

Human Rights

Basic Approach

Approach Policy

The TOPPAN Group regards human rights as a paramount principle guiding its business activities and sustainability initiatives.

We continue to operate our business under the foundational tenet of “respect for human beings.” A TOPPAN Group Human Rights Policy based on this 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.



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

More details on the TOPPAN Group Human Rights Policy >

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

Promotion Framework

Framework

TOPPAN has established a Groupwide framework for promoting human rights initiatives led by the Human Capital Working Group under the supervision of the Corporate ESG Project, a cross-divisional team that drives sustainability activities under the Sustainability Promotion Committee chaired by the president & representative director. The Board of Directors supervises key human rights efforts, while the head of the Personnel & Labor Relations Division oversees their implementation. The Personnel & Labor Relations Division, Manufacturing Management Division, and Legal Division steer day-to-day human rights activities in collaboration with related departments throughout the Group.

More details on the Corporate ESG Project (see page 10) >

Human Rights Due Diligence

Approach Activity results, performance data

TOPPAN supports the United Nations Guiding Principles on Business and Human Rights and recognizes the need for due diligence to ensure human rights. We have clarified and evaluated human rights risks in the printing industry and identified five risks specific to us, in accordance with the recently formulated TOPPAN Group Human Rights Policy.

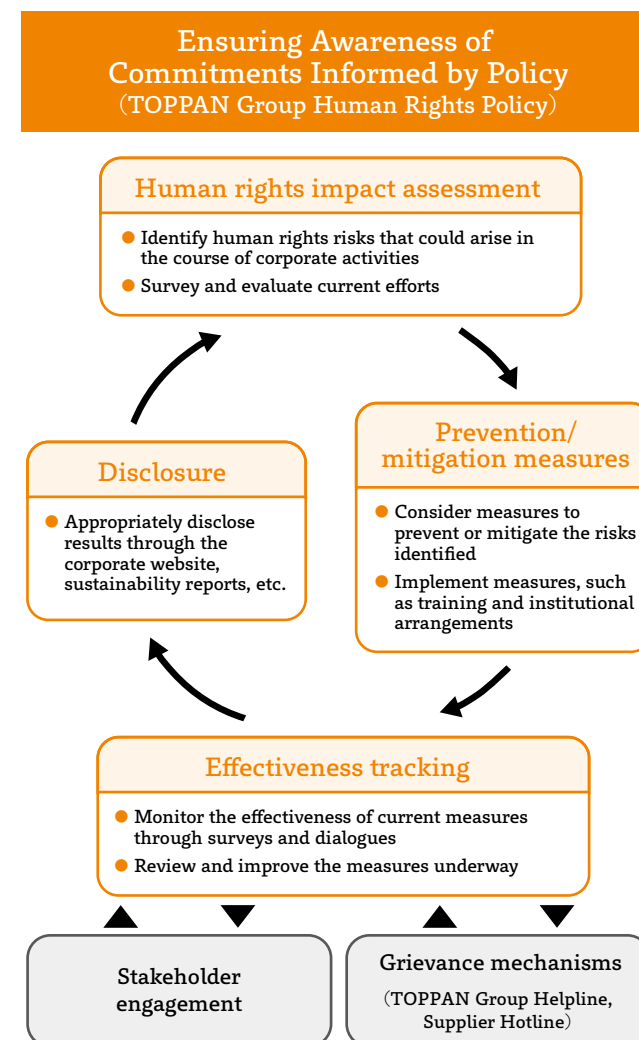
In fiscal 2023 we assessed our stakeholders with a focus on the five risks identified. The human rights risks at 72 Group companies in Japan and 100 Group companies overseas were analyzed based on written reports issued by those companies. Onsite assessments, meanwhile, were performed to investigate

the actual human rights situations in eight Japan-based companies and one company overseas. We also organized onsite assessments of business partners in the supply chain based on the results of self-assessment questionnaires we asked them to complete. Group companies and business partners were provided with feedback on issues with higher risk potential and proposals on risk mitigation and corrective measures. The Board of Directors and the Sustainability Promotion Committee deliberated future initiatives based on the assessment results.

TOPPAN continued to participate in the Human Rights Due Diligence Working Group and the Human Rights Education Working Group organized by the Global Compact Network Japan, in fiscal 2023. We have gained a comprehensive view of the human rights issues faced in Japanese and international

societies and the initiatives launched by companies at the forefront of human rights efforts.

Human Rights Due Diligence Process












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 "human rights governance across the Group" (not shown in the list).

Results of Human Rights Due Diligence

Fiscal 2023 Human Rights Risk Assessment at the TOPPAN Group

| | Japan | Overseas |
|---|---|---|
| Assessment targets | 72 companies | 100 companies |
| Assessment period | July to December 2023 | October 2023 to March 2024 |
| Assessment method | Assessment using a human rights risk questionnaire | |
| Assessment content | 4 categories, 22 sections, 149 questions | |
| | 1. Basic Information | 2. Human Rights Due Diligence System |
| | 1A. Company basic information | 2A. Due diligence system  |
| | 1B. Business related information | 2B. Dissemination of human rights policy |
| | 1C. Employee information | 2C. Performance of human rights related training |
| | 1D. Contractor information | |
| | 1E. Certifications and participation in initiatives | |
| | | 3. Addressing Human Rights Issues |
| | | 3A. Forced labor and human trafficking  |
| | | 3B. Child labor  |
| | | 4. Management |
| | | 4A. Stakeholder engagement |
| | | 4B. Internal reporting channels |
| | | 4C. External grievance mechanism |
| | | 4D. Supply chain management |
| | | 3D. Payment of an appropriate wage |
| | | 3E. Prohibition of discrimination  |
| | | 3F. Prohibition of inhumane treatment  |
| | | 3G. Freedom of association and the right to collective bargaining  |
| | | 3H. Right abuses in local communities |
| | | 3I. Ensuring safe and healthy workplaces for all employees  |
| | | 3J. Privacy  |
| | *Red Flags() indicate significant risk factors and the non-implementation of risk mitigation measures for five areas of the core ILO labor standards (forced labor, child labor, discrimination, freedom of association and right to collective bargaining, and occupational health and safety) and the five human rights issues identified by TOPPAN (forced labor and human trafficking, discrimination, inhumane treatment, right to privacy, Groupwide human rights governance). | |
| Result (Overall evaluation) | • No significant risks requiring urgent actions were identified, and year-on-year improvements in risk control were confirmed. | • No significant risks requiring urgent actions were identified, and year-on-year improvements in risk control were confirmed. |
| Results (Human rights due diligence system) | • Particular improvements in addressing insufficiencies in the human rights risk management system covering the supply chain were confirmed. • Improvements in organizing human rights training were confirmed. | • Improvements in the internal system for human rights risk management were confirmed, although insufficiencies in supply chain management were a remaining concern. • Improvements in organizing human rights training were confirmed. |
| Results (Addressing human rights issues) | • Insufficient occupational safety and health management was a remaining concern. • Multiple incidents of harassment, etc. were reported in the previous year, but appropriate measures (incl. disciplinary measures) were reliably taken at the time of occurrence. | • Insufficient occupational safety and health management was a remaining concern. • Privacy risks are prevalent in many companies that operate businesses requiring the handling of personal information of customers, though comprehensive risk mitigation measures have been reliably implemented. |
| Results (Management) | • Improvements in addressing insufficient communication with external stakeholders were confirmed, though continuous efforts for further improvements will be required going forward. • Failures in fully informing business partners of Group policies and in sufficiently assessing human rights risks in the supply chain were pointed out as concerns. | • Insufficient communication with external stakeholders was a remaining concern. • Insufficient establishment of an external grievance mechanism was a remaining concern. • Failures in informing business partners of Group policies and in assessing human rights risks in the supply chain were a remaining concern. |

Follow-up Assessments

No significant risks requiring urgent actions and no violations of local laws/regulations or international norms were identified in a detailed analysis of the human rights risk assessment carried out in the previous year. Based on the analysis results, we have selected Group companies that appear to be at a higher risk of negatively impacting human rights. The following countermeasures were implemented during fiscal 2023 at eight designated companies in Japan and at one company overseas. TOPPAN will continue to address the identified issues in fiscal 2024.

| | Japan | Overseas |
|------------------------------------|---|---|
| No. of sites | 8 companies | 1 company |
| Assessment period | October-December 2023 | March 2024 |
| Assessment methods | Onsite assessment, etc. | Onsite assessment, etc. |
| Concerns | 1) Insufficiencies in the human rights management system covering the supply chain 2) A failure to implement sufficient human rights training in some companies | 1) Insufficient occupational safety and health management in some areas 2) Insufficient information security management in some areas 3) Insufficient dissemination of the internal reporting system |
| Mitigation and corrective measures | 1) Guidance to the companies on the reinforcement of their human rights management systems through the provision of information on the supply chain management system implemented at TOPPAN Holdings 2) Reinforced human rights training; Groupwide dissemination of training programs | 1) Guidance on taking immediate countermeasures for the issues identified 2) Information on best practices in information security management; guidance on how to implement them 3) Guidance on the implementation of employee training |

Grievance Mechanism

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

The TOPPAN Group Helpline has been established as an internal reporting system to be used by Group employees when an infringement of human rights is suspected or discovered. We also operate a Supplier Hotline open to business partners for the anonymous reporting of related matters.

 More details on the TOPPAN Group Helpline (see page 151) >

 More details on the Supplier Hotline (see page 63) >

Human Rights Training and Harassment Prevention

Training, education

TOPPAN organizes diverse forms of human rights training for Group employees based on a fundamental ethos of respect for human beings.

While new managers and supervisors have been given training on human rights issues focused on harassment prevention for some time, we have also introduced 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.

Labor Rights

Approach System Activity results, performance data

Labor-Management Initiatives for Human Rights

TOPPAN undertakes various labor rights measures based on a basic policy arising from an agreement reached through consultation with the labor union and other stakeholders.

The agreement promotes stable labor-management relations, maintains and improves working conditions, and secures the corporate concord by establishing a fundamental approach between labor and management, the rules governing union activities and labor-management negotiations, and employment conditions pertaining to wages, working hours, etc.

Developing Appropriate Working Conditions

TOPPAN convenes labor-management committees every month to review the actual working hours of employees and discuss measures to regulate them at each Group site. The committees check and take steps to ameliorate cases of long working hours occurring either chronically or over extended periods. The measures for reducing overtime work range from direct communications, such as the sending of alerts to employees and

their superiors through our work management system, to environmental adjustments, such as scheduled shutdowns for PCs and office lighting.

We also strive to adapt to the “new normal” in the post-pandemic world and develop appropriate working conditions that support the autonomy of individual employees on all fronts. Smart work and remote work systems have been introduced throughout the Group, along with smart devices that can be used in the same ways inside and outside of office environments.

Securing Occupational Safety and Health

Safety masters, safety personnel, employees in charge of engineering and safety, and other safety experts have been deployed to operational sites across Japan under the safety promotion framework of the Group. TOPPAN organizes safety training for all Group employees, both regular and contract hires, as prescribed by the Basic Policy on Safety, Health, and Fire Protection, a policy that prioritizes safety over all other considerations. Training content is extensive, including safety programs mainly for forepersons as well as the enhancement of intrinsic safety for machines and equipment through risk assessment. *Anzen Dojo* safety-training facilities outfitted to simulate and alert employees to workplace hazards are operated at seven Group sites around the world. A cumulative total of 39,968 persons have received *dojo* training since the facilities opened as part of an ongoing effort to refine Groupwide safety promotion activities for the prevention of occupational accidents. We also work with industrial physicians and the TOPPAN Group Health Insurance Union to promote prevention-focused healthcare activities aimed at securing workplaces free of mental health problems.

Pursuing Diversity and Inclusion

We position diversity and inclusion initiatives as a critical management strategy to further advance our progress as a group of corporations that create social value. Constant dialogue and heightened awareness have been facilitated to ensure mutual respect and create psychologically safe workplaces where every person can speak and act with dignity and without inhibition. TOPPAN provides employees with support systems to balance their work with childcare and nursing care burdens, promote the employment of people with disabilities, and take positive action to assure gender-equal treatment. These measures have led to increases in the percentage of persons with disabilities in the workforce and the number of female managers and supervisors.

We also implement various gender and sexual diversity (SOGI* and LGBTQ+) initiatives to incentivize every employee to create inclusive environments in which all persons can feel at ease. In addition to holding seminars open to employees across the Group, the TOPPAN ALLY initiative has been organized to encourage employees to express their alliance with sexual minorities. A system has also been introduced to extend the benefits granted to employee spouses to same-sex and/or common-law partners.

*Sexual orientation and gender identity

Paying Appropriate Wages





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

salary at TOPPAN Holdings Inc. was 7.56 million yen in fiscal 2023. The Company's remuneration system for determining employee wages is based on the individual's competencies and roles and imposes no differential standards based on gender. Remuneration is also determined uniformly across the Group companies in Japan based on similar criteria. The 2024 self-assessment of our remuneration systems has confirmed that the fiscal 2023 salaries paid to the employees of TOPPAN Holdings and its Group companies in Japan exceeded the living wages outlined in the *2021 RENGU Living Wage Report** and the

RENGO Living Wage list (2023 simplified revision) from the Japanese Trade Union Confederation (RENGO).

*The "RENGO Living Wage" is a unique calculation prepared by RENGU to estimate the basic cost that workers require to live healthy and cultured lives while maintaining their readiness to work and social dignity. The living wage is the minimum wage required to cover a worker's taxes, social insurance premiums, automobile-related expenses, and expenditures on 10 essential items: 1) food, 2) housing, 3) utilities and water, 4) furniture and household utensils, 5) clothing and footwear, 6) health and medical expenses, 7) transport and communication expenses, 8) educational expenses, 9) culture and entertainment expenses, and 10) other expenses (i.e., social activities, pocket money).

Gender Pay Gap at the TOPPAN Group

| Companies | Percentage of Women in Managerial Positions | Wage Disparity between Male and Female Employees (Average Female Wage / Average Male Wage) in Fiscal 2023 | | | |
|--|---|--|---|---|---|
| | | All Employees | Regular Employees | | Part-time and Contract Employees |
| | | | All Regular Employees | Managers | |
| TOPPAN Holdings Inc. | 11.4% | 75.8%  | 75.3%  | 99.1%  | 50.0%  |
| TOPPAN Holdings Inc. and its consolidated subsidiaries in Japan | 6.6% | 60.3% | 72.7% | 95.3% | 53.9% |
| Consolidated subsidiaries in Asia (excluding Japan) | 27.7% | 81.2% | 79.5% | 87.9% | 125.1% |
| Consolidated subsidiaries in North America | 32.4% | 88.7% | 89.6% | 74.1% | 77.7% |
| Consolidated subsidiaries in Europe | 34.2% | 87.7% | 86.9% | 77.2% | 110.1% |
| TOPPAN Holdings Inc. and its consolidated subsidiaries worldwide | 12.3% | 65.5% | 72.8% | 98.3% | 63.0% |

*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, 2024.

*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.

Average Annual Salary

| | Average Annual Salary |
|-------------|-----------------------|
| Fiscal 2019 | 6,811,464 yen |
| Fiscal 2020 | 6,775,518 yen |
| Fiscal 2021 | 7,001,363 yen |
| Fiscal 2022 | 7,060,291 yen |
| Fiscal 2023 | 7,568,204 yen |

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

Starting Salary at TOPPAN Inc.

The starting salary of new university graduates hired on April 1, 2024 was 233,500 yen (1,465 yen per hour) uniformly throughout Japan.

Starting Salary of New University Graduates (TOPPAN Inc.)

| | Starting Salary |
|------------|-----------------|
| April 2020 | 211,000 yen |
| April 2021 | 213,000 yen |
| April 2022 | 214,500 yen |
| April 2023 | 222,500 yen |
| April 2024 | 233,500 yen |

Providing an Open Recruitment Environment

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

Personnel who interview applicants receive a recruitment manual and thorough training on fair selection practices. Questions deemed to be inappropriate in an interview setting are listed in the manual to ensure that the interviewers avoid any topics that could constitute employment discrimination. Our steps to protect the human rights of applicants during the recruitment process are comprehensive. The interviewers, for example, are required to sign written pledges regarding the handling of personal information.

Properly Operating Technical Internship Programs

Head office personnel collaborate with local general affairs staff in a fact-finding survey conducted to assess human rights risks for foreign technical interns working at TOPPAN Group sites

across Japan. The survey teams used our original check sheets to verify the actual living and working conditions for the interns and whether the internship programs were being run in accordance with the requirements stipulated by the Ministry of Health, Labour and Welfare of Japan. We confirmed that technical internship programs had been introduced at five plants operated by two of our manufacturing subsidiaries in Japan as of fiscal 2023.

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

Identifying Human Rights Risks in New Businesses

As part of the due diligence process associated with mergers, management integration, and joint venture formulation, TOPPAN 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 Group is subject to this risk assessment and required to take steps to mitigate and prevent any risks identified.

No significant risks to be addressed were found in our fiscal 2023 risk assessment.