

Respect for Human Rights

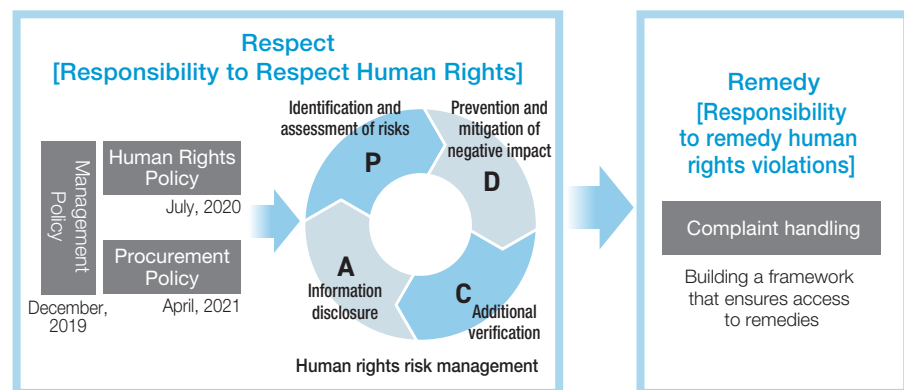
Basic approach to human rights

The Group believes that in order to contribute to a sustainable society and continue to be a “company needed by society,” it is essential to fulfill our corporate responsibilities relating to respect for human rights and to earn the trust of society. Accordingly, we have included “respect for human rights” in our Management Policy. In addition, we have established a Human Rights Policy, which stipulates that we will not violate any form of human rights. We are also committed to awareness-raising activities related to respect for human rights and work environment development so that varied employees of the Group can all work safely and comfortably.

Human rights due diligence

Based on the two perspectives of “respect” and “remedy” set forth in the United Nations Guiding Principles on Business and Human Rights, The NTN Group prioritizes “responding to human rights risks in employees,” “responding to human rights risks in the supply chain,” and “building a framework that ensures access to remedies,” which is considered to have a particularly high severity among the human rights risks in the NTN Group. In order to ascertain the actual situation about negative human rights impacts, such as forced labor, child labor and abuse of employees’ freedom and rights, in our business activities, we conducted a human rights questionnaire for our 44 overseas affiliates and received answers from all of them. As a result of the questionnaire analysis in FY 2024, we conclude that the possibility of risk occurrence is low, as most of the overseas affiliates have the policy and framework for protecting human rights and non-occurrence of incidents related to human rights violation was answered. On the contrary, several companies have received complaints from employees but have already taken the appropriate and necessary actions in accordance with their internal policies. We will continue to engage in human rights due diligence by conducting periodic questionnaire to identify and resolve issues, while evaluating the effectiveness of our initiatives.

United Nations Guiding Principles on Business and Human Rights



Human Rights Policy

In order to further promote human rights initiatives, a Human Rights Policy was established by resolution of the Board of Directors. It is a common set of values related to human rights shared by all Group employees that serves as the touchstone for day-to-day behaviors and business activities, as we seek to ensure that human rights are respected.

Based on the Human Rights Policy, we will take action on human rights issues – action that is becoming increasingly standardized globally as exemplified by the Sustainable Development Goals (SDGs) and the UK’s Modern Slavery Act - and fulfill our corporate responsibility for respecting human rights.

Respond to human rights risks in employees

Sound workplace relations based on labor-management discussions

Establishing a forum where labor and management can share information with each other, NTN Group strives to share the content of each measure. Quarterly “Labor-Management Roundtable Meetings” are held in which executives provide thorough explanations about business operations and strategies, the business environment and other topics to the labor union and listen to the views of labor. In addition, labor-management committee meetings are held whenever appropriate regarding actions leading to improved employee motivation and ease of work. In very intense exchanges of opinion, the committee decides on ways to improve working conditions so that NTN Group remains an attractive place to work.

Survey of foreign workers

Given the vulnerable position of foreign workers in Japan, we proactively address the foreign workers’ human rights. Specifically, we investigate the working condition of foreign workers in our Group and have a system in place to enable quick response as necessary.

Respond to human rights risks in the supply chain

Conflict mineral surveys

Incomes from the mining of tin, tantalum, tungsten and gold (3TG) in the conflict areas of the Democratic Republic of the Congo (DRC) and neighboring countries could be a source of capital for armed forces, which could lead to human rights infringement, illicit mining and smuggling. We continuously monitor whether the mineral resources contained in materials and components used in our products are mined from conflict and high-risk areas. In FY 2024, we traced back through our supply chain of 244 business partners to identify the material smelters, and about 96% of such partners reported that they do not use any conflict minerals. We will continue to conduct this survey periodically.

Companies listed on U.S. Stock Exchanges are required to disclose any use of conflict minerals under the U.S. Dodd-Frank Act. Based on the results of the above survey, we respond to inquiries from our customers regarding conflict minerals, even though we are not subject to this Act.