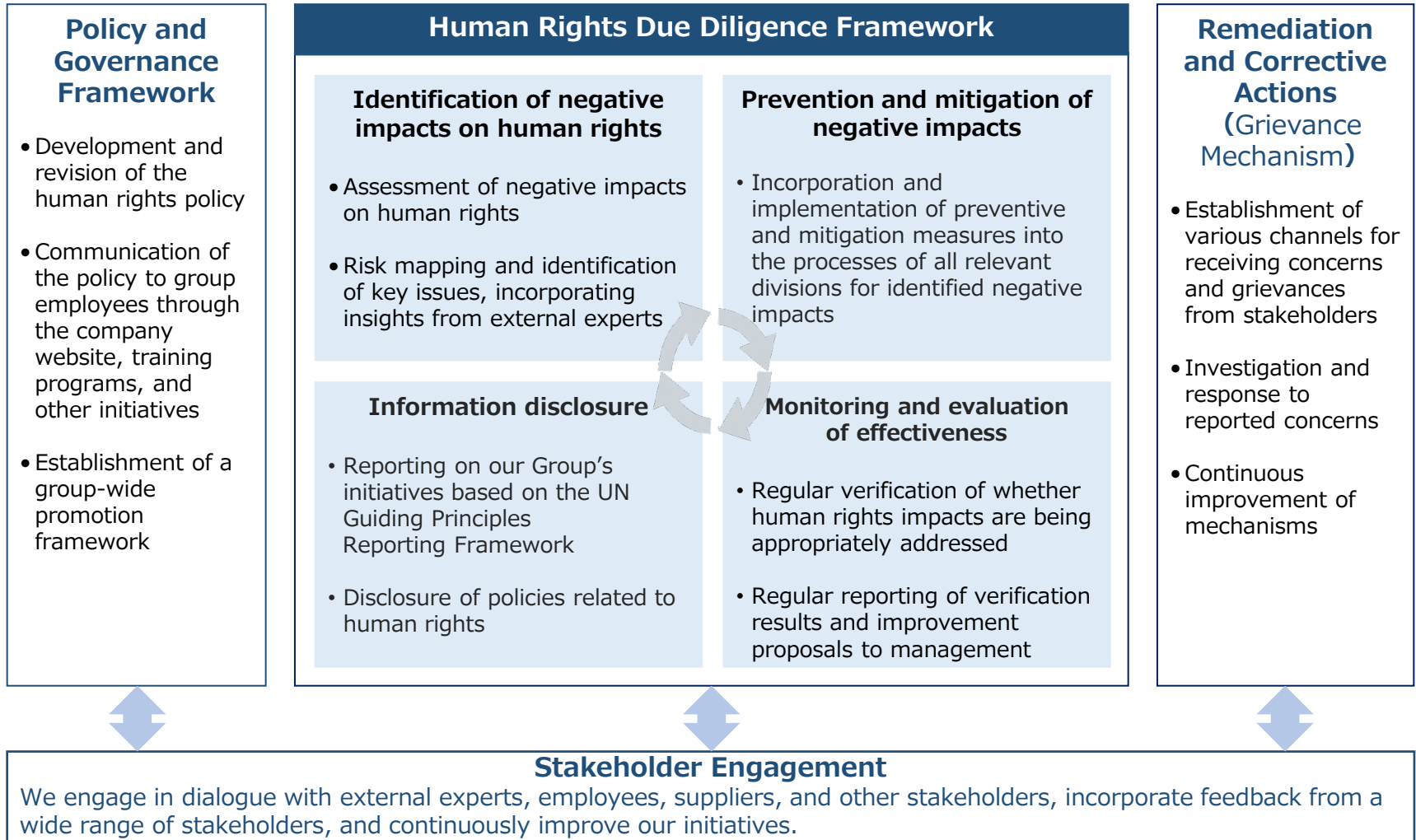


1. Human Rights Management System

We have established a management system in line with the United Nations Guiding Principles on Business and Human Rights to fulfill our responsibility to respect human rights. We have developed human rights due diligence framework and remediation measures in line with our human rights policy.



2. Methods for Human Rights Risk Assessments (Risk Assessment Item)

Step 1

Review items based on the Guidelines*1

Total 24

Population by theme*1

1	Human Trafficking (Overseas Operations / Debt Bondage)
2	Forced Labor (Overseas Operations / Debt Bondage)
3	Child Labor (Overseas Operations / Debt Bondage)
4	Conflict Minerals
5	Rights of Indigenous Peoples and Local Communities
6	Leakage of Personal Information
7	Infringement of Privacy
8	Human Rights Violations on the Internet
9	Management of Technical Intern Training Program*2
10	Excessive Working Hours (Working Time Management)
11	Working Conditions (Occupational Health and Safety)*3
12	Consideration for Persons with Disabilities
13	Consideration for Children and the Elderly
14	Discrimination Against Foreign Nationals
15	Women's Empowerment
16	Discrimination Against LGBTQ Individuals
17	Harassment (Various Forms)
18	Inappropriate Treatment of Customers
19	Wage Shortfalls / Unpaid Wages / Living Wage
20	Human Rights Issues Related to Technology and AI
21	Freedom of Expression / Thought, Conscience, and Religion
22	Infringement of Intellectual Property Rights
23	Right of Access to Remedy Mechanisms
24	Discrimination in Hiring

Step 2

Identify items relevant to our Group

Total 19

6	Leakage of Personal Information
7	Infringement of Privacy
8	Human Rights Violations on the Internet
9	Management of Technical Intern Training Program*2
10	Excessive Working Hours (Working Time Management)
11	Working Conditions (Occupational Health and Safety)*3
12	Consideration for Persons with Disabilities
13	Consideration for Children and the Elderly
14	Discrimination Against Foreign Nationals
15	Women's Empowerment
16	Discrimination Against LGBTQ Individuals
17	Harassment (Various Forms)
18	Inappropriate Treatment of Customers
19	Wage Shortfalls / Unpaid Wages / Living Wage
20	Human Rights Issues Related to Technology and AI
21	Freedom of Expression / Thought, Conscience, and Religion
22	Infringement of Intellectual Property Rights
23	Right of Access to Remedy Mechanisms
24	Discrimination in Hiring

Step 3

Establish and implement four assessment methods for each item

Total 19

7	Infringement of Privacy
8	Human Rights Violations on the Internet
10	Excessive Working Hours (Working Time Management)
11	Working Conditions (Occupational Health and Safety)*3
12	Consideration for Persons with Disabilities
13	Consideration for Children and the Elderly
15	Consideration for Children and the Elderly
16	Discrimination Against LGBTQ Individuals
17	Harassment (Various Forms)
19	Wage Shortfalls / Unpaid Wages / Living Wage
14	Discrimination Against Foreign Nationals
24	Discrimination in Hiring
6	Leakage of Personal Information
18	Inappropriate Treatment of Customers
9	Management of Technical Intern Training Program*2
20	Human Rights Issues Related to Technology and AI
21	Freedom of Expression / Thought, Conscience, and Religion
22	Infringement of Intellectual Property Rights
23	Right of Access to Remedy Mechanisms

Assessment methods

Employee survey

On-site assessment

+

Interview

Separate data aggregation*4

Assess applicability

*1 Items were selected through a comprehensive review based on UN materials, publications issued by Japan's Ministry of Justice, and risk disclosures, integrated reports, and sustainability reports of other companies.

*2 The assessment included migrant workers.

*3 The assessment included the three fundamental labor rights (the right to organize, the right to collective bargaining, and the right to collective action).

*4 A separate incident management system has been established for personal information leaks and inappropriate responses to customers.

3. Rightsholders considered in the assessment of human rights impacts

As a result of analyzing adverse human rights impacts in our business activities from the perspectives of whether we may cause, contribute to, or be directly linked to such impacts, we identified that our employees and customers of our business partners may be affected in multiple ways.

Potentially Affected Rightsholders	Types of impacts caused by our Group			Forms of Negative Impacts
	Cause	Contribute to	Directly Linked to	
Employees • Permanent Employees • Contract employees • Temporary agency workers • Female employees	●			Negative impacts directly caused by our Group on our employees.
		●	●	Negative impacts on our employees caused by external parties, such as employees of business partners and their customers
Suppliers • Contractors • Procurement partners		●		Negative impacts caused by our employees on employees of upstream contractors and suppliers through outsourcing and procurement activities
Customers of business partners • Consumers	●	●		Negative impacts caused by our employees on customers (consumers) of business partners through the provision of call center services and other business activities
Local communities associated with business activities of suppliers			●	Negative impacts on local communities caused by suppliers through our group's outsourcing and procurement activities

4. Human Rights Risk Map (Illustrative)

Based on the risk assessment, the key human rights risks associated with our Group’s business activities were compiled into the risk map (illustrative) below and approved by the Board of Directors in FY2024. This risk map will be periodically reviewed and updated.

