

Report on 2025 Business and Human Rights Conference in Tokyo

Date: 10:00-16:30 Friday, 24th October, 2025

Format: Zoom Online Conference

Hosts: Caux Round Table Japan

Cooperation:

Ajinomoto Co., Inc., ANA Holdings Inc., JP Research & Consulting, Inc.,
Mazda Motor Corporation, Nippon Yusen Kabushiki Kaisha (NYK Line), Regrit Partners,
TODA KOGYO CORP., Tokio Marine & Nichido Fire Insurance Co., Ltd.,
Tokio Marine dR Co.,Ltd.

Foreign Organizations:

Office of the United Nations High Commissioner for Human Rights,
OECD Centre for Responsible Business Conduct, Mission to Seafarers Philippines,
World Benchmarking Alliance, Ethical Impact, Work Better Innovations, Walk Free

Participants:

177 people in total

Host



Cooperation



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TOKIO MARINE



Tokio Marine dR Co.,Ltd.

On Friday, October 24, 2025, the Caux Round Table Japan (CRT Japan) held the "2025 Business and Human Rights Conference" in Tokyo. Continuing from last year, the conference was conducted online, attracting 177 participants, including representatives from 109 companies and 22 organizations.

The conference aimed to achieve three main objectives: (1) to understand and raise awareness of the latest trends in business and human rights, (2) to promote collaborative processes to address human rights issues, and (3) to encourage the implementation of the UN Guiding Principles on Business and Human Rights.

In 2011, the United Nations Human Rights Council endorsed the UN Guiding Principles on Business and Human Rights (UNGPs), establishing an international framework for respecting human rights in business activities. The UNGPs consist of three pillars—the State duty to protect, the corporate responsibility to respect, and access to remedy—and call for concrete actions by both governments and companies. Fourteen years after their adoption, legal regulations requiring companies to implement and disclose supply chain management have been accelerating worldwide. Under these circumstances, initiatives based on the UNGPs have become not only a matter of legal compliance but also a critical element for strengthening corporate credibility, improving risk management, and achieving sustainable growth.

At this conference, domestic and international experts, as well as corporate representatives, gathered to explore practical and effective ways to implement the UNGPs, discussing specific challenges and potential solutions. The event opened with a panel discussion featuring invited overseas experts, focusing on effective engagement with rights-holders and presenting advanced international practices and institutional frameworks. Participants had the opportunity to identify connections between global trends and their own company's initiatives. This was followed by presentations from Japanese companies, which shared practical examples of human rights initiatives based on the UNGPs, as well as responses to challenges identified through human rights due diligence and impact assessments. In addition to success stories, participants exchanged candid views on ongoing challenges and future areas for improvement. Further dialogue with international experts helped identify possible approaches to resolving concrete issues faced in the field.

Through these discussions, it became evident that effective implementation of the UNGPs requires a wide range of efforts, including leadership commitment, internal system development, collaboration with business partners, formulation of human rights policies, establishment of human rights due diligence processes, and the creation of grievance mechanisms. In particular, continuous dialogue with rights-holders and the enhancement of supply chain transparency were recognized as essential elements to ensure effectiveness.

Moving forward, CRT Japan will continue to provide comprehensive support grounded in the UNGPs and promote an enabling environment that empowers companies to take proactive steps toward realizing a sustainable society.

■ Opening Remarks

Hiroshi Ishida, Executive Director, Caux Round Table Japan

This conference was convened to examine how companies should advance their own initiatives in light of global developments in business and human rights. As a non-profit organization, CRT Japan serves as a bridge between companies and stakeholders, operating from a neutral standpoint. In particular, in initiatives based on the UNGPs, CRT Japan places importance on conveying the voices from the field to corporate management and linking them to implementation. Such processes are directly connected to the practice of human rights due

diligence, where engagement with rights-holders plays a key role. Regarding grievance mechanisms, participants emphasized the importance of managing them as an integral, two-way system rather than as a separate process from human rights due diligence. To improve situations in which grievances remain unvoiced despite the existence of such mechanisms, it is essential to build smooth communication based on mutual trust. Through partnerships with corporate members, CRT Japan aims to further promote business and human rights initiatives across sectors.

Subsequently, four partner companies introduced their concrete initiatives on respecting human rights. JP Research & Consulting specializes in human rights risk assessments and stakeholder engagement support, both in Japan and abroad, and assists companies' human rights due diligence through AI-driven desktop research. Regrit Partners seeks to address fundamental challenges by reviewing business structures and models, offering comprehensive support that includes the use of technology. Tokio Marine & Nichido Fire Insurance provides solutions to strengthen corporate resilience in addition to its core insurance business, developing systems that also address human rights risks. Tokio Marine dR supports companies in formulating human rights policies and conducting human rights impact assessments both domestically and internationally, while promoting global collaboration in the field of sustainability.

Finally, Okada from CRT Japan introduced a new initiative to develop human rights evaluation indicators for supervising organizations and registered support institutions. This effort was launched in response to growing inquiries from companies employing technical interns and specified skilled workers, seeking guidance on how to select appropriate support institutions. Starting this fiscal year, CRT Japan has begun developing evaluation indicators based on global standards. Out of approximately 14,000 organizations, 157 were selected to receive a questionnaire, and responses were obtained from 11. Going forward, CRT Japan aims to facilitate appropriate matching between companies and support institutions and to promote better working environments. The evaluation framework consists of five levels, from A to E, with the top 20 percent of organizations expected to have their initiatives publicly disclosed. Companies are encouraged to express their participation in this initiative and to request their partner institutions to respond to the survey.

■ Summary of Panel Discussion with Global Experts

The panel discussion centered on the EU Corporate Sustainability Due Diligence Directive (CSDDD/CS3D) and the Corporate Sustainability Reporting Directive (CSRD).

Ms. Bonny from Work Better Innovations emphasized that while monitoring the evolution of legal frameworks is important, it should not “suck all the oxygen out of the room.” She argued that rather than merely replicating European models, countries in the Asia-Pacific region should confidently develop tools and approaches tailored to their own contexts.

Mr. Nathaniel from Walk Free noted that the CS3D provides an integrated framework encompassing not only human rights but also environmental due diligence. He pointed out that other regulations, such as laws prohibiting the import of goods made with forced labor, also play an important role in shaping corporate behavior. He stressed the need to position human rights due diligence not only as a compliance requirement but as a key component of risk management that meets investor expectations and builds market trust.

Mr. Namit from the World Benchmarking Alliance stated that regulations are primarily designed for “laggards,” while true corporate leaders continue to conduct human rights due diligence based on the UNGPs regardless of

the existence of laws. He underscored the importance of sustained corporate leadership.

Mr. Neill from Ethical Impact reminded that the UNGPs place responsibilities not only on companies but also on governments. Transparent and consistent enforcement of regulations, he said, creates a level playing field for businesses.

Mr. Rishi, a business and human rights expert, explained that in India, listed companies are required to report on human rights issues, and practicing human rights due diligence enables alignment with multiple regulatory frameworks. He further stressed that in the post-COVID context of fragmented supply chains, training, dialogue, and trust-building with local partners are indispensable.

Regarding the relationship between companies and civil society, panelists agreed that NGOs and CSOs are not merely critics but valuable partners who possess on-the-ground knowledge and can help identify risks. Early engagement, before tensions arise, was seen as particularly effective. Ms. Bonnie referenced the concept of the “Middle Way,” highlighting the importance of steady improvement through sincerity and humility rather than the pursuit of perfection. Mr. Rishi reiterated the UNGPs’ “Know and Show” approach—stressing that companies should go beyond submitting reports to actively demonstrate their policies and improvement processes, maintaining ongoing dialogue with stakeholders.

In conclusion, the international experts shared a common view: rather than being driven solely by regulation, companies should pursue field-based, continuous human rights due diligence and strengthen their credibility and competitiveness through transparent dialogue and sustained practical engagement.

■ Case Studies on Business and Human Rights by Japanese Companies

Lin Chia Tan, Manager, Commodity Chemicals, Procurement-Strategic Sourcing-Raw Materials, Global, Kao Corporation

The Procurement Division of Kao Corporation presented its raw material sourcing initiative carried out in collaboration with smallholder farmers on the island of Sumatra, Indonesia, aimed at contributing to a sustainable society. Based on its 2019 Kirei Lifestyle Plan, Kao identified the procurement of sustainable raw materials as a top priority and, in 2020, launched the SMILE Program in partnership with three local companies. Over a ten-year period, the program targets approximately 5,000 smallholder households, providing technical assistance and support for obtaining RSPO (Roundtable on Sustainable Palm Oil) certification. Kao also supplies materials free of charge and purchases certification credits to further assist farmers. In 2022, with the cooperation of CRT Japan, Kao introduced a grievance mechanism for farmers, which is now being used by 390 participants. For transparency, the contents of the consultations are disclosed on a public website. Through on-site visits, dialogue, and hygiene education programs at local schools, Kao continues to build trust with communities and monitor environmental and human rights risks. These initiatives have been featured in both domestic and international media, underscoring Kao’s leadership and commitment to sustainable sourcing practices.

Kei Saito, Deputy General Manager, Corporate Planning Division, Member of the Sustainability Committee, Nissin Foods Holdings

Nissin Foods Holdings introduced its smallholder palm oil farmer support project in Sugihwaras Village, South Sumatra, Indonesia. In collaboration with CRT Japan, the local organization SPKS, and the regional government, Nissin identified key challenges through on-site visits and direct dialogue with farmers. The main

issues identified were: (1) lack of cultivation and farm management knowledge, (2) low bargaining power due to reliance on intermediaries, and (3) limited financial management skills. With support from technical experts, Nissin has been working to address these challenges and strengthen farmers' capacities. By helping smallholders obtain RSPO (Roundtable on Sustainable Palm Oil) certification, the project aims to improve productivity and profitability while contributing to the company's goal of achieving 100% sustainable palm oil sourcing. In addition, Nissin promotes responsible sourcing by conducting satellite monitoring for environmental oversight and maintaining ongoing dialogue with suppliers to better understand on-the-ground realities. The company emphasized that "it is essential not to rely solely on certification systems, but for companies themselves to visit the sites and take action," expressing its commitment to further expanding these activities in the future.

Nami Ohno, Sustainability Promotion Department, Sustainability Division, Morinaga Milk Industry Co., Ltd.

Morinaga Milk Industry Co., Ltd. has positioned respect for human rights as a core principle of its corporate management and is advancing human rights due diligence in line with international standards such as UNGPs. In June 2022, the company conducted a comprehensive human rights risk assessment covering all of its business operations, identifying six key risks related to supply chain management, foreign workers, employees, and consumers. In addition to assessments using the Sedex platform, Morinaga has been conducting on-site visits and interviews to identify and address risks. For example, at an affiliated company in Kumamoto, interviews with foreign technical interns revealed issues concerning safety and living conditions. The company took corrective action and conducted a follow-up visit to confirm improvements, which were subsequently recognized through an internal award. Furthermore, a human rights impact assessment conducted at a materials manufacturer identified challenges stemming from cultural differences and limited access to grievance mechanisms within a multinational workforce. Morinaga's procurement department has been working collaboratively to implement improvements in response. In 2022, Morinaga also joined an external grievance platform and has been strengthening both internal and external reporting systems. The company reaffirmed its commitment to prioritizing voices from the field and continuously enhancing the effectiveness of its human rights initiatives.

Yoshiyuki Asada, Program Manager, Corporate Services Div., Mazda Motor Corporation

A company-wide Human Rights Due Diligence Project Team has been established, reporting twice a year to the Management Committee and the Board of Directors. Based on guidance from CRT Japan, the company identified the improvement of working conditions for foreign workers as its top priority issue. From October to November 2023, it conducted human rights impact assessments at two component suppliers and one sales company, identifying challenges such as financial hardship, insufficient communication, and limited understanding of employment contracts. In response, the company implemented measures including multilingual signage, workload and overtime balance adjustments, and improvements to housing conditions. At its Hiroshima site, a PDCA (Plan-Do-Check-Act) cycle is being expanded by combining management and employee surveys with in-person interviews across 62 partner companies. The company has also joined an external grievance mechanism, strengthening its capacity for remedy and dialogue. Looking ahead, it plans to extend these efforts to supply chains in Thailand and Europe, further advancing responsible sourcing and stakeholder engagement in

line with international standards.

Yohei Fukuda, Manager, Leader of Personal & General Affair Group, TODA KOGYO CORP.

Toda Kogyo Corp., a Hiroshima-based chemical materials manufacturer with a 220-year history, has been advancing its initiatives with a focus on the PDCA (Plan-Do-Check-Act) cycle for human rights due diligence. In 2023, the company formulated its Human Rights Policy, identified potential risks, and set the working conditions of domestic and international workers-particularly foreign technical interns-as its top priority issue. In July 2024, with support from a third-party organization, Toda Kogyo conducted a Human Rights Impact Assessment, identifying issues such as the financial burden of living expenses, lack of signage in native languages, chemical safety education needs, availability of prayer spaces, and accessibility of consultation channels. A follow-up assessment confirmed generally high satisfaction levels after improvements were made, but also revealed variations in responses between sites and new concerns, including anxiety over hazardous tasks and requests for greater support in skill certification. The company plans to maintain ongoing dialogue with workers and conduct another follow-up in December 2024. A preliminary survey at its Thailand site has also begun, with a comprehensive activity report scheduled for release in July 2026. Toda Kogyo remains committed to deepening collaboration with expert organizations and embedding respect for human rights throughout its operations.

Yuko Tsutsui, Managing Executive Officer, Chief Executive of Sustainability & Transformation Headquarters, Nippon Yusen Kabushiki Kaisha

Nippon Yusen Kabushiki Kaisha (NYK Line) has been advancing its initiatives in line with UNGPs through a three-step approach: formulating a human rights policy, conducting human rights due diligence, and providing remedy. In 2022, the company identified key human rights risks through internal workshops with third-party organizations, including Verisk Maplecroft and CRT Japan, and prioritized five focus areas: shipbuilding, port operations, automobile logistics, ocean-going seafarers, and ship recycling. Human rights impact assessments were carried out through on-site dialogue with rights-holders, jointly with CRT Japan and local partner organizations. The findings and corrective actions were shared with suppliers and group companies, followed by monitoring and evaluation to confirm implementation progress and effectiveness after a set period. In parallel, NYK revised and publicly disclosed its Supplier Code of Conduct, approved by the Board of Directors, and strengthened transparency through its website and sustainability reports. The Sustainability Strategy Headquarters leads ongoing monitoring and reports directly to the Management Committee and the Board of Directors, ensuring governance-level oversight. In 2024, the company launched an external grievance mechanism, expanding awareness of remedy access through seafarers' meetings and other communication channels. NYK is pursuing a phased approach-starting small, sharing lessons learned, and gradually scaling up its efforts-with the goal of completing a full cycle of human rights impact assessments across all five focus areas within the fiscal year.

Shoichiro Ikebe, Executive Officer, Worlding Inc.

From the perspective of an organization supporting companies, suppliers, and supervising organizations in the employment management of foreign technical interns and specified skilled workers, the presentation reported

on on-the-ground challenges and corresponding solutions. It was noted that, rather than occupational accidents, the majority of practical risks stem from daily life issues such as harassment by neighbors, housing disputes, malfunctioning appliances, damage caused by animals, and excessive billing. There are approximately 3,700 supervising organizations, 68,000 host companies, and 450,000-500,000 technical interns nationwide, and the majority of supervising organizations were found to have an insufficient understanding of human rights. As countermeasures, efforts have focused on promoting human rights awareness within supervising organizations themselves and introducing a grievance mechanism (“NINJA”), developed in cooperation with CRT Japan. Under this system, the Assist Cooperative registered 1,600 individuals and received 20 cases within 18 months, finding that face-to-face communication and visible outreach effectively encourage reporting. In addition, an external evaluation survey of supervising organizations was launched, with responses received from 11 organizations during the May-June period and a second round scheduled for November-December. The initiative aims to enhance transparency and develop criteria for evaluating and selecting supervising organizations, thereby contributing to improved protection and support for foreign workers.

Akifumi Tomi, Corporate Sustainability, Senior Director, ANA HOLDINGS INC.

ANA Holdings Inc. has established a governance framework under the supervision of its Board of Directors, comprising a Corporate Strategy Council and an ESG Management Promotion Council. Across its 57 group companies, approximately 100 managers at the section-chief level have been appointed as ESG Promotion Leaders (EPLs), forming a unique structure to promote ESG initiatives at the operational level. Since 2015, ANA has conducted human rights due diligence with support from CRT Japan, in line with UNGPs. Building on its Human Rights Policy, the company implements a continuous three-step process: identifying actual conditions, conducting surveys among potentially affected groups, and carrying out third-party interviews. The results are promptly shared with EPLs and contractors to formulate, implement, and monitor improvement measures. ANA has also introduced the “NINJA” grievance mechanism, creating an environment in which foreign workers can raise concerns safely and confidently. In FY2023, the company focused on raising awareness of the mechanism, achieving notable progress-16 cases were received in the first half of the year, compared to zero in the previous fiscal year. One concrete case involved reports of discrimination and injury from a foreign worker at an airport contractor. The issue was addressed swiftly through fact-finding by EPLs, followed by third-party interviews and facilitated workshops, which led to relationship restoration between the parties and tangible workplace improvements. ANA emphasizes a commitment to “never leaving voices unheard” and “never letting responses lapse.” The company ensures that complainants receive continuous updates and maintains a trust-based approach to addressing human rights concerns across its operations and supply chain.

■ Discussion and Summary with Overseas Experts

In Mr. Mauricio from the Office of the High Commissioner for Human Rights (OHCHR) explained that the Office, as the custodian of UNGPs adopted in 2011, continues to support their consistent implementation both within and beyond the United Nations system. Ahead of the 15th anniversary of the UNGPs next year, he highlighted several initiatives, including the publication of a database of companies involved in activities related to occupied territories, Responsible Business Conduct (RBC) projects in Latin America and Africa, and the “B-Tech” initiative addressing human rights in the technology sector. He also

announced the upcoming launch of a free “Business and Human Rights Helpdesk” during the UN Annual Forum next month, which will provide practical guidance to companies and governments on UNGP implementation—with plans to expand its services to the Japanese language in the future.

Addressing recent developments surrounding the EU Corporate Sustainability Due Diligence Directive (CSDDD), Mauricio expressed strong concern over the removal of the risk-based due diligence approach and the weakening of civil liability provisions. He warned that if companies limit their actions only to their own operations and first-tier suppliers, they risk overlooking serious human rights abuses occurring deeper in their supply chains. He stressed that the global trend toward mandatory human rights due diligence legislation is accelerating, and aligning systems with the UNGPs, the OECD Guidelines for Multinational Enterprises, and the ILO Tripartite Declaration is the best way to ensure future compliance across jurisdictions while minimizing legal and reputational risks.

Following this, Ms. Lena Diesing from the OECD underscored that amid a proliferation of human rights and environmental due diligence regulations, international standards serve as a “compass.” The UNGPs, the ILO Tripartite Declaration, and the OECD Guidelines are mutually consistent, and compliance with one provides alignment with the others. She emphasized that the OECD Guidelines for Multinational Enterprises represent the most comprehensive global standard on Responsible Business Conduct (RBC), endorsed by 52 countries, and require both National Contact Points (NCPs) for grievance handling and a six-step risk-based due diligence process (embedding policy, identifying and prioritizing risks, prevention and mitigation, monitoring, communication, remediation).

She outlined three main categories of regulations: Disclosure laws, such as the UK and Australian Modern Slavery Acts and the EU’s CSRD; Mandatory supply chain due diligence laws, such as those in France, Germany, Norway, and the EU’s CSDDD; and Product market regulations, including the U.S. Uyghur Forced Labor Prevention Act (UFLPA) and the forthcoming EU Forced Labour Regulation.

The CSDDD, she noted, is highly consistent with the OECD’s six-step approach, meaning companies that build their systems and processes around the OECD framework will be well prepared for compliance across different legal regimes. The OECD continues to promote alignment through government dialogues and offers practical resources such as sector-specific guidance, materials in Japanese, and the Asia RBC Programme.

CRT Japan highlighted the growing complexity of global regulatory frameworks and urged Japanese companies to engage practically with rights-holders in accordance with the UNGPs and OECD Guidelines. Ms. Diesing agreed, emphasizing that the OECD’s six-step due diligence framework explicitly includes stakeholder engagement and participation in remediation, and that sectoral guidance, such as for the minerals industry can be utilized.

Mr. Mauricio further noted that meaningful progress requires a “smart mix” of voluntary and mandatory measures, as well as domestic and international, judicial and non-judicial mechanisms. He explained that voluntarily aligning with international standards gives companies a strategic advantage as regulations evolve - enhancing their competitiveness in investment, recruitment, and procurement, while reducing risks related to reputation, litigation, and business interruption. He added that companies themselves know their

value chains best, and that a risk-based approach allows them to exercise leadership in prioritizing issues.

In conclusion, both experts reaffirmed the practical importance of preparing based on international standards, positioning such efforts as the most effective and forward-looking strategy for companies navigating an increasingly complex global regulatory landscape.

■ Closing Remarks

Hiroshi Ishida, Executive Director, Caux Round Table Japan

It was emphasized that for Japanese companies to advance human rights due diligence and grievance mechanisms in a practical and meaningful way, it is essential to build progress through incremental improvements grounded in dialogue with people on the ground. While achieving internal consensus can be challenging, engaging multiple departments and addressing issues one by one at the operational level helps establish a strong foundation for the entire organization. The risk-based approach, it was noted, should not remain a theoretical exercise but rather a mechanism for detecting problems early through human-to-human dialogue and implementing preventive measures before risks escalate. Furthermore, it was highlighted that human rights due diligence and grievance mechanisms should not be treated as separate processes but pursued simultaneously to foster trust and credibility. Such steady, ongoing engagement was described as key to reducing companies' reputational risks and strengthening resilience. CRT Japan reaffirmed its commitment to supporting Japanese companies in this journey-helping them deepen their practical implementation of these processes in good faith and in alignment with international frameworks such as the OECD Guidelines for Multinational Enterprises.