







Responses to priority risks (harassment and human rights abuses)

The NOF Group comprehensively identifies business risks surrounding its operations and selects “priority risk” items that should be addressed to enhance resilience. In the area of “Harassment and Human Rights Abuses,” which was selected as a “priority risk” in the fiscal 2022 risk assessment, we are implementing measures focusing on four themes. The results of activities and plans for each measure are as follows.

	Results of activities in FY2023	FY2024 activities plan
1  Revision of the Code of Ethical Conduct	Drafted a revision based on the new Corporate Philosophy and three values in light of changes in social conditions and awareness surrounding corporate compliance	Finalize the contents and disseminate to the Domestic Group in a special issue of the in-house newsletter. In addition to disclosing the Japanese and English versions on our website, consider planning in-house training programs to make it clear that our Code of Ethical Conduct is synonymous with our values
2  Establishment of a guide for responding to harassment	Prepared the “Guide to Handling Whistle-blowing Cases” that summarizes points to keep in mind, focusing on initial response to harassment cases, preparedness of managers, and prevention of secondary damage to victims due to investigations	Hold briefing sessions for managers, who are key for preventing and dealing with harassment. Improve awareness and encourage proactive engagement by making people feel it is a personal responsibility
3  Strengthening of awareness of human rights and compliance <div> Introduction of compliance education videos Implementation of education on values, human rights, and compliance </div>	Purchased educational videos on the themes of prevention of harassment and raising human rights awareness. Also considered introducing a video platform to make videos available internally Created original content and held in-house lectures on “The NOF Group’s Values and Human Rights & Compliance” as a training program for developing human resources with a sense of values and autonomy	Establish an environment that is easily accessible to all employees, and make educational videos available internally. Announce video themes during awareness months and weeks to encourage individuals and groups to actively use the videos The Legal Department and the Human Resources & General Affairs Department collaborate to provide compliance education focusing on harassment as well as education on specific laws and regulations, such as the Subcontract Act, within training at the organizational level
4  Implementation of employee engagement surveys (human rights DD for employees)	Open-ended responses from the employee engagement survey were classified and aggregated, and information was extracted toward improving systems and resolving human rights risks. Internal disclosures on this were also considered	Conduct similar surveys to understand trends toward spread and improvement of measures. Publish an overview of the results in the in-house newsletter to communicate that the employee engagement survey is the basis for each measure