

Risk Management

Policy

The NLM Group manages risks to its business strategy such as direct and indirect losses, the suspension or shutdown of business, damage to credibility or brand image, and so on.

We classify the risks surrounding our business into nine risk categories, and establish and operate policies and systems that are appropriate for the probability and impact of each risk.

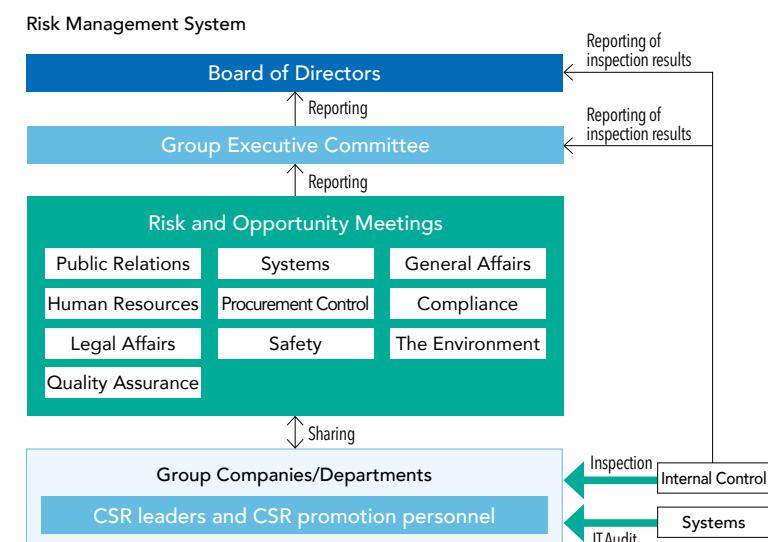
Framework

The basic framework for managing particularly important risks for overall Group management and each area of business has been set forth in the Group Risk Management Regulations. Risks are identified according to a process of identifying potential risks, assessing their likelihood, and assessing their impact.

Based on the results of the assessment of identified risks, we develop risk management policies and systems that include crisis response plans, formulate an annual plan for each, and manage risks based on the plans.

The department responsible for each risk recognizes each priority risk as something affecting the entire NLM Group and engages in management so that overall and individual risks are mitigated and avoided, and so that a response can be put into practice in the event a risk materializes.

The risk management status at each Group company is monitored through audits conducted by the risk management department, including quality audits, environmental audits, labor audits, and IT audits. The statuses determined from these audits are reported by the risk management department at the Risk and Opportunity Meetings as reports on the status of individual issues or general status reports so that the information is shared. They are reported to the NLM Holdings Group Executive Committee, and subsequently to the Board of Directors twice a year.



Plan and Initiatives

Regarding the risks stated in the Group Risk Management Regulations, the major operational and hazard risks and the evaluation of the responses to these risks are as follows.

Risk category	Major risks	FY2024 Plan and Initiatives		
		Risk management measures and response policies	Current year evaluation	Previous year evaluation
Operational risks	Violations of applicable laws and regulations	<ul style="list-style-type: none"> Violation of laws or rules, and harassment Operational fraud Defect in the framework for remediating infringements on human rights 	<input type="radio"/> Compliance meetings and training <input type="radio"/> Raising awareness of recurrence prevention (site manager meetings and workplace visits) <input type="radio"/> Establishment of a complaint mechanism and formulation of relief procedures	<input type="radio"/> <input type="radio"/>
	Quality issues	<ul style="list-style-type: none"> Decline in quality awareness Overlooking of high-risk development projects Shortage/uneven allocation of human capital in charge of quality practices 	<input type="radio"/> Compliance training, Quality Day initiatives, audits, and provision of information about rules <input type="radio"/> Management and evaluation of products to which laws and regulations apply and of quality risks <input type="radio"/> Establishment of efficient personnel distribution, checking of the sufficiency of human resources, and rotation of human resources	<input type="radio"/> <input type="radio"/>
	Environmental issues	<ul style="list-style-type: none"> Violation of environmental laws or regulations and environmental mishaps Shortage of human capital in charge of practical environmental tasks Deterioration of environmental equipment 	<input type="radio"/> Training sessions on laws and regulations, audits, prompt communication of information, and information sharing <input type="radio"/> Provision of information about past environmental mishaps to the next generation of human resources in onsite environmental audits, etc. <input type="radio"/> Regular inspections and replacement, installation of equipment to prevent problems	<input type="radio"/> <input type="radio"/>
	Health and safety issues	<ul style="list-style-type: none"> Injuries caused by being pinched or caught in machinery or equipment Occurrence of lost-time injuries Violation of laws and regulations and violation of rules 	<input type="radio"/> Inspection of dangerous locations, strategy meetings, and information sharing <input type="radio"/> Inspection of sites where injuries have occurred and horizontal deployment within the Group <input type="radio"/> Support for actions taken in response to instructions from supervising offices, holding of training sessions, and assistance in the identification and addressing of issues	<input type="radio"/> <input type="radio"/>
	Information security issues	<ul style="list-style-type: none"> Cyberattack Software license compliance Abuse/defect of information system Shortage of IT human capital 	<input type="radio"/> CSIRT training, collection of information, and addition of security products <input type="radio"/> Internal software audits and development of an IT asset management system <input type="radio"/> Beginning full-scale operation of the IT control and management system for systems subject to information technology general control (ITGC) activation <input type="radio"/> Introduction of outsourcing services, use of generative AI, and provision of IT training	<input type="radio"/> <input type="radio"/>
	Leakage of trade secret	Leakage of electronic information assets	Diagnosing IT issues at all sites, training, strengthening CSIRT, and formulating guidelines for using generative AI	<input type="radio"/> <input type="radio"/>
	Security and export control	Unauthorized exports and violation of trade restrictions	Communication of information about the revision of laws, checking of the status of export control, and checking of the status of judgments regarding whether restrictions apply or not	<input type="radio"/> <input type="radio"/>
	Failure in the timely disclosure of information	Inadequate communication	Increase in the frequency of opportunities to engage in dialogue and improvement of the materials and methods for disclosing information	<input type="radio"/> <input type="radio"/>
	Hazard risks	Natural disasters/accidents	<ul style="list-style-type: none"> Continuing to ensure disaster early warning alerts are provided, establishment of stockpiles, development of BCPs, and implementation of disaster drills Courtesy calls to police, fire departments, and related organizations and attendance of their general meetings, etc. 	<input type="radio"/> * ⁴ <input type="radio"/>
		Accidents		<input type="radio"/> <input type="radio"/>

O : Complete/annual progress target was achieved. △ : Initiatives were taken but the target has yet to be achieved.

Measures for items evaluated as △ in the previous year evaluation

*1 The establishment of a framework for remediating infringements on human rights was completed in FY2024. *2 Coordination continues to be underway to rotate human capital in charge of quality practices. *3 Outsourcing of some IT-related operations will begin in 2025. *4 Tabletop BCP exercises and training on establishment of a disaster control headquarters were implemented in FY2024.