Respect for Human Rights

We strive to contribute to a sustainable society by promoting respect for human rights.

Basic Approach to Respect for Human Rights

In the Nihon Kohden Charter of Conduct, which sets forth the standards of behavior to be observed by the Company and its executives and employees, Nihon Kohden states that the Company has respect for human rights at all times. The Nihon Kohden Code of Ethics and Conduct provides specific guidelines for actions to be taken to ensure respect for human rights.

In July 2015, the Company signed the United Nations (UN) Global Compact, aiming to remain a company trusted by society and to contribute to the creation of a sustainable society through corporate activities in accordance with the Ten Principles of the UN Global Compact in the four areas of human rights, labor, the environment, and anti-corruption.

With the globalization of corporate activities in recent years, social expectations for corporate human rights initiatives have been growing. As it is extremely important for Nihon Kohden to respect the human rights of its stakeholders, we established the Nihon Kohden Group Human Rights Policy in December 2020. By following the Policy and promoting initiatives to respect human rights, we will contribute to the realization of a sustainable society.

For further details, please refer to our website.
Respect for Human Rights

Human Rights Due Diligence

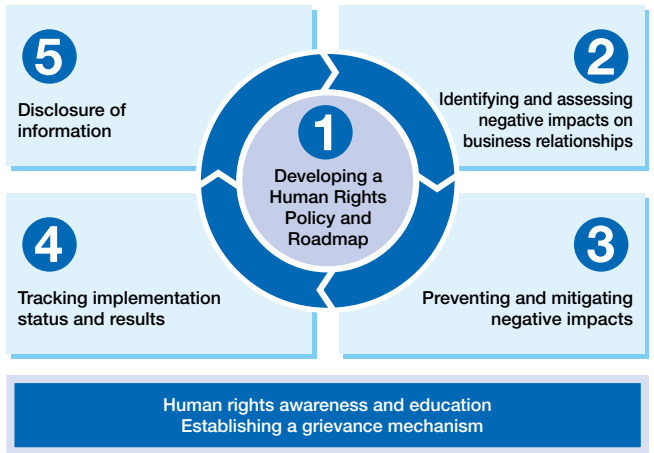
Nihon Kohden has established a human rights due diligence framework to identify, prevent, and mitigate negative impacts on human rights.

We conduct surveys covering all suppliers of our domestic and overseas Group companies (excluding certain overseas subsidiaries). In addition, we have established a human rights consultation hotline for our suppliers and customers, promoting efforts to respect human rights throughout the supply chain.

In FY2025, to further strengthen our response to human rights risks, we reviewed the survey questionnaire, revising the questions to make them clearer and easier to understand, while also identifying high-risk questionnaire items.

We will continue to foster understanding of Nihon Kohden's commitment to respect for human rights and promote sustainability efforts in cooperation with our supply chain.

Overview of Our Human Rights Due Diligence



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■ Human Rights Risk Assessment and Identification

To address potential human rights risks that may arise through its interactions with diverse stakeholders during business activities, Nihon Kohden conducts an impact assessment of human rights issues. We focused on and assessed approximately 30 human rights issues with reference to the United Nations Global Compact, the ILO Declaration on Fundamental Principles and Rights at Work, the Stakeholder Engagement Program of the Caux Round Table Japan Committee, and the Handbook for Management that Respects Human Rights formulated by the Japan Business Federation (KEIDANREN). Based on this assessment, we identified "Excessive and unreasonable working hours" as well as "Sexual harassment, power harassment, and harassment related to pregnancy, childcare, and nursing care, etc." as the Group's key human rights issues. To address these key human rights issues, we are promoting measures to reduce risks across Group companies in Japan and overseas. We will continue to review our assessment on a regular basis and work to prevent or mitigate negative impacts.

For further details, please refer to our website.
Human Rights Impact Assessment/Human Rights Risk Assessment

Initiatives to Respect Human Rights

In accordance with the Nihon Kohden Group Human Rights Policy, the Group is working to prevent all forms of discrimination and harassment. In FY2025, no human rights violations or harassment leading to disciplinary dismissal from employment occurred.

■ Structure

Nihon Kohden's human rights initiatives are discussed by the Sustainability Promotion Committee, which is chaired by the president, and the results of the discussions are shared with and reported to the Board of Directors. The Corporate Strategy Division and the Human Resources Department play a central role in implementing human rights initiatives within the Company.

Deliberative body	Sustainability Promotion Committee (Key human rights-related matters discussed by the Committee are submitted to and reported to the Board of Directors in accordance with the Standards for Procedures for Requesting Deliberations and Making Decisions.)
Secretariat	Corporate Strategy Division, Human Resources Department

■ Human Rights Education and Training for Employees

Nihon Kohden has been conducting e-learning programs for all executives and employees to prevent harassment and ensure compliance with labor-related laws and regulations. In FY2025, the numbers of executives and employees who participated in harassment education and in human rights training were 4,070 and 4,435, respectively. Through these training programs, we aim to foster a deeper understanding of human rights risks and human rights policies, while also promoting understanding of sexual minorities (such as LGBTQ individuals), and fostering a workplace culture that supports the elimination of discrimination based on gender identity and sexual orientation.

We also strive to prevent human rights violations before they occur through training for newly appointed managers that includes sessions on harassment prevention and procedures for responding to harassment reports and consultations.

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■ **Initiatives to Prevent Harassment**

Nihon Kohden aims to remain an ethical company that is widely trusted by society. To this end, in its Ethical Company Declaration, the Company affirms its commitment to respecting the human rights of all individuals, refraining from any acts that infringe on personal dignity or involve unfair discrimination. The Company also strives to prevent harassment by explicitly prohibiting it in the Nihon Kohden Code of Ethics and Conduct, Nihon Kohden Group Human Rights Policy, and Employment Regulations.

To respect employees' human rights and ensure a safe and comfortable workplace environment, we established and published the Basic Policy on Customer Harassment in December 2025. Based on this Policy, we provide internal training to raise awareness of the Policy and promote understanding of appropriate responses.

To prevent harassment and ensure prompt resolution when it occurs, we have also established an internal harassment consultation desk and internal reporting system, as well as an external harassment consultation desk to offer consultations on various human rights issues, including different forms of harassment, as well as labor issues involving sexual minorities (such as LGBTQ individuals) and foreign employees. Employees may use these consultation desks and reporting system anonymously, and the privacy of the individuals involved is strictly protected to ensure that reporters do not suffer any unfavorable treatment. To address concerns raised through these consultations, we conduct fact-finding investigations and confirm the facts regarding the details of the consultation, with the consent of the persons themselves. Appropriate measures are then taken, including corrective actions, awareness-raising to improve the work environment, and educational efforts to prevent recurrence. These matters are shared and countermeasures are discussed at quarterly meetings of the Compliance Committee. In FY2025, there were 25 harassment consultations and nine grievance consultations.

E-learning programs on harassment have been conducted regularly for both general employees and managers, with 4,070 participants (100% participation rate) in FY2025. Harassment training for newly appointed managers enhances their understanding of appropriate responses to various forms of harassment, including customer harassment, thereby helping prevent harassment and create a comfortable workplace environment.

Additionally, we established a human rights consultation hotline for our suppliers and customers in October 2023 to receive inquiries and consultations regarding human rights issues in the supply chain. Through this initiative, we strive to protect human rights throughout the supply chain.

■ **Considerations for Social Minorities**

Nihon Kohden is committed to fostering a deeper understanding of diverse identities, including sexual orientation, gender identity, and gender expression. We are also committed to eliminating prejudice and discrimination against LGBTQ individuals and other social minorities. Through these initiatives, we aim to create a comfortable and fulfilling work environment where diversity is respected, and all employees have the opportunity to thrive. For further details on DE&I promotion initiatives, please refer to the **Initiatives to Enhance the Value of Human Capital page.**

Initiatives throughout the Supply Chain

Nihon Kohden is actively working to promote respect for human rights throughout the supply chain, including its business partners. The Company prohibits child labor and forced labor in the Nihon Kohden Procurement Policy and the Nihon Kohden Sustainable Procurement Standards.

To ensure compliance with our Nihon Kohden Sustainable Procurement Standards, we conduct an annual questionnaire survey and monitoring to reduce and mitigate human rights risks through ongoing communication with our business partners. The questionnaire consists of five categories, including "human rights." In FY2024, the survey scope was expanded to include all suppliers of domestic and overseas Group companies excluding some overseas subsidiaries. In FY2025, we revised the questionnaire items to make them easier to understand, while identifying high-risk items and strengthening our response to human rights risks. Through additional surveys, interviews, and feedback based on the questionnaire results, we engage in dialogue with our suppliers and support them in reducing risks.

For further details, please refer to our website.
Adherence to the Nihon Kohden Sustainable Procurement Standards