

October 1st, 2025
Nippon CSR Consortium

Version for Public Consultation

2025 Human Rights Due Diligence Workshop
Invitation to Comment on “Human Rights Issues by Sector (draft)”

Since September 2012, the Nippon CSR Consortium has been working to provide a forum in which to identify and discuss negative human rights impacts that may arise as a result of corporate activities. This work has been conducted in collaboration with companies from various industrial sectors, as well as NPOs, NGOs and human rights experts in academia.

The 14th Human Rights Due Diligence Workshop in 2025 continued to utilize the Human Rights Guidance Tool developed by the UNEP FI to identify "key human rights issues for each sector". A total of eight workshops were held from June 6th to August 1st in 2025, and this document was compiled. The Consortium applies the Chattam House Rule to promote dialogue through free, open, and in-depth discussions. It should be noted that the participants have developed this document based on their own personal views and not those of the organizations to which they belong. Caux Round Table Japan (CRT Japan), which manages the Nippon CSR Consortium, is solely responsible for the compilation of this document.

This paper is the result of a series of discussions in the workshop. The Consortium hereby releases “Human Rights Issues by Sector (draft)”

1. Subject

Human Rights Issues by Sector (draft)

2. Application

(1) Consultation Period

October 1st 2025 – October 31st 2025 (Japan Time)

(2) Submission Address

Please send your comments to CRT Japan’s Nippon CSR Consortium secretariat, by e-mail (info@crt-japan.jp). Please kindly be advised that we are unable to accept comments through other methods (such as by telephone, fax, or post), nor are we able to accept anonymous submissions.

(3) Application Procedure

Address to: Secretariat of the Nippon CSR Consortium (in CRT Japan)

Subject: Comment on “Human Rights Issues by Sector (draft)”

Organization/Affiliation and Name: (Department, Name)

Email and Telephone :

(4) Comments:

We invite public comments on the following questions. In the description of your comments, please specify the industry sector, page number, and concrete issue that your comment addresses.

1. Please share any comments on the concept and procedure of this workshop
 2. Please freely respond with any comments on “Human Rights Issues by Sector (draft)”
 3. What kind of format and/or procedure do you consider would be most appropriate for finalizing the report?
- (5) Submission and Inquiry
Secretariat of Nippon CSR Consortium (in CRT Japan Office)
E-mail: info@crt-japan.jp

3. Handling of Comments

Your feedback will be used as a reference for our future initiatives. Please understand that we cannot provide individual responses to the opinions we receive. The feedback you submit may be published on the web page of the Caux Round Table Japan. However, if the feedback contains information about an individual that could identify a specific person, or if it is determined that publication may harm the property rights or other rights of an individual, corporation, etc., the relevant portions will be redacted before publication.



Hiroshi Ishida
Executive Director, Caux Round Table Japan

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Attachment 1: Workshop for Identifying Human Rights Issues

Attachment 2: Summary of Discussions by Industry (Japanese only)

1 Preface

1-1. Purpose of the Human Rights Due Diligence Workshop

The Nippon CSR Consortium was established in September 2012 to raise awareness and promote activities in the fields of business and human rights by offering a forum in which companies can discuss human rights issues with NGOs/NPOs and human rights experts. Since 2012, the Consortium has held the Human Rights Due Diligence Workshop for 14 years. The workshop has been implemented with the participation of NGO/NPOs, academics, and experts, mainly from companies.

There are some underlying factors that contributed to the establishment of the consortium. Companies face difficulty in responding to various demands and expectations from a broad range of their stakeholders. Therefore, it is effective and useful for companies to join this consortium, discuss and identify what human rights issues they need to address with NGOs/NPOs, and plan to carry out their human rights activities in their companies. The consortium also emphasizes sustainability of activities. It is important for companies to be committed to continuous efforts for incremental improvement. In order to respond dynamically to a diverse range of issues, it is also important for companies to stay abreast of changes and issues in the society that potentially link their activities to human rights impacts.

The Nippon CSR Consortium positions the workshop as an activity that aims to assist companies in (1) identifying and assessing any actual or potentially adverse human rights impacts as defined in the UN Guiding Principles¹, which are connected to their activities, and (2) integrating and acting upon the findings, (3) reporting, and (4) tracking improvement continuously. We hope participants' companies can use the knowledge acquired at this workshop to support their human rights due diligence activities at their companies.

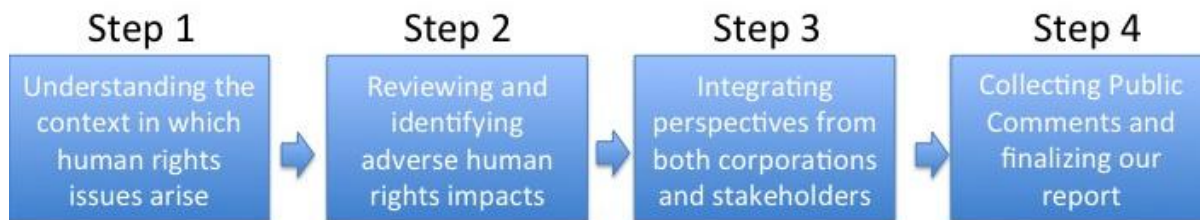
The “Human Rights Issue by Sector (draft)” represents the outcome of the discussions started in June 2025, and is hereby opened for public consultation. We would appreciate candid comments on the drafts from stakeholders. The content of the feedback received will be reflected to the greatest extent possible in the compilation of the “Human Rights Issues by Sector (14th Edition)” in 2025.

In addition, the progress of this program from 2012 to the current fiscal year is summarized in Attachment 1: Programme for Identifying Human Rights Issues.

Refer to: Human Rights Council, 2011, *Report of the Special Representative of the Secretary-General on the issue of human rights and transnational corporations and other business enterprises*, Available at: <https://digitallibrary.un.org/record/705860?v=pdf> (Accessed Sep 17th, 2024).

1-2. Procedure of the Workshop in 2025

The workshop consists of the following four steps.



Step1: Understanding the context in which human rights issues arise

- Corporate participants were given a lecture on the particular context in which human rights issues arise by members of NGOs/NPOs and subject experts. After the lecture, the participants from the company, NGO/NPO, and subject experts were separated by the given topics and discussed further.

Step2: Reviewing and identifying adverse human rights impacts arising from corporate activities

- The participants reviewed the sector specific human rights issues formulated by the CSR Consortium last year as to whether there were any additions/deletions/correction points, using the Human Rights Guidance Tool (2014 revision).

*Supplemental meetings were held online as each industry's discussions progressed.

Step3: Integrating perspectives from both corporations and stakeholders

- The corporate participants summarized the discussion content and exchanged views with NGOs/NPOs and subject experts. After receiving feedback from these groups, the corporate participants finalized their discussion content by sector. The Secretariat then compiled their work and developed the draft document titled "Human Rights Issues by Sector."

*Supplemental meetings were held online as each industry's discussions progressed.

Step4: Collecting Public Comments and finalizing our report

The Secretariat invites public comments on this paper from October 1st 2025 – October 31st 2025.

1-3. Points for Consideration

1-3.a Relevance between business operations and human rights

At the outset of this workshop, some of the participating NGOs/NPOs had only a limited understanding of how the social and environmental issues they raised were related to "business and human rights." However, all participating organizations demonstrated a strong awareness of the SDGs and made significant contributions to the discussion. On the other hand, many corporate participants in the workshop initially had a limited understanding of the relationship between their business activities and human rights. Nevertheless, through the course of the workshop, both sides have gradually come to understand that social and environmental issues are closely related to "business and human rights," and that there is a connection between corporate activities and "business and human rights."

1-3.b Scope of Study and Analysis

The workshop does not include the following study and analysis.

- The interconnection map of WEF Global Risks illustrated in "Human Rights Issues by Sector (v.3)" is not discussed or in the scope of analysis.
- "Priorities on the SDGs by Sector" is not discussed or in the scope of analysis.

2 CRT Japan's viewpoint as the Secretariat of Nippon CSR Consortium

In this year's program, it once again became evident that significant challenges remain in embedding human rights and sustainability practices. In particular, the fact that head office-led initiatives have not sufficiently reached on-the-ground operations or group companies—and that employees and business partners have yet to regard these issues as their own—remains a factor hindering long-term improvement. Beyond one-off, one-way initiatives such as e-learning and briefings, it is essential to establish mechanisms for mutual understanding and continuous feedback through site visits and two-way dialogue.

With regard to embedding human rights awareness throughout the supply chain, participants shared that practical difficulties increase further down the tiers—from primary to secondary to tertiary suppliers. In particular, in raw material procurement, managing supply chains for forest and mineral resources remains difficult even at the smelter level, and there is a tendency to lack awareness of issues such as forced labor when operating only in domestic markets. Multiple, overlapping barriers exist, including contractual terms, cultural and customary differences, and cost burdens, and there are limits to what can be achieved through mere agreements or surveys. This makes it essential not only to raise human rights awareness company-wide, including among procurement staff, but also to promote understanding and penetration of these concepts among suppliers through education and awareness-raising. It is also necessary to leverage external evaluation criteria and industry initiatives to build systems in which the entire supply chain shares a common awareness and standards.

Protecting the rights of migrant workers is also a critical challenge. Issues raised included improving the treatment of dispatched and local staff, ensuring a living wage, the lack of maternity and childcare leave systems, shortages of interpreters, and frictions arising from dialects and cultural backgrounds. There is also a gap between local practices and international standards. To reduce confusion at worksites, measures such as phased responses, the development of internal guidelines, cooperation with local communities, and innovations in everyday communication are necessary. In some regions, the problem of technical intern trainees going missing has become increasingly serious, reportedly due to concerns about working conditions and human rights violations. Against this backdrop, the Japanese government is discussing revisions to the Technical Intern Training Program. Companies must not only adapt to the new system but also strengthen efforts under the current system to prevent disappearances and human rights violations and to improve workplace conditions.

One case that particularly drew the attention of program participants involved mining development. It visualized human rights violations that are difficult to see in day-to-day operations and prompted reconsideration of the scope and limits of corporate responsibility and influence. Even when direct remediation is difficult, companies can potentially help reduce risks by collaborating with local entities and NGOs and by strengthening information gathering. While obtaining ESG certification offers a certain degree of credibility, gaps between certification and on-the-ground realities, as well as inconsistencies in how external certification bodies operate, remain challenges. There was a growing consensus that companies

should avoid over-reliance on certifications and instead strengthen their own fact-checking and engagement with stakeholders. Moreover, directly visiting sites and engaging with a variety of stakeholders—including suppliers, local residents, governments, and NGOs—is critical for understanding current conditions, building trust, and finding pathways to solutions.

In addition, the effectiveness of grievance mechanisms at Southeast Asian production sites drew significant attention. While regular employees and union members can raise concerns more easily, dispatched workers, contractors, and cleaning and cafeteria staff tend to lack both human rights awareness and access to channels, creating a risk that their voices do not reach management. Simple, low-barrier mechanisms such as anonymous, easy-to-use physical suggestion boxes or web forms that allow direct communication without going through contractual channels are effective. It is also essential to make such mechanisms multilingual to accommodate the diverse languages of local workers, and to ensure the existence and usage methods of the system are well publicized and understood over time so that it can truly function.

Overall, companies need to shift their human rights initiatives from a “head office–driven declarative model” to an “implementation model co-created with the front lines.” To achieve this, it is important to strengthen systems for gathering voices from the field, provide company-wide and multi-layered human rights education, engage in two-way communication with suppliers, balance alignment with international standards with cost management, and create environments where vulnerable people can raise concerns without fear. While addressing human rights issues requires time and cost, delays in action directly translate into reputational risks for companies. By acting early and implementing flexible remedial measures suited to local realities, companies can go beyond mere risk avoidance to enhance corporate value and gain social trust. Engagement on human rights is, by nature, a dialogue with affected parties. In this program, we have worked to visualize human rights issues of concern from both civil society and corporate perspectives. As a next step, when companies address human rights issues, it is essential that they recognize problems and consider countermeasures through dialogue with the actual rights-holders experiencing violations, as well as the NGOs/NPOs supporting them. The activities of this program serve as an entry point to help companies implement human rights due diligence. When problems arise, companies must work with stakeholders to respond swiftly by leveraging their expertise and strategic capabilities, fulfilling accountability and transparency to secure legitimacy. In doing so, they can obtain a “social license to operate” and enhance business sustainability. For participating companies, it is vital to integrate these efforts into internal management and link them to their human rights policies and practices.

Meanwhile, while the global economy has expanded under market liberalization, the increasingly complex and extensive supply chains that have accompanied this growth have, in reality, generated a steady stream of new human rights challenges. Frequent inter-state conflicts and disputes arising from differences in political systems have had a serious impact on global supply networks. In recent years, there has been a trend toward rebuilding supply chains with an emphasis on security and business continuity planning (BCP). Civil society has called on companies to prevent the diversion of consumer goods for military purposes and to promote declarations and initiatives for peace.

Under any circumstances, business activities have the potential to negatively impact human rights. Companies that face these issues squarely and fulfill their responsibilities in both prevention and remediation are the ones that can secure long-term sustainability.

[Notable Initiatives in 2025]

In FY2025, as a new effort reflecting international trends and based on issues raised by civil society, four overseas organizations active in the field of business and human rights were invited, and a total of ten themes were provided. Going forward, the CRT Japan plans to invite overseas experts in business and human rights and to hold the “2025 Business and Human Rights Conference in Tokyo” in October. Leveraging this opportunity, we will implement the “2025 Global Stakeholder Dialogue” as a forum for sharing and discussing initiatives and challenges between overseas experts and program participants, aiming to connect international knowledge with on-the-ground experience.

Nippon CSR Consortium

Minoru Matsuzaki

Hiroki Wada

[List of Issues Raised by Civil Society in 2025]

1. “The CRT Business Conduct Guidelines as a Global Pioneer in the Importance of Dialogue in Corporate Management”
Hiroshi Ishida, Executive Director, CRT Japan
2. “Local Land Conflicts over Raw Material Production of Tropical Commodities — Focusing on Supply Chains of Pulp and Wood Products in Indonesia”
Akira Harada, Representative Director, Japan Tropical Forest Action Network (JATAN)
3. “OECD Responsible Business Conduct Instruments and Tools”
Kate Wilson, Project Manager, Asia, OECD Centre for Responsible Business Conduct
4. “Latest Trends in WBA/CHRB 2025”
Hitoshi Morotomi, CRT Japan
5. “The Realities of Modern Slavery in the Asia Region and Outline Expectations for Japanese Companies”
Nathanael Foo, Principal, Business & Human Rights, Walk Free
6. “Rights and Protection of Migrant Workers in the Value Chain in Asia”
Bonny Ling, Executive Director, Work Better Innovations; Research Fellow, Institute for Human Rights and Business
7. “Human Rights Risks Faced by Foreign Workers in Japan Beyond the Technical Intern Training Program and Points for Corporate Attention”
Shoichiro Ikebe, Executive Officer, Worlding Inc.
8. “Current Labor Risks in Asian Business”
Kenichi Kumagai, CSR Program Director, Japan ILO Association; Visiting Professor, Tokyo International University
9. “What the ‘Ethical Company Scorecard’ Asks About Corporate Social Responsibility”
Mariko Yamaoka, Co-Representative, Citizens’ Network for Sustainable Society Through Consumption (SSRC)
10. “Development and Human Rights: Cases of Environmental and Social Issues at Mining Sites”
Hikaru Matsumoto, FoE Japan, Nuclear Phase-out, Development and Human Rights

3. Human Rights Issues by Sector

3.1 Manufacturing Industry (automotive and others)

※Value Chain of Manufacturing Industry (automotive and others)

Creation (research, development, design) **Purchase** (equipment construction, procurement), **Production** (production, manufacturing) **Transportation** (storage, logistics)
Sell (sales and marketing) **Use** (consumption, utilization, maintenance and servicing) **Discard** (disposal and recycling)

Human Rights Issues in the Manufacturing Industry (automotive and others)			Specific Concerns	Value Chain						
				Create	Purchase	Production	Transport	Sell	Use	Discard
	Treatment in the workplace	Working hours or wages	<ul style="list-style-type: none">•Wage levels are not in line with the local standard of living, or the increase in wages is not commensurate with the rise in prices.•There is a concern that the living wage is being maintained through overtime work.•Insufficient wage compensation for unavoidable long vacations, lack of places for children when parents cannot take leave•Risk of overtime due to production adjustments (prioritizing deadlines)•Partial non-payment of wages for working hours (e.g., inappropriate management of working hours for remote work, overtime hours in excess of deemed overtime hours under the deemed working hours system, rounding off fractions of working hours, failure to approve overtime requests, etc.) and forced labor in excess of legal working hours•Excessive work by managers (middle management) and other annual salary employees•Risk of subcontractors working longer hours and lower wages by passing on increased raw material and energy costs to subcontractors due to geopolitical changes or global economic conditions, or by forcing subcontractors to bear the burden of their roles without rational reasons.•Disparities in working conditions and wages within the same group <ul style="list-style-type: none">•Long working hours due to lack of appropriate capital investment•Risk of long working hours due to lack of appropriate personnel replacement when an employee leaves the company•Wage disparity due to regular/non-regular status and attributes•Economic deprivation of employees due to unfair dismissal * Risk of causing child labor•Impact of the Work Style Reform–related legislation (reduced income, increased workload, and worsening of health due to restrictions on truck drivers' working hours)•Long working hours for staff preparing for and operating international big events (special and irregular work, short delivery times)•Short delivery times for orders to suppliers may have contributed to illegal labor.•Possible inability to negotiate prices with suppliers, and inability of employees of suppliers to secure living wages commensurate with the increase in living costs due to high prices.	✓	✓	✓	✓	✓	✓	✓
		Health and Safety	<ul style="list-style-type: none">•Workplace accidents resulting in death or serious injury, particularly in research, manufacturing, and factory settings•Risk of work-related accidents while working at home not being recognized•Lack of personal and private space and sanitary conditions in dormitories•Health hazards caused by working in environments that do not adequately meet health and safety standards•Permanent remote work may encourage workers to work longer hours, which may affect the mental and physical health of workers and their children.•Lack of communication due to remote work may lead to alienation and exclusion from the workplace.•Failure to compensate for the cost of utilities required for remote work may cause workers to work under inappropriate room temperatures.•Lack of multilingual support may prevent foreign workers from accessing necessary health and safety information.•Differences in health and safety training opportunities due to differences in employment status, nationality, race, gender, age, educational background, length of service, etc.•Forcing employees to work remotely if they wish to come to the office <ul style="list-style-type: none">•Particularly in research, manufacturing, and factory settings, the risk of occupational accidents resulting in death or serious injury•Risk that occupational accidents occurring during telework may not be recognized as such•Lack of personal and private space, and inadequate sanitary conditions in dormitories•Health hazards caused by working in environments that do not sufficiently meet occupational safety and health standards•Risk that the normalization of telework may promote long working hours, adversely affecting the physical and mental health of workers and their children•Risk of isolation or exclusion from the workplace due to insufficient communication under telework arrangements•Risk of forcing workers to labor under inappropriate room temperatures when electricity and heating/cooling costs required for telework are not compensated•Risk of privacy violations and leakage of personal information through new internal communication tools, such as group chats, that have become widespread with the adoption of remote work <ul style="list-style-type: none">•Risk that foreign workers may be unable to access essential occupational safety and health information, such as evacuation routes, due to insufficient multilingual support•Risk of disparities in occupational safety and health training opportunities arising from differences in employment type, nationality, race, gender, age, educational background, or years of service•Forcing remote work on employees who wish to work on-site	✓	✓	✓	✓	✓		✓

Business/ Supply Chain	Discrimination	Health and Safety	<ul style="list-style-type: none">•Risk that the equal right to participate in community life may be undermined due to a lack of inclusion, insufficient livelihood support, and inadequate provision of information•Risk that migrant workers, when not encouraged to participate in open communities, may instead belong to closed communities, leading to disappearance or involvement in criminal activities•Adverse physical and mental effects from not being granted adequate rest breaks and leave•(Particularly in factory and other on-site work) risk of pregnant and breastfeeding workers being placed in environments that could endanger themselves or their children, and insufficient consideration for women’s specific physical and mental changes such as menstruation•Health hazards and cases of heatstroke caused by working in extreme heat, including the employer’s duty to take measures against heatstroke•Risk that the safety of food ingredients provided in employee cafeterias is not ensured•Occupational health management issues arising from the introduction of side jobs (secondary employment)•Risk that at construction sites, workplaces, etc., there are insufficient or no toilets and changing rooms designed for women or sexual minorities, thereby compromising their safety and dignity	✓	✓	✓	✓	✓	✓
			<ul style="list-style-type: none">•Curfews and locked entrances at employee dormitories may hinder emergency evacuation and restrict employees’ freedom of movement•Adverse physical and mental effects on employees caused by excessive demands or complaints from customers (customer harassment)•Risk of causing further human rights violations by justifying complaints made against customers•Risk that livestock industry workers may suffer mental health problems due to mentally burdensome tasks such as slaughtering•Risk of serving employees food ingredients in the company cafeteria that are sourced from livestock farms with no consideration for animal welfare (i.e., where traceability is not ensured and the risk of pathogen contamination is high), in order to keep product prices low•Risk that appropriate occupational safety and health training tailored to specific workplaces is not provided•Risk that food served in employee cafeterias does not take into account animal welfare or religious considerations (e.g., use of meat from animals raised or processed under stressful conditions, provision of non-halal meat to Muslim employees)						
		At the time of hiring and at the time of employment	<ul style="list-style-type: none">•Discrimination based on race, skin color, gender, age, nationality, disability, illness, marital status, sexual orientation, gender identity, religion, place of residence, or place of origin•Various forms of harassment (including sexual harassment, power harassment, maternity harassment, remote harassment, technology harassment, and customer harassment)•Discrimination or invasion of privacy caused by leakage of personal information handled only by certain departments•Risk that AI, through the data it learns from, may detect and reinforce humans’ latent discriminatory tendencies (including in the provision of products or services that trigger human rights violations, such as TMS)•Risk of unequal treatment in AI-based predictions of resignations or job offer declines•Risk of invasion of workers’ privacy through AI-based monitoring of employees•Risk that biased AI used in recruitment or performance evaluations results in discriminatory treatment of job applicants or employees•Inability to access company systems or benefits due to differences in employment type or race•Risk that issues involving foreign workers may be politically exploited, leading to greater social division and workplace discrimination against foreign workers•Risk that low awareness of ESG among general employees could lead corporate activities to cause human rights violations (reflecting the growing view that ESG evaluation concepts should be instilled not only in executives but also in general employees to foster a stronger sense of ownership)•Possibility of contributing to discrimination due to a lack of visibility into the hiring and employment conditions of workers at suppliers•Possibility that gender bias may affect career development, including job assignments and opportunities for promotion or advancement•Risk of unequal appointments from a diversity perspective (e.g., discrepancies between the demographic ratio at hiring and the ratio of those appointed to leadership positions)•Loss of career advancement opportunities for employees whose working hours are limited by childcare or caregiving responsibilities due to evaluation criteria that prioritize working hours over productivity•Imbalance in workload arising from differences in work arrangements (remote vs. in-office)•Insufficient life-support measures for overseas personnel•Risk that deficiencies in AI-generated outputs lead to biased judgments when AI is used in recruitment or performance evaluations, undermining workforce diversity•Risk that workers are not informed of their rights at the time of hiring and are therefore unable to fully exercise them (e.g., access to benefits, grievance mechanisms)•Risk of unfair or unequal personnel evaluations due to the failure to apply fair evaluation standards (including favoritism based on a supervisor’s personal preferences)	✓	✓	✓	✓	✓	✓
Child labor	(1) Minimum age (2) Young workers	<p>(1) Possible employment of children in the supply chain in developing countries (subcontracting work, etc.) and mediation of children by brokers.</p> <p>(1) Asian workers may apply for employment by falsifying their age.</p> <p>(2) Possible risk of having them engage in night work or hazardous work.</p> <p>(1)(2) Increased physical and mental strain and loss of learning opportunities due to domestic work on behalf of parents (young caregivers).</p> <p>(1)(2) When using outside services for events, etc., young people may be working there and may unintentionally contribute to child labor.</p> <p>(1)Risk of children being involved in inside work of parts manufacturing.</p> <p>(1) Risk that child labor under the minimum age may be performed without identification or other verification, or based on false identification.</p> <p>(2) (2) Risks at Tier 2 and beyond suppliers may not be fully understood.</p>		✓	✓	✓	✓		✓

Others	Relationship with Consumers	Health and Safety, Privacy, Accessibility	<ul style="list-style-type: none">• Risk of damage to the life, health, or property of consumers as a result of failure of products or services provided to customers, inappropriate marketing activities, or failure to properly disclose information.• Inappropriate advertisements or information dissemination may cause discomfort or false perceptions among consumers, promote discrimination or prejudice, or cause health hazards due to false perceptions.• Risk of infringement of human rights of individuals due to inappropriate management of personal information obtained in the course of business processes.• In the event of human rights violations, there may be a delay in responding to the situation, resulting in the spread of damage.• Increasingly online procedures and functions may promote IT disparity• Lack of multilingualization of various procedures may prevent foreigners from accessing infrastructure necessary for daily life.• Insufficient consideration for product users (child locks, multilingual support, wheelchair accessibility, accident avoidance devices, etc.) may cause inconvenience and danger to consumers.						
			<ul style="list-style-type: none">• Lack of uniformity in industry standards for containers, etc. may lead to higher costs and increased waste.• Risk of leakage of confidential information and infringement of copyrights due to the spread of AI technology• Possibility of privacy violations through data collection, impacts on labor relations, and ethical concerns• Health hazards due to chemical substances (VOCs, etc.) released from products• Risk of products and services not reaching consumers due to withdrawal from business (in conflict countries, etc.)• Risk of infringement of human rights of employees who respond to excessive requests from consumers by not clearly indicating the scope of possible responses (customer harassment)• Risk of slander on social networking sites by players belonging to industrial companies.	✓	✓	✓	✓	✓	
		Ethical consumption	<ul style="list-style-type: none">• The risk of users being mentally burdened by unknowingly using products and services that violate human rights and animal welfare (i.e., the risk of infringing on the right to use ethical products)• In the automotive supply chain, leather products (such as steering wheels, seats, and interior trims) are widely used; however, there are concerns regarding animal welfare in relation to the rearing conditions of animals (e.g., cattle) used for leather, particularly in developing countries, as well as the possibility of forced labor involving children or migrant workers in leather processing factories (especially subcontracted facilities handling tanning processes)• In tanning and other leather processing stages, workers may suffer health damage (such as skin diseases, respiratory disorders, or cancer) due to exposure to hazardous chemicals (e.g., hexavalent chromium) and the lack of safety equipment; furthermore, improper leather processing may release harmful substances into wastewater, contaminating local rivers and groundwater, which can lead to health damage among local residents and deprive them of land rights and their means of livelihood						
	Complicity	Use or misuse for other purposes	<ul style="list-style-type: none">• Advanced functions of cameras may be used for voyeuristic photography or other sexual harm.• Surveillance cameras may be used as equipment for forced labor• Risk of criminal use of SNS• Risk of illegal modification for diversion or misuse in weapons such as cars and drones• Risk of stalking using IC tags• Risk of consumers suffering damage such as explosion or harmful gas emission when transferring detergent, etc. to a container other than the dedicated one• 3D printers may produce weapons or other items that infringe on human rights.• Risk of counterfeit bills being manufactured by a scanner• Risk of damage to the human body (including mental health) due to use for other than the intended purpose• Leakage of personal or confidential information due to employee use of generated AI						✓
	Remedy	Establishment of a remediation process	<ul style="list-style-type: none">• Risk that the effectiveness of grievance mechanisms may not be ensured due to insufficient establishment of grievance channels and processes, and inadequate monitoring by third-party organizations• Risk of disparities in the remedies provided to non-Japanese individuals due to language and cultural barriers• Risk that perpetrators disciplined as a result of a report may reoffend in another location• Risk of pressure or leakage of reported information when the content of the report is unfavorable to the company or its entities• Risk that insufficient disclosure of information about the grievance-handling process prevents users from feeling safe to use it (due to concerns about cover-ups or retaliation)• Ensuring a trusted and fair process that does not cause any disadvantage to stakeholders who use it• Risk that stakeholders, including those across the entire group and supply chain, are not adequately made aware of the mechanism or guaranteed accessibility• Need to establish support for individuals who face specific barriers, such as language or access to grievance channels• Risk of insufficient consultation with victims, human rights defenders, and other potential users of the grievance mechanism regarding its design and performance• Risk that users are not clearly informed of the available process, including indicative processing times• Risk that the lack of communication that the mechanism is available to all workers, regardless of employment type, results in lost opportunities for remedy• Risk of lost opportunities for remedy due to the absence of an environment where telephones or computers can be used	✓	✓	✓	✓	✓	✓

3.2 Manufacturing Industry (electricity and information)

※Value Chain of Manufacturing Industry (electricity and information)

Creation(research, development, design) **Purchase** (construction of facilities, procurement) **Production** (manufacturing) **Transportation** (storage, logistics)
Sell (sales and marketing) **Use**(consumption, utilization, maintenance and servicing) **Discard** (disposal and recycling)

Human Rights Issues in the Manufacturing Industry (electricity and information)			Specific Concerns	Value Chain						
				Create	Purchase	Produce	Transport	Sell	Use	Discard
		Working hours or wages	<ul style="list-style-type: none">•Risk of minimum wages not being in line with local living standards, leading to long working hours•Risk of not being able to guarantee a proper place to stay if parents are unable to take leave.•Risk of overtime due to production adjustments (prioritizing delivery dates) and troubleshooting•Possible lack of proper management of working hours due to remote work and discretionary work (Separation of work and private life).•Possible truncation of working hours (problem of rounding down fractions of working hours)•Failure to properly report working hours may result in the failure to pay proper compensation (wages).•Risk of wage disparity affecting children's future education•Risk of long working hours and lower wages for subcontractors due to the transfer of increased raw material and energy costs to subcontractors as a result of geopolitical changes <ul style="list-style-type: none">•Particularly in Japan, the risk of unpaid overtime (“service overtime”) and long working hours, including excessive workloads for managers (middle management)•Improper application of the discretionary labor system or “deemed management” status (e.g., exceeding statutory or prescribed working hours or deemed overtime hours without payment of overtime wages)•Risk that wage disparities within group companies may result in failure to uphold the principle of equal pay for equal work, even under equivalent working conditions and employment types•Risk that not introducing new equipment or technologies may lower productivity and lead to longer working hours•Risk that wages not aligned with the cost of living in the worker’s country or region may prevent a basic standard of living (e.g., leading to malnutrition or loss of children’s educational opportunities)•Risk of declining living standards if wages do not rise in line with increases in the cost of living (e.g., food, daily necessities, energy)	✓	✓	✓	✓	✓	✓	✓
		Continuous employment, working environment	<ul style="list-style-type: none">•Risk that terminating transactions with a supplier due to human rights issues may lead to reduced production at the supplier, resulting in wage cuts or layoffs•Risk of human rights violations from transfers or relocations that disregard the employee’s wishes (e.g., mandatory assignments requiring workers to live apart from their families)•Risk of human rights violations from transfers, relocations, or unemployment due to the inability to perform remote work•Risk that changes to transfer conditions under the current Technical Intern Training Program (to be transitioned to the Development Employment Program) may cause participants who cannot acquire skills within a short period (e.g., one year) to easily lose their jobs or face harsh employment conditions and living environments•Risk of overlooking inappropriate wage reductions or unfair dismissals by relying solely on desk-based research to understand actual employment practices and working environments•Risk that insufficient support for improving Japanese language skills may ultimately result in no improvement in treatment or working conditions							

Business/ Supply Chain	Treatment in the workplace	<p>(1) Risk that failure to properly update old production equipment and technologies may result in occupational accidents causing death or serious injury, particularly in research, manufacturing, and factory settings</p> <p>(1) Risk of occupational accidents occurring during telework (e.g., due to insufficient safety measures, differences in work environments causing health problems, or disruption of daily routines)</p> <p>(1) Risk that living conditions such as shared dormitory rooms with multiple occupants and inadequate sanitary facilities may adversely affect workers' physical and mental health</p> <p>(1) Risk that deficiencies in showers, toilets, and other facilities; location of dormitories within factory premises; or locked management from the outside may negatively impact employees' health</p> <p>(1) Risk that emergency exits, evacuation drills, and other measures do not meet global occupational safety and health standards</p> <p>(1) Risk that insufficient or superficial occupational safety and health training increases the likelihood of serious workplace accidents</p> <p>(1) Risk that occupational safety is not ensured for foreign workers due to the lack or insufficiency of multilingual manuals and evacuation route information</p> <p>(1) Risk that blurred boundaries between work and private life result in reduced personal time for workers</p> <p>(1) Risk that the safety of employees and accompanying family members is not ensured in countries experiencing pandemics or conflict</p> <p>(1) Risk that the safety of employees engaged in on-site work (e.g., manufacturing) that cannot be performed remotely is not ensured during pandemics</p> <p>(1) Risk of inadequate labor and care environments for pregnant and nursing workers (e.g., handling heavy objects, working with hazardous substances, lack of nursing rooms or childcare support)</p> <p>(1) Risk of inadequate labor and care environments for elderly workers (e.g., handling heavy objects, insufficient measures to prevent falls)</p> <p>(1) Risk of insufficient consideration for religious needs, such as prayer rooms, prayer times, and dietary requirements (e.g., halal)</p> <p>(1) Risk that the lack of a work environment accommodating sexual minorities (LGBTQ+) may prevent workers from being able to work with a sense of security</p>							
	Health and Safety (1) Physical, hard, working environment (2) Mental (3) Health (4) Education	<p>(2) Long working hours may cause employee health care problems, especially mental health.</p> <p>(2) Lack of communication due to remote work may lead to alienation and exclusion from the workplace.</p> <p>(2) Risk of not being recognized as workers' compensation in the event of injury or illness while working remotely.</p> <p>(2) Risk of having to bear the increased utility costs associated with remote work (compensation for telecommuting allowance)</p> <p>(3) Risk of progression of illness due to lack of medical checkups</p> <p>(3) Risk of progression of occupational disease due to lack or non-use of protective equipment such as finger sacks, gloves, masks, ear plugs, etc.</p> <p>(3) Likelihood of remote work becoming a regular occurrence and the accompanying long-term work environment not being maintained (e.g., illness under illness)</p> <p>(3) Possible inability of foreign workers to properly access medical care due to language barriers</p> <p>(3) Possible increase in the number of heat stroke victims due to heat waves caused by rising temperatures resulting from climate change</p> <p>(3) Risk of increased risk of diseases due to various environmental changes caused by climate change</p> <p>(4) Likelihood that insufficient consideration is given to the treatment of foreign workers in terms of language issues, such as guidance and awareness of safety and health aspects</p> <p>(4) Risk that foreign workers are not sufficiently considered in safety and health guidance, communication, and awareness-raising due to language barriers</p> <p>(4) Risk that migrant workers are not provided with equal and fair opportunities in education, employment, wages, and living conditions</p> <p>(4) Risk that long working hours deprive employees of opportunities for education and training</p> <p>(4) Risk of disparities in educational opportunities arising from differences in employment type, nationality, race, gender, age, educational background, or years of service</p> <p>(4) Risk that educational curricula generated by AI with biased perspectives may unintentionally promote discrimination or false perceptions</p> <p>(4) Risk that the lack of multilingual educational opportunities prevents foreign workers from obtaining equal and fair opportunities to acquire skills</p> <p>(4) Risk that employees are unable to keep up with rapid technological advancements in skill acquisition, wages, and promotions due to the lack of appropriate opportunities to learn and utilize the latest technologies, such as generative AI, necessary for job performance</p> <p>(1)-(4) Risk that children's healthy lives are impaired due to parents' long working hours</p>	✓	✓	✓	✓	✓	✓	

		<ul style="list-style-type: none">• Risk of unequal treatment in terms of working conditions, training and vocational education, and promotion opportunitiesDiscrimination against infected individuals or those who are unvaccinated• Risk that discrimination against a worker’s occupation extends to discrimination against their children• Discrimination based on race, skin color, gender, age, nationality, disability, illness, marital status, sexual orientation, gender identity, religion, place of residence, or place of origin• Risk of insufficient reasonable accommodation for persons with disabilities (e.g., installation of ramps, adjustments to facial recognition systems for individuals with visual impairments)• Various forms of harassment (including sexual harassment, power harassment, remote harassment, SOGI harassment, maternity harassment, moral harassment, customer harassment, and technology harassment)• Risk that AI, through the data it learns from, may detect and reinforce latent human discriminatory tendencies (including in tools such as TMS)• Risk of unequal treatment in AI-based predictions of resignations or job offer declines• Risk of invasion of workers’ privacy through AI-based monitoring <ul style="list-style-type: none">• Risk of invasion of workers’ privacy if the company manages personal biometric data (e.g., sleep information)• Risk that the use of AI in recruitment or performance evaluation may unintentionally promote discrimination if evaluators fail to make appropriate judgments• Risk that workers’ abilities and achievements are not properly evaluated due to the use or non-use of AI or a lack of transparency in evaluation criteria, leading to unfair discrimination or disparities in wages and promotions• Risk that technical intern trainees may face dismissal, forced return to their home country, or other disadvantages due to marriage, pregnancy, or childbirth• Risk that technical intern trainees are not granted maternity leave, childcare leave, or short working hours• Risk of unequal decision-making at the time of recruitment due to unconscious bias• Risk of intentional unequal decision-making at the time of recruitment based on gender, sexual orientation or gender identity, disability, appearance (e.g., facial photographs), educational background, etc.							
Discrimination	At time of hire/employment	<ul style="list-style-type: none">• Risk of inequality or unfairness arising from the lack of multilingual information provided to foreign workers during recruitment• Risk of perpetuating discrimination by referencing a candidate’s previous wage level during recruitment (if the candidate was treated discriminatorily in their prior job)• Risk that withdrawal from business activities in conflict-affected countries may prevent products or services from reaching consumers• Risk that low awareness of ESG among general employees could lead corporate activities to cause human rights violations• Risk that while working conditions for in-house/directly employed technical intern trainees can be monitored, the realities of technical intern trainees within the supply chain remain unknown, leading to inappropriate employment conditions and working environments• Risk of lost work experience opportunities due to gender bias (including “mommy track” practices such as exclusion from business trips or overseas assignments)• Risk of overlooking inappropriate wage reductions or unfair dismissals by relying solely on desk-based research to understand actual employment practices and working environments <ul style="list-style-type: none">• Risk of unequal appointments from a diversity perspective (e.g., discrepancies between the demographic ratio at hiring and the ratio of those appointed to leadership positions)• Risk that a lack of improvement in the industry’s image may ultimately reduce opportunities for women to succeed (e.g., using industry characteristics as an excuse for insufficient promotion of female role models or visibility of women working through different life events)• Risk that older workers’ range of occupational choices may be restricted solely due to age• Risk that, even when job duties remain unchanged after reemployment of older workers, only wages are reduced, violating the principle of equal pay for equal work• Risk that mandatory retirement and demotion based on age constitute age discrimination• Risk that advances in AI may replace existing jobs, leading to higher unemployment rates• Risk that insufficient consideration for pregnant and nursing workers may deprive women of work and career development opportunities• Risk of unequal treatment due to the lack of recognition of LGBTQ+ partners in company policies (e.g., leave, celebration payments) <ul style="list-style-type: none">• Risk that changes in DEI policies in influential countries or regions may affect corporate DEI initiatives, resulting in lost opportunities for hiring or promoting target talent• Risk that mandatory dress codes infringe on freedom of expression and reinforce gender-related biases (e.g., requiring uniforms only for women)	✓	✓	✓	✓	✓	✓	
Child labor	(1) Minimum age (2) Handling of young workers	<ul style="list-style-type: none">(1) Risk of child labor and the brokering of children by intermediaries within the supply chain, including at mineral mining sites(1) Asian workers may apply for employment by falsifying their age(2) Possible risk of having them engage in night work or hazardous work		✓	✓	✓	✓		✓
Forced labor	Recruitment	<ul style="list-style-type: none">• Risk that migrant workers may be required to pay recruitment fees or surrender their identification documents• Risk of debt labor of foreign technical intern trainees• Risk of unintentional involvement in criminal activities through black market work through misuse of anonymous communication apps, etc.			✓	✓			✓
	Employment	<ul style="list-style-type: none">• Risk of forced labor occurring within the supply chain, including at mineral mining sites• Risk that excessive demands on suppliers, such as orders with extremely short delivery deadlines, may lead to long working hours amounting to de facto forced labor• Risk that continued use of products manufactured through forced labor may prevent improvement of the situation and further worsen or perpetuate the practice of forced labor	✓	✓	✓	✓	✓		
Impact on local communities		<ul style="list-style-type: none">• Risk that environmental destruction caused by activities such as mineral mining or deforestation may negatively affect the culture, livelihoods, and health of surrounding local communities	✓	✓	✓				

			<ul style="list-style-type: none">•Risk of insufficient dialogue and communication with worker representatives or labor unions•Risk that systems and practices for labor–management consultations or collective bargaining are not sufficiently established or implemented; also, while collective bargaining rights may be recognized, actual negotiations may not take place•Risk that workers’ rights are not adequately guaranteed under a union shop system•Risk that in certain countries or regions (particularly at overseas subsidiaries), labor unions are prohibited—explicitly or in practice—or do not fulfill their intended role of protecting employees, resulting in inadequate protection of workers’ rights•Risk of restricting foreign workers’ freedom of association•In Japan, risk that the predominance of enterprise-based unions in negotiations with management—compared to industrial unions—makes unions more susceptible to company influence, reducing the ability to adequately protect workers’ rights•Risk that the rights of workers in freelance, delivery, retail, and similar sectors are not adequately protected	✓	✓	✓	✓	✓	✓
Community	Resources/ Community	Resource Use	<ul style="list-style-type: none">•Risk that developing and designing products, as well as conducting logistics and sales, with high environmental impact (e.g., high electricity consumption, low recyclability) may lead to excessive resource extraction and affect the livelihoods of surrounding local communities (upstream supply chain)•Risk that excessive use or pollution of water and land, over-extraction of resources, and destruction of ecosystems during factory operations or on-site construction may harm the livelihoods and health of nearby communities•Risk that using energy or resources mistakenly believed to have low environmental impact—when in fact the impact is high—may contribute to environmental destruction and human rights violations•Risk that the use of renewable energy or biomass resources may negatively affect local communities (e.g., environmental impact from power plants, deforestation driven by palm oil production)•Risk of massive electricity consumption from the circulation and use of cryptocurrencies•Risk that ecosystem destruction in forests and oceans caused by raw material sourcing may affect local cultures and residents’ livelihoods•Risk of animal welfare violations related to raw material sourcing (e.g., leather used in cases or accessories)•Risk that business site construction or operations may destroy local ecosystems and impact community livelihoods•Risk that failing to reassess the environmental impact of business activities may prolong negative effects on the global environment and people’s lives•Risk that manufacturing environmentally friendly products may still cause adverse effects on the environment and people’s livelihoods•Risk that dominant companies monopolizing natural energy may deprive people who need energy of access to it•Risk that the development and use of generative AI may consume vast amounts of energy, restricting access to essential energy for local residents, including socially vulnerable groups such as the poor•Risk of overlooking actual human rights risks due to overreliance on the fact of having obtained certifications•Risk that, amid semiconductor shortages and resulting raw material constraints, sourcing from rare metal mining sites—where child labor or forced labor is occurring and which lack certifications—may increase, thereby contributing to the perpetuation of human rights violations•Risk that the installation or disposal of solar panels may cause environmental destruction, ultimately harming the livelihoods of local residents•Risk that overseas manufacturing may place excessive strain on local water resources (virtual water issue)•Risk that inefficient water use in data centers (e.g., for cooling) may deplete water resources, reducing access to water for those who need it•Risk that the impacts of global warming may increase the risk of diseases•Risk that rising sea levels and flooding/heavy rainfall due to climate change may increase the number of people losing their homes, leading to a rise in refugees and individuals needing social assistance•Risk that water shortages caused by climate change may impair the right to access water•Risk that droughts caused by climate change may reduce agricultural output, leading to food shortages	✓	✓	✓	✓	✓	✓
		Disposal	<ul style="list-style-type: none">•Risk of causing environmental pollution, deterioration of sanitary conditions, and health damage to local residents due to:•Generation of microplastics from business activities•Waste separation being practiced but with a low recycling rate•Increase in waste and plastic waste due to the rise in takeout services•Improper use or disposal by suppliers, end consumers, or recycling companies (e.g., marine plastic pollution, increased processing loads at waste treatment facilities)•Slow progress in reuse efforts, resulting in insufficient reduction of plastic use	✓	✓	✓	✓	✓	✓
			Foreign / minority workers	<ul style="list-style-type: none">•Risk that foreign workers may become immersed in closed communities•Risk that foreign workers may be unable to join communities and become isolated•Risk that foreign or minority workers may be politically exploited, thereby fostering discrimination and division					

	Public Safety	Involvement in security and anti-social organizations	<ul style="list-style-type: none"> • In the procurement of raw materials and disposal of products, there is a risk that funds, products, and services may flow to non-governmental forces or armed groups (e.g., conflict minerals) • In the procurement of labor, a portion of wages may flow to anti-social organizations or armed groups (e.g., technical interns) • Risk that deteriorating security in conflict-affected countries may disrupt the distribution of food, daily necessities, and other supplies to local residents • Possible increase in crimes due to misuse of generated AI (e.g., misinformation by fake news, fraud, defamation, copyright infringement, etc.) 	✓					✓
	Access to land	Ownership to land	<ul style="list-style-type: none"> • Risk of forced relocation of indigenous peoples or local residents during the acquisition of land for business use • Risk that business site construction or operations may damage land value, reducing the asset value of local residents' property • Risk of health damage to indigenous peoples or local residents due to the spread of viruses - either of biological origin or introduced by external migrants - caused by land development • Risk that clearing mountains to install solar panels may cause environmental destruction and affect local residents' livelihoods • Risk that unused solar panels may be abandoned due to business bankruptcy or closure, impacting local residents' lives • Risk that land use without consideration for resilience, adaptability, or long-term changes may ultimately threaten local residents' livelihoods • Risk that mining for rare metals or gold may cause environmental pollution in surrounding areas, resulting in harm to local residents 	✓	✓				
Society and Government	Relationship with Government	Bribery and Corruption	<ul style="list-style-type: none"> • Risk that, particularly when obtaining permits and licenses, involvement in bribery or corrupt practices (e.g., facility payments) may lead to insufficient safety and other necessary inspections or verifications • Risk that participation in bribery during contracting, collusion or entrenched practices within the industry (in transaction/operation methods), or misconduct when securing government-related projects may result in inadequate safety and other necessary inspections or verifications • Risk that overseas partner or investee companies may make donations to military regimes, thereby indirectly contributing to the regime and, in turn, to human rights violations • Risk that efforts to maintain logistics flows may create corruption risks, such as bribery, leading to insufficient safety and other necessary checks 	✓	✓	✓	✓	✓	✓
		Relationships with countries with high human rights risks	<ul style="list-style-type: none"> • Risk of contributing to human rights violations when operating in countries or regions where there is a gap between local laws/customs and international standards • Risk of indirectly contributing to human rights violations by paying usage fees to military regimes when using airports in such countries • Risk of indirectly contributing to human rights violations (e.g., forced labor, ethnic discrimination, increase in refugees, community impacts) through transactions with companies or suppliers in conflict-affected areas • Risk that information control in geopolitically high-risk regions may prevent access to necessary information, resulting in an inability to ensure the safety of employees and their families engaged in business activities, or in unintentional complicity in human rights violations through business operations • Risk that expatriates or business travelers may be unjustly detained under the laws of geopolitically high-risk regions • Risk that failure to respond promptly to changes in geopolitical risks may compromise the safety of employees and their families engaged in business activities • Risk of unintentional complicity in human rights violations if the company's products or technologies are used by parties to a conflict, wartime actors, or military regimes 	✓	✓	✓	✓	✓	✓
	Consumer Relations	Health, Safety, and Personal Data Protection	<ul style="list-style-type: none"> • Risk that product or service defects, inappropriate marketing activities, or failure to properly disclose information may ultimately cause harm to consumers' life, health, or property • Risk that greenwashing may prevent accurate information about a company's or product's sustainability from reaching consumers, hindering their ability to make informed purchasing decisions • Risk that personal information obtained in the course of business processes may not be properly managed or handled, resulting in violations of individuals' human rights (privacy) • Risk that consumers may feel uneasy if it is not disclosed—or is unclear—at which stage AI is being used • Risk that, when individuals' human rights are violated, the absence of clear remedial measures may lead to the escalation of harm • Risk that inappropriate advertising or communication may promote discrimination or prejudice, cause discomfort to consumers, or result in health damage from using products or services based on false perceptions • Risk that rising anti-diversity sentiment in certain regions may lead to the provision of products and services lacking diversity considerations, making them difficult for socially vulnerable groups to use or access 	✓	✓			✓	✓
			<ul style="list-style-type: none"> • Risk that individuals who are unable to effectively use IT devices may be left behind in the information society as various procedures and information access move to PCs and smartphones • Risk that insufficient multilingual support for various procedures may prevent foreign nationals from accessing essential infrastructure for daily life • Risk that container designs not considering end-of-life disposal cycles may hinder recycling, increase waste, and worsen sanitary conditions • Risk that insufficient consideration for foreign nationals and children (e.g., lack of child locks) may cause inconvenience or danger to consumers • Risk that credit management systems incorporating AI (based on incorrect or biased machine learning) may make discriminatory decisions • Risk that the use of generative AI may result in privacy violations, copyright/trademark infringement, or the promotion of discrimination • Risk that inadequate education or awareness-raising on the proper use of online casinos or paid content services may lead to user addiction, threatening their mental, physical, and financial well-being 						

Others	Complicity	Use or misuse for other purposes	<ul style="list-style-type: none"> •Risk that surveillance cameras and similar equipment may be used for forced labor facilities or for sexual crimes such as voyeurism •Risk that criminal use of social media may lead to human rights violations •Risk that products such as drones may be illegally modified for military purposes and used as weapons to injure or kill people •Risk of stalking incidents facilitated through the misuse of IC tags •Risk that transferring substances such as detergents into non-designated containers may cause explosions or the release of harmful gases, resulting in harm to consumers (e.g., placing alcohol-based sanitizer in containers not designed for alcohol) •Risk that 3D printers may be used to produce weapons or other items that could cause human rights violations •Risk that advanced camera functions may be misused for sexual crimes such as voyeurism •Risk that misuse of high-anonymity communication apps may lead to unintentional involvement in criminal activities such as underground part-time jobs (“yami-baito”) •Risk that insufficient product/service explanations or considerations may result in improper use that violates laws (e.g., in the context of inbound tourism or the diversification of sales channels such as flea market apps) 							✓
	Remedy	Building a Remediation Process	<ul style="list-style-type: none"> •Risk that, if grievance channels or processes are insufficiently developed, human rights violations may not be remedied (e.g., due to inadequate understanding or skills of grievance officers) •Risk that insufficient oversight by third-party organizations may undermine the effectiveness of the grievance process •Risk that reports are not connected to the grievance process •Risk that whistleblowers are not protected •Risk that supporters of victims may face retaliation or attacks •Risk of current grievance mechanisms becoming a mere formality •Risk that grievance processes covering the supply chain fail to reach necessary stakeholders •Risk that reports from affected parties are not properly understood (due to insufficient information or lack of multilingual and business practice understanding) and thus the parties are not recognized as eligible for remedy •Risk that contact information lists only email or chat without a phone number (or that obtaining a phone number requires significant effort), causing inconvenience for visually impaired persons or others who prefer phone communication, preventing them from seeking advice •Risk that, even if the contact details of supplier or client representatives are known, stakeholders may be unable to consult them if the matter is not appropriate to raise with that individual •Risk that rights-holders may not trust the grievance channel (lack of psychological safety) and therefore refrain from making inquiries •Risk that biased AI used in the grievance process may lead to inappropriate handling (e.g., failing to provide fair remedy) •Risk that discrepancies between a company’s stated policy/disclosures and its actual actions may result in no remedy being provided •Risk that adherence only to local laws, without following international standards, may significantly reduce the likelihood of achieving remedy 	✓	✓	✓	✓	✓	✓	✓

3.3 Chemical and Building Materials Industry

This table is a summary of the value chain that is generally considered to exist in the industry, and individual companies need to consider their own specific products and services.

*Each value chain item includes not only the company itself but also contractors and cooperating companies that outsource manufacturing, logistics, services, etc. at each stage of the value chain. (This also includes contractors that come in and out of offices and factories.)

Human rights issues of importance in the chemical and building materials industries			Specific Concerns	Value Chain								
				Research	Development	Procurement	Manufacturing	Logistics	sales	Use/Utilization	Reuse/Recycle	Disposal
		Working Hours	<ul style="list-style-type: none">•Concerns about the possibility of overtime work due to the impact on the global supply chain caused by changes in international affairs and geopolitical risks (e.g., the situation in Ukraine and the Middle East), which may lead to changes in the client company's plans and short delivery times for orders, or concern that it is difficult to take measures and make improvements while overtime caused by longer lead times is a regular occurrence.•Concerns that working hour management according to different working conditions in different countries/regions is not sufficiently thorough and well understood.•Concerns that, if there is a discrepancy between international norms and national laws, compliance with the laws of countries that allow longer working hours than international norms may lead to health problems for workers.•Concern that late-night and early-morning overtime work and long overtime hours will become the norm due to meetings with the company's overseas offices and business partners.•Concerns that standards for new ways of working (need for rest and leave in terms of health), such as intervals between shifts, are not taken into consideration.•Concern that long working hours relying on premium wages for overtime and holiday work will become the norm because basic wages are not commensurate with the standard of living in some countries/regions (employees will be impoverished if the company prohibits long working hours exceeding the legal limit)	✓	✓	✓	✓	✓	✓		✓	✓
		Health and Safety	<p>As a manufacturing company that uses hazardous substances (e.g., chemicals) or often performs hazardous work at high altitudes, high temperatures, high pressure, or between high temperatures, the risk to the safety and health of people in the work environment or near the manufacturing site is particularly high.</p> <ul style="list-style-type: none">•Concerns that accidents involving leaks of hazardous substances may cause health hazards to on-site employees and nearby residents.•Concerns that insufficient information on chemical substances provided by suppliers may cause health hazards to their own employees and end consumers.•Concerns that outsourcing human safety and functionality testing may lead to human rights issues if the ethical standards of the outsourced company are weak.•If there is a gap between international norms (e.g., ILO Core Labor Standards) and the laws of each country, there is concern that compliance with the laws of countries that allow longer working hours than international norms may lead to health hazards for workers.•Concerns that workplace accidents may occur due to inadequate training on occupational health and safety (especially for foreign workers)•Concerns that workplace accidents may occur due to lack of personal protective equipment for employee safety or lack of instruction on how to use it. <p>•Concerns that safety instruction may not be provided in situations where there is insufficient multilingual support suitable for workers who have difficulty understanding English or Japanese, leading to work-related injuries.</p> <p>•Concerns that safety and health standards at workplaces meet legal requirements but do not take into account comfort and ease of work (e.g., not wearing protective equipment because it is too hot).</p> <p>•Concerns that the work style is not considered from the perspective of health, rather than health and hygiene (even if the legal standards are met, is the actual health of the workers being compromised).</p> <p>•In the case of an increase in the number of female workers in male-employed workplaces, there are concerns that the enjoyment of a healthy work environment will be infringed upon due to a lack of consideration for facilities such as women-only restrooms and rest areas.</p> <p>•In addition, the lack of Japanese language proficiency of foreign workers poses a significant human rights risk. In particular, cases of inadequate safety education occur due to foreign workers' lack of Japanese language proficiency. It is desirable to use tools such as showing foreign workers explanatory videos prepared in multiple languages by the Ministry of Health, Labor and Welfare and other organizations.</p>	✓	✓	✓	✓	✓	✓	✓	✓	✓

Businesses / Supply Chain	Workplace Treatment	Disciplinary Action	<ul style="list-style-type: none"> Concerns that suppliers have disciplinary action policies that are not in line with local customs in different countries/regions (in-house). Concerns that suppliers do not understand the actual disciplinary practices of their suppliers and encourage them to make necessary improvements, given different national/regional practices regarding disciplinary actions. Concern that the company's rules on disciplinary actions do not meet the standards of international rules and regulations (e.g., stipulating a reduction in salary for disciplinary actions). Concerns about human rights violations due to malicious coercion of labor or unfair dismissal because working conditions, etc. are not explained in the native language. 	✓	✓	✓	✓	✓	✓	✓	✓
		Wages	<p>The following are of particular concern at suppliers, contractors, etc.</p> <ul style="list-style-type: none"> In the first place, concerns stemming from the fact that wages in Japan for regular employees are lower than in the OECD (Shareholder compensation and dividends are increasing, but wages are not. And, there are concerns about whether the labor distribution ratio is appropriate.) Concerns that workers will not be able to lead healthy lives if they sign labor contracts with wage systems that refer only to the minimum wage set in each country, which does not reflect the actual prices of goods and services in each country. Concerns that the company's supply chain as a whole will suffer from wage suppression due to non-compliance with price shifting through abuse of a superior bargaining position. Inappropriate handling of orders from suppliers where the person in charge does not use written documents but only verbal orders (improper handling), which can lead to problems such as not paying at a later date or unilaterally reducing the amount of the order. Small and medium-sized suppliers do not understand and deal with the issue of equal pay for equal work. (1) Appropriate wages commensurate with working hours are not being paid. (2) Failure to grasp the actual status of wages paid to foreign technical intern trainees (3) Delayed or unpaid payments to workers due to turmoil in the financial market affected by the international situation (turmoil caused by the Ukraine issue) (4) Wages are not set in line with price increases and living wages (wages necessary to maintain an appropriate standard of living) are not being paid. (5) Failure to pay proper compensation to subcontractors and suppliers, resulting in failure to pay proper living wages at subcontractors and suppliers 			✓	✓	✓		✓	✓
		Hiring & Time of Employment	<ul style="list-style-type: none"> Concerns that the company is not adequately addressing the elimination of discrimination in the workplace on a global basis, as major cases of harassment vary by region/period (e.g., discrimination against certain ethnic and sexual minorities, power harassment). Insufficient education and awareness-raising may lead to unwanted outings and human rights violations. Concerns that the working environment for foreign workers with disabilities or those who do not understand Japanese may not be sufficiently developed, which may lead to human rights issues. Concerns that respect for employee privacy and reliable protection of personal information is not being achieved in the face of tightening of personal information management and regulations in various countries (EU, China, etc.) and the trend toward tightening of such regulations in Japan. Concerns about being categorized (gender, sexual orientation, gender identity, age, nationality, language, etc.) based on unconscious bias (unconscious prejudice or assumption) and being deprived of work opportunities, promotions, and advancement opportunities in desired occupations. Concerns about discrimination against specific racial groups in response to international situations. Concerns that workers may be subjected to unfair and discriminatory treatment for reasons such as illness and pregnancy without stating objectively valid criteria. Concerns that Japanese expatriates in Japanese-affiliated overseas offices may impose Japanese culture and customs on local people, thereby undermining the dignity of the staff. Or, concerns about similar behavior by local people toward Japanese staff. Concerns that unintended bias may cause unfair discrimination in the company's AI-based recruiting activities. There is also a concern that the company may infringe on religious freedom due to a lack of consideration and understanding of religious and cultural differences after the hiring of foreign employees. Concerns about negative effects such as mental burden and mental and physical weakness of employees due to the emphasis on the legally mandated employment rate and the lack of consideration for appropriate workplace assignments, as well as the lack of a person in charge who can consult with employees. 	✓	✓	✓	✓	✓	✓	✓	✓
		Layoffs and dismissals	<ul style="list-style-type: none"> In the case of foreign technical intern trainees and dispatched workers who are difficult to reassign, there is a fear that illness or pregnancy will be used as a determining factor without objectively valid criteria being clearly stated, and that the implementation will not be based on sufficient communication. Concerns about unexpected loss of employment when it is difficult to change assignments due to withdrawal from a business. Concerns about termination of employment when it becomes difficult to change work locations due to changes in life stages. Concerns about unexpected loss of employment in employment status that is considered particularly vulnerable in the value chain (e.g., non-regular workers, contractors, etc.) due to changes in the business environment 	✓	✓	✓	✓	✓	✓		
		Child labor	<ul style="list-style-type: none"> Concerns that the risks are not fully understood by Tier 2 and 3 suppliers and beyond as the supply chain becomes more complex and globalized. There is a difference between local and international laws regarding the concept of the standard age, and we are concerned that we are not able to follow up appropriately on a regional basis. Concerns that young people may be engaged in labor due to inadequate measures against impersonation, such as age verification, when operating in countries with a high risk of child labor. (1) There is a risk that children may be employed in the supply chain (subcontracting work, etc.) in developing countries, and that brokers may mediate the employment of children. (2) Asian workers may apply for employment by falsifying their age. (3) Likelihood of having them engage in night work and hazardous work Concerns that increased demand for EV vehicles will increase the need for procurement of minerals and increase the risk of child labor and forced labor at mining sites 			✓	✓			✓	✓

	Forced Labor	Forced labor Exploitation requiring a deposit or documentation for employment	<ul style="list-style-type: none">• Risk or concern of overlooking issues due to the inability to comprehensively understand the presence and actual conditions of migrant workers globally, as well as the situation of foreign technical intern trainees• Concern that recruitment fees, payments to foreign language education institutions, or debts to sending organizations may effectively constitute debt bondage, and that companies may be unable to fully cover such fees• Concern that workers' freedom of movement may be restricted (e.g., curfews in dormitories)			✓	✓						✓
		Restriction of movement	<ul style="list-style-type: none">• Concerns that freedom of movement will be restricted if the company retains original identification documents such as passports, pension books, etc.• There are concerns that the company will set a curfew that deviates from socially accepted norms at company facilities (dormitories, etc.), thereby restricting freedom of movement.• There have been cases in Japan where companies have placed financial restrictions on foreign technical intern trainees by taking custody of their bank passbooks, thereby depriving them of freedom of movement.			✓	✓						
		Forced overtime	<ul style="list-style-type: none">• Concerns about forced overtime work (or even voluntary work resulting in overtime) due to orders received without consideration of resources.	✓	✓	✓	✓	✓	✓			✓	
		Human trafficking	<ul style="list-style-type: none">• Concerns about missing risks and problems due to the lack of a comprehensive grasp of the existence and actual status of migrant workers and foreign technical intern trainees on a global scale.		✓	✓						✓	
	Freedom of association	Freedom of association and Right to collective bargaining	<ul style="list-style-type: none">• Concerns that labor-management negotiations may not be normal• Concern that there is no means for employees to discuss labor-related issues without interference from the company.• Concerns that labor-management disputes and human rights issues may arise due to the company's refusal to negotiate with minority unions.• Concerns that freedom of choice and freedom to join or leave a union are not ensured.• Concerns that unjust dismissal or disadvantageous actions will be taken against employees for their active participation in labor-management negotiations	✓	✓	✓	✓	✓	✓			✓	✓
		Measures where not permitted by national law	<ul style="list-style-type: none">• Concerns that there is no means for employees to discuss labor-related matters without interference from the company	✓	✓	✓	✓	✓	✓			✓	✓
	Relationships with suppliers in countries/regions with high human rights risks		<ul style="list-style-type: none">• Concern that prioritizing company profit in supplier selection and sourcing from countries or regions with high human rights risks may indirectly contribute to adverse human rights impacts — particularly in the upstream supply chain for high-risk conflict minerals (tantalum, tin, tungsten, gold), cobalt, natural mica, copper, natural graphite, lithium, nickel, and others, where the potential for human rights harm is significant• Concern that ceasing procurement from high human rights risk countries or regions without engaging suppliers to drive improvements may amount to abandoning the resolution of root problems• Concern that carrying out a responsible withdrawal from high human rights risk countries or regions may still result in local employees and surrounding communities losing access to social infrastructure, services, and employment (e.g., large-scale job losses following the withdrawal of foreign companies from Myanmar)		✓	✓							
	Community	Resources	Resources	<p>As a chemical company, we are working to reduce our environmental impact and properly manage chemical substances, but we recognize the following as potential human rights issues</p> <ul style="list-style-type: none">• Concerns about destruction or pollution of natural capital due to inappropriate use or disposal by suppliers (customers) (e.g., marine plastics, pesticides)• Concerns about pollution and health hazards in a wide area due to spillage or exposure of pollutants• Concerns about the impact of resource depletion on the livelihoods of local residents and the maintenance of social infrastructure• Concerns that the promotion of conversion from fossil resources to non-fossil resources may lead to violations of indigenous peoples' rights, such as forced expropriation of their lands, and adverse effects on biodiversity due to deforestation, etc. Specific examples are as follows(1) Concern that the use of edible plants (corn, soybeans, etc.) as resources will indirectly cause price hikes and food shortages.(2) Concern that the use of biodegradable plastics and biomass fuels made from oil palm will contribute to environmental destruction at the source. <p>• Lack of awareness that environmental issues are part of human rights issues</p> <p>• In the process of promoting materials informatics in materials development and improving efficiency through the use of AI, there are concerns that erroneous operations and decisions due to a lack of a human perspective could lead to environmental destruction and health hazards.</p>		✓	✓	✓			✓		✓
			Environment	<ul style="list-style-type: none">• Risk of biodiversity loss and water depletion due to deforestation and overconsumption caused by factory construction, etc.• Concerns that the false image of bioplastics (e.g., biodegradable plastic will return completely to nature) will encourage ocean dumping and impede resource recycling.• Concern that residual plastics or PFAS and other chemicals from the company's own production may remain in the environment, threatening the health and livelihoods of people living in coastal areas• Concerns about human rights violations due to continued GHG emissions during manufacturing/recycling and inhibition of climate change mitigation caused by a focus on recycling and reducing and a lack of a focus on reusing.• Concerns about human rights violations due to the high environmental impact of products that are claimed to be environmentally friendly through partial greenification but have a high environmental impact when viewed over their entire lifecycle, resulting in environmental pollution.		✓	✓	✓			✓	✓	✓
			Biodiversity	<ul style="list-style-type: none">• Concerns that animal experimentation will undermine the dignity of animals by keeping them in poor conditions before the experiment.• Concerns that animal experiments on conscious animals may cause unnecessary suffering and damage the dignity of the animals.• Concern that animal welfare is not ensured when procuring raw materials of animal origin.• Concerns that new pesticides will affect unexpected organisms and have a negative impact on biodiversity.	✓	✓	✓	✓			✓		

Society and Government	Relationships with Government	Bribery and corruption <ul style="list-style-type: none"> Concerns that bribes will be demanded and that the company's acceptance of payment will have negative human rights impacts and disadvantages for rights holders (e.g., illegal construction will be approved, residents will be forced to change their living environment under unfair conditions, or the living environment will deteriorate). Concerns that involvement in corruption may result in surcharge payment orders or shutdown orders, which may have reputational damage, and consequently indirectly affect the employment of employees. 		✓	✓		✓		✓	✓
	Relationships with countries/regions with high human rights risks Remedies	<ul style="list-style-type: none"> Concerns about indirectly contributing to the occurrence and promotion of negative human rights impacts by <ul style="list-style-type: none"> (1) Obtaining permits, licenses, etc. and operating in countries with high human rights risks (2) Procurement from state-owned enterprises in countries with high human rights risks (e.g., conflict minerals, timber, polysilicon) For example, human rights violations in the manufacturing process of polysilicon produced in the Uyghur Autonomous Region in China have been raised as an issue, but it is difficult to prove that the material is not included in the solar panel products used by the company. Concern that the company's products may be used for unintended purposes in export destinations, causing health damage or indirectly contributing to conflicts (e.g., through conversion for use as weapons) 	✓	✓	✓	✓	✓	✓	✓	
Remedy		(1) Concerns that the negative impact on human rights cannot be grasped due to the lack of a complaint handling system established, maintained, and communicated to a wide range of stakeholders related to the business. <ul style="list-style-type: none"> Concerns that the voices of suppliers from Tier 2 and beyond, with whom there are usually no direct communication contacts in the supply chain, are not being understood. Concerns that the grievance system is only formal and does not capture the voices of those who are directly affected. Risk of unfair dismissal due to lack of protection for whistleblowers (2) Concerns that the following human rights issues are not being addressed in a timely/appropriate manner <ul style="list-style-type: none"> The consultation system/point of contact is not set up in consideration of local language, reception time zone, legal system, culture, etc. The access to the grievance mechanism and the expected response and timeframe are not communicated in advance. The value chain is not visualized. Information is not properly communicated, and appropriate responses are not taken from the perspective of respect for human rights. <ul style="list-style-type: none"> Dialogue, disclosure of inquiries, etc., are not conducted (Conceptual and operational arrangement with the Whistleblower Protection Act). Concern that, in investigating reported cases, a lack of confidentiality and transparency may result in violations of the whistleblower's human rights Concern that foreign employees in the company or its supply chain may become disconnected from the community, leading to social isolation and preventing them from seeking appropriate support 	✓	✓	✓	✓	✓	✓	✓	

3.4 Food and beverage industry

Human rights issues in the food and beverage industry				Specific Concerns	Value Chain					
Risk Area			R&D		Procurement	Manufacturing	Logistics	Sales	Consumption	Disposal
Treatment in the Workplace	Working Hours	Global		<ul style="list-style-type: none">• Risk of long working hours occurring across all operations, including in-house manufacturing plants, contract manufacturers (suppliers), and logistics drivers• Risk of compulsory labor during peak production seasons (e.g., seasonal products) in order to meet delivery deadlines• Risk of overwork due to increased production demands from temporary or special orders, and risk of labor time management issues arising from greater adoption of telework under changing work styles• Risk that long working hours may adversely affect employees’ families• Risk of chronic overtime beyond prescribed working hours due to staffing plans based on the assumption of overtime work• Concern that labor shortages caused by infectious disease outbreaks, wars, etc., may worsen and lead to longer working hours for employees• Risk that advances in AI and automation may increase unemployment rates or cause significant reductions in working hours, resulting in income loss and increased poverty• Risk that inability to utilize AI and similar technologies may hinder productivity gains, preventing the reduction of working hours	✓	✓	✓	✓	✓	✓
				<ul style="list-style-type: none">• Risk that a declining birthrate and aging population may cause labor shortages and increase the workload of individual workers• Risk of human rights violations stemming from a global pandemic (e.g., significant reduction in working hours, wage decreases, unemployment, labor shortages and increased individual workloads, psychological stress for employees required to work on-site, communication breakdowns in remote environments, increased psychological stress, greater childcare burdens)• Risk that failure to secure substitute staff for employees on maternity leave, childcare leave, or caregiving leave may increase the burden on other employees• Risk that continuous shifts occur in factories without adequate rest intervals between working periods						
	Wages	Global		<ul style="list-style-type: none">• Wage levels are not in line with local living standards.• Wages are not justified under the piece-rate wage system (e.g., palm oil plantations, or fishing grounds).• There is a risk that workers will not be paid proper wages due to lack of fair trade.• There is a risk that the wages of foreign workers do not meet the minimum standard of living or that they are not well housed.• Wages are not commensurate with working hours (compliance with laws and regulations in each country)• Wages are not guaranteed due to factory shutdowns, lockdowns, etc. due to global outbreaks of infectious diseases.• Despite working overtime, there is a risk that overtime hours will be capped and overtime wages will not be paid.• Risk that allowances related to remote work are not being paid						
			Japan	<ul style="list-style-type: none">• Wages differ depending on the type of employment, even though the work is the same.• Wages are below the standard of living.• Foreign workers and technical intern trainees are treated unfairly, such as unfairly low wages, termination of employment, and other disadvantageous treatment.• Wages of technical intern trainees may be used for disputes in their home countries.• Unfair low wages, suspension of employment, or other disadvantageous treatment of dispatched workers, even Japanese workers.• Unreasonable deductions from wages may occur that are not predetermined.• Possible inability to raise wages due to inability to pass on price hikes in raw material prices• Foreign workers: Unemployment due to production stoppages, diminishing remittances in real terms to home countries due to yen depreciation, and decrease in attractiveness of work in Japan• Intensifying competition among suppliers due to difficulty in securing raw materials → Poor working and wage environment for suppliers not selected• The difference in take-home pay between urban and rural areas is large because the rent collection level for foreign workers is the same in urban and rural areas.• The price hike in raw material prices has forced the company to pass on the higher prices, which increases the workload and mental stress of negotiating price revisions and replacing raw materials.• Soaring prices (while wages do not increase) make life difficult for workers.• Risk of wage disparity between men and women due to gender bias• Possible failure to clearly state working conditions in a way that foreign workers can understand.	✓	✓	✓	✓	✓	✓
				<ul style="list-style-type: none">• Risk that employees/workers’ health and safety may be threatened when assigned to dangerous work during product manufacturing (including raw material procurement) or research and development, handling hazardous chemicals including pesticides, working under inadequate occupational accident responses or excessive workloads, or being stationed in countries/regions with deteriorating security due to political instability (including from the perspective of employees with disabilities)• Risk of insufficient measures to accommodate diverse cultures and needs for risk reduction, such as color barrier-free design (color usage considerations), door opening/closing direction, language labeling for foreign workers, inclusive toilet and changing room facilities for LGBTQ individuals, and the use of assistive devices for heavy labor• Risk that heavy labor burdens at logistics hubs (e.g., container unloading, freezer work) disproportionately affect vulnerable individuals, with insufficient health considerations• Insufficient support for foreign workers in accessing medical care, and in securing adequate food, clothing, housing, and mental health care• Insufficient infection prevention measures in the workplace• Risk of insufficient infection prevention measures for children, and that global pandemics may increase the risk of child abuse or neglect by parents						

Health and Safety	Global	<ul style="list-style-type: none"> •Risk that not all employees receive proper health checkups, and that no corporate actions are taken based on the results •Risk that alleviating the physical burdens unique to remote work is left entirely to the individual •Risk that (due to global pandemics) the increase in remote work (causing work progress issues and stress) and restrictions on outings may reduce communication, leading to mental health problems, as well as health issues from lack of exercise, thereby worsening employee health and safety •Risk that global warming and climate change may adversely affect the health of outdoor workers in industries such as agriculture •Risk that climate change may reduce crop yields and livestock production globally, decreasing protein availability and creating health risks and disparities between those who can and cannot access sufficient protein (protein crisis) Risk that failure by employers to implement heatstroke prevention measures in the workplace (both indoors and outdoors) may affect workers' health •Risk that inadequate hazard labeling and safety training programs accommodating cultural and linguistic differences may compromise safety •Risk of infection for workers who cannot telework, such as factory employees, during commuting and work in the event of a global pandemic 	✓	✓	✓	✓	✓	✓
	Japan	<ul style="list-style-type: none"> •Risk to health and safety if appropriate considerations and measures are not taken according to workers' circumstances, such as for older workers or pregnant women •Risk that a lack of awareness and delayed response to occupational safety and health—now included in the ILO core standards—may threaten employees' health and safety •Risk that insufficient education and training opportunities for night-shift workers, short-hour workers, and temporary employees may threaten health and safety •Risk that rising raw material and energy costs may undermine employers' ability to ensure proper health and safety management •Risk that evacuation routes and the nearest evacuation sites from dormitories are not indicated in languages understandable to foreign workers •Risk that evacuation drills at business sites are insufficient, particularly for night-shift workers, short-hour workers, and temporary employees •Risk that dietary restrictions linked to hygiene management (e.g., norovirus prevention measures restricting the consumption of raw oysters or bivalves) may infringe on rights •Risk of mental health deterioration due to inadequate harassment prevention measures •Risk that failure to provide occupational safety and health training or support to suppliers may result in workplace accidents •Risk that failure to conduct fire and evacuation drills at least once after dormitory occupancy begins and every six months thereafter may lead to severe impacts during disasters 	✓	✓	✓	✓	✓	✓
	Global	<ul style="list-style-type: none"> •Insufficient compliance with the implementation of punishment for harassers. •Insufficient enforcement of appropriate punishment due to lack of internal awareness of laws, regulations, and work rules. •Risk that wage reductions imposed as a disciplinary measure may result in workers not receiving fair payment for the work they have performed 	✓	✓	✓	✓	✓	✓

Businesses / Supply Chain	Discrimination	At Employment	Global	<ul style="list-style-type: none"> • Risk of discrimination in hiring based on race, gender, religion, region, SOGI, disability, ethnicity, creed, medical history (HIV, etc.), caregiving, fertility treatment, childcare, etc. • The risk of debt service, which is in effect debt work owed to sending agencies, such as recruiting fees and payments to foreign language institutions. There is also a domestic problem of hiring without realizing the background. • The risk of working under inappropriate conditions due to the lack of working conditions presented at the time of hiring in a language that foreign workers can understand. • Risk of repeated discrimination due to complicity in reproduction of bias caused by unconscious bias and lack of recognition • Risk of unequal treatment in hiring decisions, resignation predictions, and declination predictions by AI • Risk of asking questions during job interviews that show a lack of understanding of diversity and human rights, or requiring applicants to select only male or female gender options on résumés and similar documents 	✓	✓	✓	✓	✓	✓
		At Work	Global	<ul style="list-style-type: none"> • Likelihood that workers (including foreign employees, workers with disabilities, and temporary employees) will receive inadequate safety training and unequal treatment. • Likelihood that workers will be forced into unstable forms of employment. • Discrimination based on employment status (e.g., lack of training opportunities, denial of participation in meetings, etc.) • Harassment (sexual harassment/power harassment/maternal harassment/SOGI harassment, etc.) from/to/within business partners • Lack of working environment for people with disabilities • Lack of LGBTQ-friendly facilities (restrooms, changing rooms, etc.), lack of dialogue with LGBTQ people, and lack of promotion of understanding among others • Increased teleworking causes harassment that is invisible to those around it • Disparities in AI and other technological skills, as well as in opportunities to utilize technology • Possibility of unequal treatment due to reassignment by AI • Fear of human rights violations due to the global pandemic of infectious diseases (harassment and discrimination against infected people and their families, discrimination based on vaccination history, invasion of privacy, and restrictions on work) • Lack of education and training on respect for human rights for employees at Global locations, which may result in increased discrimination, etc. 	✓	✓	✓	✓	✓	✓
			Japan	<ul style="list-style-type: none"> • Risk of discrimination arising from differences in nationality or religion due to insufficient multilingual or multi-faith manuals and lack of consideration for diverse working environments • Discrimination or harassment against foreign workers by host companies • Insufficient quality and quantity of education and training for foreign workers • Requirement for workers in factories to wear different-colored uniforms/hats based on nationality • Need for consideration regarding prayer rooms, hijabs, cultural etiquette, and permissible food items (e.g., pork, beef) • Lack of direct communication between Japanese employees and foreign workers (overreliance on interpreters) • Inconsistent approaches to time management • Questionable practice of assigning shared accommodation based solely on binary gender distinctions • Risk of forced vaccination or excessive preventive measures during global pandemics of infectious diseases with high severity potential • Excessive assignment of work (including miscellaneous tasks) to younger workers • Stress caused by differences in individual approaches to pandemic prevention measures • Risk that the lack of workplace infrastructure—such as multilingual company regulations and other documents necessary for smooth communication—prevents essential information from being conveyed • Failure to provide foreign workers with support to improve Japanese language skills and deepen understanding of Japanese lifestyle, culture, customs, and employment practices, or overreliance on foreign communities leading to stagnation in language and life skills development • Lack of opportunities for foreign workers to participate in community events or activities, leading to social distance from local residents and an increased risk of involvement in crime • Risk that foreign workers may become overly dependent on their own communities, leading to insufficient communication and mutual understanding with the company • Risk that inadequate promotion of cross-cultural and system understanding among foreign workers may result in perception gaps • Risk of privacy violations against infected individuals • Risk that lack of necessary support for foreign workers to live safely and comfortably in their residential areas may leave them stranded during unforeseen events such as disasters or accidents • Risk that failure to promote understanding of diversity between Japanese and foreign workers may worsen relationships • Risk that failure to provide foreign workers and their families with opportunities to learn about Japanese culture and systems may result in their isolation within Japanese society 						

	Evaluation Treatment Dismissal	Global	<ul style="list-style-type: none"> • Discrimination in evaluation and treatment based on race, gender, religion, region, SOGI, disability, ethnicity, creed, medical history (HIV, etc.), nursing care, infertility treatment, childcare, etc. • Risk that insufficient career development support for foreign workers (e.g., clear career paths, role models, established promotion criteria and salary structures) may lead to inequality and make it difficult for them to find fulfillment in their work • The need to prevent isolation of foreign workers and their families in the local community. • Pushing high-risk jobs to those who are in a weak labor position • Discrepancies between the content of contracts and treatment of employees (including technical intern trainees) • Forcing employees and suppliers to purchase the company's products (quotas) to make a difference in evaluations and transactions • Fear of human rights violations due to the global pandemic of infectious diseases (due to decreased demand, unfair dismissal of those in vulnerable labor contract positions such as non-regular employees, and unguaranteed wages when the factory is not operating) 	✓	✓	✓	✓	✓	✓
		Japan	<ul style="list-style-type: none"> • Lack of female managers, delay in barrier-free access, and possible undermining of job satisfaction for people with disabilities. • Appropriate implementation of promotions and salary increases based on evaluations for foreign technical intern trainees. Lack of communication creates isolation, and evaluations and treatment that are worth working for are not made. • Appropriate evaluations are not made due to seniority-based evaluations. • There is a difference in treatment between new graduates and mid-career hires. • Lack of consideration for male employees in expanding the system for women. • The company assumes that promotional examinations will be conducted in Japanese. • Unreasonable evaluation and treatment (evaluated based on personal likes/dislikes regardless of results) • Nationality-based divergence of managers (not only women) • Possible deterioration of the employment environment and maintenance of an appropriate evaluation and treatment system due to the rising cost of raw materials and energy. 						
Child Labor		Global	<ul style="list-style-type: none"> • Fear of child labor under the minimum age for employment, fear of identity forgery • Fear of children losing their right to education and suffering physical and mental damage • Increase in child labor due to the increase in the number of poor people caused by widening disparities due to the global pandemic of infectious diseases • Confirmation that there is no child labor in upstream suppliers (secondary and tertiary), especially in developing countries • Child labor in family business environment • Child talent working late at night during filming of (domestic) commercials • Possible involvement in forced labor (child labor) due to use of non-certified palm oil raw materials • Risk that procuring non-certified raw materials may involve or contribute to child labor, thereby entrenching and expanding the practice of child labor 	✓	✓	✓	✓	✓	✓
Employment of young workers under 18 years of age		Global	<ul style="list-style-type: none"> • Night work, hazardous work, ID forgery • Lack of awareness of possible domestic risks as hazardous labor for those under 18 years of age (there are some manifestations that have made the news). • In some cases, young people under the age of 18 are involved as domestic labor in small-scale agricultural producers. 	✓	✓	✓	✓	✓	✓
Forced labor		Global	<ul style="list-style-type: none"> • Forced labor for migrant workers • Inhumane treatment of illegal immigrants • Slave labor in agriculture, forestry, and fishery procurement processes (working environment at fishery work sites) • Possible forced labor due to excessive demands from suppliers. • Lack of labor contracts in their native languages may lead to forced labor due to incomprehension by foreign workers. • Possible overwork at upstream suppliers (secondary and tertiary), especially in developing countries. • Possible behavioral restrictions due to company control of workers' ID cards, etc. • Disruption of supply chains may force suppliers to procure raw materials other than certified sustainable products, which may lead to the procurement of raw materials suspected of forced labor. 	✓	✓	✓	✓	✓	✓
		Japan	<ul style="list-style-type: none"> • Exploitation of technical intern trainees (e.g., taking away their passports), engaging in hazardous labor, etc. • Slave labor in the agriculture, forestry, and fisheries procurement process (working environment at livestock farms in Japan) • Forced savings at the time of contract (employer keeps bank book and seal) • Possible difficulty for technical intern trainees to return home due to a global pandemic of infectious diseases. • Exploitation of foreign students, employment of fake foreign students (ostensibly studying in Japan but in reality coming to Japan to make a living), and the existence of temporary employment agencies that force foreign students to register and work in exchange for covering their tuition and fees. • Technical intern trainees may be forced into forced labor due to high fees charged to sending agencies and brokers in their home countries. 						
Freedom of association and the right to collective bargaining	Measures to be taken if not permitted by national law	Global	<ul style="list-style-type: none"> • In countries where unions are not allowed, or where they are allowed but not applied as a matter of substance, there is a risk that freedom of association and the right to collective bargaining (in accordance with international law) may not be ensured. • In countries with weak legal systems, even if freedom of association is recognized and there is a union in the company, the union may not function adequately as a practical matter due to "intimidation" on the part of the company. 	✓	✓	✓	✓	✓	✓
		Japan	<ul style="list-style-type: none"> • There is a risk that foreign workers are not given sufficient explanations regarding freedom of association and the right to associate. • There is a risk that foreign workers are restricted or prohibited from joining labor unions. 	✓	✓	✓			
			<ul style="list-style-type: none"> • Grievance support as a relief window is needed throughout the value chain. For consumption, it is necessary to have a customer service center and a 24-hour, multi-lingual printing service. • It is necessary to establish not only an internal reporting system but also a complaint handling mechanism that is open to the outside world. • There is a possibility that access to the hotline is insufficient (employees do not know about it, the system is difficult to use, it is not resolved, etc.). • Even if multilingual support is available, there is a risk that complaints and consultations will be ignored or put off because of the cumbersome nature of the response, etc. • Even if a multilingual response is available, there is a risk that complaints and consultations may be ignored or put off because of the tedious nature of the response. • The method of consultation by means and the author in charge are not communicated internally and externally, and the legitimacy may not be ensured. • The system may not be accessible to everyone in all languages and by all means, and may not be accessible to all. • The "relief window" may not be clearly indicated to be a "human rights" reporting window, and its accessibility may not be ensured. 						

Access to Remedy			<ul style="list-style-type: none">•Risk that an effective grievance mechanism as a remedy channel is not established across the entire value chain (including in consumer-facing areas, where customer service desks, multilingual labeling, and 24-hour support may be necessary)•Risk that a complaint-handling mechanism open to external parties, in addition to internal whistleblowing systems, is not established•Risk that failure to build or operate a system for protecting whistleblowers may undermine the benefits and expectations of confidentiality•Risk of inadequate access to hotlines (e.g., employees are unaware of them, systems are difficult to use, issues are not resolved, or communication infrastructure is unreliable)•Risk that, even with multilingual capabilities, complaints and inquiries may be ignored or delayed due to perceptions that handling them is inconvenient•Risk that a high volume of inquiries not requiring remedy may lead to valid complaints or inquiries being ignored or delayed•Risk that methods of consultation and the responsible departments for each channel are not publicized internally and externally, undermining legitimacy•Risk that accessibility is not ensured by providing multilingual options and multiple means for anyone to use the mechanism	✓	✓	✓	✓	✓	✓
			<ul style="list-style-type: none">•Risk that it is not clearly indicated that the grievance channel accepts reports related to “human rights,” thereby undermining accessibility•Risk that the absence of disclosure on anti-retaliation measures undermines accessibility•Risk that the absence of disclosure on the response process (including escalation procedures) undermines predictability•Risk that failure to involve third-party organizations may undermine fairness•Risk that the number of complaints and their outcomes (including corrective processes) are not disclosed, undermining transparency•Risk that the lack of disclosure on alignment with international norms undermines compliance with rights standards•Risk that failure to analyze and evaluate complaint records prevents them from serving as a sustainable learning resource						
			<ul style="list-style-type: none">•Risk that failure to engage with the recipient of the complaint (e.g., supervisors) or the perpetrator (including those with the potential to perpetrate) prevents sustained learning•Risk that the lack of disclosure on the status of stakeholder dialogue undermines engagement•Risk that insufficient employee training and inadequate responses from employees may lead to consumer dissatisfaction and perceptions of insincerity•Risk that insufficient internal guidelines or training for consumer response may result in inquiry-handling employees being subjected to long hours or mental strain from excessive or unreasonable consumer demands•Risk that overly strict policies or manuals for handling customer harassment (customer harassment countermeasures) may infringe on consumers’ right to express themselves•Risk that the company’s employees may perpetrate harassment against employees of partner companies						
Protection of privacy		Japan	<ul style="list-style-type: none">•There is a risk of invasion of privacy, such as the use of data from surveillance cameras for food defense purposes.•There is a risk of leakage of personal information due to lack of proper management of personal information.•Risk of inadequate privacy due to, among other things, allocation of dormitory room sharing for technical intern trainees and inspection of dormitories by audits, etc., as well as infringement of rights due to unwilling consent due to ignorance of recognized rights•The possibility of privacy infringement due to the system not being able to keep up with technological innovation such as AI and metaverse.•Risk of using only AI analysis for personnel data and recruitment data, which can affect one's life.•Increased risk of leakage due to multiple parties (employers (other than HR managers), supervisory bodies, sending organizations, etc.) managing personal information of foreign technical intern trainees.•Arbitrary and discriminatory research results and marketing data are created and disclosed through big data analysis of personal information, etc. in an environment where data governance is not in place.	✓	✓	✓	✓	✓	✓
Resources	Access to natural resources	Global	<ul style="list-style-type: none">•Risk that large-scale agriculture, fisheries, or forestry operations at raw material procurement sources may cause communities to face declines in production or catch volumes•Risk of impacts on the livelihoods (and residential areas), traditional cultures, local ecosystems (including air pollution, soil contamination, and waste/plastic pollution), and access to water for local residents and indigenous peoples•Risk of land loss for local residents due to farmland development driven by population growth•Risk that monoculture (conversion to cash crops) may lead to the loss of local food self-sufficiency•Risk that developing and designing products, as well as conducting logistics and sales, with high environmental impact may lead to excessive resource extraction•Risk that containers and packaging that are difficult for consumers to sort or recycle may increase plastic waste•Risk that exporting waste plastics may cause environmental pollution and deteriorate residents’ health in importing countries•Risk that increased crop cultivation and overall water usage throughout the supply chain may raise water stress•Risk that concentrated resource purchasing in developed countries may result in food loss there while contributing to hunger in the Global South and other regions	✓	✓	✓	✓	✓	✓
			<ul style="list-style-type: none">•Risk that difficulties in sourcing raw materials from conflict areas may raise procurement costs, increasing product prices and making them less affordable•Risk that rising demand may lead consumers to unintentionally contribute to increased plastic waste•Risk that increased consumption of livestock products (especially beef) may increase GHG emissions and negatively impact the environment•Risk that business activities such as facility construction, operations, resource extraction, and raw material procurement may destroy forest, marine, and river ecosystems, pollute water, overuse land and resources, harm local communities, and trigger retaliation against opposing residents or human rights defenders (including impacts on human rights)						
	Climate Change	Global	<ul style="list-style-type: none">•Global warming may reduce crop yields and change the crops that can be harvested.•Natural disasters due to climate change may have negative impacts on livelihoods, employment, and vulnerable groups.•Businesses will be shut down due to drought, etc., which will affect employment.•Impacts on livelihoods due to climate change caused by the expansion of farmland and the resulting increase in natural disasters, etc.•Increased demand for soybeans as an alternative protein food will lead to deforestation due to the expansion of farmland.•Delayed reduction of food loss due to the lack of a food system, contributing to poverty inequality	✓	✓	✓	✓	✓	✓
	Biodiversity	Global	<ul style="list-style-type: none">•Biodiversity in oceans, river basins, and forests is damaged by large-scale agriculture, fisheries, and forestry industries from which raw materials are procured.•Biodiversity is damaged by promoting the purchase of certified sustainable products that do not give sufficient consideration to biodiversity.•Deforestation and damage to the landscape caused by the large-scale introduction of solar power generation facilities	✓	✓	✓			
Community									

[illegible]

3.5 Pharmaceutical Industry

Human Rights Issues in the Pharmaceutical Industry			Specific Concerns	Value Chain						
				Research	Development	Purchasing	Production	Distribution	Sales	Consumption
Businesses / Supply Chain	Treatment in the Workplace	Working Hours	•Concentration of clinical trials of developed products, concentration of production due to new product approvals, increased production due to pandemic outbreaks, product recalls, etc. may result in long working hours. •Long working hours may occur due to excessive customer service •Insufficient labor management based on labor laws in each country/region may cause long working hours.	✓	✓	✓	✓	✓	✓	✓
		Wages	•Wage levels are not in line with local living standards •Lack of compliance with labor laws in each country/region may result in failure to pay appropriate wages for overtime work. •Unreasonable treatment (evaluation, low wages, etc.) of non-regular workers (including foreigners) and foreign technical intern trainees Possible failure to realize equal pay for equal work	✓	✓	✓	✓	✓	✓	✓
		Employment	•The impact of single employee transfers on children's upbringing and family mental health.	✓	✓	✓	✓	✓	✓	
		Health and Safety	•Risk that dangerous tasks in research and development or manufacturing sites, the handling of animals, cells, compounds, or pharmaceuticals, and inadequate occupational safety and health measures (e.g., insufficient training, inadequate signage or labeling, lack of protective equipment) may compromise employees' health and safety •Risk that deficiencies in Safety Data Sheets (SDS) may compromise the health and safety of employees and distribution personnel •Risk that long working hours, expansion of remote work, or social isolation may cause health problems, including mental health issues	✓	✓	✓	✓	✓	✓	✓
		Health and Safety	•The health and safety of human subjects may not be adequately managed due to a lack of ethics in the Contract Research Organization during the clinical development phase of a pharmaceutical product. In addition, there is a risk of inappropriate involvement in clinical data.		✓					
		Disciplinary Action	•Risk of unjust disciplinary action being taken by the company. •Risk of the rights of whistleblowers being undermined by unfair treatment due to the lack of a whistleblower system.	✓	✓	✓	✓	✓	✓	✓
		Excess Monitoring	•Excessive monitoring of employees and control of their working conditions	✓	✓	✓	✓	✓	✓	
	Discrimination	Employment	•Discrimination based on race, place of birth, nationality, gender, SOGI, age, creed, religion, disability, disease, etc. •Discrimination may occur due to screening of specific groups by AI.	✓	✓	✓	✓	✓	✓	✓
		Time of Employment	•Risk of harassment (sexual harassment, power harassment, maternity harassment, SOGI harassment, customer harassment) •Discrimination based on race, place of birth, nationality, gender, SOGI, age, creed, religion, disability, illness, employment status, etc. •Risk of being forced to receive vaccinations •Risk of being forced to take unstable employment •Risk of not being properly covered by internal systems (e.g., parental leave, family care leave, sick leave, etc.)	✓	✓	✓	✓	✓	✓	✓
		Dismissal or termination of employment	•The possibility of dismissal on the basis of race, place of birth, nationality, gender, SOGI, age, creed, religion, disability, illness, etc. •Undue pressure due to differences in employment status.	✓	✓	✓	✓	✓	✓	✓
	Child Labor	Compliance with legal age of employment and hazardous work or employment of young workers under 18	•The possibility of child labor under the minimum working age stipulated in the ILO Basic Conventions. •The following problems may occur due to the employment of young workers under the age of 18 - Deprivation of educational opportunities - exploitation - Causing mental or physical injury	✓	✓	✓	✓	✓	✓	✓
	Forced Labor		•Risk that, in the upstream supply chain, there may be practices of forced labor exploiting vulnerable groups such as migrants, refugees, non-regular workers (including foreign nationals), and foreign technical intern trainees	✓	✓	✓	✓	✓	✓	✓
	Freedom of association and the right to collective bargaining	Freedom of association and the right to collective bargaining	•The possibility of disincentives to join labor unions or similar organizations due to retaliation, threats, or harassment from company officials, and the possibility that opportunities for labor-management consultations are not substantially secured.	✓	✓	✓	✓	✓	✓	✓
		Measures not permitted by national law	•The risk that freedom of association and the right to collective bargaining (in accordance with international law) may not be ensured in countries where trade unions and similar organizations are not recognized or recognized but not applied as a matter of practice.	✓	✓	✓	✓	✓	✓	✓
	Personal Information	Personal Information Management	•Personal health records (including genetic information) and other personal information may be leaked or misused, leading to the identification of individuals or invasion of their privacy. •Personal information obtained in the course of business of healthcare professionals, patients, employees, etc. may be leaked or utilized beyond the scope of the person's authorization.	✓	✓	✓	✓	✓	✓	✓
	Development of solutions	Development of solutions	•Risk that delays in establishing corporate systems to promote activities that protect rights-holders' rights—such as human rights due diligence—or practices such as “washing” may result in inadequate responses to human rights issues in the supply chain (including CDMOs, trading companies, and agents), thereby perpetuating rights violations	✓	✓	✓	✓	✓	✓	✓
Community	Resources	Access to natural resources	•The threat of biological piracy by seeking natural compounds (e.g. medicinal herbs) that are used for drug development	✓	✓	✓				
	Environmental Impact of Pharmaceuticals	Health and Safety	•Pollution of the environment by animals, cells, medicines, chemicals, and waste plastics, which may harm the local population's right to a healthy life and spread contamination to the animals and plants on which they feed. •Misuse of water and land, and impacts on biodiversity, at factories and on local construction sites	✓			✓	✓		✓
	Community Residents	Right to Residence	•Forced evictions due to the construction of new factories and other facilities, violations of residents' rights to a livable environment •Violation of residents' rights to a livable environment due to delays in climate change countermeasures •Regional impact due to inadequate disaster prevention measures for factories and business establishments, etc.	✓	✓		✓	✓	✓	✓

Relationships with governments	Operations in Conflict-Risk and Conflict-Affected Areas	Product Supply Risks	<ul style="list-style-type: none"> •The risk that clinical trials cannot be conducted or products cannot be supplied to people in need of medicines due to unstable social conditions •Indirectly contributing to conflicts in the region (products or funds) 	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Bribery and Corruption	Relationships with Licensing Authorities	•Illegal acts may be committed in order to request smooth approval from the manufacturing and marketing licensees (central and local governments).	✓			✓	✓				
		Relationships with medical professionals (including researchers)	•Falsification of data on research, prescriptions, clinical trials, etc., and possible illegal acts in order to request the preparation of promotional data favorable to the company.	✓	✓	✓				✓		
	Relationships with countries with low awareness of human rights	Relationships with public policy	<ul style="list-style-type: none"> •Risk that cooperation with national and regional public health measures may be used by individuals with propaganda or political beliefs of authorities that disregard human rights. •Risk of receiving inappropriate medical care due to inadequate government measures against counterfeit medicines. 				✓	✓	✓	✓	✓	✓
Access to remedies	Grievance	Relationships with patients and subjects	•Insufficient or underdeveloped systems may prevent appropriate remedies from being provided.	✓							✓	
		Employees/supply chain	•Insufficient or underdeveloped systems may prevent appropriate remedies from being provided.	✓	✓	✓	✓	✓	✓			✓
Consumers	Relationships with Patients	Health and Safety	•Insufficient measures against counterfeit pharmaceuticals				✓	✓		✓	✓	
			•Risk of health hazards due to abuse, misuse, etc.					✓		✓		
			•Delayed reporting of adverse drug reactions							✓	✓	
			•Injuries caused by product defects or accidents during handling (including doctors, nurses, pharmacists, etc.)								✓	✓
			•Risk of investigational drugs/therapeutics being used on patients without sufficient prior explanation	✓						✓	✓	
			•Risk of adverse reactions due to medication, or health hazards to patients due to incorrect medication								✓	
			•Risk of inappropriate prescription or treatment due to exaggerated PR of product information							✓	✓	
			•Risk of forced vaccination or violation of human rights by not ingesting vaccines	✓	✓	✓	✓	✓	✓	✓	✓	✓
		Consideration for vulnerable subjects	•Risk of health hazards to patients when results based on erroneous information and data from AI are used in clinical trials, etc.	✓	✓		✓	✓	✓	✓		
			•Lack of literacy about medicines and medical services may lead to inappropriate use and slander of others (including medical professionals) due to incorrect knowledge and understanding of medical care and medicines.							✓	✓	✓
			•Lack of access to treatment for rare diseases	✓	✓						✓	
			•Differences in accessibility to medical care and medicines due to a country's economic situation (low-income and high-income countries) may result in the inability to provide medicines in a timely and appropriate manner.		✓		✓			✓	✓	
Others	Public Health	Pandemic Response	•Risk that language or disability-related barriers may prevent access to pharmaceuticals or related information							✓	✓	
			•Risk that the drug will not be approved and marketed in the country and will not reach patients despite clinical trials being conducted							✓	✓	
			•Deterioration of sanitary conditions and threat to human life in the community due to the pandemic	✓	✓	✓	✓	✓	✓	✓	✓	
			•Social unrest and deteriorating public safety due to a pandemic may hamper business activities and make it impossible to supply medicines.				✓	✓	✓	✓		
			•In the event of a pandemic, supply of therapeutic drugs may not be able to keep up due to problems with production capacity, etc.				✓	✓	✓	✓		
			•Inappropriate use of antimicrobial agents may lead to an increase in infections caused by drug-resistant (AMR: Antimicrobial Resistance) bacteria that are ineffective against existing antimicrobial agents, resulting in deterioration of public health and a risk to human life.								✓	✓

3.6 Infrastructure Industry

Value Chain of Infrastructure

Buy: capital investment, procurement of vessels, vehicles, aircraft and fuel Sell: promotion, sales and marketing

Operation: operation (storage, logistics, transportation) Disposal: disposal, recycling

Human Rights Issues in Infrastructure			Specific Concerns	Value Chain			
				Create	Buy	Sell	Disposal
		Working Hours	<p>Infrastructure industry is labor-intensive industries, and even in the future, when mechanization is expected to progress further, there will be no small number of operations that will never be freed from manual labor.</p> <ul style="list-style-type: none">•Risk that fluctuating order volumes may prevent long-term employment, exposing workers to unstable employment conditions•Risk that peak seasons may cause long working hours or sudden, unplanned work at worksites and partner companies•Risk that collaboration with overseas partners may result in night or early-morning work due to time differences, leading to long working hours•Risk that, due to the high public nature of certain projects, disasters or international conflicts may cause unexpected night shifts, long working hours, or weekend work•Risk that inadequate labor time management at worksites may lead to long working hours•Risk that shortages of qualified personnel such as seafarers or truck drivers, as well as in the supply chain, may lead to long working hours•Risk that difficulty in monitoring labor conditions outside one’s own company may result in long working hours within the supply chain	✓	✓	✓	✓
		Low Wages	<ul style="list-style-type: none">•Risk that long truck waiting times at warehouses may lead to long working hours•Risk that audits and human rights due diligence as part of supply chain management may result in long working hours•Risk that task overload on managers may lead to long working hours•Risk that the 2024 problem and work-style reforms may hinder compliance with labor time limits for truck drivers and others•Risk that, despite formal systems such as childcare leave, lack of practical implementation may cause labor shortages, resulting in long working hours•Risk that labor shortages or declining technical skills among engineers may delay project progress, leading to long working hours•Risk that, in 24-hour ship operation sites, early-morning or nighttime arrivals and departures may lead to long working hours•Risk that extreme climate change may disrupt supply and demand or cause logistical delays, resulting in excessive working hours, increased waiting times, and impacts on employment conditions <ul style="list-style-type: none">•Risk that wages may fall below the level necessary for workers and their families to maintain a basic standard of living•Risk that, with the expansion of e-commerce and related industries, working hours may become chronically long, lowering hourly wages•Risk that, when business performance or demand increases, employees may not receive wages commensurate with their efforts, and the absence of special bonuses or recognition could lower motivation•Risk that wages may not be adjusted for inflation, leading to a decline in employee motivation•Risk that work-style reforms, by restricting truck drivers’ working hours and increasing staffing costs, may result in drivers earning less than what is needed for a decent living•Risk that wages of workers in the supply chain outside the company may decrease•Risk that wage equality for equal work may not be maintained due to differences in employment type•Risk of nationality-based discrimination in career advancement, such as promotion opportunities being offered only to employees of certain nationalities•Risk that wages may decrease due to declining demand <ul style="list-style-type: none">•Risk that fuel conversion or mechanization may lead to wage reductions or job losses•Risk that wage gaps may widen between large companies able to raise wages and small and medium-sized enterprises that struggle to do so	✓	✓	✓	✓

Workplace Treatment	Health and Safety	<p>In the infrastructure industry, there are always operations that involve hazards, such as loading/unloading and transporting heavy objects, using large machinery and vehicles, and working in close proximity to trains, aircraft, and ships. In order to maintain safe conditions, it is necessary to continue to contain hazards through daily efforts. Maintaining safety requires ongoing daily efforts to continuously suppress potential hazards.</p> <ul style="list-style-type: none"> •Risk of occupational accidents in dismantling sites, operating vessels and terminals, aircraft and airports, and other workplaces handling heavy machinery or heavy cargo •Risk of employee health damage or occupational accidents in unstable working environments such as outdoor sites or cold storage warehouses •Need to ensure worker safety in areas with geopolitical risks, such as regions affected by armed conflict, piracy-prone waters, or the Strait of Hormuz •Risk of secondary, life-threatening damage in the event of a disaster due to the public nature of certain business operations •Risk of mental health deterioration from power harassment arising in confined workspaces such as ships or aircraft, in small teams, or due to strict chains of command <p>•Risk of health problems caused by long working hours or working on days off to cover for absent colleagues</p> <p>•Risk of harassment or violence from customers disrupting operations</p> <p>•Risk of being unable to receive appropriate medical care during serious illness while at sea, along with the potential for increased workload on others</p> <p>•Risk of adverse effects on workers from handling hazardous new fuels</p> <p>•Increased workload from outdoor maintenance, tank work, warehouse or cargo-handling operations due to extreme weather events</p> <p>•Risk of violation of employee human rights through customer harassment in workplaces such as on-site facilities or call centers</p>	✓	✓	✓	✓	✓
		<p>With Japan's declining population, companies have diversified employment types in recent years by hiring contract and dispatch workers, senior employees, foreign workers, persons with disabilities, converting contract workers to permanent staff, and implementing shorter working hours and remote work arrangements.</p> <ul style="list-style-type: none"> •Risk of unequal treatment in working conditions, training, and promotion for diverse employees (differences in nationality, ethnicity, religion, gender, age, disability, sexual orientation, gender identity, etc.) across varied employment types (soft aspect) •Risk of human rights violations due to inadequate workplace facilities (e.g., multipurpose toilets) for women and diverse employees in roles such as truck drivers or seafarers (hard aspect) •Risk of continued unfair labor practices when employment conditions and pay statements are not provided in a language the employee understands, leaving terms vague •Risk of standardized, non-inclusive treatment that fails to recognize diversity (e.g., disability employment, SOGI considerations) •Risk of deteriorating work environment and treatment for senior workers under employment extension or post-retirement re-employment systems, including inability to uphold equal pay for equal work due to age discrimination •Risk of privacy violations from working and living in closed environments <p>•Risk of workplace harassment (e.g., power harassment, sexual harassment, maternity harassment)</p> <p>•Risk of personal data leaks not only of customers but also of employees and individuals in the supply chain</p> <p>•Risk of limiting modern workstyle choices when certain job types cannot accommodate remote work</p> <p>•Risk of neglecting care for the families of seafarers due to their long-term absence while onboard</p> <p>•Risk of unequal educational opportunities for frontline workers due to high barriers in providing training</p> <p>•Risk of unclear management responsibility for working conditions in multilayered subcontracting structures, leading to unfair treatment of workers at the bottom of the chain</p>	✓	✓	✓	✓	✓
	Human Rights Issues in Supply Chains	<ul style="list-style-type: none"> •The infrastructure industry is labour-intensive, requiring the management and maintenance of working hours and working conditions (including health and safety) across the entire supply chain. •Multi-tier subcontracting structures can limit the ability to exercise direct influence, creating a risk of insufficient understanding of working hours and working conditions across the supply chain. 	✓				
	Raw Material Procurement	<p>Infringement of the rights of indigenous peoples and local communities</p> <ul style="list-style-type: none"> •The acquisition of development areas for sourcing raw materials in the country of origin may involve the relocation of indigenous peoples and local communities. (In cases where the company holds only a minority stake in securing such rights, its ability to take a leading role in addressing the issue is limited.) <p>Human rights violations due to environmental pollution</p> <ul style="list-style-type: none"> •Around development areas in the country of origin, there is a risk of noise pollution, deforestation, water pollution, and depletion of water resources. (In cases where the company holds only a minority stake in securing such rights, its ability to take a leading role in addressing the issue is limited.) •Risk of air pollution caused by exhaust emissions from vessels and other means of transport during shipping. •Potential to contribute to a carbon-neutral society through the development of new raw material manufacturing technologies (positive impact). 	✓				
			✓	✓	✓	✓	✓

	Foreign Workers	Employment environment and conditions	<p>(General)</p> <ul style="list-style-type: none"> •Risk of unfair treatment in terms of employment and working conditions. •Risk of foreign workers becoming socially isolated due to insufficient language or daily-life support. •Risk of exploiting a worker's illegal status to make them work under extremely unfavorable conditions. •Risk of forced labor induced by the company retaining passports or ID cards and restricting freedom of movement. •Risk of serious industrial accidents caused by insufficient safety training provided in the worker's native language. <p>(Domestic)</p> <ul style="list-style-type: none"> •Risk of foreign technical intern trainees being treated unfairly under Japan's Technical Intern Training Program. <p>(Overseas)</p> <ul style="list-style-type: none"> •Risk of human rights violations such as child labor or forced labor occurring among business partners in overseas supply chains. •Risk of unpaid wages for work performed prior to formal employment. •Risk of disparities in treatment of foreign workers and trainees due to the failure to inform them of Japanese social norms, rules, and safety measures, as well as the risk of such workers violating the rights of others due to this lack of awareness. 	✓	✓	✓	✓	✓
	Services provided to Customer and areas	Safety	<ul style="list-style-type: none"> •Possibility of causing health hazards and unnecessary stress to a diverse range of passengers due to the characteristics of a closed space, long restraint time, and the inability to move seats [Aviation]. •Possible damage to health and unnecessary stress due to the characteristics of the closed space, high density, and diverse passengers on board. There is also a risk of being victimized by sexual crimes, etc. [Railways] •As a closed space, there is a risk of delay in initial response in the event of a medical emergency. •May adversely affect the local community due to the use of highly hazardous new fuel for navigation. •Risk of passengers being trapped for long periods of time due to flight delays caused by thunderstorms and other adverse weather conditions 					
		Service	<ul style="list-style-type: none"> •The risk of loss of opportunities to use public services due to inadequate support for diverse customers (nationality, ethnicity, religion, gender, age, disability, sexual identity, etc.). •While local communities are maintained by continuing routes, the elimination of routes may encourage a decline in the quality of the community [railroads and buses]. •Conflicts may lead to longer hours and higher freight costs to avoid the route, which may lead to higher prices. •Overfished fish and other fish are unknowingly in the supply chain, which may indirectly contribute to biodiversity and human rights violations. •May be rebuilt due to increased frequency of disasters, which may have an impact on local communities •There is a risk of endangering health and safety, or causing child labor or forced labor in the company's supply chain (in addition to employees). <p>【Railroads and buses】</p> <ul style="list-style-type: none"> •In the event of a logistics slowdown, customers may not be able to receive the service they desire (i.e., not be able to transport the items they want to carry). •Delays in research on alternative fuels, etc., may cause customers' expectations not to be met. <p>•Risk that a shortage of drivers will make it impossible to maintain bus routes, thereby limiting the mobility of socially vulnerable groups.</p> <p>•Risk that delays in introducing autonomous driving will prevent the resolution of labor shortages, making it impossible to maintain the necessary number of routes and service frequency.</p>		✓	✓		

Community		Information Management	<ul style="list-style-type: none"> •Risk of leakage of customers' personal information and privacy. •Risk that vulnerabilities in system security could lead to ransomware attacks, resulting in IT system shutdowns and inability to continue business operations. 					
		Community	<ul style="list-style-type: none"> •Impact on the living environment of nearby residents due to business area expansion (such as relocation of residences and noise issues). 					
	Resources	Use of Natural Resources	<p>Diversification of energy sources is progressing, including not only fossil fuels, but also unconventional natural gas resources and power generation from renewable energy sources.</p> <ul style="list-style-type: none"> •The fuel oil may cause air pollution, water degradation, and other environmental pollution, as well as destruction of habitats where the fuel oil is procured. •Air pollution may be caused by gases emitted from many transport vehicles passing along transport routes [transportation]. •Oil pollution accidents may cause damage to the marine environment and negative impacts on ecosystems. •Construction and use of transportation infrastructure such as factories, distribution centers, roads, railroads, ports, and airports may cause environmental destruction such as soil pollution, water quality degradation, and air pollution. •Procurement and use of fossil fuels such as ships, aircraft, and accompanying vehicles, and inefficient use of resources may cause climate change and negatively affect the livelihoods of people, especially women, the poor, social minorities, and refugees •Potential to contribute to sustainable development through efficient use of natural resources (positive impact) •Possible threat to human rights in terms of water and sanitation in the areas where foodstuffs are procured for operations. 	✓	✓	✓	✓	✓
			<p>[Aviation Industry]</p> <ul style="list-style-type: none"> •The potential for passengers to bear the cost of SAF fuel (aviation biofuel), which is positioned as a renewable alternative aviation fuel, and the potential for passengers to bear the cost of such fuel, which is relatively expensive [airline industry]. •Measures to reduce emissions of sulfur oxides, nitrogen oxides, etc. by switching fuels or installing scrubbers on vessels in operation due to Sox and Nox regulations [shipping industry] •The use of ballast water may affect ecosystem services in the marine environment of each region and infringe on the human rights of local residents. •The disposal of vehicles, vessels, and airplanes may cause negative environmental impacts. •In the process of supplying new alternative fuels such as biofuels, there is a risk of creating mass production farms, etc., and destroying the local natural environment •Conventional fuel workers may lose employment opportunities. •Possible negative as well as positive impacts on local communities due to the unknown nature of new technologies and fuels, such as offshore wind power. 					
		Use of Infrastructure	<ul style="list-style-type: none"> •The risk of damage to roads, ports, airports, etc. in the destination country by vehicles, vessels, or aircraft operated by the company •Trucks transporting goods to landlocked countries may damage roads in countries near ports. •Damage to infrastructure in the event of a disaster could disrupt supply chain logistics •Efforts to quickly restore infrastructure such as roads, rail lines, station facilities, and logistics hubs to maintain local livelihood infrastructure in the event of a disaster (positive impact) •Possible impact on customers or supply chain due to cargoes stopped working due to dockworkers' strike •Supply chain may be affected by driver shortages, accidents, and inadequate maintenance of roads, rail lines, and ports. •Declining number of passengers due to falling birthrate and aging population may make it impossible to maintain routes [railroads]. •Possible changes in the environment of the sea and surrounding areas due to port improvements, such as allowing large vessels to enter the port or adding facilities for new fuel supply 	✓	✓	✓	✓	
	Provision of Service		<ul style="list-style-type: none"> •The risk of accidents, terrorist acts, disasters, infectious diseases, etc. that may adversely affect the health and safety of not only our customers but also the general public and other stakeholders. •Navies of various countries deployed to areas of piracy or geopolitical risk, or security guards hired as one company to guard insecure logistics centers, •There is a risk of the use of excessive force. •Armed guards on board may use excessive force against seafarers, crew members, and pirates. •The risk of naval forces or pirates violating the rights of local residents, such as fishermen (shipping industry) <p>Risk of foreign objects being mixed in food and products that pass to the general public in food factories and food warehouses (food defense [food warehousing and food logistics]).</p>		✓	✓	✓	

Society and Government	Relationships with governments	Relationships with governments	<ul style="list-style-type: none"> •Exposure to bribery and corruption, including facilitation payments •The risk of being exposed to bribery and corruption, such as facilitation payments. •Risk of companies being complicit in human rights abuses due to policy guidance or state ideology that may lead to human rights abuses •In the event of war or conflict, companies may be complicit in human rights abuses by being recruited. 	✓	✓	✓	✓
		Bribery and corruption	<ul style="list-style-type: none"> •In the country of origin, there is a risk of bribery or collusion with government officials during negotiations with the government or other authorities for development or acquisition of rights and interests. (In cases where the company holds only a minority stake in acquiring such rights, its ability to take the lead in addressing these issues may be limited.) 	✓	✓	✓	✓
	Relationships with societies		<ul style="list-style-type: none"> •Risk of greenwashing or sustainability washing, resulting in stakeholders not receiving (or the company not providing) accurate information. •Risk of insufficient stakeholder engagement, leading to discrepancies between the company's understanding and that of the broader public regarding human rights issues. 				
Digitization			<ul style="list-style-type: none"> •Advances in technology (e.g., generative AI, facial recognition systems, AI, IoT) may lead to unforeseen privacy and human rights issues, as well as risks of cyberterrorism. •Risk of widening digital divides between those who can benefit from digitalization and those who cannot (e.g., seafarers). •Introduction of AI and IT in transportation workflows may address labor shortages and human error, but could also lead to workforce reductions. •In the event of an accident, unclear allocation of responsibility could hinder appropriate responses to victims. •Workforce reductions from digitalization may result in insufficient personnel to respond in emergencies. •Digitalization of ship equipment may generate new types of work (e.g., data input, maintenance) without improving efficiency. •Cyberattacks, such as ransomware, can lead to system shutdowns or leaks of personal and confidential information, posing serious risks to the human rights (e.g., privacy) of customers and employees. •Use of AI in recruitment or performance evaluation could result in unfair decisions based on biased training data (e.g., gender, race, age), or deliberate manipulation of training data could induce overfitting and arbitrary outputs. •Black-box AI decision-making can make it difficult to challenge or appeal output results. •Adoption of AI-generated decisions may lead to reliance on unethical supply chains, where development or operational processes involve low-wage or child labor, resulting in human rights violations. 	✓	✓	✓	✓
Others	Illicit trade, Smuggling	Human Trafficking	<ul style="list-style-type: none"> •Risk of unintentionally engaging in illicit transportation or human trafficking without recognizing the associated risks. •Risk of unintentionally transporting stowaways. 【Shipping industry】 •Risk of transporting prohibited goods. •Risk of unknowingly transporting conflict minerals or products made with forced labor. •Risk of inadvertently using products made with forced labor as company supplies. 	✓	✓	✓	
	Access to Remedy		<ul style="list-style-type: none"> •Risk of being unable to access remedies when human rights issues arise. •Risk that employees working for secondary or tertiary suppliers cannot access remedies. •Risk that individuals are unable to seek remedies due to lack of psychological safety (e.g., choice of anonymity, confidentiality of information, non-retaliation policy). •Risk that parties cannot access remedies because no grievance mechanism exists or it is not well disseminated within the supply chain. •Risk of being unable to provide appropriate and timely remedies for issues requiring long-term resolution. •Risk of being unable to access remedies in environments with limited communication infrastructure, such as on board ships. 【Shipping industry】 •Risk of inadequate response due to lack of know-how for providing remedies. 	✓	✓	✓	✓

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3.7 Consumer Goods Industry (Cosmetics and Household Goods)

Human Rights Issues in Consumer Goods Industry			Specific Concerns	Value Chain						
				R&D	Procure	Manufacture	Logistics	Advertising	Sales	Use
Own employees/ suppliers	Workplace Treatment	Working Hours	<ul style="list-style-type: none">•(a) production plans that incorporate overtime work and the need to absorb delays in upstream plans on the shop floor; (b) wage levels that are not in line with local living standards; (c) piece-rate wage systems; or (d) the possibility of long working hours due to reasons on the factory side, such as large quantities of defective or reworked products, (c) Piece-rate wage system, or (d) Long working hours may occur due to reasons on the factory side, such as a large volume of defective or reworked products.•Risk of long working hours caused by excessive customer service demands or unclear goal setting leading to inflated workloads.•Risk of insufficient labor management or intentional failure to grant legally mandated holidays, as well as non-compliance with limits on overtime work.•Risk of a chronic inability to ensure overtime limits and minimum required rest periods, especially since the introduction of remote work after the COVID-19 pandemic, due to ineffective management.•Risk of long working hours in Japan in particular, including unpaid overtime, working through breaks, and excessive workloads for managers.•Risk of workload imbalances caused by increased uptake of childcare leave, caregiving leave, or the introduction of a four-day workweek.•Risk of workload imbalances due to lack of replacement hires following workforce reductions or the presence of employees on shortened working hours.•Risk of shifting burdens to business partners by reducing in-house working hours or prioritizing high-value-added outputs to meet diverse needs.	✓	✓	✓	✓	✓	✓	✓
		Wages	<ul style="list-style-type: none">•Risk that pressure from manufacturers, retailers, and others to reduce costs may hinder passing on price increases to transaction prices, resulting in suppliers—especially at the lower tiers—not complying with minimum wage or living wage standards.•Risk of non-compliance with minimum wage in countries where revisions to the minimum wage are frequent.•Risk that inadequate legal compliance or poor labor management may lead to non-payment of proper compensation for overtime work.•Risk of non-compliance with the principle of equal pay for equal work.•Risk of wage disparities arising from gender differences.•Risk that fair compensation proportionate to productivity is not paid.•Risk of adverse impacts on livelihoods due to sudden exchange rate fluctuations.	✓	✓	✓	✓	✓	✓	✓
		Health and Safety	<ul style="list-style-type: none">•Risk that inadequate company management may lead to inability of workers to maintain physical and mental health.•Risk that insufficient safety and health education—including disaster drills (including BCP training), first aid training, and handling of hazardous chemicals, and the lack of both onboarding and regular training—may result in harm to workers.•Risk that failure to provide individualized consideration for foreign nationals, persons with disabilities, and others (particularly for foreign workers, including measures to prevent isolation from their community, multilingual manuals, alerts on Japan-specific seasonal illnesses, region-specific disasters, and cultural/language differences) may undermine their physical and mental health and safety.•Risk of health damage due to failure to address harmful working environments (e.g., noise, vibration, lighting, temperature, ventilation, local exhaust).•Risk of assigning dangerous or harmful work to pregnant women, minors, or other vulnerable groups.•Risk that aging buildings, illegal construction, non-compliant emergency exits, and evacuation routes may cause harm to workers. <ul style="list-style-type: none">•Risk that dormitories or accommodations for foreign workers (e.g., company housing) may violate laws or international standards, resulting in physically or mentally harsh living conditions.•Risk that remote work may blur boundaries between private life and work, leading to long overtime hours, overwork, and related health problems.•Risk of mental health issues arising from lack of communication opportunities due to increased remote work.•Risk that work arrangements requiring physical presence at the workplace or store may heighten psychological stress.•Risk that working during extreme weather events or disasters (e.g., torrential rain, typhoons, earthquakes) may cause stress or prevent adequate safety measures.•Risk that fewer opportunities for management to visit worksites may lead to inadequate safety checks in the field (e.g., neglecting evacuation drills).•Risk that insufficient information sharing during incidents, or working without adequate company support systems, may cause excessive stress for workers.	✓	✓	✓	✓	✓	✓	✓

Harassment	<ul style="list-style-type: none"> • Risk of being subjected to physical, sexual, psychological, or verbal harassment and abuse. • Risk that focus on sales promotion initiatives may reduce the time allocated for awareness-raising activities to prevent harassment. • Risk that foreign workers, technical intern trainees, and their families may become isolated due to insufficient explanations, including in their own language. • Risk that Japanese employees, without understanding the differences in visa status, may impose the same work as other employees on foreign workers. • Risk that harassment consultation desks may not function properly, failing to lead to resolution. • Risk that work arrangements or workplace environments lacking consideration for LGBTQ individuals, religion, or disabilities may be perceived by employees as harassment. • Risk that discrimination based on pregnancy or childbirth may force employees into unwanted working conditions. • Risk that the company may fail to protect employees from external harassment, resulting in human rights violations (customer harassment). 	✓	✓	✓	✓	✓	✓	✓
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		Disciplinary action/change of treatment	<ul style="list-style-type: none"> • Risk of unfair punishment or treatment due to unclear provisions in work rules or their arbitrary application. • Risk that foreign workers and technical intern trainees may not receive sufficient explanations, including in their own language. • Risk of unfair dismissal or forced repatriation of foreign workers due to pregnancy (including cases where maternity/childcare leave systems are not in place). • Possibility of unfair dismissal or similar actions occurring not only in Japan but also at overseas group companies. • Risk that, upon resignation, employees may be encouraged to declare voluntary resignation when it should be classified as company-initiated termination. 	✓	✓	✓	✓	✓	✓	✓
		Discrimination	<ul style="list-style-type: none"> • Possibility of receiving unequal treatment in work environment, training, or promotion opportunities due to insufficient understanding of differences such as gender, age, race, nationality, religion, LGBTQ status, or disability. • Risk that when AI technologies are used as a basis for decisions regarding promotions or transfers, biases in the underlying big data (e.g., race, gender, age) could influence judgment results, causing disadvantages to the individuals concerned. • Risk of being unable to work authentically due to unreasonable restrictions on personal appearance (e.g., clothing, hairstyle) without legitimate grounds. 	✓	✓	✓	✓	✓	✓	✓
	Freedom of association	Freedom of association, right to collective bargaining	<ul style="list-style-type: none"> • The union may refuse to form a labor union, refuse to bargain collectively without just cause, or treat union members unfairly or dismiss them. • Risk of dismissal on the grounds of strike action 	✓	✓	✓	✓	✓	✓	✓
	Grievance mechanisms	Effectiveness of reporting channels for employees	<ul style="list-style-type: none"> • Risk that a grievance mechanism is not established, or that it exists but is non-functional (e.g., insufficient protection for whistleblowers, unclear scope of eligible persons, lack of clarity on what types of reports are accepted, leading to a purely nominal reporting channel). • Risk of failing to capture reports of human rights violations from vulnerable groups due to lack of multilingual support. • Risk of lacking sufficient expertise in handling grievance cases, leading to neglect of human rights violations or causing secondary harm. • Risk that confidentiality is not maintained. • Risk that individuals refrain from reporting due to the belief that confidentiality will not be protected. 	✓	✓	✓	✓	✓	✓	✓
	Child labor	Minimum age	<ul style="list-style-type: none"> • The possibility that child labor under the minimum age may be performed without identification or on the basis of false identification. • Child labor under the minimum age may be performed due to poverty. • Risk of child labor under the minimum age in raw material procurement (plantations, mining sites, etc.) • Risk of child labor in the workforce, including temporary workers, contractors, etc. 	✓	✓	✓				✓
Suppliers	Forced Labor	Forced labor Forced overtime, human trafficking, foreign workers	<ul style="list-style-type: none"> • Risk of being forced to work through violence, threats of violence, financial exploitation (including bribes to intermediaries), passport confiscation, or other forms of intimidation. • Risk that, due to the absence of written labor (employment) contracts or lack of multilingual documentation, workers are made to work under conditions to which they have not agreed. • Risk that insufficient oversight of supervising organizations or sending agencies dispatching foreign technical intern trainees results in the exploitation of migrants, refugees, or technical interns in forced labor. • Risk that excessive overtime beyond legal limits for foreign technical intern trainees becomes normalized, leading to the situation being regarded as forced labor (including failure to conduct regular interviews with the workers concerned). • Risk that the lack of multilingual implementation or operation of stress checks results in the development of mental health issues. 	✓	✓	✓				✓
	Assessment	Human rights violations at suppliers	<ul style="list-style-type: none"> • Risk that failure to conduct adequate due diligence or to exercise leverage may contribute to human rights violations at upstream suppliers, such as secondary suppliers and contract manufacturers. • Risk that lack of on-site interviews or reality checks with socially vulnerable groups — including foreign employees of suppliers, technical intern trainees, and implementing organizations (companies where trainees work) — may result in human rights violations going unremedied. 	✓	✓	✓				✓
	Grievance Mechanisms	Effectiveness of supplier reporting channels, escalation process, and remedies	<ul style="list-style-type: none"> • No grievance mechanism is in place, or one exists but may not be functioning effectively (e.g., insufficient protection for whistleblowers or unclear scope of eligible persons; inadequate communication of the types of reports accepted, leading to the reporting channel becoming a mere formality). • Lack of multilingual support, creating a risk of failing to capture reports of human rights violations from vulnerable groups. • Insufficient expertise in handling grievance cases, creating a risk of leaving human rights violations unaddressed or causing secondary harm. • Risk of confidentiality not being maintained. • Risk that parties concerned may refrain from reporting because they believe confidentiality will not be preserved. 	✓	✓	✓				✓
	Mutual information management system		<ul style="list-style-type: none"> • Risk that inadequate information-sharing systems with primary and subsequent tier suppliers may contribute to the occurrence of human rights issues affecting supplier employees. 	✓	✓	✓				✓

Business Partners	M&A	HR Assessment in M&A acquisition audits	•Risk that, during due diligence, the human rights assessment of a potential M&A target is insufficient, resulting in human rights violations not being remedied. •Risk of lack of consideration for employees of the acquired company during the post-acquisition stage when unifying and embedding assessments, rules, and policies.	✓	✓	✓	✓	✓	✓	✓	
	Business partners	Human rights violations at Business partners	•Risk that, regardless of whether upstream or downstream, if human rights issues arise within a business partner’s organization, such human rights violations may not be remedied.	✓	✓	✓	✓	✓	✓	✓	
	Logistics contractors	Labor environment	•Risk that unreasonable requests for tight delivery deadlines by manufacturers or sellers to upstream suppliers may lead to chronic long working hours and excessive workloads. •Risk that failure to reform business practices, or failure to adequately consider supply chain management (SCM) functions when shifting business models (e.g., due to an increase in e-commerce ratio), may result in chronic long working hours and excessive workloads for employees of logistics contractors.					✓			
	Employment applicants		•Risk of human rights violations against job applicants, such as discrimination based on academic background, gender, race, or nationality, harassment, and leakage of personal information. •Possibility of conducting discriminatory recruitment and hiring practices by imposing restrictions based on gender, age, race, nationality, religion, LGBTQ status, or presence of disabilities. •Risk that when AI technologies are used as part of the hiring decision-making process, bias in the dataset attributes (such as career history, gender, or age) may occur, causing disadvantages to the applicant.	✓	✓	✓	✓	✓	✓	✓	
Society	Local residents	Health hazards in daily life	•Air pollution, chemical emissions, and wastewater from business operations may harm the health of local residents.	✓	✓	✓	✓		✓	✓	
		Human Rights Defender	•Risk that human rights defenders (such as activists) may be subjected to pressure, resulting in disadvantages or harm to themselves or their communities.								
		Infringement on living space and time	•Risk of infringing upon the land rights of indigenous peoples or local communities due to the construction of new sites and similar developments. •Risk of adverse impacts on residential areas, such as noise, air pollution, and traffic safety, arising from business operations.	✓	✓	✓	✓		✓	✓	
	Natural environment	General	•Risk that insufficient progress in “greening the economy” and addressing various natural environmental issues may fail to mitigate negative impacts on the natural environment, thereby impairing the right to a clean, healthy, and sustainable environment for current and future generations.	✓	✓	✓	✓	✓	✓	✓	
		Water Stress	•Risk of water shortages due to excessive water use. •Risk that improper treatment of industrial water may result in wastewater discharge, preventing local residents from accessing sufficient quantities of safe water.	✓	✓	✓				✓	✓
		Climate Change	•Risk that large CO ₂ emissions and other factors may hinder the mitigation of global warming, adversely affecting the global environment and all stakeholders.	✓	✓	✓	✓		✓	✓	✓
		Terrestrial resources	•Risk that manufacturing products without regard for the local environment may adversely affect the conservation of forest ecosystems. •Risk of illegal waste dumping due to abandonment of waste or failure to use appropriate disposal contractors.	✓	✓	✓	✓		✓		✓
		Marine resources	•Risk that overfishing of marine resources may adversely affect the conservation of marine ecosystems. •Risk that insufficient wastewater treatment at factories or the discharge of hazardous substances may negatively impact the marine environment. •Potential impacts include effects on fishery workers, the tourism industry, countries whose economies depend on tourism, and ecosystems (e.g., depletion of fish stocks and impacts on livelihoods).	✓	✓	✓	✓		✓		✓
	Relationships with governments	Bribery and corruption	•Risk that bribery during the process of obtaining permits or licenses may cause adverse impacts on the surrounding environment and local residents.	✓	✓	✓	✓	✓	✓		✓
		Relationships with countries with high human rights risks	•Risk of contributing to human rights violations by accommodating or aligning with countries that have high human rights risks.	✓	✓	✓	✓	✓	✓		✓
	AI	•Risk of AI generating systems or mechanisms that do not take human rights into consideration. •Risk of confidential corporate information or personal data entered into AI being inappropriately leaked, mismanaged, altered, transferred, and used. •Risk of inappropriate information being disseminated or used due to AI’s arbitrary algorithms or the provision of false information. •Risk that individuals who cannot use AI—due to differences in personal capabilities or environment—will be placed at a disadvantage, as ease of access to AI technology depends on such factors.		✓	✓	✓	✓	✓	✓	✓	

Customer	Relationships with consumers	Health and Safety	•Risk of insufficient measures to improve product quality and safety, thereby reducing risks to consumers.	✓	✓	✓	✓	✓	✓	✓	✓
			•Risk that consumers may be disadvantaged if correct information is not communicated, resulting in failure to follow proper usage instructions.	✓				✓	✓	✓	✓
			•Risk that insufficient improvement of traceability for materials and products may result in disadvantages to consumers.	✓	✓	✓	✓	✓	✓	✓	✓
			•Risk that inadequate communication of safety precautions may harm consumer safety.					✓	✓	✓	
			•Risk that access to hygiene products and similar items may be hindered, causing disadvantages to consumers.							✓	
		Privacy	•Risk that customer records, monitor data, surveillance camera footage, purchasing behavior through electronic purchasing or point systems, privacy information contained in cookies, and personal information such as delivery addresses may be leaked, improperly managed, altered, or transferred, and used inappropriately.								
			•Risk that sellers or manufacturers fail to clearly indicate, or use overly complex language in, policies or contact points regarding the handling of privacy information (including facial images) obtained through various simulators and diagnostic devices, resulting in consumers being unable to fully understand how their information is handled and thereby suffering misunderstanding, anxiety, or disadvantage.	✓			✓	✓	✓	✓	
		Respect for the individual	•Risk that sellers or manufacturers, prioritizing marketing activities, use personal information (such as website browsing history, electronic purchasing history tracking, or recommendation functions) without obtaining the consumer's consent.								
			•Risk that personal information is leaked against the customer's will, resulting in disadvantages in their daily life.								
		Children's health and safety	•Risk that advertising, marketing, or sales activities may reinforce uniform concepts of beauty, gender, generation, or other stereotypes.	✓				✓	✓	✓	
			•Risk that the use of AI or similar technologies may lead to consumer misconceptions or promote stereotypes through algorithms or information provision.								
		Harassment and Discrimination	•Risk of violating children's rights, hindering healthy development, or threatening safety and health by failing to provide sufficient information on usage, quality, or skin knowledge in product use and educational materials.								
			•Risk of unequal access to products that meet the needs specific to children's developmental characteristics.					✓	✓	✓	
		Sustainable Society	•Risk of delayed or inadequate response to children due to the absence of an ethical marketing policy.								
			•Risk of human rights violations due to failure to conduct prior checks to ensure that advertising and marketing do not induce discrimination or harassment.								
		Monitoring & Assessment	•Risk of advertising, marketing, or sales activities evoking associations with discrimination or bullying, thereby creating the impression of condoning or encouraging such behavior.					✓	✓	✓	
			•Risk of consumers suffering disadvantages in purchasing or usage scenarios due to differences in gender, age, nationality, race, religion, LGBTQ status, or presence of disabilities.								
		Lifestyle	•Risk of product promotional expressions being perceived as verbal abuse.								
			•Risk of negative environmental impacts from the disposal of plastic products, containers, and packaging.	✓	✓	✓	✓	✓	✓	✓	✓
			•Risk of exacerbating negative environmental impacts by failing to limit the use of virgin plastics in containers and packaging materials, thereby not fostering consumer awareness of plastic reduction.								
			•Risk of exacerbating negative environmental impacts by failing to engage consumers in initiatives that raise environmental awareness.								
			•Risk of undermining consumers' waste disposal awareness and exacerbating negative environmental impacts by not providing easily separable containers and packaging.								
			•Risk that human rights violations caused by advertising and marketing, or by statements from individual employees or consumers, are not proactively identified (e.g., through social media monitoring or customer service channels) and therefore not remedied.								
			•Risk that when human rights violations occur through advertising, marketing, sales activities, or business operations, lessons learned are not applied to future business activities, resulting in recurrence.					✓	✓	✓	
			•Risk that consumers are unable to make choices aligned with their individual lifestyles and values (e.g., religion, CO ₂ emissions, animal welfare, plastic use) because companies fail to provide adequate information to support informed decision-making, or due to advertising practices such as greenwashing and stealth marketing, leading to choices contrary to consumers' intentions or restricting their freedom of choice.					✓	✓	✓	

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3.8 Apparel Industry

Creation: research, development, design **Buying:** construction of facilities, procurement (fabrics, subsidiary materials) **Manufacturing:** production, manufacturing (sewing)

Transportation: storage, logistics **Sales:** sales, marketing, retail **Use:** consumption, utilization, maintenance and servicing, packaging (wrapping)

Discard: disposal, recycling, waste plastic

Human Rights Issues in Apparel Industry		Specific Concerns	Value Chain					
			Creation	Buying	Manufacturing	Transportation	Sales	Use
	Working Hours	<ul style="list-style-type: none">•Risk that production plans premised on overtime, or situations where delays in upstream planning are absorbed at the sewing site, combined with wage levels not aligned with local living standards, piece-rate pay systems, or large volumes of defective/repair work due to factory-side causes, may lead to excessive working hours (affecting workers in own factories or at contract manufacturers).• Risk that inappropriate working time management results in the failure to grant legally mandated days off or in exceeding statutory overtime limits (affecting own employees or workers in own factories or at contract manufacturers).•Risk that lack of understanding of the actual working conditions of technical intern trainees leads to violations of labor standards (Japan) (affecting trainees in domestic sewing factories or at contract manufacturers).• Risk that inability to provide support in the local language to foreign workers, including technical intern trainees, results in insufficient living support and care, and social isolation (Japan) (affecting trainees in domestic sewing factories or at contract manufacturers); communication with trainees may take significant time, limiting adequate support.• Risk of unpaid overtime, overwork of managers, and excessive workloads for nominal managers (Japan) (affecting own employees). <ul style="list-style-type: none">•Risk of excessive working hours arising from telework (Japan) (affecting own employees).•Risk of overtime caused by external factors such as changes in national policies or political situations (e.g., conflicts, lockdowns) (affecting workers in own factories or at contract manufacturers).• Risk that insufficient understanding of local or global laws leads to prolonged working hours (affecting workers in own factories or at contract manufacturers).• Risk that increased workloads due to responding to social demands such as 3R activities (e.g., recycling collection) contributes to excessive working hours.• Risk that foreign workers (e.g., from China, Southeast Asia) engaged in sewing or sales positions return to their home countries due to overseas situations (e.g., COVID-19 impacts), leading to labor shortages and overwork (affecting own employees or workers at contract manufacturers).	✓	✓	✓	✓	✓	✓
	Wages	<ul style="list-style-type: none">• Risk that cost-cutting pressures from buyers result in non-compliance with minimum wage (living wage) standards (overseas own factory or contract manufacturer workers).• Risk that in some countries, frequent revisions to the minimum wage lead to non-compliance (overseas own factory or contract manufacturer workers).•Risk that insufficient legal compliance or inadequate work time management results in failure to pay appropriate compensation for overtime (own employees, workers in own factories or at contract manufacturers).•Risk that fair compensation commensurate with productivity (considering raw material price hikes, currency fluctuations, etc.) is not paid (own employees, workers in own factories or at contract manufacturers).• Risk of unequal pay for equal work between regular and non-regular employees (including foreign workers such as technical intern trainees) (own employees, workers in own factories or at contract manufacturers).•Risk that changes in the socio-economic environment (e.g., inflation) lower real wages, undermining workers’ living standards (own employees, workers in own factories or at contract manufacturers).•Risk that the status of gender pay gaps is not understood, leading to the existence of such gaps; low ratio of female executives; lack of proactive promotion of women (own employees, workers in own factories or at contract manufacturers).	✓	✓	✓	✓	✓	

[illegible]

Community	Environment Resources	Climate Change	<ul style="list-style-type: none"> • Risk of excessive CO₂ emissions from overconsumption of electricity at production factories and retail stores. • Risk of CO₂ emissions resulting from mass production and mass disposal conducted irresponsibly (without planning). • Risk of employee health deterioration due to heatstroke and other climate-related conditions (own employees, workers at own factories, or workers at production contractors). • Risk of layoffs due to factory closures or relocations of production sites prompted by the impacts of climate change (own employees, workers at own factories, or workers at production contractors). • Risk of accelerating global warming by outsourcing production without advancing CO₂ emissions reduction in the supply chain. • Risk of indirectly increasing environmental impacts by insufficiently assessing energy usage, renewable energy utilization, and other factors in each production process of the company or suppliers, leading to more orders for high-impact materials or products. • Risk of accelerating global warming due to increased CO₂ emissions from logistics as e-commerce sales expand. 	✓	✓	✓	✓	✓	✓	✓
		Water Stress	<ul style="list-style-type: none"> • Risk of health damage to surrounding residents and adverse effects on the local environment due to large-scale water use and river pollution caused by harmful chemicals at tanneries, dyeing factories, plating factories, and similar facilities (surrounding residents). • Risk of water depletion and water pollution during the production of raw materials (cotton, cattle, natural rubber) as a result of large-scale water usage (surrounding residents). 	✓	✓	✓				
		Biodiversity conservation	<ul style="list-style-type: none"> • Risk of adversely affecting the conservation of forest ecosystems due to the manufacturing of wooden products (paper materials), impacting indigenous peoples living within forest ecosystems. • Risk of ocean pollution caused by microplastics generated during the washing of synthetic fiber products, affecting all humankind. • Risk that materials procured through supply routes with unclear traceability are contributing to environmental and soil pollution (e.g., organic cotton, wool) (surrounding residents). • Risk of environmental destruction in surrounding areas due to the inability to maintain sustainable rearing environments for cattle, sheep, goats, and other livestock. 	✓	✓	✓	✓	✓	✓	✓
		Depletion of natural resources	<ul style="list-style-type: none"> • Depletion of finite natural resources such as oil and gas. • Risk of contributing to climate change and extreme weather events due to excessive use of resources. • Risk of depleting limited resources as a result of wasteful product design that generates large amounts of fabric offcuts during the cutting process. 	✓	✓	✓	✓	✓	✓	✓
		Waste management	<ul style="list-style-type: none"> • Risk of illegal dumping of waste due to leaving waste unattended or using unqualified disposal contractors. • Risk of environmental damage from failure to implement waste reduction measures. • Risk of environmental pollution caused by the use of non-biodegradable materials. • Risk of disrupting recycling systems by using biodegradable plastics unnecessarily for materials such as combustibles. 	✓	✓	✓	✓	✓	✓	✓
		Indigenous rights	<ul style="list-style-type: none"> • Risk of threatening the livelihoods of residents in raw material producing countries (e.g., cotton, pulp) through displacement, violence, etc. • Risk of causing environmental pollution and health damage to local residents in developing countries where legal systems are not well established, even while complying with local laws. • Risk of violating the health and human rights of indigenous peoples due to insufficient traceability management leading to unintended disposal of products in certain areas (e.g., the “clothing graveyard” case in Kenya). • Risk of threatening the livelihoods of new indigenous communities by expanding operations inland to reduce costs. 	✓	✓	✓	✓			
	Discrimination	Diversity	<ul style="list-style-type: none"> • Risk of discrimination through inappropriate expressions in advertising and other media (e.g., unconscious bias, LGBTQ+ issues). • Risk of jeopardizing the continuation of the Technical Intern Training Program due to excessive negative perceptions of the system itself (domestic factory technical interns). • Risk of reinforcing stereotypical gender biases in advertising, promotion, or social media sales activities (e.g., using specific colors targeted exclusively for women or men). 	✓	✓	✓	✓			
Consumer	Relationships with consumers	Awareness	<ul style="list-style-type: none"> • Risk of failing to build a circular economy system (e.g., use of recycled or circular materials) due to insufficient initiatives to raise consumer awareness of recycling. • Risk of misleading consumers and hindering their intended purchasing decisions due to insufficient provision of accurate information on certified or sustainable materials. • Risk of engaging in greenwashing practices, leading to consumer misunderstanding and obstructing ethical purchasing behavior. 	✓	✓	✓	✓	✓	✓	✓
		Health and Safety	<ul style="list-style-type: none"> • Risk to consumers arising from insufficient efforts to improve product quality and safety. • Risk of health hazards caused by the presence of harmful substances in final products. • Risk to consumer safety from defects in battery-powered wearables or wearable devices, such as fire or explosion incidents. 	✓	✓	✓	✓	✓	✓	✓
		Protection of Personal Information	<ul style="list-style-type: none"> • Risk of privacy violations or discrimination arising from personal information leaks and the use of technologies such as AI and social media. • Risk of employing dark patterns on e-commerce sites to manipulate consumer behavior (e.g., making cancellations or returns intentionally difficult). • Risk of consumer misperception or reinforcement of stereotypes due to algorithms or information provision using AI on e-commerce sites (e.g., targeted advertising that pressures consumers with recommendations). • Risk of human rights violations, including personal information leaks, due to diversified marketing methods such as employees acting as influencers on social media. 	✓	✓	✓	✓	✓		
		Diversity Concerns	<ul style="list-style-type: none"> • Risk of insufficient consideration for diversified consumers (e.g., gender, nationality, religion, LGBTQ+). • Risk of reinforcing gender bias through mandatory clothing such as company uniforms or school uniforms without alternative options, potentially leading to human rights violations against transgender individuals. 	✓	✓	✓	✓	✓	✓	