

Company Name Keyence Corporation
Industry ICT (Supply Chain only)
Overall Score 7.7 out of 100

Theme Score	Out of	For Theme
2.0	10	A. Governance and Policies
1.8	25	B. Embedding Respect and Human Rights Due Diligence
1.5	20	C. Remedies and Grievance Mechanisms
0.8	25	D. Performance: Company Human Rights Practices
1.5	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Human Rights Policy that it 'respects the international standards on human rights and unequivocally complies with all international human rights obligations and applicable laws and regulations of the countries in which the Group does business'. [Respect for Human Rights, 12/2021: keyence.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: Also in its Human Rights Policy, it indicates: 'KEYENCE recognizes that respect for human rights for anyone who supports the Company's business activities is essential for sustaining the Company and allowing the Company to fulfil its social responsibilities. Based on this idea, and with adherence to international norms such as the United Nations Guiding Principles on Business and Human Rights as well as the International Bill of Human Rights, the KEYENCE Group has established the KEYENCE Human Rights Policy to put into practice the Group's efforts to respect human rights'. [Human Rights Policy (website policy), 10/06/2022: keyence.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Human Rights policy states that 'adhering to international norms such as [...] ILO Declaration on Fundamental Principles and Rights at Work by International Labour Organization, the KEYENCE Group has established the KEYENCE Human Rights Policy to put into practice the Group's efforts to respect human rights'. [Human Rights Policy (website policy), 10/06/2022: keyence.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Company has a explicit commitment to All four ILO Core: The Code of behaviour states that 'We [...] shall not discriminate [...] 'we prohibit any type of forced labour. We also confirmed the age at time of hire and shall not engage contract or any employment contract with children under the minimum age of employment as stipulated by local labor laws and regulations or any other applicable local law or regulation. We respect the right to freedom of association and collective bargaining in accordance with local laws'. However, it is not clear whether the Company commits to respect those rights (freedom of association and collective bargaining) in all contexts, as it indicates 'in accordance with local laws'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to commit to provide alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Human Rights Policy (website policy), 10/06/2022: keyence.com] & [Code of Behavior, 10/06/2022: keyence.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: The Supplier code states that 'We request Suppliers [...] to adhere to international norms such as the [...] ILO Declaration on Fundamental Principles and Rights at Work by International Labour Organization (ILO)'. • Met: Company explicitly list All four ILO for suppliers: The Supplier code states that 'We request Suppliers [...] to commit to respecting the right to freedom of association and collective bargaining, to avoid forced labour, child labour, discriminatory treatments, insulting words, actions and harassment, to respect human rights, and to take appropriate measures to remedy any infringements on these Social Responsibility guidelines' [Supplier Code / Procurement Guideline, 06/2022: keyence.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Company's code states that 'we shall maintain a safe and hygienic workplace environment while complying with laws and regulations regarding workplace health and safety, and while practicing workplace safety and safety-related activities'. [Code of Behavior, 10/06/2022: keyence.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company's codes states that 'we shall compensate workers for overtime hours according to the applicable laws and regulations' However, no specific commitment found to respect ILO standards on working hours or to not work more than 48 hours in regular working week, including consensual overtime paid at premium rate. [Code of Behavior, 10/06/2022: keyence.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The supplier code requires to 'maintain a safe and sanitary work environment, comply with laws and regulations regarding occupational safety and health in the workplace, and practice safe behaviours and safety ensuring in the workplace. In addition, we strictly conform to all laws and ordinances on business activities'. [Supplier Code / Procurement Guideline, 06/2022: keyence.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Responsible mineral sourcing: The Company indicates on its website section 'Responsible Mineral Procurement': Our basic policy is to refrain from the purchasing those minerals that have been illegally mined. In addition, the department in charge engages in working on the risk reduction with the procurement department, such as conducting annual surveys with suppliers using the tools provided by the RMI (Responsible Minerals Initiative), which is an organization that promotes the responsible mineral procurement.[...] Minerals such as tin, tantalum, tungsten, gold and cobalt mined in the Conflict-Affected and High-Risk Areas, such as the Democratic Republic of the Congo or an adjoining countries (Neighbouring countries to the DRC), may be sources of human rights violations such as child labor and environmental destruction, funding for armed groups and may even contribute to the conflict itself. Based on OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, KEYENCE is engaging efforts to eliminate such minerals illegally mined for electronic components contained in our products.' [Compliance, N/A: keyence.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Based on OECD Guidance: As indicated above, the Company states: 'Based on OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, KEYENCE is engaging efforts to eliminate such minerals illegally mined for electronic components contained in our products'. [Compliance, N/A: keyence.com] • Not Met: Requires suppliers to commit to responsible mineral sourcing Score 2 • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights • Not Met: Children's rights • Not Met: Migrant worker's rights • Not Met: Expects suppliers to respect at least one of these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: The Company commits to remedy: The Company states in its Human Rights Policy: 'While fulfilling its responsibility to respect human rights, KEYENCE will prevent any infringement on the human rights of others through its business activities and to take appropriate measures to remedy any infringements on human rights that may result through its business activities or those of its business partners'. [Human Rights Policy (website policy), 10/06/2022: keyence.com] • Met: Company expect suppliers to make this commitment: The supplier code requires suppliers 'to respect human rights, and to take appropriate measures to remedy any infringements on these Social Responsibility guidelines' (which includes human rights). <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: Although the Human Rights policy has been signed by the Company's president, no evidence found of [supervisory] board level responsibility for governance oversight of respect for human rights. Highest level of responsibility seems to be allocated to an executive officer (executive level responsibility is evaluated in indicator B.1.1) • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO: Although the Human Rights policy has been signed by the Company's president, no evidence found of [supervisory] board level person signalling the Company's commitment to human rights through a public communication (speeches, presentations, etc.) discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business.
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy: Although the President of the Company signed the Human Rights policy, no description found of the processes by which the Company discusses and reviews human rights strategy, policy or management processes at board level or at board committee (board of directors/supervisory board). [Human Rights Policy (website policy), 10/06/2022: keyence.com] • Not Met: Examples/trends re HR discussion in the last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Company indicates that 'executive officer in charge of sustainability' who supervises Sustainability department. [Human Rights Policy (website policy), 10/06/2022: keyence.com] Score 2 <ul style="list-style-type: none"> • Not Met: How it assigns Day-to-day responsibility: The Company indicates that 'Sustainability Department which is supervised by the executive officer in charge of sustainability assesses and monitors human rights risks throughout our business activities and supply chains'. [Respect for Human Rights, 12/2021: keyence.com] • Not Met: Day-to-day resources and expertise allocation in own ops: The Company indicates that 'Sustainability Department which is supervised by the executive officer in charge of sustainability assesses and monitors human rights risks throughout our business activities and supply chains'. No further details found on resources and expertise allocated for the day-to-day management of human rights issues. • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: HR risks is integrated as part of enterprise risk system • Not Met: Provides an example Score 2 <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment: The Company discloses an independent auditor's report by Deloitte. However, no reference to human rights was found. [Annual Report 2021, 44348: keyence.co.jp]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company indicates that 'KEYENCE has established the Corporate Policy and Business Guideline and provides all personnel with a booklet of them and periodically promotes their understanding it to ensure adoption of the KEYENCE Human Rights Policy in all business activities and to ensure all business activities are performed based on high ethical standards'. IN addition, the Modern Slavery statement indicates that 'in addition to the activity to Promote the Code of Behavior mainly the Human Resources Division, the person in charge of each department in

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>KEYENCE applies this code to everyday operations as a judgment and/or direction criterion. By doing so, we have ensured that all employee complies with this code. In order to further penetrate the Code of Behavior into the affiliated companies in overseas (outside of Japan), Keyence has established a similar system that requires all employees in the affiliated companies to confirm our Code of Behavior, through making the Code of Behavior local language'. [Human Rights Policy (website policy), 10/06/2022: keyence.com] & [MSA Statement 2020, 2021: keyence.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The Human rights policy websites states that 'KEYENCE encourages its suppliers and production partners to appreciate and support the Company's activities through established guidelines and other tools'. However, it is not clear how the company communicate with other stakeholders such as local communities (communication to suppliers is evaluated in B.1.4.b) [Human Rights Policy (website policy), 10/06/2022: keyence.com] • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Met: Requires suppliers to communicate policy requirements: The Supplier code states that 'in the basic contract that we set forth with each supplier at the start of the business, we stipulate that each suppliers respects human rights'. It also states that following the basic business contract with us, we request that our suppliers also share the above policy with their business partners and comply with this'. [Supplier Code / Procurement Guideline, 06/2022: keyence.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: As indicated above, commitment to respect human rights is a contractual requisite for suppliers. [Supplier Code / Procurement Guideline, 06/2022: keyence.com] • Met: Company requires suppliers to cascade down to their suppliers: Although the supplier code states that 'we stipulate that each supplier respects human rights, and we request that their suppliers also should comply with the contract'. [Supplier Code / Procurement Guideline, 06/2022: keyence.com]
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: How workers are trained on HR policy commitments: The Modern Slavery statement indicates that 'in addition to the activity to Promote the Code of Behavior mainly the Human Resources Division, the person in charge of each department in KEYENCE applies this code to everyday operations as a judgment and/or direction criterion. By doing so, we have ensured that all employee complies with this code. In order to further penetrate the Code of Behavior into the affiliated companies in overseas (outside of Japan), Keyence has established a similar system that requires all employees in the affiliated companies to confirm our Code of Behavior, through making the Code of Behavior local language'. However, no description found of how Company's employees are actively (and directly) trained in human rights commitments. [MSA Statement 2020, 2021: keyence.com] & [Human Rights Policy (website policy), 10/06/2022: keyence.com] • Not Met: Trains relevant managers including procurement: As above. No evidence found of specific training for relevant managers, including at least procurement. The Company has provided additional sources (HR policy), however, no material evidence was found in respect to active training. [MSA Statement 2020, 2021: keyence.com] & [Human Rights Policy (website policy), 10/06/2022: keyence.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates that 'the person in charge of KEYENCE visits directly to a production partner and not only checks the quality of the product, but also strives to grasp the actual condition of the production site and the working environment and to instruct improvement. In the fiscal year ended

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>March 2021, we visited 6 selected production partners for inspection'. No further details found, including how monitors compliance in own operations. [MSA Statement 2020, 2021: keyence.com]</p> <ul style="list-style-type: none"> • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective action process • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HR affects selection of suppliers: The supplier code indicates that 'In the basic contract that we set forth with each supplier at the start of business, we stipulate that each supplier respects human rights, and we request that their suppliers also should comply with the contract'. It is not clear, however, how human rights affects the selection process, prior to start production. [Supplier Code / Procurement Guideline, 06/2022: keyence.com] • Met: HR affects on-going supplier relationships: In addition, it states that 'The contract also sets forth that we may terminate the transaction if there is a serious breach of the contract'. [Supplier Code / Procurement Guideline, 06/2022: keyence.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: The Company states, in its Compliance webpage, that it works with suppliers to eliminate the usage of conflict minerals. "KEYENCE is engaging in efforts to eliminate conflict minerals while cooperating with suppliers, such as investigating supply chains using tools provided by the Responsible Minerals Initiative (RMI)(formerly CFSI), an organization that promotes the responsible procurement of minerals." [Compliance, N/A: keyence.com]
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations • Not Met: Identifying risks through relevant business relationships <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues • Not Met: How process applies to supply chain • Not Met: Public disclosure of the results of HR assessment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HR issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company indicates on its website that 'we have established an anonymous hotline accessible to all employees, where they can directly consult with us about any offensive behavior in the workplace or any conduct that makes the work environment inappropriate. Upon receiving a consultation, we will immediately investigate and respond to the matter, giving full consideration to privacy'. [Creating a fulfilling workplace (website), N/A: keyence.com] Score 2 <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: Although the Company indicates that the hotline is available to all employees, no details found on how they are actively made aware of it, and whether it is available in all appropriate languages. The Company has communicated the code of behaviour to employees. However, it does not seem to contain instructions regarding the hotline. [Creating a fulfilling workplace (website), N/A: keyence.com] & [Code of Behavior, 10/06/2022: keyence.com] • Not Met: Describe how workers in the supply chain have access to grievance mechanism • Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Grievance mechanism for community Score 2 <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this Score 2 <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed • Not Met: Describe support (technical, financial, etc) available for equal access by complainants Score 2 <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Public statement prohibiting retaliation: We have established an anonymous hotline accessible to all employees. Although the Company indicates

Indicator Code	Indicator name	Score (out of 2)	Explanation
	complaints or concerns		that 'we work to ensure that we do not harm each other in any way and that no one uses their role or position in a coercive manner', no evidence was found of this hotline being accessible to external stakeholders and complainants being covered by an specific anti-retaliation commitment. [Creating a fulfilling workplace (website), N/A: keyence.com] <ul style="list-style-type: none"> • Met: Practical measures to prevent retaliation: As indicated above, the hotline is anonymous. [Creating a fulfilling workplace (website), N/A: keyence.com] Score 2 <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified Score 2 <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved • Not Met: How lessons from mechanism improve management system Score 2 <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts • Not Met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields) Score 2 <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: The supplier code requires suppliers to adhere to the ILO Declaration and avoid child labour. 'We also request that you shall conduct age verification'. No evidence found, however, of requirement to have a remediation programme in place in case child labour is found. The Company includes a remediation requirement for suppliers. However, this subindicator requires specific plan for cases of child labour. [Supplier Code / Procurement Guideline, 06/2022: keyence.com] • Not Met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The supplier code requires suppliers to not 'collect fees or other money in any form'. The Code of behaviour indicates that 'we shall not collect fees or other monies in any form. We use reliable dispatched agencies when hiring dispatched employees. We regularly review our contracts with the dispatched agencies to ensure that they are in compliance with all applicable laws and regulations'. 'Compliance with the Code of Behavior is also required for all suppliers (including subcontractors) and partner companies in addition to all KEYENCE Group officers and employees'. [Supplier Code / Procurement Guideline, 06/2022: keyence.com] & [Code of Behavior, 10/06/2022: keyence.com] • Not Met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The supplier code requires that 'we also request that you shall conduct age verification and enter into employment contracts with all workers in writing and make timely payment of legally mandated wages'. [Supplier Code / Procurement Guideline, 06/2022: keyence.com] • Not Met: How working with supply chain to pay workers regularly and on time Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The supplier code requires suppliers that 'you do not require the surrender of passports or other documents as a condition of employment'. [Supplier Code / Procurement Guideline, 06/2022: keyence.com] • Not Met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: Although the supplier code includes the requirements of respecting the rights to freedom of association and collective bargaining, no evidence found to prohibiting intimidation, harassment or retaliation against trade union members and representatives. The Company's code of behaviour, which also applies to suppliers respects the rights to freedom of association and collective bargaining 'in accordance with local laws'. No evidence found of prohibition of intimidation or retaliation against union members or representatives either. [Supplier Code / Procurement Guideline, 06/2022: keyence.com] & [Code of Behavior, 10/06/2022: keyence.com] • Not Met: How working with suppliers on FoA and CB Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Sets out clear Health and Safety requirements: Although both the supplier code and the code of behaviour (which applies to suppliers) contain a basic health and safety commitment, no details found in relation to specific health and safety requirements (i.e equipment, training, fire safety, sanitation, etc.) [Code of Behavior, 10/06/2022: keyence.com] & [Supplier Code / Procurement Guideline, 06/2022: keyence.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts • Not Met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Working hours in codes or contracts • Not Met: How working with suppliers on working hours Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company states it refrains from purchasing conflict minerals, as it believes they have become a source of funding for armed groups, leading to human rights violations and environmental destruction while threatening to promote further conflict. "It is KEYENCE policy to refrain from the purchase of any parts, components, and materials that are recognized to contain conflict minerals." Nonetheless, the lack of evidence that this is included in supplier contracts and lack of a requirement to conduct due diligence aligned with OECD Guidance means the Company failed to meet criteria. [Annual Report 2019, 2019: keyence.com] Score 2 <ul style="list-style-type: none"> • Not Met: Works with smelters/refiners and suppliers to build capacity • Not Met: Contractual requirement to disclosure smelter/refiner information • Not Met: Contractual requirement covers all minerals
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Risk identification and disclosure in line with OECD Guidance • Met: Identification of smelter/refiners and OECD Guidance: The Company indicates that 'the department in charge engages in working on the risk reduction with the procurement department, such as conducting annual surveys with suppliers using the tools CMRT (Conflict Minerals Reporting Template) provided by the RMI (Responsible Minerals Initiative), which is an organization that promotes the responsible mineral procurement's 'the survey we conducted found 290 smelters in our supply chain being on the Standard Smelter list of RMI, and 267 out of the 290 smelters (92%) are Conformant Smelters, who passed the RMI audit'. [Providing Responsible Products, N/A: keyence.com] Score 2 <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance: See above. However, no disclosure found including a list of smelters judged to be compliant (those that passed the RMI audit). [Providing Responsible Products, N/A: keyence.com] • Not Met: Risk identification and disclosure covers all minerals
D.4.10.c	Reporting on responsible sourcing of minerals	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes mineral risk management plan for supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time Score 2 <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 6.18 out of 80 points scored in themes A-D has been applied to produce a score of 1.55 out of 20 points for theme E.

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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