

Respect for Human Rights

Epson will strengthen its efforts to respect human rights, earn the trust of society, and strive to be a company that grows together with society.

Epson seeks to contribute to the realization of a better world by solving selected societal issues, attaining sustainable business growth, and enhancing corporate value.

In recent years, the business environment has changed drastically, including local conflicts, climate change, pandemics, rapid technological advancements, and growing social inequality. In this context, the role of companies in respecting human rights, which is becoming increasingly serious around the world, is important. Based on the United Nations Guiding Principles on Business and Human Rights, Epson is strengthening its commitment to respecting human rights, including in the value chain. First, we have established the Epson Group Human Rights Policy, which is the basis for our efforts to respect human rights. At present, we have identified labor, working environments, and supply chain as areas that are likely to have a adverse impact on human rights, and are continuously working to avoid, prevent, and redress them. We are also working hard to develop a system that allows those who have suffered or are at risk of human rights abuses in connection with Epson's corporate activities to speak out and seek redress. In addition, we emphasize communication with stakeholders such as employees and suppliers, and engage in various dialogue activities.

By continuing to make unremitting efforts to prevent such human rights violations, we hope to fulfill our corporate social responsibility to respect human rights, gain the trust of society, and grow together with society.



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Approach & Initiatives

Epson believes that respecting human rights in its corporate activities is an essential corporate responsibility, with Management Philosophy and Principles of Corporate Behavior at the core of its management. In 2005, Epson established the Policies regarding Human Rights and Labor Standard based on the United Nations Global Compact, and has been practicing actions in accordance with this policy.

Furthermore, to respond to new challenges in the ever-changing global business environment, Epson is strengthening its human rights initiatives and has revised Epson Group the Policies regarding Human Rights and Labor Standard as the "Epson Group Human Rights Policy" as of April 1, 2022, in accordance with the United Nations Guiding Principles on Business and Human Rights. In April 2019, we also joined the Responsible Business Alliance (RBA), a non-profit organization that supports the rights and welfare of workers and communities affected by the global supply chains, and are conducting activities together with our suppliers in accordance with the RBA Code of Conduct.

In addition to complying with the Guiding Principles and respecting human rights internationally recognized in the Universal Declaration of Human Rights and elsewhere, Epson supports the aims of the RBA and, as a member, is committed to ensuring that the RBA Code of Conduct is observed also by its suppliers. Through these efforts, we aim to ensure that human rights are respected in Epson's corporate activities throughout the entire value chain, including the product supply chain. (Guiding Principle 16)

Promotion Organization

Epson's human rights initiatives are spearheaded by the professional officer responsible for key focus areas under Seiko Epson's Human Capital & Well-Being Management Division. This person is working in concert with corporate departments that supervise sustainability, RBA activities, supply chain CSR, diversity & organizational culture design and human resources, and building a network with HR departments and related departments of our global affiliates to guide initiatives to prevent human rights abuses. To appropriately address human rights issues in the supply chain, the department in charge of supply chain CSR in the Production Planning Division informs and educates our suppliers about Epson's human rights policy and code of conduct. It also conducts human rights impact assessments, supervises remedial action where needed, and has set up a whistleblowing system that business partners can use to report issues.

Our human rights initiatives are periodically reported to management meeting bodies and to the board of directors.

Epson Group Human Rights Policy

In light of recent changes in awareness and issues regarding human rights in the international community, and to further strengthen our efforts to respect human rights, we revised Policies Regarding Human Rights and Labor Standards for the Epson Group as the Epson Group Human Rights Policy as of April 1, 2022. The Epson Group Human Rights Policy is based on the content of the Guiding Principles and was revised following a resolution by the Board of Directors. We position this Epson Group Human Rights Policy as the highest-level guideline for our efforts to respect human rights and are promoting human rights initiatives focused on the Epson Group and its supply chain. We regularly review the Epson Group Human Rights Policy, and as of September 1, 2024, we revised Article 1 (Background of Enactment) in its entirety to include our purpose in the description of our business practices and to reflect the positioning of our management philosophy, which serves as the basis for the employees' decisions and actions.

[Epson Group Human Rights Policy](#) ➔

[Supplier Guidelines](#) ➔

Epson Slavery and Human Trafficking Statement

In accordance with the United Kingdom Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, the Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024, and the California Transparency in Supply Chains Act, Epson reports the policies and outcomes of its efforts to eradicate modern slavery and human trafficking from the supply chains as follows.

< Latest fiscal year >

[Epson Slavery & Human Trafficking Statement for Financial Year 2024 \(PDF, 4.9MB\)](#) 

[Epson Slavery & Human Trafficking Statement for Financial Year 2024 \(Japanese\) \(PDF, 1.2MB\)](#) 

< Past Statements >

[Epson Slavery & Human Trafficking Statement for Financial Year 2023 \(PDF, 7MB\)](#) 

[Epson Slavery & Human Trafficking Statement for Financial Year 2023 \(Japanese\) \(PDF, 1.2MB\)](#) 

[Epson Slavery & Human Trafficking Statement for Financial Year 2022 \(PDF, 1,033KB\)](#) 

[Epson Slavery & Human Trafficking Statement for Financial Year 2022 \(Japanese\) \(PDF, 991KB\)](#) 

[Epson Slavery & Human Trafficking Statement for Financial Year 2021 \(PDF, 191KB\)](#) 

[Epson Slavery & Human Trafficking Statement for Financial Year 2021 \(Japanese\) \(PDF, 901KB\)](#) 

[Epson Slavery & Human Trafficking Statement for Financial Year 2020 \(PDF, 171KB\)](#) 

[Epson Slavery & Human Trafficking Statement for Financial Year 2020 \(Japanese\) \(PDF, 843KB\)](#) 

Human Rights Due Diligence of Epson Group

Human Rights Due Diligence ▼

Concrete Actions ▼

Human Rights Due Diligence

Epson has established a process for respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights (hereinafter referred to as the Guiding Principles). Epson has established the Epson Group Human Rights Policy, and is continuously implementing activities to identify and investigate adverse human rights impacts to extract problems and issues across the value chain, including group companies and business partners, to prevent and redress them. We monitor the results or progress of these prevention and redress activities on an as-needed and regular basis and report and disclose them appropriately internally and externally.



Concrete Actions

1. Human Rights Impact Assessment (Identification of adverse impacts) (Process of respect for human rights described above ②)[Guiding Principle 18]

In FY2023, we again conducted an impact assessment and identified adverse human rights impacts. The following information was referenced in the assessment

- Recognition and knowledge through the Responsible Business Alliance (RBA) activities over the past 4 years (CSR self-assessment and RBA audits)
- Status of occurrence, consultation, and reporting of internal and supply chain incidents
- Literatures such as Ministry of Economy, Trade and Industry's "Guidelines for Respecting Human Rights in Responsible Supply Chains, etc.," and "Practical Reference Materials," and information obtained through participation in the Keizaijin Caux Roundtable Stakeholder Engagement Program, etc.

As a result, we have re-identified that the areas where human rights abuses are particularly severe and likely to occur at Epson are the labor and occupational health and safety issues listed in the table below related to Seiko Epson Corporation's employees, Epson Group company employees, agency workers, supplier employees, on-site service vendor workers, and migrant workers as well as Asia in terms of region and manufacturing in terms of business type. The "specific examples of particular concern" are listed by referring to the RBA Code of Conduct and past incidents within the Epson Group.

High Priority Groups	Major Adverse Impacts	Specific Examples Requiring Particular Attention
Employees of Seiko Epson Corporation and Epson Group Temporary staff Supplier employees On-site service vendor workers Migrant workers	Forced labor	- Intermediary fees, recruitment fees, and other expenses related to employment - Confiscation of passports - Forced overtime - Freedom to leave work or terminate employment
	Young workers	- Overtime, night shifts, and work that jeopardise the health, safety or morals
	Overwork	- Violations of laws and internationally recognized human rights norms regarding working hours, and long working hours that are detrimental to health.
	Wages and Benefits	- Unpaid overtime wages - Non-payment or deductions from wages as a disciplinary measure
	Inhuman treatment	- Harassment
	Discrimination	- Discrimination in dismissal and treatment - Pregnancy tests, dismissal of pregnant women
	Occupational Health and Safety	-Hazardous and noxious working environment -Protection of female workers -Protection of workers in emergency situations

2. Prevention and Mitigation of Adverse Impacts (Process of respect for human rights described above ③) [Guiding Principle 19]

Epson conducts CSR self-assessment annually in compliance with the RBA Code of Conduct and the survey form. After joining the RBA in April 2019, Epson is promoting activities to raise awareness of the RBA Code of Conduct to the Group, as well as conducts CSR self-assessment annually at Seiko Epson's plants and offices, domestic and overseas Group companies, and major suppliers in compliance with the RBA survey form on an ongoing basis. The results of the CSR self-assessment survey are reported to the RBA. Each Seiko Epson plant and office, Group company, and supplier identify where adverse human rights impacts are located and develop corrective plans to redress and mitigate the identified adverse impacts.

Overview of 2024 CSR Self-Assessment (Epson Group locations)

Topic	Description
Questionnaire	RBA Self-Assessment Questionnaire (SAQ) - Facility Risk Questions - Facility Control Questions
Survey Contents	RBA Code of Conduct Section A Labor Section B Health and Safety Section C Environment Section D Ethics Section E Management System
Implementation Period	Survey: April - June 2024 Identification of issues and corrective actions: July 2024-.
Target Locations	Seiko Epson business Locations 11 facilities Domestic affiliates: 8 companies (6 manufacturing companies and 2 sales and other companies) Overseas offices 45 companies (15 manufacturing subsidiaries and 30 sales and other companies)
Addressing Adverse Impacts	Develop a corrective action plan and work on redress and mitigation with the support and cooperation of the relevant headquarters departments in charge.

Results for 2024 (summary)

In 2024, Seiko Epson conducted CSR self-assessment in accordance with the fully revised RBA SAQ.

The results of CSR self-assessment at each Seiko Epson facility, domestic affiliate, and overseas affiliate showed no high-risk *.

*High risk is defined as a score of less than 60 points

The responses from each site were reviewed by the RBA supervisory department at the head office and the relevant supervisory department, and no issues that fall under priority non-conformances were found. In the process of the examination, we communicated with each site regarding any points of uncertainty and provided feedback to each site individually regarding areas that require correction.

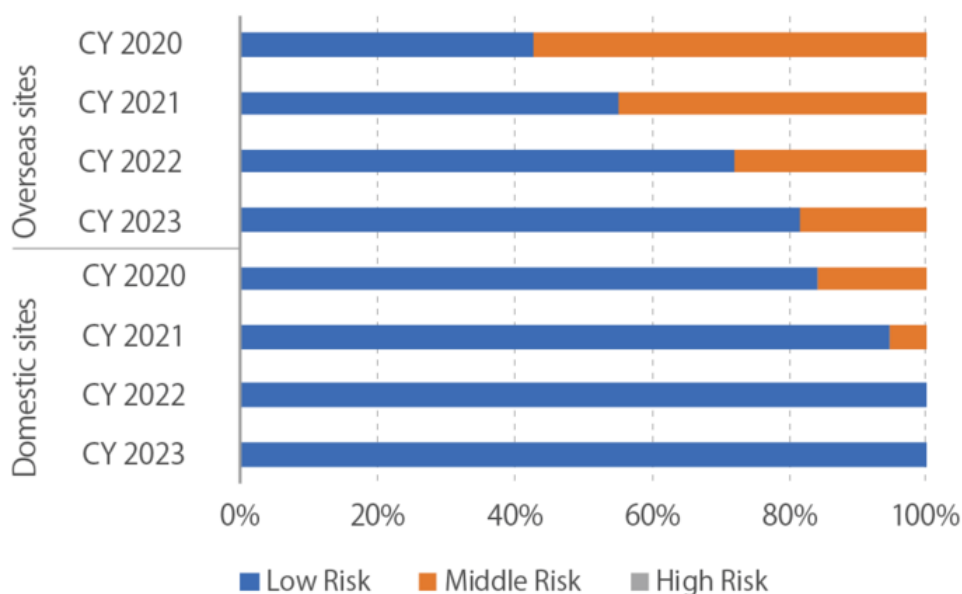
There were two common issues at many of the sites that were not adequately addressed.

Matter	Response
Reasonable accommodation for persons with disabilities	The head office supervisory department will disseminate guidelines to all sites on the meaning of this concept and the approach to dealing with it, and promote understanding of the concept.
Conducting evacuation drills during the hours when it is dark outside	The supervisory department at the head office is currently discussing with the department at the head office in charge of disaster prevention countermeasures about an announcement on the implementation of the drill.

We will continue our efforts to further disseminate Group policies, Group regulations, rules and guidelines, etc. to each of our sites to ensure that the risk of serious human rights abuses continues to be controlled.

(Reference) The following table shows the results of CSR self-assessments (self-assessments in accordance with the RBA SAQ prior to revision) conducted by Epson Group companies from 2020 to 2023. The risk level is determined based on the score. We believe that the overall risk level has been decreasing year by year as a result of corrective actions taken each year.

CSR Self-assessment results by year



* Low risk: Evaluation points are above 85, and actions are being taken overall at the level required by the RBA Code of Conduct.

Medium-risk: Evaluation points are more than 65 and equal to or below 85, and there are items for which actions are not taken at the level required by the RBA Code of Conduct, and voluntary improvement is necessary.

High Risk: Items with a score of 65 or less, and items that do not meet the required level of the RBA Code of Conduct require improvement and monitoring of results.

Verification of Compliance with the RBA Code of Conduct (Mock Audit)

Seiko Epson has been conducting RBA's self-assessment for its main business locations, and now, in addition to that, we have conducted a compliance check (mock audit) by experts.

Outline of the mock audit

Implementation period December 2024

Implementation business Place Hirooka business Place (Nagano Prefecture)

Content and methods (document verification, on-site inspection, worker interviews) in accordance with RBA VAP audit standards

Auditor Third party qualified as an associate auditor of RBA

As a result of the mock audit, no serious adverse impacts on human rights were identified. However, some non-conformances with the RBA Code of Conduct were pointed out. As a member of the RBA, Seiko Epson is voluntarily addressing these non-conformances by formulating corrective action plans in consultation with the relevant departments. Progress on these initiatives is reported to management as needed.

[Click here for more information on detailed CSR evaluation in the supply chain](#) ➔

3. Monitoring of Results and Progress (Process of respect for human rights described above ④) [Guiding Principle 20]

With the involvement of management, each facility, company, and supplier of Seiko Epson and its affiliates are working to redress or mitigate adverse human rights impacts per corrective plans. For serious adverse impacts, the relevant supervisory department at the headquarters confirms the completion of the remediation.

Epson continues to conduct the CSR self-assessment survey once a year to check the status of correction of non-compliance with the RBA Code of Conduct at each company and facility. Furthermore, seven of Epson's main manufacturing sites in Southeast Asia and China (as of May 2025) had voluntarily undergone RBA's Validated Assessment Program (VAP) audits on an ongoing basis to identify and correct issues from a third-party perspective and improve the level of their activities. To date, Epson has obtained the Platinum recognition, which is awarded when a company achieves a perfect score (200 points) with no RBA Code of Conduct nonconformities, at the production site in Indonesia, Malaysia, Thailand, China, and the Philippines.

[Locations currently certified Platinum and Gold](#) ➔

The following are some of the major examples of adverse human rights impacts identified in FY2024 as a result of CSR assessment

surveys or RBA VAP audits within the Group, which have been addressed or are being addressed on an ongoing basis.

Adverse impacts	Place of Occurrence	Status of addressing
Delay in payment of wages to retirees	manufacturing company	Changed payment date in accordance with laws and regulations (within 3 days from the date of retirement) (system to be modified)
Failure to maintain safety equipment (eye washers)	manufacturing company	Replace with fixtures that meet legal requirements
Insufficient days of paid leave granted to former dispatch worker	manufacturing company	The paid leave calculation method was revised in accordance with laws and regulations, and leave days were recalculated and granted.
Not testing drinking water (tap water) quality	manufacturing company	Inspection procedure was set in accordance with laws and regulations, and inspection was completed.
Failure to equip manufacturing machinery with safety devices	manufacturing company	Equipped with safety devices for such machines in accordance with laws and regulations

In addition, adverse human rights impacts that have been addressed and provided for remediation include the following

Adverse impacts	Place of Occurrence	Status of addressing
Long working hours by employees of business partners	Business partners	Discussed corrective measures with business partners, and actions have been taken.
Workers bear the recruitment fees	Business partners	Reimbursed
Violation of the Law concerning Worker Dispatching	Manufacturing company	Keep outsourced operations within the scope of the law.
Improvement of the emergency exit doors on the factory evacuation route	Manufacturing company	The structure of the relevant emergency exit doors has been reviewed.
Brokerage/recruitment fees to agencies paid by migrant workers	Manufacturing company	Stopped migrant workers' burden and reimbursed to workers
Custody of migrant workers' passports	Manufacturing company	Thoroughly prohibit passports from being kept in custody
Agreement process with workers regarding overtime	Sales company	Clarification of the process for requesting overtime work
Advance payment by the applicant for the cost of medical examinations at the time of hiring	Manufacturing company	Reimbursed to the individual and changed to a process that does not require advance payment
Inadequate legal requirements in the contract between staffing agencies and the employees they dispatch	Staffing agency	Update the contract to comply with the law

Failure to record overtime work	Staffing agency	Payment of unpaid overtime wages and improvement of the overtime work record system
Errors in the calculation of the amount of withholding at source	Staffing agency	Adjustment of withholding tax payments, updating of calculation system
Failure to pay legal reserves related to employees	Business partners	Discussions and improvements have been made with the business partner.
Failure to manage working hours	Business partners	Discussions and improvements have been made with the business partner.
Failure to pay overtime wages by contractors performing services on premises	Business partners	Overtime wages have been paid in accordance with the local laws

4. Communication and Reporting (Process of respect for human rights described above ⑤) [Guiding Principle 21]

The status of our efforts to address the issues requiring corrective actions is reviewed annually by the responsible manager and reported on our website and in our Sustainability Report. Global efforts of the Epson Group are reported in a statement on modern slavery and human trafficking.

[Epson Slavery and Human Trafficking Statement](#) →

To build and maintain good labor-management relations, Epson proactively provides information to employees and engages in sincere dialogue and discussions. Epson also communicates with customers about the status of Epson's efforts to respect human rights as needed.

Major initiatives undertaken in FY2024

Responding to Harassment by Customers

While there are legitimate complaints from customers requesting improvements regarding problems with products and services, there is a very small percentage of cases where requests or behavior that are inappropriate in light of social norms deny individuality or damage the dignity of the employees involved. These impede the continuous provision of services and lead to a deterioration in service quality.

Society's interest in this kind of customer harassment is growing. In fiscal 2024, Epson conducted a questionnaire survey and interviewed mainly with the sales and service divisions of Seiko Epson and its domestic affiliates. As a result, it was confirmed that some Epson employees were also victims of serious customer harassment, including adverse effects on the mind and body. In response to this, Epson has taken the following measures by referring to the "Manual for Company Measures against Customer Harassment" issued by the Ministry of Health, Labour and Welfare, and other sources.

- Epson established the "Epson Group Guidelines for Customer Harassment" (March 21, 2025) and disseminated them both internally and externally.

- In case we determine that any behavior constitutes customer harassment, we will take a firm stand against it. We may refuse to provide products or services or respond to customers.

In addition, if customer harassment continues, if it is malicious, or if it is judged that it violates criminal laws and regulations, we may deal with it in cooperation with the police, lawyers, etc.

- Employees who experience customer harassment are required to report it to their superiors and the organization takes action, and we have made it known that they can use the consultation desk.

- If necessary, we will give consideration to employees who have been affected, including mental care.

In addition, in order to prevent the Epson Group from causing harassment against its business partners, etc., we will reiterate and thoroughly inform Epson Group employees in harassment education and other activities.

*Please see below for information on the Epson domestic groups in scope.

Site 
Domestic Subsidiaries and Affiliates 

Initiatives for AI Ethical Governance

At Epson, AI is increasingly being utilized in various ways, including integration into products and adoption in business operations. At present, we are anticipating risks including copyright infringement as unauthorized use of third-party copyrighted materials, leakage of confidential information belonging to Epson or others, and the generation or dissemination of incorrect information, inappropriate expressions, or biased and discriminatory content. To ensure the proper use of AI and address potential adverse impacts such as human rights abuses, Epson is taking the following measures.

Promotion System

Establishment of the AI Ethics Committee (July 2023)

Epson has established the AI Ethics Committee with the primary purpose of collecting and analyzing a wide range of information related to AI trends, making policy decisions, responding to AI-related laws and regulations in various countries, and building and operating a comprehensive AI ethics governance framework across the group. Members of the committee include representatives from departments such as technology development, quality assurance, legal affairs, and administration.

AI Ethics Management System/Promotion System

Each department appoints an AI Ethics Manager responsible for raising awareness of AI ethics, providing education, and conducting risk assessments for AI utilization projects.

Additionally, all affiliated companies, including those overseas, designate AI Ethics Officers who are responsible for establishing AI-related standards, reviewing and assessing risks in AI system utilization projects, and educating employees.

Through this structure, Epson promotes AI ethics governance on a global scale.

Policies and Regulations

Epson AI Ethical Principles (established on August 1, 2023, revised on April 1, 2025)

These principles define the standards Epson should uphold in promoting the research, development, operation, and utilization of AI, with the aim of realizing a human-centered society where humans and AI coexist.

Epson AI Ethics Principles
Coexistence of humans and AI
Creating new AI value through co-creation
Fair, trustworthy, and accountable AI
Safe and secure data distribution
Contributing to the spread of healthy AI

Establishment of AI-related regulations and guidelines, etc.

To ensure the proper and ethical use of AI systems, Epson has developed and provided various internal rules and tools, including the AI Management Regulations, guidelines, checklists, and risk level assessment charts.

These policies apply across the entire Epson Group.

In response to the rapid spread of generative AI, Epson has also established the Generative AI Utilization Guidelines, which clearly outline considerations regarding copyright and privacy, as well as precautions for input and output.

These guidelines are designed to promote responsible and appropriate use of generative AI.

Operation

Epson manages AI systems using a "risk-based approach," in which the risk level of each AI system is assessed, and appropriate countermeasures are implemented based on the magnitude of the identified risks.

The AI Ethics Officer assesses and records the risk level for each AI utilization project.

In addition to copyright infringement and information leaks, Epson also checks for human rights violation risks from the perspective of consideration for social diversity and ensuring transparency and fairness.

If such risks are identified, we take measures to prevent or mitigate them.

Education

To deepen understanding of the importance of AI ethics and ensure the effective implementation of AI ethics management measures, Epson conducted e-learning on AI ethics in fiscal year 2024 for all employees, including those at domestic and overseas group companies.

In addition, e-learning programs have been provided specifically for employees who are involved in internal utilization of AI or the development and delivery of AI-related products and services.

Initiatives to Prevent Harassment

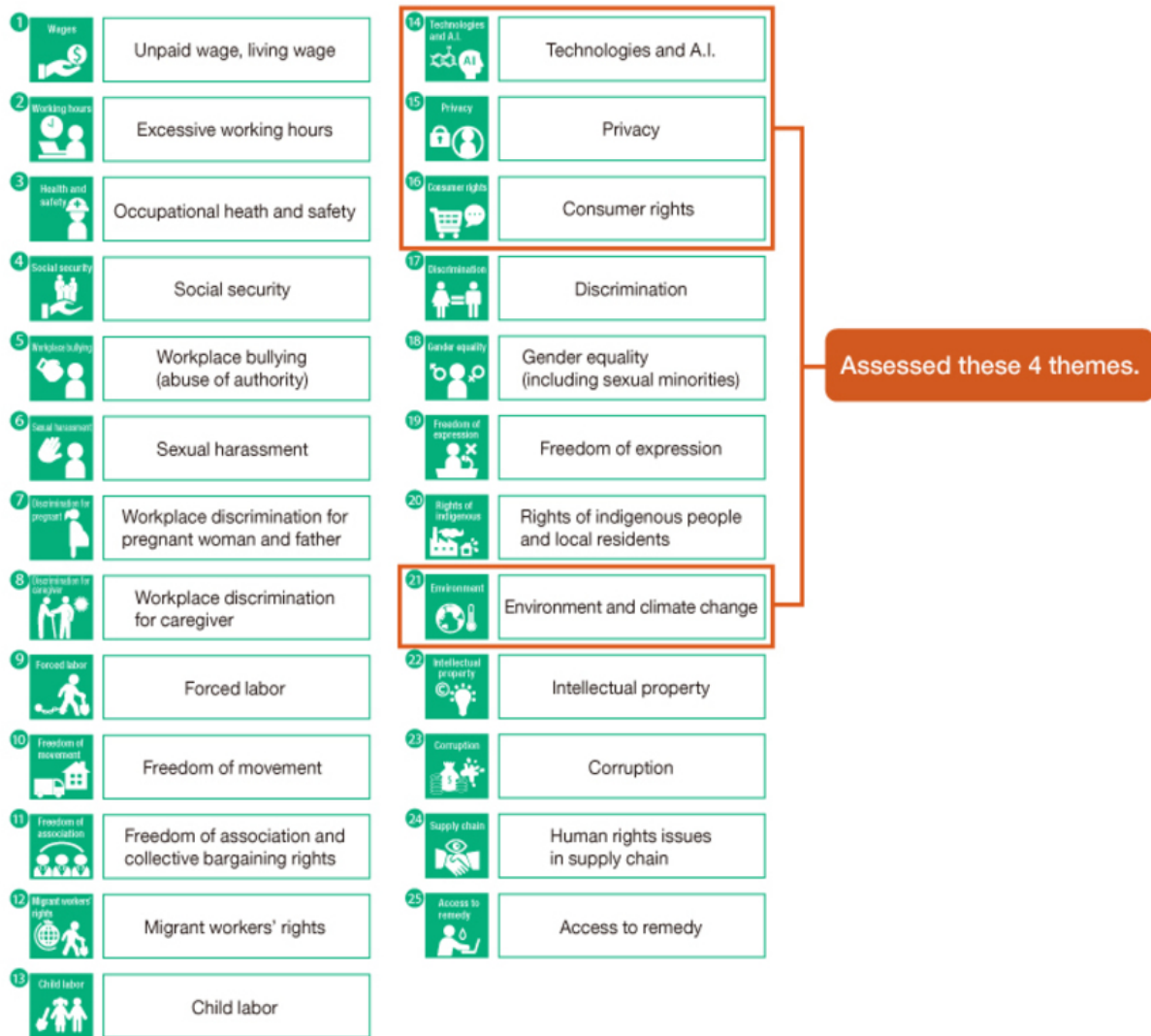
Epson recognizes that areas such as labor practices and occupational health and safety carry the highest risk of human rights abuses. In Japan, we are particularly committed to ongoing efforts to address harassment and continue to take proactive measures in this regard.

[Click here to see our approach to harassment](#) ➔

| Initiatives undertaken in FY2023

Although Epson recognizes that labor practices and occupational health and safety are the areas with the highest risk of human rights abuses, in FY2023, we also conducted assessments in areas other than those. Specifically, we referred to the 25 categories presented by the Ministry of Justice as "areas of human rights that companies should respect," and selected eight of the following areas: "technology and AI", "privacy", "consumers' rights", "freedom of expression", "rights of indigenous people and local residents", "environment and climate change", "intellectual property", and "bribery and corruption". After considering the degree of difficulty in remediability and the scale and scope of impact, and considering the relevance to Seiko Epson's corporate activities, four themes were established: AI, privacy, consumers' rights, and environment and climate change.

Areas of Human Rights that Companies Should Respect



Prepared with reference to the "Approach required by companies for 'Business and Human Rights' today" (Human Rights Protection Bureau, Ministry of Justice)

Of the four issues the following were discussed with the relevant divisions: the possible adverse impacts of human rights in general; the potential adverse impacts at Epson; laws, regulations, and general mechanisms and frameworks for preventing, stopping, and mitigating adverse impacts; mechanisms and frameworks at Epson; whether or not Epson has a consultation/reporting windows for stakeholders; and whether or not actual consultations/reports have been made. As a result, we concluded that, although the use of AI, in particular, is currently limited within the company and no serious adverse impact has been observed, we have determined to continue monitoring it. This is because the technology is likely to develop dramatically in the future and have a significant impact on society, and secondly, because for Epson as well there are various possibilities for development, such as internal use and development of other businesses and incorporating it into products, and that these may have an impact on human rights. We will also continue to monitor the other three themes although no serious adverse impacts have been found to date.

Grievance Mechanism

[Approach ▼](#)[Concrete Actions ▼](#)

Approach

Epson has established and operates contact points for complaints in line with the United Nations Guiding Principles on Business and Human Rights (Guiding Principles 22, 29, and 31), which are available to anyone who has suffered or feels threatened of suffering a human rights abuse in connection with Epson's corporate activities. The Company is committed to responding sincerely to complaints and similar issues received, and to enhancing the effectiveness of appropriate remedies.

In addition, these grievance mechanisms are utilized for the following three purposes:

- (1) A means of reporting specific adverse human rights impacts for remedy and redress
- (2) One means of human rights impact assessment
- (3) Confirmation of whether the human rights issues identified and addressed have been surely remedied and redressed

Concrete Actions

Consultation and Reporting Hotline for Employees

Epson has established various contact points, including the Epson Helpline, Harassment Consultation Desk, Long Working Hours Consultation Desk, Employee Consultation Desk, Diversity Consultation Desk, and Consultation Desk for Foreign Nationals, to handle consultation and reporting from employees (including contract workers, part-timers, part-time workers, temporary workers, etc.) on human rights. These consultation services are available to employees (including contract workers, part-time employees, part-time freelancers, temporary workers, etc.) for consultation and reporting on human rights issues. Each of these contact points confirms the facts of the case, taking into consideration the wishes of the person consulting or reporting the matter as well as confidentiality of their identity and privacy, and works to provide remedies and prevent recurrence. Among these contact points, we are working to exchange information and understand the overall status of human rights-related consultation and reporting. Among the consultations and reports received through the above-mentioned contact points, there were three harassment cases in the second half of fiscal year 2023 and one case in the first half of fiscal year 2024 that resulted in disciplinary action. Taking into account the wishes of the individuals who reported or were affected, Epson investigated and verified the facts, and implemented measures such as deterrence of misconduct, prevention of recurrence, and ongoing support. We also communicated with the victims and provided mental and physical care as needed.

Aside from harassment, in the second half of fiscal year 2023, there was one report concerning insufficient attention to workplace safety and one report related to personal information security. In both cases, corrective actions were taken, and efforts were made to prevent future incidents.

Consultation and Reporting Contact for All Stakeholders

Epson began providing all stakeholders, including customers, investors, and local residents, with access to the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER) from April 2024, accepting consultations and reports through the dialogue and remedy platform provided by JaCER. JaCER is an organization that aims to provide a collaborative grievance resolution platform involving many companies in accordance with the UN Guiding Principles on Business and Human Rights (Guiding Principle 30) and to support and promote grievance resolution by its member companies from a professional standpoint. Epson is working with the support of JaCER to improve the effectiveness of its grievance mechanism, promote dialogue with stakeholders and advance remedy for those affected by human rights abuses. Through the use of these contact points, we will appropriately respond to consultations and reports on human rights from a wide range of stakeholders.

The consultation and reporting contact points mentioned above are operated under strict control, prohibiting retaliation against informants and ensuring anonymity.

[Whistleblowing Systems and Reporting Channels](#) ➔

[Whistleblowing System for Suppliers](#) ➔

[Contact for Inquiries](#) ➔

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Training

Approach ▼

Concrete Actions ▼

Approach

Epson provides various types of education and training to ensure that its processes for respecting human rights function effectively, including for directors, management-level employees, procurement workers, general employees, and the supply chain. (Guiding Principle 16(d)) In particular, Epson communicates its policy and approach to respect for human rights to its supply chain through seminars on respect for human rights, as well as through meetings for introducing the procurement policy, briefings on supplier guidelines, and other opportunities.

Concrete Actions

Education for Epson Group Employees

For some time now, Epson has been promoting awareness of the RBA Code of Conduct and its detailed rules, mainly among relevant departments and personnel engaged in human resources, health and safety, environment, ethics, supply chain management, and other operations within the company in Japan and overseas. In FY 2021, on the occasion of the revision of the Epson Group Human Rights Policy, Epson once again provided training on "business and human rights" to directors, the members of the departments in charge of related functions at Seiko Epson's head office and related personnel, mainly from the human resources departments of domestic and overseas affiliated companies. Since fiscal year 2022, Epson has been conducting e-learning programs aimed at raising awareness of respect for human rights. These programs cover the basics of "Business and Human Rights", the Epson Group Human Rights Policy, and Epson's initiatives to promote respect for human rights. They are mandatory for all executives, employees, contract workers, and temporary staff of Seiko Epson and domestic affiliates, as well as for managers and above at all overseas subsidiaries.

As of now, the completion rate among targeted participants is 87.9% in Japan and 95.8% overseas. In addition, Epson continues to host seminars led by external experts on human rights-related topics for executives and employees across the Epson Group.

Seminars and Briefings for Suppliers

In addition to explanations and expectations regarding social demands and the RBA (Responsible Business Alliance) requirements at the supplier briefings on CSR procurement, we also hold seminars and information sessions for the purpose of gaining a better understanding of the details. A large number of suppliers have participated. Epson also conducts surveys of suppliers to ascertain their needs, which are reflected in the seminars and briefings.

Epson believes that it is important for suppliers to voluntarily engage in CSR initiatives based on an understanding of the underlying objectives, without making the activities themselves an objective. In particular, based on the recognition that human rights require focused efforts, Epson conducts seminars every year by asking outside consultants and experts to serve as lecturers to provide

professional information in light of ever-changing social demands.

In FY2023, following the revision of the RBA Code of Conduct and Epson's Supplier Guidelines, we held a briefing session, which was attended by more than 1,000 suppliers and helped them understand Epson's procurement policy and the purpose and changes of the RBA Code of Conduct.

| Human Rights Training for Security Personnel

Seiko Epson outsource security services to third-party companies, and we ask these companies to provide human rights training. In the detailed CSR evaluation based on the self-assessment for suppliers conducted in FY2024, we confirmed the implementation of human rights training by our subcontractors.

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Respect for Human Rights in the Supply Chain

Approach and Initiatives for Respecting Human Rights in the Supply Chain ▼

Addressing identified human rights issues ▼

Approach and Initiatives for Respecting Human Rights in the Supply Chain

Approach

Epson has declared in its Human Rights Policy that human rights should be respected not only by Epson but also by its suppliers. As stated in the Human Rights Policy, Epson is not only committed to complying with the UN Guiding Principles on Business and Human Rights and respecting internationally recognized human rights as stated in the Universal Declaration of Human Rights and others but is also committed, as a member and supporter of the RBA's (the Responsible Business Alliance) objectives, to ensuring that suppliers comply with the RBA Code of Conduct. (Guiding Principle 16(c)) Through these efforts, we aim to ensure that human rights are respected throughout the supply chain of Epson products.

Concrete Actions



Epson believes that respecting human rights in its corporate process is an important corporate responsibility, with Management Philosophy and Principles of Corporate Behavior at the core of its management. In 2005, Epson established Epson Group the Policies regarding Human Rights and Labor Standards based on the United Nations Global Compact and had been practicing actions in accordance with this policy.

In April 2019, we also joined the Responsible Business Alliance (RBA), a non-profit organization that supports the rights and well-being of workers and communities affected by the global supply chain and are working with our suppliers to promote business activities in accordance with the RBA Code of Conduct.

Furthermore, Epson is strengthening its human rights initiatives to respond to new challenges in the ever-changing global business environment. Epson revised the "Epson Group the Policies regarding Human Rights and Labor Standards" as of April 1, 2022, in compliance with the UN Guiding Principles on Business and Human Rights, through a resolution of the Board of Directors as the "Epson Group Human Rights Policy."

In addition, Epson has established the Epson Group Supplier Guidelines, consisting of the RBA Code of Conduct and Epson's policies. Epson requests suppliers to comply with them and obtain written consent.

[Epson Group Human Rights Policy](#) ➡

[Supplier Guidelines](#) ➡

2 . Human Rights Due Diligence (Process of respect for human rights described above ②) [Guiding Principle 17-21]

Among all stakeholders involved in business activities (customers, shareholders and investors, local communities, business partners, NGOs and NPOs, employees, etc.), Epson has identified the supply chain as a high priority from the perspective of human rights. Under the requirements for a Regular Member of the Responsible Business Alliance (RBA) on supplier management^{*1}, Epson confirms compliance with each item of the RBA Code of Conduct (labor and human rights, health and safety, environment, ethics, and management systems), and works to remedy and redress, as well as to affirm status of respecting human rights of indigenous people and foreign migrant workers. For over 10 years, we have been conducting annual human rights impact assessments using CSR assessments and other measures for our major suppliers, including not only direct material suppliers such as parts and manufacturing contractors but also other business partners (on-site service providers, human resources agencies such as recruitment agencies and staffing agencies, logistics companies, etc.). In addition to the self-assessment in which suppliers respond to the designated forms, included in the human rights impact assessment is confirmation by on-site verification and audits. The identified adverse impacts are remedied, corrective action plans are formulated, and recurrence prevention measures are taken. In addition to identifying adverse impacts through assessments, Epson recognizes the importance of reporting through grievance mechanisms and other means as measures for human rights impact assessment.

^{*1} [Overview of RBA Regular Membership Obligations](#) 📄

3. Evaluation Results, Prevention/Remediation (Process of respect for human rights described above ③)

Through the above assessment activities, we identify adverse human rights impacts at suppliers and implement prevention and mitigation measures for them.

4. Monitoring (Process of respect for human rights described above ④)

Epson continues to conduct annual CSR self-assessments and similar to confirm supplier compliance with the RBA Code of Conduct. In addition, Epson has received confirmation of compliance with the RBA Code of Conduct E12 (Supplier Responsibility) and D7 (Responsible Mineral Sourcing), among others, during ongoing VAP audits at Epson manufacturing sites. Indirect workers (employees of on-site service vendors and dispatch workers,) are included in the scope of the audits and are used as a means to identify adverse human rights impacts and we redress any non-conformities or deficiencies when detected.

In addition, information reported through grievance mechanisms and similar is used as a means of measuring the effectiveness of addressing adverse human rights impacts.

5. Communication and Reporting (Process of respect for human rights described above ⑤)

Epson discloses its progress and achievements in respecting human rights in its supply chain, as well as the status of its own group companies, in its Sustainability Report on the Web after an annual review by the responsible person. With regard to modern slavery and human trafficking, Epson publishes an annual statement on the Modern Slavery Act of each country, including the United Kingdom, and reports on the Epson Group's efforts to address this issue.

6 . Remediation [Guiding Principle 22, 29, 30 and 31]

All group companies in Japan and overseas have set up a contact point for suppliers to receive consultations and reports. Anonymous reporting and reporting in local languages are allowed, and we strictly prohibit any retaliation for reporting. We are also a member of the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER), a complaint-handling platform that complies with the UN Guiding Principles on Business and Human Rights, to promote dialogues and remedies.

Contact Information (for inquiries) (e.g. corporate phone number)

Suppliers of Group Companies in Japan: Consultation and Reporting Desk [➔](#)

Overseas Group Company Suppliers: List of Contact Points Established by Each Company (PDF,380KB) [PDF](#)

JaCER Contact [☐](#)

Addressing Identified Human Rights Issues [Guiding Principle 19]

Epson has developed a program for suppliers who are high-priority targets for addressing adverse human rights impacts and is promoting activities worldwide.

1. Informing Suppliers of the Code of Conduct through Supplier Guidelines and Obtaining Their Consent

The Epson Group Supplier Guidelines are available in seven languages (English, Japanese, Simplified Chinese, Spanish, Portuguese, Thai, and Indonesian) to ensure that they are understood by many suppliers. We publicize the guidelines on the web and each Group company in Japan and overseas has made this information known to all suppliers. In 2024, when the guidelines were revised, we held a briefing session to explain the revision to our suppliers and earned their understanding of the details of the Supplier Code of Conduct (the RBA Code of Conduct). In addition, we have obtained written consent from over 2000 suppliers to comply with the above Supplier Guidelines.

2. Education through Human Rights Seminars

Every year, Epson conducts a human rights seminar for suppliers, inviting outside experts as guest speakers.

At the seminar, in addition to the policy and status of Epson's initiatives, we provide information on Epson's approach to respect for human rights and the latest information on the global and Japanese situations surrounding human rights.

More than 300 suppliers participate in the seminar every year, and in FY2024 approximately 300 companies/500 people attended.

< Seminar program >

Seminar 2024

Theme: Business and Human Rights and International Labor Standards

Guest speaker:

Mr. Ryusuke Tanaka, Program Officer, External Relations and Labor Standards Specialist, International Labour Organization (ILO) Office in Japan

Ms. Mami Kamoshita, Program and Operations Officer, International Labour Organization (ILO) Office in Japan

Seminar 2021, 2022, 2023

Theme: Business and Human Rights

Guest speaker:

Mr. Keisuke Hanyuda, CEO, OWLS Consulting Group

3. Due Diligence through SAQ, Remediation, etc.

Epson has conducted annual supplier due diligence for over 10 years.

We use the Self-assessment questionnaire (SAQ), which checks compliance with the RBA Code of Conduct, to understand the status of our suppliers' efforts to respect human rights. In addition to implementing human rights remedies, we provide feedback to each supplier on matters that require action at that supplier's base, request that they take action, and confirm whether any corrections have been made. The RBA Code of Conduct alone covers a wide range of human rights issues, particularly in section A: Labor. However, we have identified and evaluated particularly salient human rights issues also in consideration of the ILO Core

Labor Standards, the principles of the United Nations Global Compact, and so forth.

(Salient Evaluation Item)

Items	ILO Convention	RBA Code of Conduct
Prohibition of child labor	No. 138/182	A2
Forced labor prohibition	No. 29/105	A1
Appropriate management of working hours (Maximum working hours: 60 hours per week, 1 day off every 7 days)	-	A3
Proper payment of wages (Proper payment of minimum wages and overtime wages, observance of payment dates)	-	A4
Humane treatment (Prohibition of harassment)	No. 190	A5
Non-discrimination	No. 100/111	A5
Freedom of association and collective bargaining rights	No. 87/98	A6
Ensure a safe and healthy work environment	No. 155/187	B Health and Safety

Remediation/Redress Cases

- Reimbursement of Recruitment Fees to Foreign Workers

Through the self-assessment, we identified a case that foreign workers who hired by on-site manufacturing contractors at our manufacturing sites, had paid recruitment-related fees in their home countries of foreign workers. (such as commissions, language training fees, and visa acquisition fees).

→(Remedies and Corrective Actions) We held discussions with the manufacturing contractor and confirmed through evidence that the reimbursement had been completed. Furthermore, we have agreed with the manufacturing contractor in question to ensure that there will be no payment by workers for recruitment fees in the future.

- Employment Contracts

Through self-assessment, we identified that employment contracts at multiple suppliers were lacked certain items of terms and condition, and were not written in a language that workers could understand.

→(Remedies and Corrective Actions) We have provided detailed explanations to the relevant suppliers regarding the items that should be included in their employment contracts, requested them to change the format, and have confirmed that they have completed remedial and corrective measures.

- Holidays

During a VAP audit conducted at our manufacturing sites, it was identified that on-site security company was not paying overtime wages and holiday allowances and that holidays were not being granted.

→(Remedies and Corrective Actions) We have requested the relevant security company to pay the wages and allowances in question and to grant holidays, and have confirmed the completion of the remedial corrective measures.

4. Remedies through Reporting Channels for Business Partners [Guiding Principle 22, 29 and 31]

The mechanisms allow reporting in the local languages and are operated in strict compliance with the prohibition of retaliation for reporting. In addition to the Epson Group Supplier Guidelines and the recommendation to inform and use the mechanisms at briefing sessions, reporting can be made via the website, and we are working to operate reporting mechanisms that are easy for stakeholders to use. We assist in reaching remedies for adverse human rights impacts that are identified as a result of reports from supplier employees or their legitimate representatives as well as audits.

(Examples of remedies and corrective actions)

A case in which overtime wages were not paid due to damage to recording equipment at an on-site manufacturing contractors at our manufacturing sites

→(Remedies and Corrective Actions) We identified the case through the reporting channel, made the manufacturer pay for the wage shortage, and confirmed that corrective measures had been taken to prevent a recurrence.

Contact Information (for inquiries) (e.g. corporate phone number) ➔

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