

# Protecting and Respecting Human Rights

## Policy

In our Management Policy, we have stated that, "The Group will engage in fair and honest business operations, with respect for human rights and an emphasis on ethics," and set "Protecting and respecting human rights" as one of our material issues.

Based on our understanding that our business activities may negatively impact human rights directly or indirectly and there may be a negative impact on human rights directly related to the NLM Group's businesses, products, and services, we formulated the NLM Group Human Rights Policy in 2016 to protect and respect the human rights of the people involved in our business activities. In 2023, we significantly revised this policy, and we are promoting initiatives to protect and respect human rights.

☞ [The NLM Group's Human Rights Policy \(Japanese only\)](https://www.nikkeiinholdings.co.jp/csr/human-rights/0402.html) <https://www.nikkeiinholdings.co.jp/csr/human-rights/0402.html>

## Framework

We established the Human Rights Subcommittee in November 2022 to further promote initiatives for protecting and respecting human rights. This organization consists of people in charge of HR and procurement from the Corporate Personnel Administration Office, which is deeply involved in human rights, and people in charge of CSR and compliance from the Sustainability Promotion Administration Office. The Human Rights Subcommittee meets at the right time as necessary. Progress in the action plan is reported, and information about trends related to protection and respect for human rights is shared in the meetings. Results of activities are reported to the Group CSR Committee, the Group Executive Committee and the Board of Directors.

Additionally, the Company was registered as a participant in the United Nations Global Compact (UNGC) on September 17, 2025, and at the same time became a member of the Global Compact Network Japan, which serves as the UNGC's country network in Japan. We endorse the Ten Principles advocated by the UNGC across the four areas of human rights, labor, environment, and anti-corruption, and are committed to advancing their realization.

### Framework



## Plan and Results

We have formulated a plan for its initiatives for protecting and respecting human rights for FY2022 to FY2024. Regarding items of initiatives, we formulated our plan based on the three initiatives and eight categories of measures described in Business and Response to Human Rights (Digest Version), which was published by the Human Rights Bureau of the Ministry of Justice.

In FY2024, there were some initiatives which were initially planned but were postponed, as well as initiatives which were replaced with alternative measures. We will step up our efforts to implement these initiatives in the next fiscal year.

As part of our FY2025 plan, we intend to conduct a survey on compliance with our human rights policy to identify areas requiring strengthened efforts, and consider and implement relevant measures. In addition, we will survey the management status of foreign technical intern trainees within our supply chain.

| Category  | FY2024 Plan  | Assessment of FY2024 results   |  |
|---|--|--|--|
| Commitment under the policy                         | Formulation of a human rights policy   | They have been detailed in the integrated report since FY2023. <input type="radio"/>   |  |
|   | Assessment of impacts on human rights  | Requirements related to foreign national employees were added to labor audit items and the audit was conducted. <input type="radio"/>  |  |
| Implementing human rights due diligence             | Implementation of education and training   | Educational content on human rights was reviewed. It was not implemented. <input checked="" type="radio"/>   |  |
|   | Implementation of preventive and corrective measures (to address the apparent and latent negative impacts on human rights) | Changing the systems was considered. The creation of barrier-free spaces was also promoted in a timely manner. <input type="radio"/>   |  |
|   | Initiatives regarding internal environment/systems   | Awareness of the requirements was increased by conducting a CSR questionnaire survey for suppliers. <input type="radio"/>  |  |
|   | Supply chain management  | Continuing sustainable, responsible procurement  | CSR procurement was continued. <input type="radio"/>   |
|   | Implementation of monitoring (follow-up investigation)   | Checking employees' duty status, exchanging views with the labor union   | Labor and management continued to consult each other regularly. <input type="radio"/>            |
|   | External disclosure  | Describing the results of human rights risk assessments in the integrated report   | A shift was made to a survey on human rights policy compliance. <input checked="" type="radio"/> |
| Maintaining and developing remedial measures system | Establishment of a complaint handling mechanism (for responding to the negative impact on human rights that has occurred)  | Considering the establishment of a contact for human rights consultations <input type="radio"/><br>Considering the establishment of a supplier hotline <input type="radio"/><br>Customer support contact <input type="radio"/> |  |

○: Progress made as planned, △: Initiated but did not meet the plan, ×: Postponed or replaced with an alternative measure

\* Japan Center for Engagement and Remedy on Business and Human Rights

☞ [Complaint reporting form](https://jacer-bhr.org/en/application/form.html) <https://jacer-bhr.org/en/application/form.html>