

Materiality **Respect for human rights**

**Basic approach to human rights**

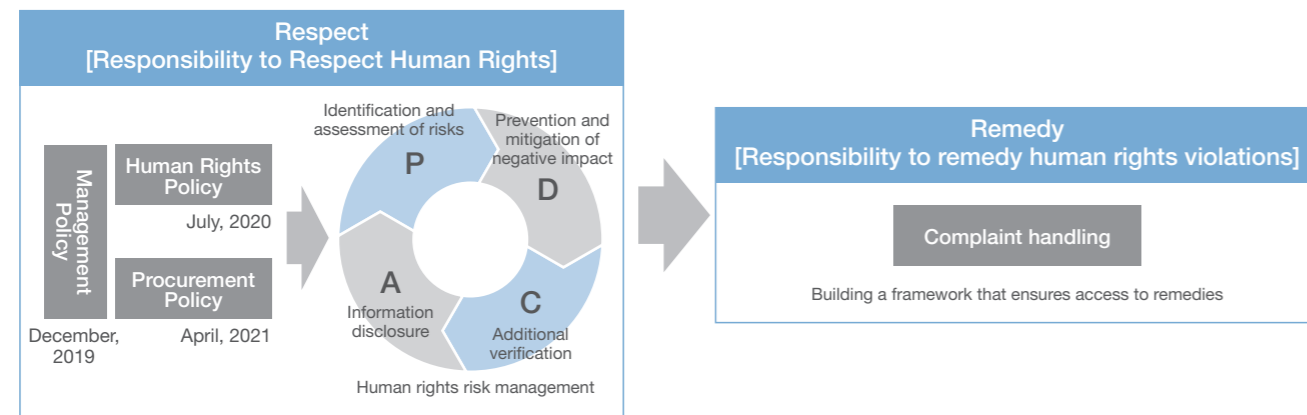
The Group believes that in order to contribute to a sustainable society and continue to be a “company needed by society,” it is essential to fulfill our corporate responsibilities relating to respect for human rights and to earn the trust of society. Accordingly, we have included “respect for human rights” 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, our 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.” In order to ascertain the actual situation about negative human rights impacts in our business activities, we conducted a human rights questionnaire for our overseas affiliates. Analysis of the questionnaire results showed a low possibility of risk occurrence. We will continue to work for human rights due diligence by conducting a questionnaire regularly.

■ **Overview of human rights due diligence**

United Nations Guiding Principles on Business and Human Rights



**Human Rights Policy**

In order to further promote human rights initiatives, we have formulated a Human Rights Policy in which all Group employees share common sense of values related to human rights and which serves as the basis for their day-to-day activities and business activities. In doing so, we are making efforts to ensure that human rights are respected.

Based on the Human Rights Policy, we will address human rights issues which are gaining more and more global attention, as exemplified by the Sustainable Development Goals (SDGs) and the UK’s Modern Slavery Act, and fulfill our corporate responsibility for respecting human rights.

**Outline of the Human Rights Policy**

1. NTN will respect internationally-recognized human rights.
2. NTN will not violate the human rights of others.
3. NTN will respond appropriately to any negative impacts its business activities may have on human rights.

**Respond to human rights risks in employees**  
**Sound labor-management relations based on labor-management consultations**

We strive to share the content of each measure between labor and management in a forum where labor and management can exchange information with each other. We hold quarterly “Labor-Management Roundtable Meetings,” in which executive managers provide thorough explanations about the Business Management Policy, management environment, and other topics to the labor union and listen to the views of the labor union. In addition, we hold labor-management committee meetings as appropriate according to each measure that leads to improvement of “motivation to work” and “ease of work,” with the aim of exchanging opinions to deepen mutual understanding and deciding on work styles that lead to improvement of attractiveness of a place to work.

**Survey of foreign workers**

We monitor 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**

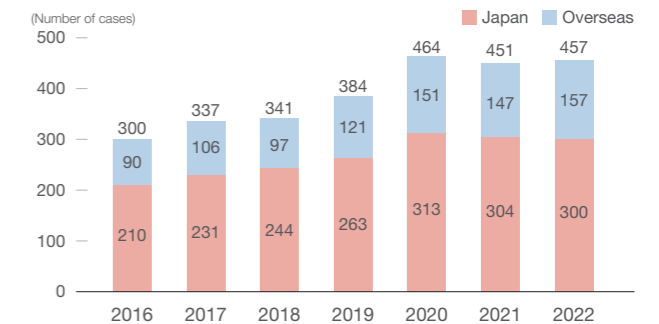
**Correspond to forced labor and child labor (Conflict mineral surveys)**

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. In April 2016, we established our CSR Procurement Guidelines, upholding the policy of “Responsible mineral procurement,” to continuously monitor whether the mineral resources contained in materials and components used in our products are

mined from conflict and high-risk areas. In the fiscal year ended March 2023, we traced back through our supply chain of 245 business partners to identify the material smelters, and more than 97% 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. As human rights issues are gaining attention globally, corporate awareness of such issues is growing. Regardless of the U.S. Dodd-Frank Act, the number of companies voluntarily eliminating the use of conflict minerals is increasing as shown in the chart below.

■ **Number of conflict mineral surveys (responding to requests from customers)**



**Excerpt from NTN CSR Procurement Guidelines**

● **Responsible mineral procurement**

Mineral resources included in materials and components will be checked for any negative social impacts on human rights, the environment, etc. If a negative impact is suspected or verified to be present, we will substitute a method that does not use those conflict materials.

● **Prohibition of child labor**

We will not violate the obligation to protect children and will not employ children that do not meet the minimum working age of each country and region.

● **Prohibition of forced labor**

We will ensure that all labor is voluntary and that employees can leave their job freely. We will not use forced labor.