

# SEGA SAMMY Group Sustainable Procurement Guidelines [1st Edition] Revision List

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SEGA SAMMY HOLDINGS INC.

Sustainability Communication Department, Sustainability Division

\*Only changes are listed.

\*Only changes in clause/subclause numbers are also listed.

No.	Page	Clause	Subclause	Part	Before Revision	After Revision
1	5	I . Compliance with Laws and Respect for International Standards		Subclause Point Explanation	*Not stated	<b>I . Compliance with Laws and Respect for International Standards</b>  Suppliers are requested to comply with applicable laws and regulations in their own countries as well as in countries or regions where they operate, and to respect international standards both internally and through their supply chains.  International standards refer to expectations for socially responsible organizational behavior derived from customary international law, generally accepted principles of international law, and universally or nearly universally accepted intergovernmental agreements.
2	5	II . Human Rights and Labor			I . Labor	<b>II . Human Rights and Labor</b>
3	5	II . Human Rights and Labor	( II – 1 ) Prohibition of Forced Labor	Subclause	( I – 6 ) Prohibit forced labor	<b>( II – 1 ) Prohibition of Forced Labor</b>
4	5	II . Human Rights and Labor	( II – 1 ) Prohibition of Forced Labor	Point	Particularly in overseas supply chains, suppliers are requested to cause their employees to voluntarily engage in their employment, and not to cause their employees to engage in forced labor.	<b>Particularly in overseas</b> supply chains, suppliers are requested to <b>cause</b> ensure that their employees <b>to voluntarily engage in their employment</b> are employed at their free will, and <b>not to not</b> cause their employees to engage in forced labor.
5	5	II . Human Rights and Labor	( II – 1 ) Prohibition of Forced Labor	Explanation	The following are some examples of forced labor: (1) Labor in return for debt that limits the freedom of job turnover due to the repayment of debt, etc.; (2) Slave labor practiced as a result of human trafficking; (3) Inhumane prison labor in harsh environments, regardless of the fact of such people being prisoners.	<b>*All items listed on the left are deleted and replaced with the following</b>  The following are some examples of factors of forced labor: (1) Exploitation of vulnerability (2) Deception (3) Isolation (4) Threats and intimidation (5) Retention of salary (6) Debt bondage (7) Excessive overtime (8) Prohibition of movement (9) Physical or psychological abuse (10) Retention of original ID documents (11) Execution of contracts in languages that employees do not understand (12) Charging workers for employment placement fees and other employment-related fees
6	5	II . Human Rights and Labor	( II – 2 ) Prohibition of Child Labor and Protection of Young Workers	Subclause	( I – 7 ) Prohibit child labor	<b>( II – 2 ) Prohibition of Child Labor and Protection of Young Workers</b>
7	6	II . Human Rights and Labor	( II – 2 ) Prohibition of Child Labor and Protection of Young Workers	Point	Suppliers are requested not to employ children who are under the minimum age for employment and not to assign jobs that may impair children's development, particularly in overseas supply chains.	<b>In supply chains</b> , suppliers are requested not to employ children who are under the minimum age for employment and not to assign jobs that may impair <b>the children's</b> development <b>, particularly in overseas supply chains</b> of children or young workers.
8	6	II . Human Rights and Labor	( II – 2 ) Prohibition of Child Labor and Protection of Young Workers	Explanation	(1) In Japan, child labor means: a) employing persons who are under fifteen years old; b) violating the laws which are designed to protect young laborers; and c) as concrete examples of protecting young laborers from employment that may impair their health, security, and morality, night-shift work and dangerous work shall be restricted.  (2) Overseas, child labor means: a) the employment of persons who are under the minimum age for employment, and the violation of the obligation to protect such persons as specified in each country's laws. b) in countries where there are no relevant provisions in the laws or regulations, acts violating the minimum age treaties and/or recommendations of the ILO are regarded as constituting child labor (The rule of the minimum employment age is fifteen years old: ILO treaty No.138).	<b>*All items listed on the left are deleted and replaced with the following</b>  Child labor refers to the employment of persons who are under the minimum age for employment as defined by national laws and the conventions and/or recommendations of the International Labour Organization (ILO). There are also certain types of work in which young workers are not allowed to engage (see ILO Convention No. 138). Night work and hazardous work are restricted by law and regulations because they may be detrimental to the health, safety, and morals of young workers.
9	6	II . Human Rights and Labor	( II – 3 ) Working Hours	Subclause	( I – 3 ) Regulate working hours	<b>( II – 3 ) Regulate</b> Working Hours

10	6	II. Human Rights and Labor	(II – 3) Working Hours	Explanation	In this item, the following are the examples of proper control: (1) Scheduled working days per year do not exceed the legal ceiling; (2) Providing employees with at least one holiday per week; (3) Providing the rights of a vacation leave on an annual basis as specified in the law.	<del>In this item,</del> The following are <del>the</del> examples of <del>proper control</del> appropriate management: (1) Scheduled working days per year do not exceed the legal ceiling; (2) <del>Providing employees with at least one holiday per week;</del> (3) <del>Providing the rights of a vacation leave on an annual basis as specified in the law;</del> (2) Working hours per week, including overtime hours (provided that cases of disaster or other unavoidable emergency situations are excluded), do not exceed the legal ceiling; (3) Employees are provided with holidays that each continue at least 24 hours; (4) Employees are granted rights to annual vacation leave, maternity leave, and childcare leave as specified by laws and regulations; (5) Employees are provided with a break time as specified by laws and regulations; (6) Physical and mental health examinations are conducted for employees to protect their health
11	6	II. Human Rights and Labor	(II – 4) Appropriate Wages	Subclause	(I – 2) Pay appropriate wages	(II – 4) <del>Pay</del> Appropriate Wages
12	6	II. Human Rights and Labor	(II – 4) Appropriate Wages	Explanation	The minimum wage means the lowest wage specified in each country's wage-related laws. In this item, payment of other allowances including overtime compensation and legal payment are included. Unreasonable wage reduction means a wage reduction in violation of labor-related laws, etc.	Minimum wage refers to the lowest wage specified in each country's wage-related laws. In this item, payment of other allowances, including overtime compensation and <del>legal payment</del> <del>are</del> <del>statutory</del> <del>benefits</del> , is included. Unreasonable wage reduction <del>means</del> refers to a wage reduction in violation of labor-related laws, <del>etc</del> and regulations. When suppliers pay compensation to employees, they shall provide wage statements that contain sufficient information to verify that accurate compensation has been paid.
13	7	II. Human Rights and Labor	(II – 5) Prohibition of Inhumane Treatment	Subclause	(I – 5) Prohibit inhumane treatment and infringement of human rights	(II – 5) <del>Prohibition of Inhumane Treatment</del> <del>and infringement of human rights</del>
14	7	II. Human Rights and Labor	(II – 5) Prohibition of Inhumane Treatment	Explanation	Inhumane treatment includes abuse, physical punishment, sexual harassment, and power harassment (i.e. harassment by verbal abuse and intimidating acts).	Inhumane treatment includes abuse ( <del>psychological and physical</del> ), physical punishment, sexual harassment, <del>and</del> power harassment (i.e., harassment <del>by</del> <del>in</del> the form of verbal abuse and intimidation <del>acts</del> ) and maternity harassment.
15	7	II. Human Rights and Labor	(II – 6) Prohibition of Discrimination	Subclause	(I – 1) Prohibit discrimination	(II – 6) <del>Prohibition of Discrimination</del>
16	7	II. Human Rights and Labor	(II – 6) Prohibition of Discrimination	Point	Suppliers are requested to prohibit discrimination during the process of recruiting and hiring, and to endeavor to attain equal opportunity and fairness of treatment.	Suppliers are requested to <del>respect diversity</del> , prohibit discrimination during the <del>process of recruiting and hiring and to endeavor, training, and evaluation process, and strive</del> to attain equal opportunity and fairness of treatment.
17	7	II. Human Rights and Labor	(II – 6) Prohibition of Discrimination	Explanation	Typical elements of discrimination include a person's race, creed, gender, age, social status, family origin, nationality, ethnicity, religion, birthplace, skin color, sexual orientation, political opinion, union membership, marital status, and so on.	Typical <del>elements</del> <del>factors</del> of discrimination include a person's race, creed, gender, age, social status, family origin, nationality, ethnicity, religion, birthplace, skin color, sexual orientation, <del>gender identiy</del> , <del>disability</del> , <del>pregnancy</del> , political opinion, union membership, marital status, and so on. If any of these matters are reported, suppliers shall exercise appropriate care so as not to cause disadvantages to the informant.
18	7	II. Human Rights and Labor	(II – 7) Employees' Right to Freedom of Association	Subclause	(I – 4) Respect the rights to freedom of association	(II – 7) <del>Respect the</del> Employees' Right to Freedom of Association
19	7		(II – 7) Employees' Right to Freedom of Association	Explanation	(2) Freedom to participate in labor unions in accordance with laws and regulations	(2) Freedom to participate <del>or not to participate</del> in labor unions in accordance with laws and regulations;
20	8	III. Health and Safety	(III – 1) Workplace Safety	Subclause	(III – 2) Promote workplace safety	(III – 1) <del>Promote</del> Workplace Safety
21	8	III. Health and Safety	(III – 1) Workplace Safety	Point	Suppliers are requested to evaluate their workplace safety risks and to ensure safety in the workplace with appropriate design, technique, and control method.	Suppliers are requested to evaluate their workplace safety risks and to ensure safety in the workplace <del>with through</del> appropriate design, <del>technique</del> <del>tecnology</del> , and <del>control method</del> management measures. In particular, reasonable consideration shall be given to pregnant women and nursing mothers.
22	8	III. Health and Safety	(III – 1) Workplace Safety	Explanation	The risk to safety in the workplace means the potential risks of accidents and health problems occurring during working hours, such as electric shocks or other energy-caused accidents, fire, vehicular accidents, slippery floors and falling objects. The following are some examples of appropriate design, technology and control methods: - Monitoring dangerous places with sensors; - Blocking off power sources for machinery and equipment by locking the same (lock out); - Installing a tag/notice which specifies the prohibition of operating an energy-blocking device while the power source is blocked (tag out); - Provision of protective equipment, such as glasses, goggles, hard hats and gloves.	<del>The risk to</del> Safety risk in the workplace <del>means</del> refers to the potential risks of accidents and health problems occurring during working hours, such as electric shocks or other energy-caused accidents, fire, vehicular accidents, <del>slippery floors</del> surfaces that are slippery or prone to tripping, and falling objects. <del>The following are some</del> Examples of appropriate design, technology and <del>control methods</del> : management measures include - monitoring <del>dangerous places</del> hazardous areas with sensors; - blocking <del>off</del> access to power sources for machinery and equipment by locking the same (lock out); - <del>Installing</del> placing a tag/notice <del>which</del> that specifies the prohibition of operating an energy-blocking device while the power source is blocked (tag out);, and - provision of protective equipment, such as <del>glasses</del> ; protective goggles, <del>hard hats</del> helmets and gloves. Reasonable consideration for pregnant women and nursing mothers includes that in relation to lifting/moving heavy loads, exposure to infectious diseases, working in a strained or burdensome position, or working long hours.

23	8	III. Health and Safety	(III – 2) Emergency Response	Subclause	(III – 5) Emergency response	(III – 2) Emergency Response
24	8	III. Health and Safety	(III – 2) Emergency Response	Explanation	<p>Emergency response measures may include, for example:</p> <ul style="list-style-type: none"> <li>- Prompt reporting during an emergency;</li> <li>- Notification to employees;</li> <li>- Clarification of evacuation procedure;</li> <li>- Installation of evacuation facilities;</li> <li>- Storing of emergency medical products;</li> <li>- Installation of fire detecting system and fire containment device;</li> <li>- Securing external communication method;</li> <li>- Development of recovery plan etc.</li> </ul> <p>The methods for causing employees to be thoroughly informed in the workplace may include:</p> <ul style="list-style-type: none"> <li>- Providing emergency response education to employees (including evacuation drill)</li> <li>- Storing or posting emergency response procedures, etc., within easy reach of employees in the workplace.</li> </ul>	<p>Emergency response measures may include, for example, prompt reporting during an emergency, notification to employees, clarification of evacuation procedures, installation of evacuation facilities, <b>securing of evacuation routes</b>, storing of emergency medical products, installation of a fire detecting system, <b>and installation of a fire containment device</b>, securing external <b>means of communication method</b>, and development of a recovery plan etc.</p> <p>The methods <del>for causing employees to be thoroughly informed</del> to ensure awareness within the workplace may include <b>providing provision</b> of emergency response education to employees (including evacuation drill) <b>and</b> storing or posting emergency response procedures, etc., within <b>easy reach of employees in the workplace the workplace in areas easily accessible to employees.</b></p>
25	8	III. Health and Safety	(III – 3) Occupational Injuries and Illnesses	Subclause	(III – 4) Take appropriate measures for occupational injuries and illnesses	(III – 3) <del>Take appropriate measures for</del> Occupational Injuries and Illnesses
26	9	III. Health and Safety	(III – 3) Occupational Injuries and Illnesses	Explanation	<p>Appropriate measures include:</p> <ul style="list-style-type: none"> <li>- Rules and programs that promote reporting by employees;</li> <li>- Classification and record of injury/illness;</li> <li>- Provision of required medical treatment;</li> <li>- Investigation of injury/illness;</li> <li>- Taking corrective measures to prevent any causes of such injuries or illnesses;</li> <li>- Systems or measures enabling employees to return to the workplace (including purchasing workers' compensation insurance, or taking necessary actions in relation to applicable governmental authorities).</li> </ul>	<p>Appropriate measures include rules and programs that <del>promote reporting by facilitate</del> employees <b>reporting</b>, classification and recording of injury/ies and illnesses, provision of <b>required</b> medical treatment <b>as needed</b>, investigation of injury/ies and illnesses, <b>taking implementation of corrective measures to prevent eliminate any the causes of such injuries or illnesses, systems or measures enabling employees to return to the workplace encouraging employees to return to work, and not forcing them to return until their condition has eased (including purchasing enrolling in workers' compensation insurance, or taking necessary actions in relation to applicable governmental authorities and performing the necessary administrative procedures, as required by law).</b></p>
27	9	III. Health and Safety	(III – 4) Workplace Hygiene	Subclause	(III – 3) Promote hygiene in the workplace	(III – 4) <del>Promote hygiene in the</del> Workplace Hygiene
28	9	III. Health and Safety	(III – 5) Consideration for Physically Demanding Work	Subclause	(III – 6) Give consideration to physically burdensome work	(III – 5) <del>Give Consideration to for</del> Physically <del>burdensome</del> Demanding Work
29	9	III. Health and Safety	(III – 6) Machine Safeguarding	Subclause	(III – 1) Take safety measures for machinery and equipment	(III – 6) <del>Take safety measures for machinery and equipment</del> Machine Safeguarding
30	10	III. Health and Safety	(III – 7) Health and Safety at Facilities	Explanation	<p>The facilities provided for employee's living include those provided in the workplace for the employees (cafeterias, restrooms, locker rooms, etc.), as well as any facilities provided for employees outside of the workplace. Maintaining cleanliness/sanitation, securing safe drinking water, taking measures against fire, air ventilation, temperature control, emergency escape routes (exit), and storing personal belongings in a safe manner are all included as examples of securing safety and hygiene.</p>	<p>The facilities provided for employees' living <b>purposes</b> include those provided in the workplace for <b>the</b> employees (such as cafeterias, restrooms, and locker rooms, etc.) as well as any facilities provided for employees outside of the workplace (such as dormitories).</p> <p><b>Examples of securing safety and hygiene include</b> maintaining cleanliness / and sanitation, securing safe drinking water, <b>taking measures against fire prevention measures</b>, air ventilation, temperature control, emergency escape routes (exits), <b>and storing safe storage of personal belongings in a safe manner are all included as examples of securing safety and hygiene</b>, and adequate space.</p>
31	10	III. Health and Safety	(III – 9) Health and Safety Communication	Subclause Point Explanation	*Not stated	<p>(III – 9) Health and Safety Communication</p> <p>Suppliers are requested to provide appropriate health and safety information, education and training on workplace hazards for employees and to ensure a mechanism for employees to raise safety concerns.</p> <p>Hazards in the workplace include, but are not limited to, mechanical, electrical, chemical, fire, and physical hazards.</p> <p>Health and safety information as well as education and training shall be provided in a language that employees understand and in a location that is accessible to them. Examples of education and training include proper use of personal protective equipment, emergency response, safe operation of machinery, and preparation for entering harmful environments. Education and training shall be provided prior to the start of work and on a regular basis.</p>
32	11	IV. Environment			II. Environment	IV. Environment
33	11	IV. Environment	(IV – 1) Government Permits and Licenses	Subclause	(II – 4) Obtain government permits and licenses	(IV – 1) <del>Obtain</del> Government Permits and Licenses

34	11	IV. Environment	(IV – 1) Government Permits and Licenses	Explanation	In Japan, the following managers, who are required to have obtained a certain level of qualifications, must be established in accordance with the applicable laws, regulations, etc.: - Waste Disposal and Public Cleaning Law: Manager responsible for specially controlled industrial waste; - Energy Saving Act: Qualified person for energy management in factories that use more than a certain level of energy; - Air Pollution Control Act, etc.: Manager in charge of pollution control in any factories that emit chemical substances, dust, soot, and so on.	<del>*All items listed on the left are deleted and replaced with the following</del>  In Japan, businesses are required to assign managers who have obtained certain qualifications stipulated by laws and regulations. Such managers include: specially controlled industrial waste control supervisors, as provided in the Act on Waste Management and Public Cleaning; qualified energy managers for factories using over a certain level of energy, as provided in the Act on the Rational Use of Energy; and pollution control managers for factories that emit chemical substances, dust, and soot, as provided in the Air Pollution Control Act and other acts.
35	11	IV. Environment	(IV – 2) Energy Efficiency and Resource Management	Subclause	(II – 5) Promote resource and energy saving by reusing, reducing, and recycling (3R)	<del>(IV – 2) Promote resource and energy saving by reusing, reducing, and recycling (3R) Energy Efficiency and Resource Management</del>
36	11	IV. Environment	(IV – 2) Energy Efficiency and Resource Management	Point	Suppliers are requested to promote “resource saving” and “energy saving” in order to reduce the environmental burdens associated with business activities.	Suppliers are requested to <del>promote “resource saving” and “energy saving”</del> make effective use of resources and promote resource- and energy-saving activities in order to <del>reduce the environmental burdens associated with business activities</del> contribute to a decarbonized society. In addition, they are requested to comply with laws and regulations concerning proper treatment and recycling of waste, and to promote activities to reduce the volume of final waste generated in the manufacturing process of products.
37	11	IV. Environment	(IV – 2) Energy Efficiency and Resource Management	Explanation	Resource saving means striving to effectively utilize resources, including achieving a reduction in the amount of resources to be used in manufacturing the products and a reduction of waste, as well as promoting the utilization of recycled resources and parts. Energy saving means striving to rationalize the use of heat and electric energy, so that fuel resources such as oil, natural gas, coal, coke etc., can be effectively utilized. 3R stands for Reduce, Reuse, and Recycle.	<del>*All items listed on the left are deleted and replaced with the following</del>  Contribution to a decarbonized society refers to working to improve energy efficiency and engaging in activities to continuously reduce energy consumption and greenhouse gas emissions. Resource saving refers to the effective utilization of resources. Means to achieve this include reducing material use and waste in relation to products and promoting the use of recycled resources and parts. Energy saving refers to rationalization of the use of thermal and electric energy. Promotion of the active use of renewable energy can realize further reduction of environmental impact. Proper treatment of waste refers to the proper disposal of waste generated in the course of business activities, such as development and manufacturing processes and distribution processes, at the responsibility of the business operator. Final waste refers to final waste generated by landfill or incineration.
38				Subclause	(II – 6) Appropriate disposal of waste and reduction of final waste	<del>*Deleted (integrated into (IV – 2) Environment)</del>
39				Point	Suppliers are requested to comply with the laws and regulations regarding appropriate waste disposal, recycling, etc., and to promote the reduction of final waste arising in the course of manufacturing the products, etc.	<del>*Deleted</del>
40				Explanation	Appropriate waste disposal means the appropriate disposal, at the responsibility of a business operator, of any waste which arises in connection with business activities, including in the course of development and manufacturing, and logistics. Final waste means the final waste arising due to landfill, burning, etc.	<del>*Stated in ((IV – 2) Environment)</del>
41	12	IV. Environment	(IV – 3) Minimization of Environmental Impacts (Wastewater, Sludge, and Air Emission)	Subclause	(II – 3) Minimize environmental pollution (drainage, soil, air, etc.)	<del>(IV – 3) Minimization of Environmental pollution Impacts (drainage, soil, air, etc. Wastewater, Sludge, and Air Emission)</del>
42	12	IV. Environment	(IV – 4) Management of Chemical Substances Used in Manufacturing	Subclause	(II – 2) Control hazardous chemicals used in manufacturing	<del>(IV – 4) Control hazardous Management of Chemicals Substances Used in Manufacturing</del>
43	12	IV. Environment	(IV – 5) Management of Chemical Substances Contained in Products	Subclause	(II – 1) Control hazardous chemicals contained in products	<del>(IV – 5) Control hazardous Management of Chemicals Substances Contained in Products</del>
44	12	V. Fair Trading and Ethics	(V – 1) Anti-corruption	Subclause	(V – 1) Prohibit corruption and bribery	<del>(V – 1) Prohibit corruption and bribery Anti-corruption</del>
45	13	V. Fair Trading and Ethics	(V – 1) Anti-corruption	Point	Suppliers are requested to maintain a sound and normal relationship with politicians and public administrators, without engaging in any bribery and/or making illegal political donations to any public officials, including foreign public officials.	Suppliers are requested <del>not to maintain a sound and normal relationship with politicians and public administrators, without engaging in any bribery and/or making illegal political donations to any public officials, including foreign public officials,</del> corruption, extortion, or embezzlement of any kind, to maintain a sound and normal relationship with politicians and administrative authorities, and to refrain from bribing any public officials or making illegal political contributions.

46	13	V. Fair Trading and Ethics	(V – 1) Anti-corruption	Explanation	Engaging in bribery means any act of offering money, entertainment, gifts, or other benefits or facilities to any public servants or equivalent persons (hereafter, collectively referred to as public officials), in the pursuit of receiving some sort of business advantage in return, such as an approval and license, the acquisition/maintenance of trading, or access to non-disclosed information.	Engaging in bribery <del>means refers to</del> any act of offering money, entertainment, gifts, or other benefits or facilities to any <del>politicians</del> , public servants, <del>foreign public officials</del> , or other persons prohibited by domestic or foreign laws and regulations, or equivalent persons ( <del>hereafter</del> , collectively <del>referred to as</del> "public officials"), in the pursuit of receiving some sort of business advantage in return, such as an approval <del>and or</del> license, the acquisition <del>/</del> or maintenance of <del>trading business</del> , or access to non-disclosed information.
47	13	V. Fair Trading and Ethics	(V – 2) Prohibition of the Offering and Receiving of Inappropriate Profit and Advantage	Subclause	(V – 3) Prohibit the offering and receiving of inappropriate profit and advantage	(V – 2) Prohibition of the Offering and Receiving of Inappropriate Profit and Advantage
48	13	V. Fair Trading and Ethics	(V – 2) Prohibition of the Offering and Receiving of Inappropriate Profit and Advantage	Point	In relation to stakeholders, suppliers are requested not to offer inappropriate benefits to and/or receive inappropriate benefits from any antisocial forces, etc.	In relation to stakeholders, suppliers are requested not to offer or receive inappropriate benefits, and to <del>and/or receive inappropriate benefits from any</del> eliminate any relationship with antisocial forces, etc.
49	13	V. Fair Trading and Ethics	(V – 2) Prohibition of the Offering and Receiving of Inappropriate Profit and Advantage	Explanation	(1) Acts of bribery, such as offering or receiving a gift, award, prize money, etc., beyond the bounds stipulated by the laws or regulations to/from a customer, or providing or receiving money/valuables or entertainment beyond social norms;	(1) Acts <del>of considered to constitute</del> bribery, such as offering to or receiving from a customer a gift, award, prize money, etc., beyond the <del>bounds limits</del> stipulated by the laws <del>or and</del> regulations <del>to/from a customer</del> , or providing or receiving money <del>/</del> or valuables or entertainment beyond the <del>limits of</del> social norms;
50	13	V. Fair Trading and Ethics	(V – 3) Provision and Disclosure of Information	Subclause	(V – 8) Provision and disclosure of information	(V – 3) Provision and Disclosure of Information
51	14	V. Fair Trading and Ethics	(V – 3) Provision and Disclosure of Information	Explanation	The information to be provided/disclosed for stakeholders includes details of business activities, financial status, business performance, risk information (e.g. damage due to large-scale disaster, any occurrence of an adverse effect on the environment and society, discovery of a material violation of laws or regulations), and so forth.	The information to be provided <del>/</del> or disclosed <del>for</del> to stakeholders includes details of business activities, financial status, business performance, risk <del>and incident</del> information (e.g., damage due to a large-scale disaster, any occurrence of an adverse effect on the environment and society, discovery of a material violation of laws or regulations), and <del>so-forth</del> ESG (environment, social, and governance) information.
52	14	V. Fair Trading and Ethics	(V – 4) Respect for Intellectual Property	Subclause	(V – 6) Respect intellectual property	(V – 4) Respect <del>for</del> Intellectual Property
53	14	V. Fair Trading and Ethics	(V – 4) Respect for Intellectual Property	Explanation	Intellectual property rights (IPR) include patent rights, utility model rights, design rights, trademark rights, copyrights, trade secrets, and so on. Prior to development, production, sale, and/or provision of a product/service, a preliminary IPR survey of third parties shall be sufficiently conducted. Unless there are any justifiable reasons, unauthorized use of any third party's IPRs will constitute an infringement upon such party's IPRs. For example, the following acts constitute infringement upon IPRs: (1) Illegal duplication of computer software and other copyrighted works; and (2) Acquisition and use of any third party business secrets by illegal means.	Intellectual property <del>ies</del> rights (IPRs) include patent rights, utility model rights, design rights, trademark rights, copyrights, <del>and</del> trade secrets <del>and so on</del> . Prior to the development, production, sale, and/or provision of a product/service, a preliminary <del>IPR</del> survey of third parties <del>y</del> IPRs shall be sufficiently conducted. <del>Without the prior consent of the other party, no suppliers shall engage in any act that would allow them to obtain confidential information. Confidentiality obligations and the ownership of IPRs shall be specified in the contract.</del> Unless there are any justifiable reasons, the unauthorized use of any third party's IPRs will constitute <del>an</del> infringement <del>upon</del> of such party's IPRs. For example, the following acts constitute <del>infringement upon</del> IPRs <del>infringement</del> : (1) Illegal duplication of computer software and other copyrighted works; <del>and</del> (2) Acquisition and use of any third party's business secrets by illegal means; (3) Coercing the provision of free technical information, manufacture of prototypes, and transfer of IPRs. (4) Unauthorized use of IP and know-how
54	14	V. Fair Trading and Ethics	(V – 5) Prohibition of Abuse of a Superior Position	Subclause	(V – 2) Prohibit abuse of a superior position	(V – 5) Prohibition <del>abuse</del> of Abuse of a Superior Position
55	15	V. Fair Trading and Ethics	(V – 6) Prohibition of Impediments to Free Competition	Subclause	(V – 4) Prohibit impediments to free competition	(V – 6) Prohibition of Impediments to Free Competition
56	15	V. Fair Trading and Ethics	(V – 7) Provision of Accurate Information on Products and Services	Subclause	(V – 5) Provide accurate information on products and services	(V – 7) <del>Provideson</del> of Accurate Information on Products and Services
57	15	V. Fair Trading and Ethics	(V – 8) Prevention and Early Detection of Improper Acts	Subclause	(V – 9) Prevention and early detection of improper acts	(V – 8) Prevention and Early Detection of Improper Acts

58	15	V. Fair Trading and Ethics	(V – 8) Prevention and Early Detection of Improper Acts	Explanation	Typical examples of measures for a “system that enables the early detection of improper acts and the prompt response thereto” are as follows: Installing in-house and external whistleblowing contact in relation to improper acts so that the top management can discover improper acts at an early stage.	Typical examples of measures for a “system that enables the early detection of improper acts and the prompt response thereto” are as follows: <del>Installing in-house and external whistleblowing contact in relation to</del> A system for the early detection and response to improper acts may, for example, include the establishment of internal and external contact points for reporting improper acts so that <del>the top</del> management can <del>discover</del> detect improper acts at an early stage. In such cases, it is necessary to ensure the confidentiality and anonymity of whistleblowers and to protect them from retaliation or other disadvantageous treatment.
59	16	V. Fair Trading and Ethics	(V – 9) Responsible Sourcing of Minerals	Subclause	*Not stated	(V – 9) Responsible Sourcing of Minerals
60	16	V. Fair Trading and Ethics	(V – 9) Responsible Sourcing of Minerals	Explanation	*Not stated	Suppliers are requested to promote self-assessments to ensure that minerals such as tantalum, tin, tungsten, and gold contained in the products they manufacture do not cause or contribute to serious human rights abuses, environmental degradation, corruption, or conflict in Conflict-Affected and High-Risk Areas, and to verify the same at their sourcing locations.
61	16	V. Fair Trading and Ethics	(V – 10) Appropriate Export and Import Control	Subclause	(V – 7) Appropriate export control	(V – 10) Appropriate Export and Import Control
62	16	V. Fair Trading and Ethics	(V – 10) Appropriate Export and Import Control	Point	Suppliers are requested to develop a clear-cut control system and take proper export procedures, regarding exports of technologies and goods regulated by laws and regulations.	Suppliers are requested to <del>develop</del> establish a clear-cut control system <del>and take proper export procedures, regarding</del> for the import and exports of technologies and goods regulated by laws and regulations <del>and to carry out appropriate import and export procedures.</del>
63	16	V. Fair Trading and Ethics	(V – 10) Appropriate Export and Import Control	Explanation	Technologies and goods regulated by laws and regulations include parts, products, technologies, equipment, and software, etc., for which exports thereof are regulated by international treaties/agreements/regulations (such as the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies) and domestic laws. Exporting may require specific procedures such as acquiring permission from the regulatory governmental authorities.	Technologies and goods regulated by laws and regulations include parts, products, technologies, equipment, <del>software, and software, etc., for which other items whose import or exports thereof are</del> regulated by laws and regulations based on international treaties/agreements <del>/regulations</del> (such as the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies) <del>and domestic laws.</del> Exporting <del>or importing</del> may require specific procedures such as acquiring permission from the regulatory <del>governmental</del> authorities.
64	16	V. Fair Trading and Ethics	(V – 11) Respect for Privacy	Subclause Point Explanation	*Not stated	(V – 11) Respect for Privacy  Suppliers are requested to respect the privacy of customers, third parties, and their employees.  Privacy refers to the right to have one’s personal and family affairs, private life, and personal secrets not interfered with or infringed upon by others or the right to control one’s own information.  Respecting the privacy of customers and appropriately managing and protecting personal information are strongly demanded in the international community as a social responsibility of companies.
65	16	VI. Quality and Safety			IV. Product Quality and Safety	VI. Product Quality and Safety
66	16	VI. Quality and Safety	(VI – 1) Ensuring Product Safety	Subclause	(IV – 1) Ensure product safety	(VI – 1) Ensuring Product Safety
67	17	VI. Quality and Safety	(VI – 1) Ensuring Product Safety	Explanation	In the product design phase, suppliers shall design the products in a manner that can sufficiently ensure product safety, and shall sell products by taking their responsibility as a manufacturer into consideration. With regard to product safety, legal compliance as well as the level of safety that should normally be maintained must be taken into consideration. The laws, regulations, etc., relating to product safety in Japan include: - the Electrical Appliances and Materials Safety Act; - the Consumer Products Safety Act; and - the Household Goods Quality Labeling Act; Safety standards are defined in detailed regulations provided by laws, the JIS, etc.	In the product design phase, suppliers shall design <del>the</del> products in a manner that can sufficiently ensure product safety, and shall sell products by taking their responsibility <del>ies</del> as a manufacturer into consideration. With regard to product safety, legal compliance as well as the level of safety that should normally be maintained must be taken into consideration. The laws and regulations <del>, etc.,</del> relating to product safety in Japan include the Electrical Appliances and Materials Safety Act, the Consumer Product Safety Act, and the Household Goods Quality Labeling Act. Safety standards are defined in detailed <del>regulations provided by rules set forth in</del> laws, the JIS, etc. <del>Foreign safety standards include UL, BSI, and CSA.</del>
68	17	VI. Quality and Safety	(VI – 2) Quality Control	Subclause Point	*Not stated	(VI – 2) Quality Control  Suppliers are requested to comply with all applicable laws and regulations regarding the quality of their products and services as well as their own quality standards and customer requirements.
69	17	VII. Information Security			VI. Information Security	VII. Information Security
70	17	VII. Information Security	(VII – 1) Defense Against Cyber Attacks	Subclause	(VI – 1) Secure protection against computer network threats	(VII – 1) <del>Secure protection against computer network threats</del> Defense Against Cyber Attacks
71	17	VII. Information Security	(VII – 1) Defense Against Cyber Attacks	Point	Suppliers are requested to take protective measures against threats on computer networks, and not to cause any damage to their company and others.	Suppliers are requested to take <del>protective</del> defensive measures against threats <del>on computer networks, and not to cause any damage to their company</del> from cyber attacks and to perform appropriate management to prevent damage to themselves and others.

72	17	VII. Information Security	(VII – 1) Defense Against Cyber Attacks	Explanation	Threats on computer networks refer to, for example, the flow of information due to computer viruses, computer worms, and spyware. Any leakage of any customer information or confidential information may cause both an interruption to business and a grave loss in confidence. Therefore, it is important to take measures against threats against computer networks so that there will be no negative effects, either internally or externally.	*All items listed on the left are deleted and replaced with the following  Cyber attacks include acts of leaking trade secrets such as personal information, customer information, business partner information, or confidential information, or causing damage such as the encryption of important files, for example, by way of malware infection through targeted emails or being directed to malicious sites. It is important to have a plan in place for rapid recovery in the event of a cyber attack. Such measures may include adding information leak detection, backing up critical data, and duplicating servers and data centers.
73	17	VII. Information Security	(VII – 2) Prevention of Leakage of Personal Information and Confidential Information	Subclause	(VI – 2) Prevent leakage of personal information	(VII – 2) Prevention of Leakage of Personal Information and Confidential Information
74	17	VII. Information Security	(VII – 2) Prevention of Leakage of Personal Information and Confidential Information	Point	Suppliers are requested to appropriately control and protect personal information of employees, customers, and third parties.	Suppliers are requested to appropriately <del>control</del> manage and protect the personal information of customers, third parties, and their employees as well as confidential information received from not only within their own company but also customers and third parties.
75	18	VII. Information Security	(VII – 2) Prevention of Leakage of Personal Information and Confidential Information	Explanation	Personal information means information on live individuals that can identify a specific person by name, date of birth, and other descriptions in the information (including information that can be easily compared with other information to identify a specific person.) Appropriate control means the construction and operation of an overall management scheme on personal information, and includes creating regulations and guidelines to be observed by employees, making plans, implementing programs, and conducting internal audits and reviews based on such management scheme. Appropriate protection means not unreasonably or improperly obtaining, utilizing, disclosing, or leaking personal information.	Personal information means information <del>on</del> concerning liveing individuals that can identify a specific person by name, date of birth, and other descriptions <del>contained</del> in the information (including information that can be easily compared with other information to identify a specific person). Confidential information generally refers to information disclosed in documents agreed to be confidential (including electromagnetically or optically recorded data information) or information orally disclosed after giving notice of the confidential nature of the information. Appropriate <del>control</del> management means refers to the <del>construction</del> establishment and operation of an <del>overall</del> general management scheme <del>on</del> for personal information that is compliant with relevant laws and regulations, and includes <del>creating</del> the implementation of access control and information security measures, preparation of regulations and guidelines to be observed by employees, <del>making</del> development of plans; in accordance therewith, <del>implementing</del> <del>programs</del> ; of such plans and measures, and conducting internal audits and reviews <del>based on such management scheme</del> . Appropriate protection means refers to not unreasonably or improperly obtaining, utilizing, disclosing or leaking personal information.