

# Human Rights

## Basic Approach

The TOPPAN Group conducts its business activities based on the spirit of “respect for human beings,” and regards human rights as a paramount principle guiding its business activities and sustainability initiatives. The TOPPAN Group Human Rights Policy based on this fundamental tenet was formulated in October 2021. Respect for human beings, or more specifically respect for human rights, is required as the first behavioral norm set under the TOPPAN Group Conduct Guidelines. Basic Principle 1 of the guidelines includes protecting individual dignity, prohibiting discrimination and harassment, prohibiting child labor and forced labor, and promoting diversity and inclusion.

We have also been taking measures to avoid human rights violations that might adversely affect the lives of people living near Group sites in the course of business. Our environmental conservation initiatives, for example, are promoted based on the TOPPAN Group Declaration on the Global Environment and the Basic Policy on Biodiversity.

## Supporting Human Rights Principles under the UN Global Compact

TOPPAN has been participating in the United Nations Global Compact and therefore supporting its six principles of human rights and labour since 2006.

WE SUPPORT



## TOPPAN Group Human Rights Policy

From our very beginnings, we have leveraged our printing technologies to provide solutions to wide-ranging social issues in an unstinting effort to transcend the boundaries of the printing business by responding to the needs of people and of the times. The underlying tenet for these endeavors is respect for human beings. The TOPPAN Group Human Rights Policy is an expression of our commitment to respecting human rights across Group operations as TOPPAN grows as a creator of social value.

### The Structure of the TOPPAN Group Human Rights Policy

1. Our Approach to Human Rights
2. Scope of Application
3. Compliance with Applicable Laws and Regulations
4. Responsibility to Respect Human Rights
5. Human Rights Due Diligence
6. Stakeholder Engagement
7. Remedy
8. Education and Training
9. Management Responsibility for Human Rights
10. Information Disclosure

#### Approach to Individual Issues

- Child Labor, Forced Labor, and Human Trafficking
- Discrimination and Harassment
- Diversity & Inclusion
- Right to Collective Bargaining and Freedom of Association
- Occupational Safety and Health
- Right to Privacy

TOPPAN Group Human Rights Policy >

<https://www.holdings.toppan.com/en/about-us/our-corporate-approach/human-rights-policy.html>

## Governance

### Promotion Framework

The TOPPAN Group Human Rights Policy states that the Board of Directors supervises the TOPPAN Group's human rights efforts, while the head of the Personnel & Labor Relations Division oversees their implementation. The Board of Directors assigns responsibility for human rights efforts to the Sustainability Promotion Committee chaired by the president & representative director, and the Human Capital Working Group (responsible for human rights themes and overseen by the Personnel & Labor Relations Division and a supervising executive) under the Corporate ESG Project leads the initiatives. The Personnel & Labor Relations Division, Legal Division, Manufacturing Management Division, and other departments work together to promote human rights efforts throughout the TOPPAN Group.

The Board of Directors receives an annual report from the Management Committee on important matters and issues regarding respect for human rights, as discussed and deliberated on by the Sustainability Promotion Committee, and discusses, monitors and supervises the setting and progress of targets related to those efforts.

In the event of any issues related to human rights (such as occupational accidents, fires or incidents of harassment), the Board of Directors receives reports—including responses from the relevant divisions—and discusses appropriate actions.

## Strategy and Measures

Based on the TOPPAN Group Human Rights Policy, we are promoting the identification of negative human rights impacts through human rights due diligence, activities to remedy and mitigate negative impacts, and initiatives for specific issues, while also fostering awareness among employees through education.

## Human Rights Due Diligence

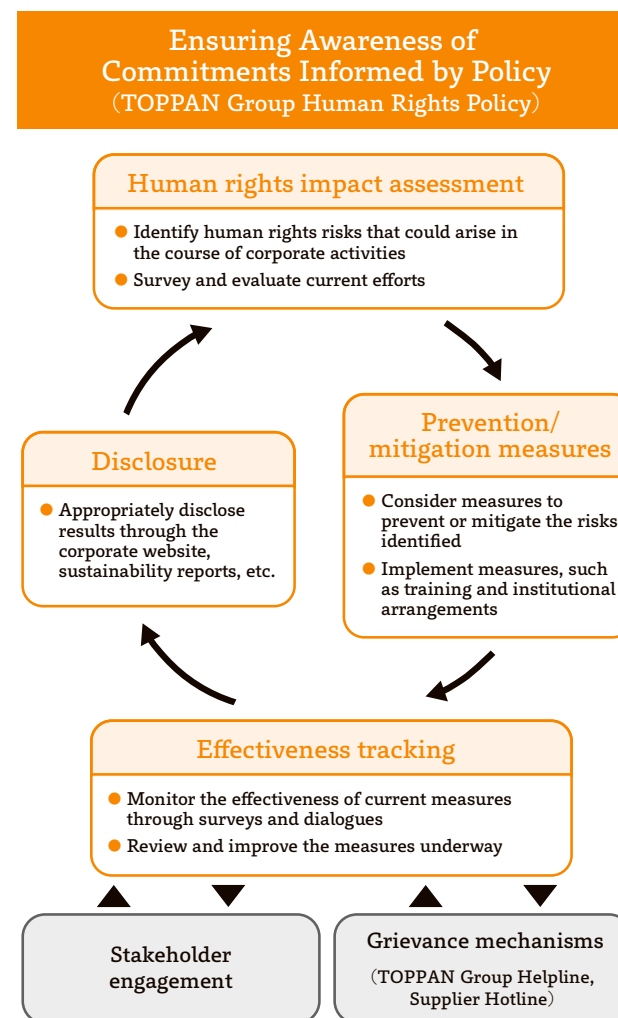
The TOPPAN Group supports the United Nations Guiding Principles on Business and Human Rights and recognizes the need for due diligence to ensure human rights. For risk assessments, we endorse international human rights standards such as the International Bill of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and conventions on workers' rights regarding wages, working hours, and other matters, and have established a human rights due diligence system drawing on this perspective. With the formulation of the TOPPAN Group Human Rights Policy in fiscal 2021, we identified and assessed human rights risks in the industry and identified five human rights risks (forced labor and human trafficking, discrimination, inhumane treatment, right to privacy, and Groupwide human rights governance).

📄 Identification of Human Rights Risks (see page 38) >

The TOPPAN Group recognizes that the occurrence of human rights risks can lead to management risks such as reputation, legal and financial risks. Focusing on the five human rights risks we identified, we conduct human rights risk assessments not only for our company but also for our Group companies in Japan and overseas and throughout our supply

chain, and we are taking steps to mitigate and remedy these. The human rights due diligence process follows the PDCA cycle, and the results of investigations and analyses are reported to both the Board of Directors and the Sustainability Promotion Committee, where future initiatives are discussed.

### Human Rights Due Diligence Process



## ● Human Rights Due Diligence Results

In response to the formulation of the TOPPAN Group Human Rights Policy in fiscal 2021, the TOPPAN Group conducted human rights risk assessments of Group companies in Japan and overseas in fiscal 2022 and fiscal 2023. We distributed original feedback sheets that included risk reduction measures to all companies participating in the human rights risk surveys (178 companies in fiscal 2022 and 172 in fiscal 2023). Based on these feedback sheets, each company has taken steps to correct and mitigate risks identified through the human rights risk assessments, thus implementing the human rights due diligence process. Going forward, the human rights risk assessment will generally be conducted every other year. In fiscal 2024, we carried out a human rights risk analysis for the TOPPAN Group based on the human rights due diligence results of the past two years. We also provided guidance on corrective and mitigating measures to 23 companies for which past assessments identified items that could negatively impact human rights. We have also pursued multifaceted initiatives to correct and mitigate risks related to human rights, including education on human rights, development of advisors to prevent harassment, and efforts to ensure payments of appropriate wages.

Drawing on the results of analysis, in fiscal 2025 we plan to organize another human rights risk assessment for the entire TOPPAN Group. We will continue our efforts for ensuring respect for human rights and aim to eliminate categories C and D, as uniquely defined by the TOPPAN Group, through ongoing initiatives.

\*About categories  
 • Number of applicable Red Flag questions  
 • Number of applicable questions about human rights risks  
 • Implementation rate of human rights risk mitigation measures  
 • Human rights risk index based on region and industry  
 Categories A–D are determined based on the above four criteria. The human rights due diligence process is implemented with category D given the highest priority for follow-up.

## Trends and status of human rights risk assessment results over the past 2 years

- (1) Assessment method: Assessment using human rights risk questionnaire
- (2) Assessment content: 4 categories, 22 items, 149 questions
 

1. Basic Information  
 Company basic information, business-related information, employee information, contractor information, certifications and participation in initiatives

2. Human Rights Due Diligence System  
 Due diligence system, dissemination of human rights policy, performance of human rights-related training

3. Addressing Human Rights Issues  
 Forced labor, child labor, appropriate work hour management, payment of an appropriate wage, prohibition of discrimination, prohibition of inhumane treatment, freedom of association and the right to collective bargaining, right abuses in local communities, ensuring safe and healthy workplaces for all employees, privacy

4. Management  
 Stakeholder engagement, internal reporting channels, external grievance mechanism, supply chain management
- (3) Trends in assessment results

Evaluation	Fiscal 2022	Fiscal 2023	Change
Risk Category A	67	114	+47
Risk Category B	49	34	-15
Risk Category C	45	21	-24
Risk Category D	17	3	-14
Total Number of Companies	178	172	-6

- (4) Analysis of assessment results
 

• With education and guidance for Group companies on corrective and mitigating measures, the Group’s overall approach to human rights issues improved over the two years.

• There is a relative need for further improvement regarding initiatives for “occupational safety and health,” “harassment” and “privacy protection.”

• “Supply chain management” showed improvement over the two years, but there remains room for improvement in communicating and engaging in dialogues about our policies and conducting human rights risk assessments.
- (5) Overview of follow-up guidance
 

• Dissemination and understanding of each company’s issues based on feedback sheets

• Public communication of our commitment by posting the human rights policy on our website

• Sharing information on TOPPAN Holdings’ system and guidance on strengthening the human rights promotion and management system

• Sharing human rights-related educational tools and publicizing education content throughout the Group
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## Grievance Mechanism

Upon detecting a negative human rights impact caused or worsened by the Group's business, we will work to remedy the issue through appropriate means. If the negative impact is directly linked to our activities through business relationships, we will work with relevant stakeholders to fulfill our role in remediation.

The TOPPAN Group Helpline is as an internal reporting system for Group employees to use when human rights infringement is suspected or discovered. The Supplier Hotline is open to business partners for anonymous reporting of related matters.

 TOPPAN Group Helpline (see page 169) >

 Supplier Hotline >

<https://www.holdings.toppan.com/en/about-us/our-corporate-approach/supplier-hotline.html>

## Issues and Responses

As a result of our human rights due diligence process, no serious risks requiring urgent action were identified in the Group. Regardless, human rights risks of comparative concern include “occupational safety and health,” “privacy protection,” “harassment,” and “supply chain management,” and we are implementing the following measures for each.

### Occupational Safety and Health

Based on the TOPPAN Group Basic Policy on Safety, Health, and Fire Protection, safety masters, safety personnel and other safety experts have been deployed to operational sites across Japan. We organize comprehensive safety training for all Group employees, both regular and contract hires. The training ranges from safety programs for forepersons to risk

assessment courses to enhance intrinsic equipment safety. We also implement checks and improvements for chronically or persistently long working hours at each site, using related information and countermeasures. We implement measures to reduce overtime work, such as alerts to employees and supervisors, automatic lights-off, and automatic PC shutdowns.

### Privacy Protection

As an industry handling information, we comply with our personal information protection policies to appropriately manage and protect personal information throughout the Group.

### Harassment

Based on an agreement on harassment prevention, we are enhancing systems and initiatives throughout the Group, providing harassment prevention education to all employees, and establishing support and prevention frameworks, including harassment counselors at each site.

### Supply Chain Management

The Corporate ESG Project's Supply Chain Management Working Group has established a framework to reinforce initiatives, and we are working to expand and implement our Sustainable Procurement Guidelines throughout the Group.

## Labor Rights

### ● Labor-Management Initiatives for Human Rights

We have a labor agreement on human rights with the Toppan Printing Labour Union to promote stable labor-management relations, maintain and improve working conditions, and ensure corporate concord by establishing a fundamental approach, the rules governing union activities and labor-management negotiations, and employment conditions pertaining to wages, working hours, etc. The union includes members from eight consolidated subsidiaries and has concluded binding elements of the labor agreement (union activities, negotiation rules, etc.) with common content across those companies. For other consolidated subsidiaries, we strive for appropriate labor-management relations through close information sharing and commit to protecting workers' human rights.

### ● Providing an Open Recruitment Environment

We recruit diverse human assets regardless of nationality, gender, age, or disability by delivering information on TOPPAN to a broad range of people through company presentations, websites, and other media.

Personnel who interview applicants receive a manual and thorough training on fair recruitment practices. Inappropriate interview questions are listed to ensure interviewers avoid topics that could constitute employment discrimination. We take comprehensive steps to protect human rights during recruitment, with interviewers being required to sign written pledges on the handling of personal information.

## ● Properly Operating Technical Internship Programs

Head office personnel collaborate with local general affairs staff in a survey conducted to assess human rights risks for foreign technical interns working at Group sites across Japan. The survey teams used our original check sheets to verify living and working conditions for interns and whether internship programs are run in accordance with the requirements stipulated by the Ministry of Health, Labour and Welfare of Japan. We confirmed that technical internship programs were run at three plants operated by two of our manufacturing subsidiaries in Japan as of fiscal 2024.

The survey also confirmed that the employment contracts of foreign interns were explained in their native languages or languages they could understand; that there were no cases of unpaid wages or long overtime hours; that appropriate wages were paid in accordance with hours worked; and that living conditions provided to interns were comparable to those provided to our employees.

## ● Paying Appropriate Wages

TOPPAN pays appropriate wages to Group employees by considering local living costs and observing minimum wages set under the laws and regulations of each country or region. In addition to monetary remuneration and welfare and benefits legally required, we offer non-monetary support such as programs for enhanced job satisfaction, self-actualization, and career development.

The Company's remuneration system is based on the individual's competencies and roles and imposes no differential standards based on gender. Remuneration is also determined uniformly across Group companies in Japan based on similar criteria. On the other hand, while there is a certain gender wage gap among actual workers, this is due to differences in





age composition, job grade structure, a relatively high proportion of female workers utilizing shortened working hours for childcare, and differences in the ratio of management class employees. To improve this, we have highlighted “Human Capital and Diversity” as one of the initiatives in our Medium Term Plan, set increasing the ratio of female management class employees as a KPI, and are prioritizing efforts to address this as a key management issue. In fiscal 2023, based on analysis of internal survey results that visualized key issues, executives held discussions and announced a “D&I Action Declaration,” and each department established D&I promotion measures in

### Average Annual Salary

	Average Annual Salary
Fiscal 2020	6,775,518 yen
Fiscal 2021	7,001,363 yen
Fiscal 2022	7,060,291 yen
Fiscal 2023	7,568,204 yen
Fiscal 2024	8,167,997 yen

\*Covers Toppan Inc. up to fiscal 2022 and TOPPAN Holdings Inc. from 2023.

### Gender Pay Gap at the TOPPAN Group

Company	Percentage of Women in Managerial Positions	Wage Disparity between Male and Female Employees (Average Female Wage / Average Male Wage) in Fiscal 2024			
		All Employees	Regular Employees		Part-time and Contract Employees
			All Regular Employees	Managers	
TOPPAN Holdings Inc.	15.0%	78.7% 	77.6% 	96.9% 	56.8% 
TOPPAN Holdings Inc. and its consolidated subsidiaries in Japan	7.8%	59.7%	73.3%	96.5%	55.4%
Consolidated subsidiaries in Asia (excluding Japan)	27.6%	87.8%	90.1%	85.6%	125.2%
Consolidated subsidiaries in North America	27.0%	89.9%	92.0%	86.6%	74.4%
Consolidated subsidiaries in Europe	34.5%	87.9%	87.7%	71.1%	83.7%
TOPPAN Holdings Inc. and its consolidated subsidiaries worldwide	12.9%	65.6%	75.3%	99.0%	61.3%

\*Calculated based on the provisions of the Japanese Act on the Promotion of Female Participation and Career Advancement in the Workplace (Act no. 64 of 2015). The calculation method applied to overseas affiliates conforms to the standards presented in the act.  
 \*\*“Wages” include wages, salaries, allowances, and any other payments (whatever they are called) paid by the employer to workers as compensation for their labor.  
 \*The totals for “TOPPAN Holdings Inc. and its consolidated subsidiaries worldwide” are tabulated from the weighted averages reported by TOPPAN Holdings Inc. and its overseas subsidiaries. Those for overseas subsidiaries have been converted into Japanese yen using the rate as of March 31, 2025.  
 \*The “Wage Disparity between Male and Female Employees” is calculated for the business year at each company, which may differ from the business year of TOPPAN Holdings.

● Starting Salary at TOPPAN Inc.

The starting salary of new university graduates hired on April 1, 2025 was 250,000 yen (1,569 yen per hour) uniformly throughout Japan.

Starting Salary of New University Graduates (TOPPAN Inc.)

	Starting Salary
Fiscal 2021	213,000 yen
Fiscal 2022	214,500 yen
Fiscal 2023	222,500 yen
Fiscal 2024	233,500 yen
Fiscal 2025	250,000 yen

Human Rights Training and Harassment Prevention

TOPPAN organizes diverse forms of human rights training for Group employees based on a fundamental ethos of respect for human beings. We are fostering and promoting a culture of respect for human rights by raising overall awareness of the human rights risk assessment throughout the Group and sharing best practices. In addition to promoting understanding of the basic approach to respect for human rights, we conduct annual training for all employees to enhance their understanding of the individual issues identified in the assessment (including harassment, diversity & inclusion, and occupational safety and health), and thoroughly inform employees about specific actions for respecting human rights.

For harassment in particular, while new managers and supervisors have been given training on human rights issues focused on harassment prevention for some time, we are running a program for the prevention of workplace harassment covering all Group employees (under the harassment prevention agreement reached with the Toppan Printing Labour Union in April 2020). Personnel & labor relations departments across the Group, meanwhile, have set up consultation desks to manage workplace harassment. The departments train counselors on methods to prevent harassment and strictly deal with every case. If any form of harassment comes to light, the departments will investigate the case appropriately, mainly through interviews with the parties involved, and strive to resolve the matter promptly through measures such as corrective or disciplinary actions against the persons responsible.

The Conduct Guidelines Promotion Leaders also present case studies on human rights issues as a means of disseminating the Conduct Guidelines at their assigned workplaces and enhancing the understanding of human rights across the Group.



## Risk Management

Risks related to human rights are identified in “Business and Other Risks,” which outlines the major risks associated with the TOPPAN Group, and are incorporated into comprehensive risk management.

(For details on risk management related to sustainability risks, see section 2 of the Securities Report [issued in Japanese])

### Identification of Human Rights Risks

The first step of the human rights due diligence process is identifying human rights risks. We have categorized human rights issues by prioritizing human rights risks as they relate to the characteristics of our businesses, competitor trends, and international human rights standards. As a result, we have identified the human rights risks of the TOPPAN Group as “forced labor and human trafficking,” “discrimination,” “inhumane treatment,” “right to privacy,” and “Groupwide human rights governance.”

Based on the above approach, we conduct investigations and interviews with TOPPAN Group stakeholders (including domestic and international Group companies and supply chains) to gain an understanding of current circumstances and promote improvement activities. As part of the due diligence process associated with mergers, management integration, and joint venture formulation, TOPPAN also conducts a risk assessment of human rights issues such as inhumane treatment, freedom of association, and occupational safety and health management. Any entity joining the TOPPAN Group is also subject to this risk assessment and required to take steps to mitigate and prevent any risks identified. Going forward, we will continue to implement the human rights due diligence process with our

stakeholders, including onsite assessments, and promote efforts to identify human rights risks.

#### Identifying Human Rights Risks in the Printing Industry

Human Rights Issue	TOPPAN Employees	Supply Chain	Customers	Users	Communities
Forced labor / Human trafficking	Medium	High	—	—	—
Child labor	Low	Low	—	—	—
Discrimination	High	High	—	—	—
Inhumane treatment	Medium	High	—	—	—
Freedom of association / Right to collective bargaining	Low	High	—	—	—
Working hours	Low	High	—	—	—
Wages	Low	High	—	—	—
Right to privacy	High	High	High	High	—
Ethical/responsible marketing	—	—	Low	Low	—
Freedom of expression	—	—	High	Medium	—
AI and human rights	—	—	Low	Low	—
Product safety and quality	—	—	Low	Low	—
Health of local residents	—	—	—	—	Medium
Sanitation of soil, water, etc.	—	—	—	—	Medium
Rights of Indigenous people	—	—	—	—	Low

\*We have categorized human rights issues by prioritizing human rights risks as they relate to the characteristics of our businesses, competitor trends, and international human rights standards. Five core human rights risks facing us have been identified through the process: the **four risks shown above in red** and “Groupwide human rights governance” (not shown in the list).