monitor human rights risks in the same cycle as other business risks.</p>
3.3.1	<p><Training & Development Inputs> Average hours per FTE of training and development:28.6hours/ FTE Average amount spent per FTE on training and development: 10,242 JPY/ FTE</p> <p>· Breakdown of workforce based on other group(s): Yes</p>
3.3.2	<p>■Learning methods (externally/internally) offered for employee development includes: -Coaching or Mentorship TEPCO assigns mentors who are senior employees close in age to new hires, creating an environment where they can seek advice on work and career development. -Teams and Networks (e.g. Employee Resource Groups) Diversifying Career Options To enable timely team formation and increase opportunities for employees to take on new challenges, we are promoting an internal dual-role system ("Career Challenge") that allows employees to experience work of interest while continuing their current duties, thereby supporting autonomous career choices ■Type of program offered for employee development includes: -Leadership development program Management Leader Development Training Management leader candidates are provided with six-month training programs to help them recognize essential leadership qualities. Programs are tailored for senior managers (department and division heads) and mid-level managers (section managers), focusing on practical content to strengthen business planning capabilities. We also offer programs for general staff, followed by video content on finance and marketing to support the acquisition of management literacy based on their development progress. -Transition program for retiring and terminated employees TEPCO provides early opportunities for employees to reflect on their careers ahead of the senior phase, emphasizing the importance of self-analysis, career development, and reskilling. To support this, TEPCO conducts Career and Life Design Training when employees reach the age of 45. -Digital transition program TEPCO aims to provide employees with the fundamental knowledge required to achieve its DX goals and therefore conducts the "DX Human Resource Development Training by Learning Video." Through this program, TEPCO seeks to resolve issues faced by stakeholders and workplaces by fostering DX talent and promoting comprehensive data-driven operations. Our target is to develop more than 6,000 DX professionals by FY2025 who understand DX and actively practice and promote it in their respective workplaces.</p> <p>■Disclosure of the quantitative business impact of any of the programs mentioned TEPCO has calculated the labor hours saved through DX as a result of the "DX Human Resource Development Training by Learning Video" and converted them into personnel cost reductions: FY2024 Actual: Approx. 110,000 hours → Cost reduction of about 4 billion yen FY2030 (cumulative from FY2024): Approx. 2.31 million hours → Cost reduction of about 90 billion yen</p>
3.3.3	<p>□ Total employee-related expenditure (salary + benefits) 2020-2024 · 2021: 278.4 billion yen · 2022: 270.6 billion yen · 2023: 277.5 billion yen · 2024: 262.5 billion yen □ FTE 2020-2024 · 2021: 27,064 · 2022: 26,649 · 2023 : 26,415 · 2024: 26,183</p>

3.3.4	<p>Total number of new employee hires FY2021:721 FY2022:719 FY2023:848 FY2024:958</p> <p>Percentage of open positions filled by internal candidates (internal hires) FY2021:78.5% FY2022:72.3% FY2023:72.1% FY2024:72.9%</p> <p>Average hiring cost/FTE FY2021:651,412 yen FY2022:753,544 yen FY2023:776,882 yen FY2024:842,920 yen</p> <p>-Breakdown of workforce based on other group(s): Yes</p>
3.3.5	<p><Employee Turnover Rate> Total employee turnover rate FY2021:6.1 FY2022:4.9 FY2023:5.6 FY2024:5.2</p> <p>Voluntary employee turnover rate FY2021:1.08 FY2022:1.00 FY2023:1.20 FY2024:1.31</p> <p>-Breakdown of workforce based on other group(s): Yes</p>
3.3.6	<p><Long-Term Incentives for Employees> TEPCO has introduced a system that incorporates individual performance-based annual salary into the compensation structure as part of its long-term incentive program for employees. Under this system, the amount paid varies according to each employee's performance, and it applies to all employees below the senior management level. Individual goals include sustainability performance targets, which differ depending on the department to which the employee belongs.</p>
3.3.7	<p><Employee Support Programs> <u>Employee Benefits</u> <input type="checkbox"/> Workplace stress management Check-ups and stress checks are opportunities to ascertain our physical and mental condition. The results of check-ups are reviewed by industrial doctors/nurses, and detailed health guidance and interviews are provided as necessary. Through these efforts, we are working to prevent disease and detect early symptoms of serious diseases in order to prevent them from worsening. ----- <input type="checkbox"/> Sport & health initiatives The company offers programs that promote employee health. Yoga Classes by In-house: Yoga Instructors are offered to promote health and in-house communication. <u>Work Conditions</u> <input type="checkbox"/> Flexible working hours The company has flexible working hours program. ----- <input type="checkbox"/> Working-from-home arrangements The company has working-from-home arrangement program. ----- <input type="checkbox"/> Part-time working options The company has a program that allows rehired employees to reduce their work days to three days per week. The company has part-time working options for staffs raising children. <u>Family Benefits</u> ----- <input type="checkbox"/> Childcare facilities or contributions The company has a company-run childcare center. ----- <input type="checkbox"/> Breast-feeding/lactation facilities or benefits The company has assistance in purchasing baby bottles, formula, etc. ----- <input type="checkbox"/> Paid parental leave for the primary caregiver in excess of the minimum legal requirement. Employees who are raising children or nursing caregivers are entitled to a certain period of leave. Total number of paid leave in weeks offered to the majority of the employees:1week ----- <input type="checkbox"/> Paid parental leave for the non-primary caregiver in excess of the minimum legal requirement. Employees who are nursing the non-primary caregivers are entitled to a certain period of leave. Total number of paid leave in weeks offered to the majority of the employees:1week ----- <input type="checkbox"/> Paid family or care leave beyond parental leave (care for a child, spouse, partner, dependent, parent, sibling, or other designated relation with a physical or mental health condition) Additional leave is granted to employees for nursing needs, such as when a child develops a fever. Total number of paid leave in weeks offered to the majority of the employees:1week</p>
3.3.8	<p><Type of Performance Appraisal> Type of Individual Performance Appraisal Below are annually exercised for all of employees. <input type="checkbox"/> Management by objectives: systematic use of agreed measurable targets by line superior 100% of all employees <input type="checkbox"/> Multidimensional performance appraisal (e.g. 360 degree feedback) 100% of all employees <input type="checkbox"/> Formal comparative ranking of employees within one employee category 100% of all employees Performance Appraisal Frequency: At least yearly</p>

3.3.9	<p><Trend of Employee Wellbeing> ・Standard Method: Employee Engagement FY2021: 75.4 FY2022: 75.2 FY2023 : 76.9 FY2024: 76.1 Target for FY2024: 76.9</p> <p>・Data Coverage(the percentage of total employees): Every year 100% ・Breakdown of workforce based on other group(s): Yes</p> <p>・Survey Methodology: Since FY 2019, TEPCO has started the employee happiness survey for scaling the employee engagement. In the employee happiness survey, employees are asked "happiness level" out of 11 points(0="Not satisfied at all" at all, 5="neutral, 10="Very satisfied").</p> <p>・Scale or options used in the survey : 11 points scale(0="Not satisfied at all" at all, 5="neutral, 10="Very satisfied")</p> <p>・In tracking employee metrics, the company it applies to Job satisfaction, Purpose, Happiness and Stress.</p>
3.4.1	<p><OHS Policy> <input type="checkbox"/>Is applicable to the company's entire operations/ employees as well as contractors or individuals under the company's supervision. YES Our Safety Policy apply our entire operations/ employees as well as contractors or individuals under the company's supervision.</p> <p>----- <input type="checkbox"/>Compliance with relevant OHS international standards and regulations, voluntary programs and/or collective agreements on OHS. YES</p> <p>----- <input type="checkbox"/>Consultation with and participation of workers, and, where they exist, workers' representatives. YES We are promoting good health in cooperation with the TEPCO Health Insurance Association. In labor-management negotiations with the union, representatives of the company and the union regularly exchange opinions on safety at each worksite. Please refer to our web site:https://www.tepco.co.jp/en/hd/about/esg/health/index-e.html [TEPCO Health Insurance Association]</p> <p>----- <input type="checkbox"/>A commitment to continually improve the performance of the OHS management system. YES In our policy, we commit to continually improve the performance of the OHS management system Please refer to integrated report P48: The TEPCO Group regards, in all operations, the daily honing of greater safety together with those we work with—under the recognition that safety is the top priority and that the pursuit of safety has no end—as our most important business foundation.</p> <p>----- <input type="checkbox"/>Setting up prioritization and action plans. YES To prevent accidents, we formulate "Safety Activity Plans" based on risk assessments and other factors, and deploy activities accordingly. We check and evaluate the implementation status of safety activities and review them as necessary to implement the PDCA cycle for safety management and to make continual improvements.</p> <p>----- <input type="checkbox"/>Establishment of quantitative targets for improving OHS performance metrics. YES With the goal of zero fatalities, we have established safety officers and safety staff at each of our core operating companies to horizontally disseminate safety-related information and countermeasures.</p> <p>----- <input type="checkbox"/>Endorsement of the implementation of the OHS policy. Please select the highest endorsing decision-making body: Board of directors Please refer to integrated report P48: TEPCO Holdings, Inc. and its core operating companies have established dedicated occupational safety and health organizations and personnel, and are promoting coordinated safety activities. Annual plans related to safety are reported to the Board of Directors as key management issues.</p> <p>----- Code of Conduct Related to the Corporate Ethics and Compliance Policies of the TEPCO Group declares the following and sets forth our policy of placing the highest priority on safety. This code was endorsed by executive management.</p> <p>1. Respecting all people (1) Making safety our top priority - We are committed to thinking and acting with safety as our top priority. - In addition to complying with all relevant safety regulatory laws as well as safety rules and regulations, we shall strive to: ・Comprehensively implement safety assurance measures in all facilities that we operate. ・Carry out suitable safety measures if signs of abnormalities or danger are discovered. ・Provide rapid relief and restoration measures in the event of an accident or disaster. ・Ensure the safety of workers and the general public thorough safety-first initiatives applied to all working environments and procedures.</p> <p>In addition, with the goal of zero fatalities, we have established safety officers and safety staff at each of our core operating companies to horizontally disseminate safety-related information and countermeasures. To prevent accidents, we formulate "Safety Activity Plans" based on risk assessments and other factors, and deploy activities accordingly. In addition, we check and evaluate the implementation status of safety activities and review them as necessary to implement the PDCA cycle for safety management and to make continual improvements. In labor-management negotiations with the union, representatives of the company and the union regularly exchange opinions on safety at each worksite.</p>

3.4.2

<OHS Programs>

 OHS risk and hazard assessments to identify what could cause harm in the workplace.
 YES

 please refer to our intergrated report

 Prioritization and integration of action plans with quantified targets to address those risks.
 YES

 Integration of actions to prepare for and respond to emergency situations.
 YES

 Evaluation of progress in reducing/preventing health issues/risks against targets.
 YES

 Internal inspections.
 YES

 Independent external verification of health, safety and well-being: please provide the names and standards used (such as ISO 45001):
 YES

 Procedures to investigate work-related injuries, ill health, diseases and incidents.
 YES

 OHS training provided to employees and/or other relevant parties to raise awareness and reduce operational health & safety incidents.
 YES

 OHS criteria introduced in procurement and contractual requirements.
 YES

To prevent accidents, we formulate a "Safety Action Plan" based on risk assessment and hazard evaluation, and also set quantitative targets and prioritize action plans to develop activities. We monitor the number of disasters, check and evaluate the status of safety activity planning and implementation, and make continuous improvements. For emergency disaster response, we have prepared a basic manual for disaster investigation and reporting, and conduct periodic disaster drills. When a disaster occurs, an investigation is conducted by in-house safety staff in accordance with the company's internal investigation manual. In addition, we strive to understand the actual situation onsite with the cooperation of external organizations as necessary. To prevent disasters, we conduct various training programs for all employees, including e-learning and on-site training at training centers, in accordance with the basic safety training manual. OHS criteria introduced in procurement and contractual requirements. TEPCO's procurement policy stipulated consideration for human rights, safety and occupational health.

3.4.3

Fatalities	FY2021	FY2022	FY2023	FY2024
Employees	0	0	0	0
Contractors	2	2	0	3

Target for FY2024: 90%

3.4.4

LTIFR	UNIT	FY2021	FY2022	FY2023	FY2024
Contractors	LTIFR(n/million hours worked)	0.08	0.14	0.26	0.12
Data coverage	% of employees	100	100	100	100

3.4.5

LTIFR	UNIT	FY2021	FY2022	FY2023	FY2024
Contractors	LTIFR(n/million hours worked)	0.44	0.57	0.44	0.66
Data coverage	% of Contractors	100	100	100	100

3.5.1

Customer Satisfaction Measurement

	FY2021	FY2022	FY2023	FY2024
Satisfaction Measurement	70.4	72.3	73.5	89.3※
Response Rate	12.8	14.7	12.6	9.8
Contents	Overall satisfaction, ease of understanding explanations, etc.from TEPCO customer service			

※Regarding the Satisfaction Measurement, until FY2023, we aggregated only the highest rating (Rank 1) out of the five-point scale. Starting from FY2024, the aggregation scope has been expanded to include the top two ratings (Rank 1 and Rank 2).

3.6.1	<p><Privacy Policy: Systems/ Procedures> <u>Privacy policy applies to the entire operations, including suppliers</u> Our Privacy Policy applies to all of our operations because it has no provisions limiting the scope of its application.</p> <p><u>Designated person or department responsible for privacy issues</u> Comment With support from the Chief Human Resources Officer, Tomomichi Seki is responsible for privacy issues and personal information as Chief Information Security Officer. When risks, including privacy issues, occur, they are reported to the Risk Management Committee, where the root cause is investigated and preventive measures are considered. Depending on the case, these efforts are reported to the Executive Committee and the Board of Directors.</p> <p><u>Privacy policy system embedded in group-wide risk/compliance management</u> Our company has established an Information Security Subcommittee as a specialized subcommittee of the overall Risk Management Committee, with a Privacy Policy framework incorporated into the group's risk and compliance management structure.</p> <p><u>Disciplinary actions in case of breach (i.e. zero tolerance policy)</u> Our employment regulations specify disciplinary action for violations of our Privacy Policy, which includes customer privacy information.</p> <p><u>We conduct third-party audits of the privacy policy compliance.</u> Ensuring the Safety and Accuracy of Personal Information in Basic Policy for the Handling of Personal Information. <excerpt> (Organizational safety management measures) Self-inspections of the status of personal data handling shall be regularly conducted and audits by other departments, or third-parties, shall be implemented.</p> <p><u>We conduct internal audits of the privacy policy compliance.</u> Self-inspections of the status of personal data handling shall be regularly conducted and audits by other departments, or third-parties, shall be implemented.</p>
3.6.2	<p>The following items are informed to customers in our "Basic Policy for the Handling of Personal Information" "Use Purposes of Personal Information at the Company" and "Procedures for Disclosing, Correcting, Stopping Use, and Obtaining Notification of the Use-Purpose of Personal Information" on our web site: https://www.tepco.co.jp/en/hd/privacypolicy/index-e.html#anchor01</p> <p>■Nature of information captured Names, addresses, date of birth, phone numbers, occupations, e-mail addresses, contract information</p> <p>■Use of the collected information Please refer to "Use Purposes of Personal Information at the Company" The Company publicly declares that the specific use purposes of personal information in its possession shall be used according to the following. The Company shall use personal information in its possession within the scope necessary for the following purposes in relation to the business operations listed below indicated in the Company's articles of incorporation: Contract signing and execution, after-service, facilities maintenance and repair, questionnaires, improving and developing our products and services, sending/soliciting/sales of advertising and publicity materials related to our products and services, legally required business operations, as well all other business operations incidental to these. However, thorough attention shall be given to maintaining fair competition when using this personal information. Persons who do not want to receive questionnaires from the Company, direct mail related to our products and services, and other notifications may request to stop receiving such materials.</p> <p>■Possibility for customers to decide how private data is collected, used, retained and processed ⓄRequest access to data held by the company Please refer to "Procedures for Disclosing, Correcting, Stopping Use, and Obtaining Notification of the Use-Purpose of Personal Information" -1. Disclosure of Personal Information 1. Disclosure of Personal Information You may request the disclosure from the Company according to the Act on the Protection of Personal Information if you want to know the content of your personal information. (1) Persons Who May Request Disclosure In general, the person corresponding to the information ("individual concerned") may make a request. In some cases, another person may request the disclosure of personal information in place of the individual concerned, such as in the case of a representative authorized by the individual concerned ("appointed representative" hereinafter) or a legal representative of a minor or adult ward.</p>
3.7.1	<p>TEPCO is implementing the following initiatives to provide electricity supply services to all customers:</p> <ul style="list-style-type: none"> •Except for cases specified under "Limits of Acceptance" in the Terms of Wheeling Supply, etc., TEPCO can enter into supply contracts. •For customers with high-voltage or higher requirements who are unable to conclude a power supply contract with any retail electricity provider, TEPCO supplies electricity based on the Final Guaranteed Supply Terms. •By fiscal year 2020, TEPCO installed approximately 28.4 million smart meters in all households and business locations within its service area—except for certain sites where replacement work was difficult—achieving a 100% installation rate. (Reference: TEPCO has installed approximately 28.4 million smart meters in all households and business locations within its service area by fiscal year 2020, except for certain sites where replacement work was difficult, achieving a 100% installation rate. This enables TEPCO to provide electricity services to all customers.) <p>To further deliver affordable, clean, and stable electricity, TEPCO is implementing the following initiatives:</p> <ul style="list-style-type: none"> ⓄEffective utilization of decarbonized power sources: TEPCO maximizes the use of diverse power sources, including nuclear and renewable energy, and promotes zero-emission thermal power initiatives through JERA Co., Inc. ⓄStrengthening grid capabilities: TEPCO is advancing regional integration, optimization of grid utilization, and decentralization to accommodate increased renewable energy connections and growing electricity demand. ⓄCustomer-oriented services: TEPCO provides renewable energy-related services and programs that encourage the adoption of storage batteries, aiming to promote local production and consumption of electricity and contribute to the realization of a carbon-neutral and disaster-resilient society.

3.7.1.1

■ Providing Financial Support and Rate Assistance to Customers

TEPCO offers regulated rate plans that include a fuel cost adjustment calculated based on trade statistics prices for crude oil and liquefied natural gas, with an upper limit set on the variable unit price. For example, in January 2023, TEPCO's electricity charges were approximately 1.4 times higher than they would have been without applying the fuel cost adjustment.

Under the Disaster Relief Act, TEPCO applies special measures to electricity charges for customers affected by the recent disaster designated as a "severe disaster," provided certain conditions are met.

■ Offering Flexible Payment Options and Digital Tools to Help Customers Manage Expenses

Through the "Kurashi TEPCO Web" platform, customers can check electricity charges, forecast future bills, earn points, and access various benefits—all in one place.

■ Promoting Access to Clean Energy and Water Through Community Collaboration

TEPCO provides services that contribute to regional energy management to meet local needs for stable electricity supply and carbon neutrality. To this end, TEPCO has signed "Carbon Neutral Co-Creation Agreements" with 46 municipalities. Among these, nine have been designated by the Japanese government, led by the Ministry of the Environment, as "Decarbonization Leading Areas," serving as model regions for community-driven decarbonization initiatives.

To ensure stable electricity supply, TEPCO collaborates with national and local governments to build coordination systems for disaster preparedness, including earthquakes and typhoons. TEPCO also works with the Self-Defense Forces and other relevant organizations to establish systems for sharing and collecting disaster-related information.

Rivers used for power generation often carry natural debris such as grass, leaves, and driftwood, as well as household waste like plastics, glass, and metals. These materials not only hinder power generation but also negatively impact water quality and ecosystems. TEPCO removes such debris appropriately to protect water and the local environment. Additionally, water from the Azusa River in Nagano Prefecture is dammed at the three Azusa River dams (Nagawado, Mizunodo, and Inakora) for power generation and, under agreements with local communities, supplies irrigation water to five municipalities in the Chushin Plain region.

■ Investing in Infrastructure to Improve Access to Reliable Clean Energy and Water

TEPCO invested approximately ¥867.4 billion in fiscal year 2024 to ensure a stable supply of clean electricity and plans to invest about ¥951.4 billion in fiscal year 2025.

Most of these investments are allocated to replacing aging energy supply facilities. To maintain supply reliability, TEPCO plans and executes appropriate and rational equipment upgrades from a medium- to long-term perspective, balancing construction volumes and securing implementation capacity.

Since similar challenges exist nationwide, TEPCO also promotes nationwide collaboration on construction capacity and material procurement to ensure the sustainability of the entire supply network.

TEPCO is also investing in safety measures at nuclear power plants.

Regarding water initiatives, TEPCO is working to improve the efficiency of hydropower generation through repowering, which utilizes water resources without imposing environmental burdens. In fiscal year 2024, TEPCO invested ¥36.9 billion in these facility upgrades.

■ Developing projects that address the interconnected needs of water and energy use.

TEPCO, through its subsidiary TEPCO Renewable Power, owns approximately 40% of the entire Oze National Park and about 70% of its special protected zone to cultivate water sources for hydroelectric power stations. As the landowner for nearly 60 years, TEPCO has implemented various initiatives to preserve the wetlands, including the maintenance of wooden pathways.

To protect water resources in Oze, TEPCO has installed seven public restrooms equipped with advanced purification systems capable of treating wastewater to a level comparable to natural river water.

Furthermore, mountain lodges operated by TEPCO Power Technology—such as Hatomachi Sanso, Shibutsu Sanso, Toden Koya, Motoyu Sanso, and Oze-numa Sanso—are equipped with washlet toilets. This initiative aims to reduce toilet paper usage, minimize the load on purification systems, and maintain high water quality.

3.7.2 Stakeholder Engagement Policy

We have established two policies regarding stakeholder engagement. Specifically, we have set the "TEPCO Group Charter of Corporate Conduct," which defines the principles of conduct for the TEPCO Group, and the "Code of Conduct Related to the Corporate Ethics and Compliance Policies of the TEPCO Group," which outlines specific actions for executives and employees.

The TEPCO Group operates a highly public electric utility business and therefore impacts a wide range of stakeholders. We recognize all stakeholders as affected communities. Accordingly, our policies stipulate that we must communicate openly with all stakeholders. As part of our engagement strategy, we are committed to transparent information disclosure, proactive dialogue, and ensuring fairness.

These policies apply to all of our business operations, and we are also working to encourage their application across our supply chain. The policies have been approved at the executive level, and a dedicated committee, the "TEPCO Group Corporate Ethics Committee," has been established. This committee is chaired by President Kobayakawa, who also serves as a director, and consists of one internal member (an executive) and four external members, such as lawyers and university professors. Depending on the matter, the committee reports to the Executive Committee or the Board of Directors.

As a contact point (complaints/grievance mechanism) available to the community, we have established email and telephone channels that can be used by any stakeholder.

Code of Conduct Related to the Corporate Ethics and Compliance Policies of the TEPCO Group
https://www.tepco.co.jp/en/hd/about/corporate/pdf/corporate_conduct_02-e.pdf

III. Communicating openly

2. Active communication with society

- To guarantee full transparency of business operations, we shall actively and in a timely and appropriate manner disclose and report about corporate activities and safety information, including equipment trouble or accident, to all TEPCO group stakeholders and society as a whole.

- We shall actively engage in dialogue with all TEPCO Group stakeholders and society as a whole, and respond to their expectations faithfully.

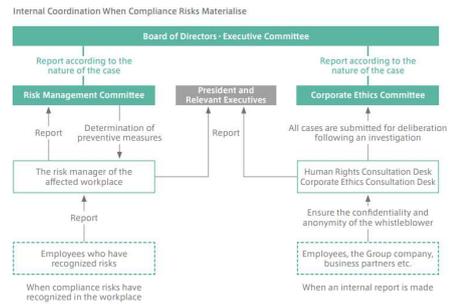
- We shall not conduct inappropriate actions that can undermine the fairness and transparency of awareness-building initiatives implemented from a neutral standpoint by national or local governments.

TEPCO Group Corporate Ethics Committee (*Japanese only)

https://www.tepco.co.jp/about/business_ethics/approach/committee.html

Contact point for external stakeholders (complaints/grievance mechanism) (*Japanese only)

<https://www.tepco.co.jp/ep/userecho/index-j.html>



3.7.3

TEPCO Group's engagement programs regarding local stakeholders, which are publicly disclosed, include programs related to Fukushima and Niigata, where nuclear power plants are located. Each office regularly publishes newsletters for local stakeholders. Information about communication channels for local stakeholders is introduced not only on our website but also in these newsletters.

The progress of the programs is regularly disclosed on our website. We hold tours and dialogue sessions at the power plants, and for example, in Fukushima, over 145,000 people have toured the power plant. In Niigata, we have established communication booths 174 times within Niigata Prefecture, attracting over 3,900 visitors. We utilize the feedback received during these interactions to improve the decommissioning process and the operation of the power plants.

As an example of addressing grievances tracking, in response to concerns raised at the Niigata booth regarding low trust in our power plant operations, we established the Kashiwazaki-Kariwa (KK) Steering Committee to incorporate external perspectives and expertise into the plant's operation. We are committed to integrating stakeholders' opinions into our operations as much as possible.

[Fukushima] (*Japanese only)

Commitment to Fukushima Community to Achieve Both Reconstruction and Decommissioning

<https://www.tepco.co.jp/decommission/information/promise.html>

Published on March 27, 2020

https://www.tepco.co.jp/decommission/information/newsrelease/reference/pdf/2020/1h/20200327_2.pdf

Progress in the Commitment (April 19, 2024)

https://www.tepco.co.jp/decommission/information/newsrelease/reference/pdf/2024/1h/20240419_2.pdf

Fukushima newsletters

<https://www.tepco.co.jp/decommission/visual/magazine/>

Meeting

<https://www.tepco.co.jp/decommission/information/newsrelease/zadankai-j.html>

[Niigata] (*Japanese only)

Niigata Head Office Action Plan

https://www.tepco.co.jp/niigata_hq/about/plan/index-j.html

Published on March 30, 2018

https://www.tepco.co.jp/niigata_hq/data/info/backnumber/20180330-2-j.html

Progress in Action Plan - FY2023 3rd Quarter (January 31, 2024)

https://www.tepco.co.jp/niigata_hq/data/info/pdf/2023/20240131-3Qkoudoukeikaku

Niigata newsletters

https://www.tepco.co.jp/niigata_hq/communication/newsatom/index-j.html

4.2.2

Strategic Workforce Planning (SWP) using People Analytics:

<Objective>

Align human capital strategy with business strategy to secure, develop, and allocate talent for both core energy operations and new growth areas (DX, GX, global business).

<Scope>

TEPCO Holdings and 4 core operating companies (Fuel & Power, Power Grid, Energy Partner, Renewable Power) covering >75% of global FTEs.

<People Analytics Approach>

1. Talent Data Integration: Centralized management of employee skills, experience, and career aspirations through a talent management system.
2. Predictive Analytics: Use of AI/ML models to analyze employee survey data (47 indicators) and predict engagement and well-being trends.
3. Scenario Planning: Quantitative evaluation of risks/opportunities (e.g., DX talent shortages, demographic shifts) based on external environment and internal workforce data.
4. Gap Analysis: Identification of qualitative and quantitative talent gaps for key management issues (e.g., DX, global talent, power professionals).
5. Action Planning: Development of targeted programs (Next-Generation Management Talent Development, DX Talent Development Cycle, Business Creation Training) and succession planning via Strategic Human Capital Cultivation Committee.

<Key Metrics Monitored (FY2024)>

- Employee Well-being Score: 6.79
- Human Capital ROI: 2.17
- Fulfillment Rate of Planned Hiring: New graduates 99%, mid-career 96%
- DX Talent Development: 6,300 (target 8,000 by FY2027)- Business Creation Talent: 1,723 (target 2,700 by FY2027)
- Management Leader Candidates: 517 (target 500 annually)

<Evidence from "TEPCO Human Capital Report2025">

- Framework of Human Capital Strategy (p.16-17)
- Employee Well-being analytics using AI/ML (p.18)
- Human Capital ROI and impact path (p.19)
- Metrics and Targets for Resource Management and Ambidextrous Management (p.20-30)
- Governance structure and committee roles (p.8)
- Risk & Opportunity analysis linked to talent strategy (p.12-15)

Please see "TEPCO Human Capital Report2025"

https://www.tepco.co.jp/en/hd/about/ir/library/integratedreport/pdf/TP2025_HC_en.pdf