

**Company Name** Kyocera Corporation  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score** 8.2 out of 100

Theme Score	Out of	For Theme
1.9	10	A. Governance and Policies
1.4	25	B. Embedding Respect and Human Rights Due Diligence
1.0	20	C. Remedies and Grievance Mechanisms
4.0	25	D. Performance: Company Human Rights Practices
0.0	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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: On its Labor-related Code of Conduct it indicates that 'Kyocera Corporation shall uphold the human rights of all workers'. [Human Rights Policy, 02/10/2020: <a href="https://global.kyocera.com">global.kyocera.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to the UNGPs: It states that 'the Kyocera Group supports the (...) "the UN "Guiding Principles on Business and Human Rights"'. However, 'support' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, 02/10/2020: <a href="https://global.kyocera.com">global.kyocera.com</a>]</li> <li>Not Met: Commitment to the OECD Guidelines for Multinational Enterprises</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Company has a commitment to the ILO Core: It states that 'the Kyocera Group supports the (...) "the "ILO Declaration on Fundamental Principles and Rights at Work". However, 'support' is not considered a formal statement of commitment according to CHRB wording criteria. Previous assessment used evidence from webpage section 'Promotion of diversion and inclusion - Human Rights', which CHRB no longer considers a suitable source for policy statements. [Human Rights Policy, 02/10/2020: <a href="https://global.kyocera.com">global.kyocera.com</a>]</li> <li>Not Met: Company has a explicit commitment to All four ILO Core: The Company indicates that 'The Kyocera Group shall place particular importance on the following human rights issues'. It includes: prohibiting forced labor, prohibiting child labor, prohibiting discrimination and respecting freedom of association and the right to collective bargaining. Regarding the latter, it states 'In accordance with the laws and labor customs of each individual country, we shall respect the right to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>associate freely and the rights of workers engaged in activities’. However, it is not clear whether it is committed to respect these rights in all contexts and locations as the Company indicates that it respects these rights ‘in accordance with the laws and labor customs of each individual country’. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. Previous assessment used evidence from webpage section ‘Corporate Social Responsibility’, which CHRB no longer considers a suitable source for policy statements. [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to commit to ILO Core: It states that 'the Kyocera Group supports the (...) “the "ILO Declaration on Fundamental Principles and Rights at Work”". Suppliers are expected to respect this policy. However, ‘support’ is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Company explicitly list All four ILO for suppliers: The Company indicates, on its Human Rights Policy, that ‘The Kyocera Group shall place particular importance on the following human rights issues’. It includes: prohibiting forced labor, prohibiting child labor, prohibiting discrimination and respecting freedom of association and the right to collective bargaining. Regarding the latter, it states ‘In accordance with the laws and labor customs of each individual country, we shall respect the right to associate freely and the rights of workers engaged in activities’. However, although Suppliers are expected to respect this policy, it is not clear whether they are expected to commit to respect the right to freedom of association in all contexts and locations as the Company indicates that it respects these rights ‘in accordance with the laws and labor customs of each individual country’. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul>
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"> <li>• Met: Commitment to respect H&amp;S of workers: According to its Environmental Safety Policy, the Company indicates that it 'will comply with laws, agreements and internal standards regarding health and safety'; 'Kyocera will conduct risk assessments and reduce occupational health and safety risks by eliminating sources of danger in order to prevent workplace accidents and disasters'. [Environmental Safety Policy, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: It indicates that ‘Work hours shall never exceed the limits set in applicable local laws’. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expect suppliers to commit to H&amp;S of their workers</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates, on its Human Rights Policy, that ‘Work hours shall never exceed the limits set in applicable local laws’. Suppliers are expected to respect this policy. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul>
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"> <li>• Met: Responsible mineral sourcing: Regarding its 3TG purchase, it indicates that 'the Kyocera Group has a policy not to purchase conflict minerals that serve as a source of funding to armed groups or any other materials or products made using metals that pose a risk to human rights'. [Kyocera Group’s Conflict Minerals Policy, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Based on OECD Guidance: It also indicates that ‘we are also required to engage in the responsible procurement of minerals, based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (hereafter referred to as “OECD Guidance”) issued to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>all companies'. However, no commitment to following the OECD Guidance at least in respect of 3TG found. Previous assessment used evidence from the Conflict Minerals report, which CHRB no longer considers a suitable source for policy statements. [Kyocera Group's Conflict Minerals Policy, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to commit to responsible mineral sourcing: It indicates that 'We intend to continually establish a strong supply chain relationship through various measures, including the signing of a letter of engagement with suppliers that includes a pledge to contact Kyocera immediately if a connection to conflict minerals have been discovered'. However, it is not clear that it requires its suppliers to follow the company's responsible sourcing policy or the company requires its suppliers to follow the OECD Guidance. The request has to appear in a formal policy statement according with CHRB standards. [Kyocera Group's Conflict Minerals Policy, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commits to follow OECD Guidance for all minerals: The Company indicates that 'the Kyocera Group has a policy not to purchase conflict minerals that serve as a source of funding to armed groups or any other materials or products made using metals that pose a risk to human rights'. However, it is not clear that the Company has policy statement to follow the OECD Guidance explicitly covers all minerals. Previous assessment used evidence from the Conflict Minerals report, which CHRB no longer considers a suitable source for policy statements. [Kyocera Group's Conflict Minerals Policy, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Suppliers expected to make similar requirements of their suppliers</li> </ul>
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	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"> <li>• Not Met: Women's rights</li> <li>• Not Met: Children's rights</li> <li>• Met: Migrant worker's rights: It indicates, on its Labor-related Code of Conduct, that 'Kyocera Corporation shall uphold the human rights of all workers (...). This applies to all workers, including (...) migrant workers'. [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Met: Expects suppliers to respect at least one of these rights: The Companies CSR policy it states: 'We are very pleased if you [supplier] understand this guideline and promote CSR activities eagerly. Due to importance of CSR, please note that we reluctantly have to reconsider whether we continue the business with you, in case that you do not approve of this activity.' [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>] &amp; [CSR Procurement Guideline: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Child Rights Convention/Business Principles</li> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
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"> <li>• Met: The Company commits to remedy: The Human rights policy states that 'We shall (...) provide remedy, and avoid contributing to the impacts. If adverse human rights impacts become evident, we shall engage in remedy and correction through the appropriate procedures'. [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Met: Company expect suppliers to make this commitment: On its Human Rights Policy, it indicates that 'We shall (...) provide remedy, and avoid contributing to the impacts. If adverse human rights impacts become evident, we shall engage in remedy and correction through the appropriate procedures'. Suppliers are expected to respect this policy. [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>
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"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs)</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Board level responsibility for HRs: The Company claims that human rights issues are being discussed at the Kyocera Group CSR Committee. However, according to the corporate structure, the CSR Committee is part of the Business execution system and therefore not placed directly at board level. The Kyocera Group CSR Committee deliberates and identifies top priorities for the Kyocera Group to address. Important issues to be resolved through business, in particular, are approved by the Kyocera Group Management Committee or the Board of Directors according to the approval criteria. [Sustainability Management, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>] &amp; [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>Not Met: Describe HR expertise of Board member</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Board/Committee review HRs strategy</li> <li>Not Met: Examples/trends re HR discussion in the last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: How affected stakeholders/HR experts informed discussions: Although the company claims that: "We continue to disclose information to all stakeholders, including shareholders/investors, in order to deepen their understanding of our sustainability initiatives and goals." no further details are provided on how decisions are actually communicated to affected stakeholders. [Sustainability Management, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul>
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"> <li>Not Met: Incentives for at least one board member</li> <li>Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Performance criteria made public</li> <li>Not Met: Review of other board performance criteria</li> </ul>
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"> <li>Not Met: Board process to review business model and strategy [INTEGRATED REPORT 2021, 31/03/2021: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>Not Met: Describe frequency and triggers for reviewing</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: Example of actions decided</li> </ul>

## 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"> <li>Not Met: Score of 1 on A.1.2.a</li> <li>Met: Senior responsibility for HR implementation and decision making: The company states that "The Kyocera Group has created a working group in which managers from multiple departments, including human resources, CSR, risk management, procurement, auditing, and public relations, participate. After completing training for education on human rights initiatives, we are also considering broader training on human rights issues. In addition, Kyocera considers human rights measures a critical issue and is discussing them at the Kyocera Group CSR Committee." [Human Rights Web, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>] &amp; [INTEGRATED REPORT 2021, 31/03/2021: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: How it assigns Day-to-day responsibility</li> <li>Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>Not Met: Resources and expertise allocation in the supply chain</li> </ul>
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"> <li>Not Met: Senior manager incentives for human rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: HR risks is integrated as part of enterprise risk system: The Kyocera Group faces various risks that may affect the credibility or business sustainability of the Kyocera Group, including changes in the market environment, occurrence of natural disasters, incidents and accidents, the impact of climate change, information leakage, deficiencies of labor conditions in the supply chain, and violation of human rights. [Risk Management and Compliance, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Provides an example: The company states: "The Kyocera Group is making group-wide efforts to reinforce its risk management system to cope with global risks that are becoming more complex. The Kyocera Group faces various risks that may affect the credibility or business sustainability of the Kyocera Group, including changes in the market environment, the occurrence of natural disasters, incidents and accidents, the impact of climate change, information security, stoppages and deficiencies in labor conditions in the supply chain, and violations of human rights. To cope with these issues, the Kyocera Group endeavours to reduce and mitigate risks while implementing countermeasures through the Business Continuity Plan (BCP) and acting on the Basic Policy on Risk Management put in place for this purpose." However, no example of human rights integration given. [Risk Management and Compliance, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates its policy to all workers in own operations: The company states that it "has designated May as "Morality Month" to improve human rights and labor awareness among employees. Workplace compliance information is announced at morning meetings, and training is provided for those in relevant supervisory roles. The Kyocera Code of Conduct, which covers our stance on initiatives in human rights, legal compliance, environmental and social contribution, and workplace attitudes, is made available to all employees via the company intranet, and employees are made aware of its contents." However, the company fails to clarify whether the policy is made available in local languages. [Human Rights Web, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder</li> <li>• Not Met: How policy commitments are made accessible to audience: Although Kyocera discloses that provides each year a meeting with local communities to discuss about the CSR Economic, Social and Environmental Report Meetings since 2005, there is no description about Company's policy communication to the local communities. [Corporate Social Responsibility, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain</li> <li>• Not Met: Requires suppliers to communicate policy requirements</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How HR commitments made binding/contractual</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a</li> <li>• Not Met: How workers are trained on HR policy commitments: The Company discloses that in 2018 to promote diversity and inclusion, made training on LGBT to managers of the personnel and general affairs departments. However, CHRB couldn't find an evidence that Kyocera provided training on human rights issues for all workers. [Promotion of diversion and inclusion - Human Rights, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Trains relevant managers including procurement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Trains suppliers to meet company's HR commitment [Supply Chain Management, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Disclose % trained [Supply Chain Management, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul>
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"> <li>• Not Met: Scores at least 1 on A.1.2.a</li> <li>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: Company provided feedback to this datapoint but it was not material. It is unclear how the company is monitoring the implementation of its human rights policy across its operations and supply chain.</li> <li>• Not Met: Proportion of supply chain monitored</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective action process</li> <li>• Not Met: Disclose findings and number of corrective action</li> </ul>
B.1.7	Engaging and terminating business relationships	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"> <li>• Met: HR affects selection of suppliers: The Company indicates on its Supply Chain Management that supplier selection is based on: ' understand our basic philosophy; Management's own thinking and management philosophy must be convincing;[...] To be active in global environmental conservation activities; Comply with the Kyocera Group Guidelines for Responsible Business Conduct in the Supply Chain.' The Company's Business Conduct in the Supply Chain includes HR. [CSR Procurement Guideline: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Met: HR affects on-going supplier relationships: The Company state 'the Kyocera Group works together with suppliers to promote CSR activities in order to fulfill our social responsibilities such as human rights, labor, and environmental protection. We are very pleased if you understand this guideline and promote CSR activities eagerly. Due to importance of CSR, please note that we reluctantly have to reconsider whether we continue the business with you, in case that you do not approve of this activity.' [CSR Procurement Guideline: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights</li> <li>• Not Met: Working with suppliers to meet HR requirements</li> </ul>
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"> <li>• Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years</li> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Not Met: Describe how views influenced company's HR approach</li> </ul>

## 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"> <li>• Not Met: Identifying risks in own operations</li> <li>• Not Met: Identifying risks through relevant business relationships</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>
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"> <li>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues</li> <li>• Not Met: How process applies to supply chain</li> <li>• Not Met: Public disclosure of the results of HR assessment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Action Plans to mitigate risks: The Kyocera Group discloses that endeavours to reduce and mitigate risks while acting on the Basic Policy on Risk Management put in place for this purpose. However, does not describe its global system to take action to prevent, mitigate or remediate its salient human rights issues. [Risk Management and Compliance, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Description of how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>
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"> <li>• Not Met: System for tracking or monitor if actions taken are effective</li> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>
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"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul>

### 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"> <li>• Met: Channel accessible to all workers: The Company discloses that has a Hot-Line Center in which its workers can consult for a diverse range of issues. Employees can seek advice and consultation, as well as report actions that are or may be in violation of laws and internal regulations relating to human rights, labor, safety and health, environment, fair business practices, etc. [Risk Management and Compliance, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Channel is available in all appropriate languages and workers aware</li> <li>• Not Met: Describe how workers in the supply chain have access to grievance mechanism</li> <li>• Not Met: Expect Suppliers to convey expectation to their own suppliers</li> </ul>
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"> <li>• Not Met: Grievance mechanism for community: Company provided feedback to this indicator but evidence not material. It is unclear if the company has a grievance mechanism that is open to communities.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes accessibility and local languages and stakeholder awareness</li> <li>• Not Met: Communities access mechanism direct or through suppliers</li> <li>• Not Met: Expect supplier to convey expectation to their own suppliers</li> </ul>
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"> <li>• Not Met: Engages users to create or assess system</li> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Engages with potential or actual users on the improvement of the mechanism</li> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Response timescales and how complainants will be informed</li> <li>• Not Met: Describe support (technical, financial, etc) available for equal access by complainants</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Escalation to senior/independent level</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	available and explained		
C.5	Prohibition of retaliation for raising complaints or concerns	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Public statement prohibiting retaliation</li> <li>• Not Met: Practical measures to prevent retaliation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders</li> </ul>
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"> <li>• Not Met: Complainants not asked to waive rights</li> <li>• Not Met: Company does not require confidentiality provisions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Will work with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
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"> <li>• Not Met: Describes how remedy has been provided: The company state: " We shall identify and evaluate any adverse human rights impacts, and shall remove or reduce the causes, provide remedy, and avoid contributing to the impacts." However, no further information found on how the company has provided remedy.</li> <li>• Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
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"> <li>• Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company discloses that in 2018 were undertaken 27 consultations on different matters. However, does not describe how many cases are related to human rights issues. [Risk Management and Compliance, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How lessons from mechanism improve management system</li> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Pays living wage or sets target date</li> <li>• Not Met: Describes how living wage determined</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Paying living wage</li> <li>• Not Met: Definition of living wage reviewed with unions</li> </ul>
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"> <li>• Not Met: Discloses living wage requirements in supplier code or contracts</li> <li>• Not Met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The Kyocera Group explicitly prohibits the use of child labor. [Promotion of diversion and inclusion - Human Rights, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Age verification of workers recruited</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Remediation if children identified</li> </ul>
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"> <li>• Not Met: Child Labour rules in codes or contracts: In its Supplier Code the Company states that "Suppliers are requested not to employ children who are under the lowest labor age and not to assign such jobs that impair children's development". However, there is no mention to verify the age of job applicants and workers and remediation programme if some child is found working. [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Job seekers and workers do not pay recruitment fee: The Company state 'Employers and agents must not keep any identification or immigration documents belonging to workers, including government-issued identification, passports or work permits (except those that they are legally required to keep), and must not destroy, conceal or confiscate these or prevent workers from using them. Workers shall not be required to pay an employment commission to their employer or agent or any other fees related to their employment. If it is discovered that any workers have paid fees of this nature, the money shall be returned.' [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Commits to fully reimbursing if they have paid</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
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"> <li>• Met: Debt and fees rules in codes or contracts: The Company Supply Chain Guidelines state 'Employers are not to require employees to pay recruitment fees to them or agents.' [Supply-Chain CSR Deployment Guidebook, 27/08/2018: <a href="http://kyoceradocumentsolutions.com">kyoceradocumentsolutions.com</a>]</li> <li>• Not Met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Pays workers in full and on time</li> <li>• Met: Payslips show any legitimate deductions: The Company indicates 'Employers are to provide employees with comprehensible wage statements in a timely manner.'</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.d	Prohibition of forced labour: Wage practices (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"> <li>• Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Does not retain documents or restrict movement: The Company indicates 'All work shall be done on workers' own volition, and workers must be free to leave the workplace or terminate their employment at any time. Employers and agents must not keep any identification or immigration documents belonging to workers, including government-issued identification, passports or work permits (except those that they are legally required to keep), and must not destroy, conceal or confiscate these or prevent workers from using them.' [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
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"> <li>• Met: Free movement rules in codes or contracts: The Company Supply Chain CSR Procurement Guideline indicates that ' Employers are not to use forced labor, slave labor, bonded labor or labor by trafficking of persons; Employers are to confirm the intention of employees by signing an employment agreement in writing with them or exchanging a statutory document; All labor is to be provided voluntarily, and employees shall be free to leave work [...]; Employers are not to require employees to pay recruitment fees to them or agents.' [CSR Procurement Guideline: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company state 'Kyocera Corporation shall respect the right of all workers to join a union for the purposes of collective bargaining and peacefully assembling, based on local laws. Workers and/or a representative shall be able to directly communicate their opinions and concerns about working conditions and management practices to management without fear of discrimination, reprisal, threats or harassment. As indicated below, the Company has a high rate of unionisation, which is considered a proxy for not retaliating in practice. [CSR Procurement Guideline: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Met: Discloses % total direct operations covered by collective CB agreements: The Company reports the 'percentage of workers belonging to a union is equivalent to 94.9%' of its workforce. [ESG Data Sheet: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Meets both requirements under score 1</li> </ul>
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"> <li>• Not Met: FoA &amp; CB rules in codes or contracts: The Company Supply Chain Guideline indicates 'Kyocera Supply Chain CSR Procurement Guidelines requires [that] employers are to respect employees' rights to form and join trade unions in conformance with local laws; Employers are to provide employees with opportunities to openly communicate with management regarding working conditions.' However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [CSR Procurement Guideline: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Describes process to identify H&amp;S risks and impacts: The company states: "Kyocera will conduct risk assessments and reduce occupational health and safety risks by eliminating sources of danger in order to prevent workplace accidents and disasters." [Occupational Safety, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company provides a graphic that describe the evolution of lost time accident rate (number of afflicted person/1 million hours) per year and discloses that "the lost time accident rate of the Kyocera Group (Japan) in 2022 was 0.36". [ESG Data Sheet: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Met: Discloses Fatalities for last reporting period: The Company reported zero and one fatal accident for the years of 2021 and 2022 respectively. [ESG Data Sheet: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Met: Occupational disease rate for last reporting period: The Company reported a rate of 0.22 occupational disease rate for the year of 2022. [ESG Data Sheet: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Set targets for H&amp;S performance: Although the Company states that "will continue to take action to reduce industrial accidents and create a safe working environment safe for all its employees", there is no quantitative information about target for health and safety performance. [Building a Safe &amp; Secure Work Environment, 5/7/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Met targets or explain why not or what is doing to improve management systems</li> </ul>
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"> <li>• Not Met: Sets out clear Health and Safety requirements</li> <li>• Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period</li> <li>• Not Met: Fatalities disclosures for last reporting period</li> <li>• Not Met: Occupational disease rates for the last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</li> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.8.a	Women's rights (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Process to stop harassment and violence against women: The Company states that works to prevent power harassment and sexual harassment in the workplace. We have set up an Employee Counselling Center to receive consultations and reports regarding violations of behavioural guidelines, including harassment, laws, and regulations. We also carry out internal investigations and corrective actions as necessary.' [Human Rights Web, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Working conditions take account of gender</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment: The company provides a analysis of trends demonstrating closing gender pay gap but does not gives a detailed measures or steps. [Promotion of diversion and inclusion - Human Rights, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Met: Provides analysis of trends demonstrating closing gender pay gap: The company provides a table with analysis of trends demonstrating closing gender pay gap. [Promotion of diversion and inclusion - Human Rights, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul>
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"> <li>• Not Met: Women's rights in codes or contracts: Company provided feedback to this datapoint, but evidence was not material. It is unclear if the company has women's rights in codes and contracts.</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.9.a	Working hours (in own production or manufacturing operations)	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"> <li>• Not Met: Respects max hours, min breaks and rest periods in its own operations: The Company discloses that the human resource departments undertake independent checks for legal violations of working hour management according to labor-related laws and regulations, in-house rules, and labor agreements with unions. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Promotion of diversion and inclusion - Human Rights, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>] &amp; [Human Rights Policy, 02/10/2020: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Assesses ability to comply with its commitments when allocating work/targets</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How it implements and checks this in its operations [Promotion of diversion and inclusion - Human Rights, 5/6/2019: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul>
D.4.9.b	Working hours (in the supply chain)	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"> <li>• Not Met: Working hours in codes or contracts: In its supplier code the Company states that: "Suppliers are requested to regulate employee's working hours/holidays/vacations not to exceed the legal ceiling". However, the Company does not describe what are the maximum working hours and minimum resting periods. [Supplier Code of Conduct, N/A: <a href="http://americas.kyocera.com">americas.kyocera.com</a>]</li> <li>• Not Met: How working with suppliers on working hours</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by excessive working hours</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	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"> <li>• Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company indicates 'The Kyocera Group's investigations for responsible mineral sourcing follow a system and procedures that comply with the five steps set forth in the OECD Due Diligence Guidance. Specifically, Kyocera conducts investigations based on the RMAP promoted by the RMI, and evaluates all risks, including human rights violations, as specified in Annex II of the guidance. The OECD Due Diligence Guidance defines conflict-affected and high-risk areas (CAHRAs) as areas with a high risk of conflict or human rights violations.' [Supply Chain Management, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Works with smelters/refiners and suppliers to build capacity</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Contractual requirement to disclosure smelter/refiner information</li> <li>• Not Met: Contractual requirement covers all minerals</li> </ul>
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Risk identification and disclosure in line with OECD Guidance: The Company reports 'Kyocera conducted survey to our business partners using the Conflict Minerals Reporting Template (CMRT) prepared by the Responsible Minerals Initiative (RMI), an international organization dealing with conflict mineral issues. In FY2019, the Due Diligence based on Annex II of the OECD Guidance was conducted. As a result, we sent a Risky Smelter Report to business partners who had some problems that needed addressing in order to raise their attention.' [Supply Chain Management, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Met: Identification of smelter/refiners and OECD Guidance: The Company provides a table with the smelters and refiners that have been identified and indicates 'we checked the smelters/refineries listed in the CMRT provided by our suppliers against the list disclosed in the RMI.' [Supply Chain Management, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses the smelters and refiners in line with OECD. [Supply Chain Management, N/A: <a href="http://global.kyocera.com">global.kyocera.com</a>]</li> <li>• Not Met: Risk identification and disclosure covers all minerals</li> </ul>
D.4.10.c	Reporting on responsible sourcing of minerals	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"> <li>• Not Met: Describes mineral risk management plan for supply chain: Company provided feedback to this datapoint but information is not material.</li> </ul>

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

## 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		<ul style="list-style-type: none"> <li>• Area: Forced labour; discrimination</li> <li>• Headline: Kyocera among companies accused of using suppliers linked to forced labour in China</li> <li>• Story: On March 1st, 2020, the Australian Strategic Policy Institute (ASPI) released a report called "Uyghurs for sale" that named Kyocera among 83 other companies benefiting from the use of potentially abuse labour transfer programmes. According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China, have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are thought to be working in forced labour conditions across the country. The ASPI report alleged that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred out of Xinjiang between 2017 and 2019, claiming that people are being effectively "bought" and "sold" by local governments and commercial brokers.</li> </ul> <p>The ASPI used open-source public documents, satellite imagery, and media reports, the institute identified 27 factories in nine Chinese provinces that have used labourers. The research found that workers were transferred to work several factories including Hubei Yihong Precision Manufacturing. According to the report, Hubei supplies directly several companies including: GoerTek, Kyocera, Cisco, Panasonic among others.</p> <p>ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uighur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain". The report calls on companies mentioned to "conduct immediate and thorough human rights due diligence on its factory labour in China, including robust and independent social audits and inspections."</p> <p>[ABC, 01/03/2020, "Apple, Nike and other major companies implicated in Muslim forced labour in China": <a href="http://abc.net.au">abc.net.au</a>] [Australian Strategic Policy Institute, 01/03/2020, "Uyghurs for sale": <a href="http://aspi.org.au">aspi.org.au</a>] [The Guardian, 01/03/2020, "China transferred detained Uighurs to factories used by global brands – report": <a href="http://theguardian.com">theguardian.com</a>] [Financial Times, 01/03/2020, "Xinjiang forced labour reported in multinational supply chains": <a href="http://ft.com">ft.com</a>]</p>
E(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> Score 1 <ul style="list-style-type: none"> <li>• Not Met: Public response: The company stated: "Our company recognizes that it is essential to respect the human rights of all of our stakeholders in its corporate activities in a way that aims to help construct a sustainable society, and we prohibit forced labor in any way. Kyocera has established the "Kyocera Group Human Rights Policy" and applies it to our entire value chain, including all business activities of the Kyocera Group. We also expect our business partners and suppliers to respect human rights, including the prohibition of forced and child labor, and we conduct all of our business operations in accordance with this policy (link below)". However, it does not acknowledge the specific allegation of forced labour and discrimination of Uyghurs in its operations in China. [Kyocera Corporation response to joint communication by UN Special Rapporteurs dated 12/03/21 (OTH 119/2021), 27/05/2021: <a href="http://scommreports.ohchr.org">scommreports.ohchr.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail.</li> </ul>
E(1).2	The company has investigated and taken	0	<p>The individual elements of the assessment are met or not as follows:</p> Score 1 <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders: The company stated: "We have established a consultation desk for employees to handle grievance and have a system that allows any employees to consult with the desk confidentially. We have also set up</li> </ul>



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	appropriate action		<p>a customer service center for general public to use. In addition, a special channel for employees or related parties of our business partners to use is available when they are aware that our employees' or our clients' conduct is against the law or the "Kyocera Supply Chain CSR Procurement Guideline." In any case, the company will give due consideration to the privacy of whistleblowers and handle information so as not to cause any disadvantage to them, promptly confirm the facts, and take strict measures" However, this does not indicate that the company has engaged with Uyghurs affected by the alleged forced labour and discrimination. [Kyocera Corporation response to joint communication by UN Special Rapporteurs dated 12/03/21 (OTH 119/2021), 27/05/2021: <a href="https://www.spcmmreports.ohchr.org">spcommreports.ohchr.org</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Identified cause: The company stated: "At present, we have not confirmed that materials have been procured related to forced labor of Uyghurs. However, we will continue to request corrective measures if facts pertaining to human rights abuses are found, and if it is still difficult to correct them, we will consider appropriate measures, such as suspending the purchase of applicable products". With this, the company does not present investigative results on the underlying causes of the events concerned. [Kyocera Corporation response to joint communication by UN Special Rapporteurs dated 12/03/21 (OTH 119/2021), 27/05/2021: <a href="https://www.spcmmreports.ohchr.org">spcommreports.ohchr.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: The company stated that "we will continue to request corrective measures if facts pertaining to human rights abuses are found, and if it is still difficult to correct them, we will consider appropriate measures, such as suspending the purchase of applicable products". However, this does not describe improvements made to the management system.</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>

## 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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