

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.nikkeihinholdings.co.jp/csr/human-rights/0402.html)
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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.



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		Disclosing human rights protection and respect activities	They have been detailed in the integrated report since FY2023.	○
Implementing human rights due diligence	Assessment of impacts on human rights		Implementing human rights due diligence	Requirements related to foreign national employees were added to labor audit items and the audit was conducted.	○
	Implementation of preventive and corrective measures (to address the apparent and latent negative impacts on human rights)	Implementation of education and training	Incorporating the contents of human rights and diversity training programs into the LMS menu	Educational content on human rights was reviewed. It was not implemented.	×
		Initiatives regarding internal environment/ systems	Changing internal systems (HR, assessment, workstyles) and introducing barrier-free equipment	Changing the systems was considered. The creation of barrier-free spaces was also promoted in a timely manner.	○
		Supply chain management	Communicating and promoting understanding of our CSR procurement policy to suppliers	Awareness of the requirements was increased by conducting a CSR questionnaire survey for suppliers.	○
			Continuing sustainable, responsible procurement	CSR procurement was continued.	○
		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.
	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.	×
	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	Membership in JaCER* was continued.	○
Considering the establishment of a supplier hotline			Membership in JaCER was continued.	○	
Customer support contact			Ongoing	○	

○: 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

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