

E S G Pursuing Compliance and Integrity



Respect for Human Rights

In 2022, the Hakuholdo DY Group established its Group Human Rights Policy. In 2023, we further identified salient human rights issues within our business activities and formulated Human Rights Due Diligence Guidelines to address them. In line with these guidelines, we are steadily implementing human rights due diligence across the Group.

Human Rights Initiatives

The Hakuholdo DY Group’s Human Rights Policy

The Hakuholdo DY Group aims to create a society abounding in *sei-katsu-sha*’s aspirations and where they can live vibrant lives through our creative human resources, who serve as our greatest asset.

Respect for human rights is the foundation upon which the Hakuholdo DY Group is built, and we promote respect for human rights as the root of ethical, sustainable business. In order to fulfill our responsibility to respect human rights more thoroughly, we have formulated a Human Rights Policy for the Group based on the “Protect, Respect, and Remedy” framework outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Details ▶ [WEB Full text of the Human Rights Policy](#)

Implementation Structure

Hakuholdo DY Holdings’ Board of Directors has a responsibility to implement ongoing monitoring of all activities stipulated by the Policy in regard to respect for human rights. While fulfilling the monitoring function in relation to measures addressing particularly salient human rights issues, the Board also devises appropriate measures to prevent any direct or indirect involvement in human rights infringements. The Corporate Sustainability Division, as the unit responsible for sustainability matters, works under the guidance of the director responsible for overseeing sustainability to spread awareness of the Policy and implement initiatives related to respect for human rights overall.

Human Rights Due Diligence

Salient Human Rights Issues

Human Rights Issues		Rights holders whose human rights could potentially be negatively impacted		
		Employees	Suppliers*	<i>Sei-katsu-sha</i>
Expression and dissemination of information	Restrictions on expression in production processes	Medium	Medium	—
	Discrimination arising from expression or dissemination of information	—	—	High
	Leakage of personal information or invasion of privacy	Low	—	High
Labor	Workplace discrimination or harassment	High	High	—
	Discrimination in hiring	Low	Low	—
	Overwork or long working hours / safety and health	High	High	—
	Forced labor	Low	Medium	—
	Child labor	Low	Medium	—
Religion	Religious freedom	Medium	Medium	—

* Mainly business partners

Remedy Mechanism

To ensure that individuals subjected to human rights violations can receive redress, we have established response liaisons within the Group for whistleblowing and consultation from all officers and employees. This contact point monitors reports, considers appropriate measures, and reports to the Group Compliance Committee.

Details ▶ [WEB Remedy Mechanism \(Response Liaisons\)](#)

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Human Rights Due Diligence Initiatives

The Group conducts human rights training for regular and contract employees at eight major domestic companies.* The purpose of this training is to deepen understanding of human rights and to encourage behavior that respects human rights in everyday life.

In addition, we conduct surveys to measure the permeation of the training and to identify and assess individual issues.

* Hakuholdo, Daiko Advertising, YOMIKO ADVERTISING, Hakuholdo DY ONE, SoldOut, Hakuholdo DY Media Partners, HAKUHODO Technologies, and Hakuholdo Product's

Fiscal 2024 Results

Item	Fiscal 2024 Results
Human rights training	Attendance rate: 91.2%
Human rights assessment	Response rate: 79.4%

Note: Hakuholdo, Daiko Advertising, YOMIKO ADVERTISING, Hakuholdo DY ONE, Hakuholdo DY Media Partners, HAKUHODO Technologies, and Hakuholdo Product's are aggregated individually; SoldOut is aggregated on a consolidated basis.

**Results of Human Rights Assessment (Questionnaire)
(Fiscal Year Ended March 31, 2025)**

Overall	No urgent, serious human rights risks requiring immediate action were identified.
Basic understanding of human rights	Basic understanding of human rights exceeded 90% at each company.
Human rights response structure	Recognition and understanding of the whistleblowing channels were very high, but we will implement additional awareness initiatives regarding usage procedures and anonymity assurance to ensure even broader understanding and thorough communication.
Potential risks related to salient human rights issues	For "overwork or long working hours / safety and health" and "workplace discrimination or harassment," steady improvement trends were observed compared with the previous year. We will plan and advance risk prevention measures and recommendations for further improvement.

Integrity in Marketing Activities

Responsible Communication Development

As a corporate group engaged in advertising and other forms of expression, we are implementing responsible communication development to earn the trust of all stakeholders. As the foundation of this, we have established a shared compliance knowledge platform across the Group to disseminate essential knowledge for communication development. The platform offers on-demand video content explaining topics such as shared Group rules and expression risks, deepening employees' understanding of potential risks. Additionally, each Group company conducts training focused on risks related to expressions, working to raise awareness among all employees.