Respect for Human Rights

Basic approach to human rights

As a global manufacturer of mechanical components such as bearings, the NTN Group conducts business operations while engaging with diverse stakeholders across domestic and international supply chains. The NTN Group recognizes that ensuring the safety and dignity of its employees and giving due consideration to human rights throughout the supply chain are indispensable to sustainable business operations and the maintenance of corporate value, and has accordingly positioned “Respect for Human Rights” as one of the fundamental pillars of its management policy.

Inadequate attention to human rights can heighten business risk through impacts on procurement, quality, and reputation. For this reason, the NTN Group positions human rights initiatives not merely as a compliance obligation but as an integral component of risk management and a key factor underpinning sustainable business value, promoting initiatives that are fully embedded in its business activities.

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.

Awareness-raising activities for employees on human rights

To deepen understanding of “business and human rights” as well as “harassment”, NTN provides e-learning programs. Through these initiatives, we aim to enable each and every employee to connect awareness of human rights to their own work and act accordingly.

In addition, to prevent harassment in the workplace and facilitate early resolution, we have established consultation services at each business site, providing an environment where employees can seek advice with confidence. All consultations are handled with due consideration for privacy.

Furthermore, these initiatives are not limited to NTN alone; they are also implemented at domestic consolidated subsidiaries, promoting group-wide efforts to foster respect for human rights and improve the working environment, including measures to curb excessive working hours.

Identifying and Responding to Human Rights Risks within the NTN Group

Human rights questionnaire

The NTN Group conducts assessments of potential negative impacts on human rights arising from its business activities, including forced labor, child labor, and infringements on employees’ freedoms and rights, in accordance with the United Nations Guiding Principles on Business and Human Rights.

Harassment was identified as one of the anticipated risks through a human rights risk questionnaire conducted for 19 domestic affiliates. Based on these findings, we are promoting the implementation of harassment prevention training and the establishment of consultation channels at our affiliates.

In addition, we conducted a human rights survey covering 44 of our overseas affiliates and received responses from all of them. Based on the results of the FY2025 survey, we assessed the risk level to be low, as most affiliates have established policies and frameworks for protecting human rights and reported that no serious incidents of human rights violations had occurred. Nevertheless, in order to gain a better understanding of the implications of the survey results and the presence of potential risks, we will follow up more thoroughly on the responses (through interviews and other means). We will also progressively implement necessary corrective and improvement measures based on the findings, thereby enhancing the effectiveness of human rights due diligence.

Sound workplace relations built on labor-management dialogues

The NTN Group complies with labor laws and regulations in each country, establishes opportunities for labor and management to exchange information, and strives to promote mutual understanding of various initiatives. Quarterly “Labor-Management Roundtable Meetings” are held as a forum for executives to provide thorough explanations of business operations and strategies, the business environment, and other topics, while also listening to the labor union’s views. In addition, labor-management committee meetings are held as appropriate in connection with initiatives aimed at improving the work environment. Through active dialogue, the committee determines measures to improve working conditions so that the NTN Group remains an attractive place to work.

Respect for the human rights of foreign workers

The NTN Group believes it is important to foster a working environment in which all employees, regardless of nationality or background, can work with confidence and fully demonstrate their capabilities. In particular, taking into account the fact that foreign workers employed in Japan may face challenges in accessing information and communicating due to differences in language and culture, the NTN Group is taking measures to provide appropriate support. Specifically, with respect to work procedure manuals and operational guidelines, we are developing materials written in employees’ native languages to ensure that work can be performed safely and smoothly. In terms of working conditions, we ensure fair and equitable treatment based on job responsibilities, roles, and performance without differentiation by nationality, while also supporting long-term career development.

Respect for Human Rights

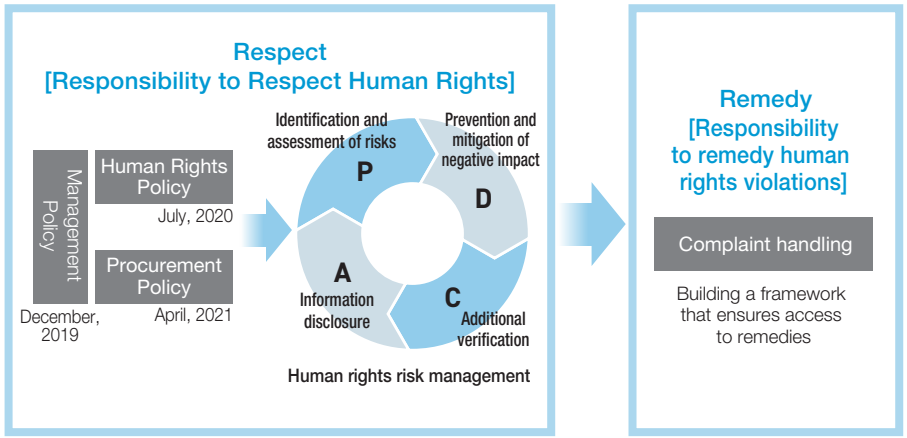
Grievance mechanisms and responses

From the perspective of respect for human rights, NTN has established relevant regulations with the aim of responding appropriately in the event of harassment, and has set up harassment consultation services at each business site.

In addition, the Helpline (whistle-blower system) described on p.76 also addresses human rights-related consultations. Through these channels, we work to identify issues at an early stage, respond and make corrections appropriately, and prevent human rights violations.

Overseas, responses are also handled through internal reporting channels that have been established and operated in accordance with the conditions of each region.

United Nations Guiding Principles on Business and Human Rights



Response to human rights risks in supply chain

The NTN Group recognizes that respecting human rights throughout its supply chain is an important responsibility, based on the Human Rights Policy and the Procurement Guidelines (hereinafter, “Procurement Guidelines”).

NTN’s initiatives

Sustainable Procurement Survey for business partners

To promote respect for human rights across the entire supply chain, the understanding and cooperation of not only the NTN Group but also our business partners are indispensable. Through the NTN Policy Briefing Sessions, NTN ask our principal business partners to comply with the Procurement Guidelines, including respect for human rights.

In Japan, we regularly conduct the NTN Group Sustainable Procurement Survey (hereinafter, “Procurement Survey”) to identify and mitigate various potential risks in the supply chain, including human rights risks. Through the Procurement Survey, we review the status of our business partners with respect to human rights-related issues based on the Procurement Guidelines, such as forced labor, child labor, and occupational health and safety issues, and promote improvements.

In FY2025, we conducted the Procurement Survey targeting 465 business partners and received responses from 79% of them. Based on analysis of the responses and detailed follow-up interviews with certain business partners, no significant human rights risks have been identified at this time.

Based on the results of the Procurement Survey, for issues identified as requiring priority improvement, we share an improvement guide prepared by NTN with business partners, promote a deeper understanding of human rights, and support their efforts. In addition, through the continuous implementation of the Procurement Survey, we monitor changes in business partners’ responses and access confirm whether their initiatives have improved. We will continue to conduct the Procurement Survey and strive to mitigate human rights risks in the supply chain.

Conflict mineral surveys

Proceeds 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 groups, which could lead to human rights violations, illicit mining, and smuggling.

NTN continuously monitors whether the mineral resources contained in materials and components used in our products are mined from conflict-affected and high-risk areas. In FY2025, we traced back through our supply chain of 122 business partners to identify the smelters, and received responses from 93% of them. No use of conflict minerals was identified through this survey; however, we will continue to conduct this survey on a regular basis.

Companies listed on U.S. Stock Exchanges are required to disclose any use of conflict minerals under the U.S. Dodd-Frank Act. Although we are not subject to this Act, we conduct surveys in line with its intent and respond to inquiries from our customers regarding conflict minerals.