

Human Rights Due Diligence Initiatives



The Nisshinbo Group's mission is to "contribute to the society through our business activities," and we have been conducting our business operations with respect for human rights. In August 2023, the Nisshinbo Group established the "Nisshinbo Group Human Rights Statement" to express our commitment to respecting human rights.

This statement is the overarching statement of all documents and norms related to the Nisshinbo Group's efforts to respect human rights in its business activities.

Our group will be an actor in respecting, protecting, and promoting the human rights of not only our employees but also those of our customers, business partners, local communities, and all other individuals with whom we interact. We will manage our business with respect for human rights through human rights due diligence. We will strive to realize a well-being society in which people living today and children who will live in the future, can each lead happy and fulfilling lives.

▶ [Nisshinbo Group Human Rights Statement](#)

Initiatives for 2024

Thorough Communication and Understanding of the Human Rights Statement

In order to promote business activities that respect human rights and to ensure that the Group's Human Rights Statement, which serves as the foundation for such activities, is well known and understood, we have distributed a video message by the president to all group companies, conveying the importance of the Human Rights Statement and his thoughts on respect for human rights. We also make it a rule to inform new employees of this statement at the time of joining the company and check the status of implementation every year.

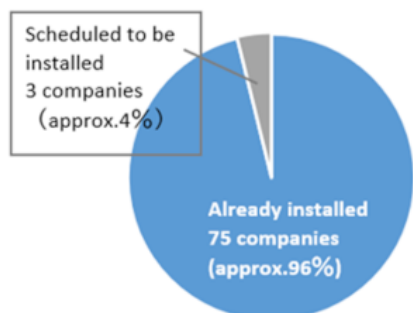
In the future, we plan to further announce our statement with external stakeholders by posting the statement on each of our group company's website. We also plan to develop the rules and regulations at each company based on the content of this statement.

Maintenance of Grievance Mechanism

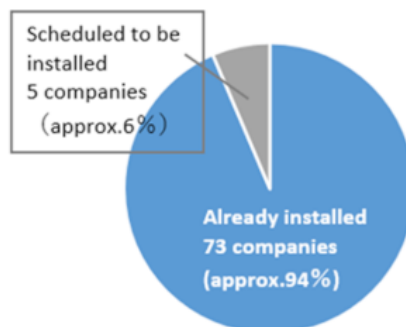
Results of our survey on the maintenance of grievance mechanism in all group companies

Surveyed: 78 domestic and overseas group companies

◆Progress of the installation of contact points (helplines)



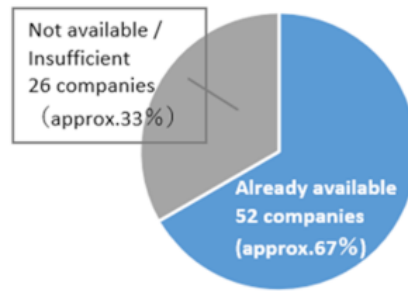
Internal contact points (helplines) for employees



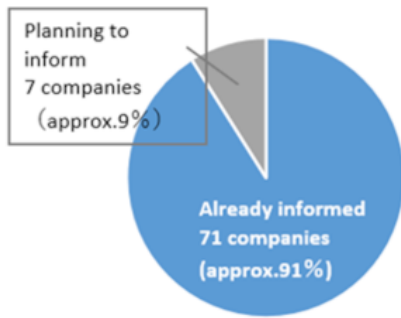
External contact points (helplines) for stakeholders, including employees*.

*Companies using the "Corporate Ethics Reporting System" set up by Nisshinbo Holdings Inc. in substitution for the in-house contact point (helpline) are also included.

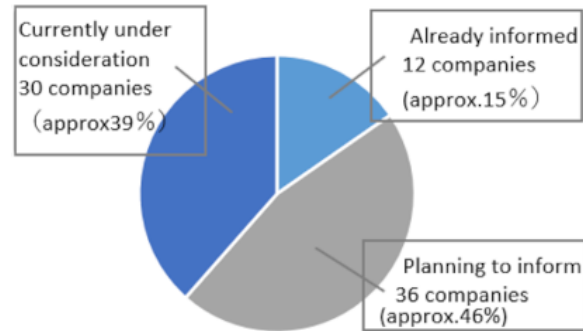
◆Availability of manuals and other procedures for receiving and responding to grievance



◆Progress of informing the availability of contact points (helplines)



Progress of informing employees about the contact point (helpline)



Progress of informing external stakeholders about the contact point (helpline)

We confirmed that 90% or more the group companies have established internal and external contact points (helplines). However, we will promptly follow up with those companies that have not sufficiently prepared manuals and other relevant documents on how to receive and respond to grievance.

In addition, since the availability of contact point (helpline) for external stakeholders is not well informed, we will post about it on each of our group company's website and distribute corresponding documents to suppliers.

Establishment of Sustainable Procurement Guidelines

We revised the Nisshinbo Group Sustainable Procurement Basic Policy (established in 2015) in 2024 to comply with the Nisshinbo Group Human Rights Statement. This is aimed at respecting our suppliers as equal partners through healthy business relationships, while always acting with fairness and integrity in accordance with high standards, including but not limited to social rules and corporate ethics. We also established the Nisshinbo Group Sustainable Procurement Guidelines which corresponds to the procurement policy.

In establishing the guidelines, we referred to the RBA Code of Conduct and JEITA's Responsible Business Conduct Guidelines issued by the Japan Electronics and Information Technology Industries Association (JEITA).

This policy and guidelines are communicated to suppliers through each of our domestic group companies, which are also responsible for conducting a questionnaire survey of suppliers to check the status of initiatives related to sustainable procurement and providing feedback based on the survey results.

We will continue to promote sustainable procurement initiatives that respect human rights while ensuring that our suppliers understand the Nisshinbo Group's basic policies and guidelines.

▶ Promoting Responsible Supply Chains

Developing a Responsible Mineral Procurement System

3TG (tin, tantalum, tungsten and gold) minerals, which are considered to be conflict minerals, may lead to serious human rights violations such as child labor and forced labor, but due to the growing awareness of human rights in society, it is expected that the scope of regulations will be expanded to include other minerals and regions.

For this reason, we consider responsible mineral procurement as a key issue in our human rights due diligence and have launched our initiative starting from FY2024. First, we are working to improve the group's mineral procurement system by sharing information related to mineral procurement company-wide and having dialogs with those in charge of mineral procurement.

Establishment and Steady Implementation of Education System

The Nisshinbo Group believes that an essential understanding of corporate responsibility to respect human rights (Business and Human Rights) is necessary to promote effective human rights due diligence efforts.

Group Human Rights Training

As the “Group Human Rights Training” conducted every year, we held a lecture titled “Business and Human Rights, the Basic Version” to all group companies in FY2024 to convey the basics of Business and Human Rights. This training will continue to be provided to new employees in the future.

Top Management Human Rights Training for executives

As part of our annual training program for top management, we held a lecture by Mr. Kazuo Tase, the CEO of SDG Partners, Inc. The lecture titled “Business and Human Rights: How to Find the Winning Strategy” discussed how to link “Business and Human Rights”, an extremely important theme for corporate management in recent years, to a company’s “winning strategy” while considering international trends related to human rights and case studies of other companies.

Approximately 400 participants attended the lecture, including not only top management but also managers from various group companies.

In order to promote management that respects human rights, we will continue to conduct training on themes that will lead to a deeper understanding of human rights among top management.

Future Plans

From 2025 onwards, we will further advance our human rights due diligence efforts, focusing on the following:

1. Identifying and addressing human rights risks
2. Further development and strengthening of grievance systems
3. Establishment of human rights guidelines
4. Establishment of a responsible mineral procurement system
5. Steady education and trainings to promote understanding of respect for human rights

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