

Sustainability Management

1 Basic Policy

Nippon Paper Industries signed and joined the United Nations Global Compact in 2004. The Company promotes sustainability management that pursues both social and environmental sustainability and the future growth of the Company by realizing the Group Mission based on the Ten Principles of the United Nations Global Compact in four areas (human rights, labor, environment, and anti-corruption).

In 2023, the Japan Paper Association, of which the Company is a member, established the "Japan Paper Association Basic Principles for Sustainability" based on discussions among member companies. The Company will adhere to these principles and fulfill our social responsibility through business activities.



→WEB

Participation in the United Nations Global Compact (Japanese only)

<https://www.nipponpapergroup.com/csr/admin/ungc/>

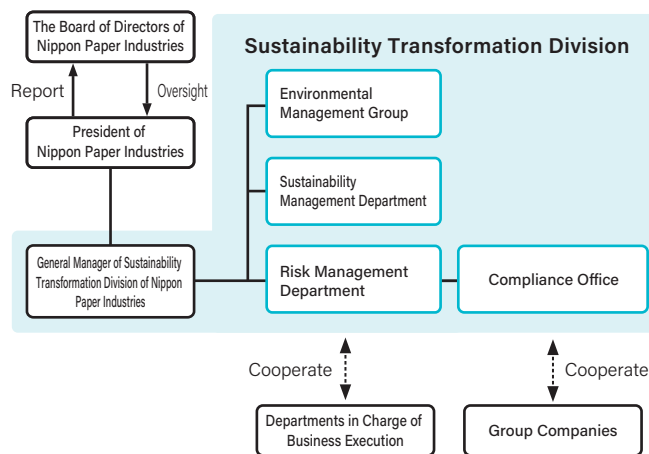


→WEB

Japan Paper Association Basic Principles for Sustainability (Japan Paper Association Sustainability Report 2024, P.5)

https://www.jpaa.jp/sustainability/report/pdf/en_report2024.pdf

2 Promotion Structure



- Under the oversight of the Board of Directors of Nippon Paper Industries, a Sustainability Transformation Division was established directly under the Company's President and Representative Director to promote environmental management, enhance risk management, share ESG-related information, and strengthen relationships with stakeholders.
- The Sustainability Transformation Division has previously reported to the Board of Directors on sustainability-related activities, and in FY2024 the division presented four reports on climate change, crisis response training, the status of evaluations by ESG rating agencies, and other matters.
- Since 2011, the Company has been conducting CSR surveys once a year at Group companies in Japan and overseas in order to confirm the status of the companies' responses to issues such as the environment, human rights, and regulatory compliance. In FY2024, as in the previous fiscal year, the survey analysis results were reported at the [Group CSR Liaison Meetings](#) →P10 to share issues with the CSR representatives of Group companies.

3 Employee and other Personnel Training and Development

Achievements in Sustainability-related Training and Development (FY2024)

	Target participants	Number of participants	Number of events (frequency)
e-Learning	Employees of NIPPON PAPER GROUP	9,615	1 (once a year)
Sustainability training	New employees of NIPPON PAPER GROUP	98	1 (once a year)
	New managers of Nippon Paper Industries	49	1 (once a year)
Sustainability lectures	NIPPON PAPER GROUP employees and Nippon Paper mill contractors	3,715	1 (once a year)
The School of Friendship for Forests and Paper →P78	Elementary and middle school students and their guardians	58	2 (twice a year)

CASE STUDY

Human Rights Awareness-raising (Nippon Paper Industries)

The Company regularly holds lectures from experts and conducts internal training to provide opportunities for raising stakeholder awareness regarding sustainability. In FY2024, the Company provided all Group employees with e-learning and an on-demand lecture on the theme of human rights. The e-learning presented opportunities for employees to learn the fundamentals of business and human rights. In the lecture, attorney Emi Omura (partner at CLS Hibiya Tokyo Law Office) talked about the impact that respect for human rights has on workplaces and companies and introduced some of the Company's initiatives. Attendees and online viewers shared a great deal of feedback, such as saying that they learned that human rights are involved in each and every one of the Company's business activities, that they wanted to improve their workplace environments by paying mutual attention to their words and behavior, or that they wanted to make sure that they didn't make unreasonable requests of business partners.



Lecture in session

Enhancement of Corporate Governance

1 Basic Policy

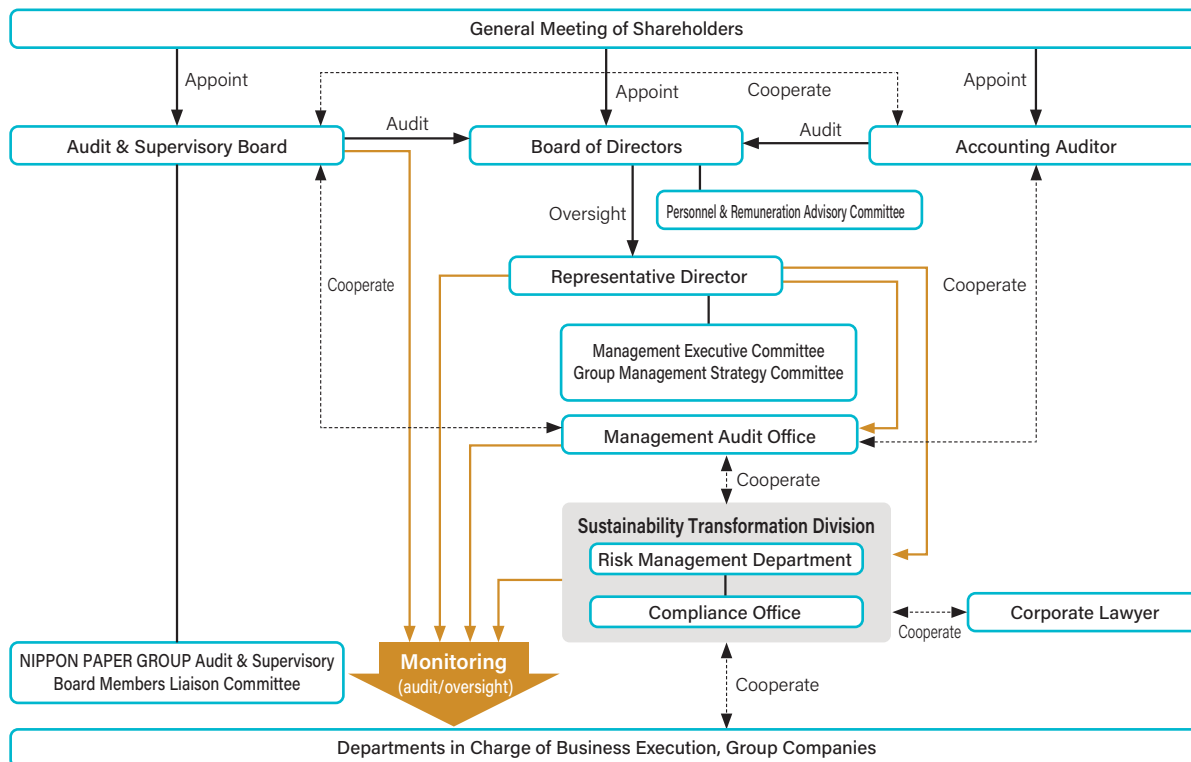
→P83 **Corporate Governance Policy**

→WEB **Corporate Governance Report**
<https://www.nipponpapergroup.com/english/ir/governance/>

→P87 **Basic Policy to Establish the Internal Control Systems**

2 Corporate Governance Structure

Corporate Governance Structure (As of July 1, 2025)



● Nippon Paper Industries is a company with an Audit & Supervisory Board.

● The Company's accounting auditor is Ernst & Young ShinNihon LLC.

1. Board of Directors

● The Board of Directors has a supervisory function for overall management, ensures the fairness and transparency of management, and also makes the most appropriate decisions for the Company in the form of decisions on the execution of important operations, which are legally required to be made by the Board of Directors. The Board also supervises the execution of duties by the representative director and executive officers. The Chairman of the Company also serves as the Chairman of the Board of Directors and does their utmost to exercise and strengthen the supervisory functions of the Board.

● In view of the importance of environmental and social challenges related to sustainability, the Board of Directors shall raise awareness among corporate officers and employees, strive to facilitate the sustainable development of society, and enhance the corporate value of NIPPON PAPER GROUP by promoting active efforts to resolve challenges while giving consideration to stakeholders.

Status of Meetings of the Board of Directors (FY2024)

Number of Board of Directors meetings: 13

Average rate of attendance by directors: 99.1% (outside directors: 100%)

Average rate of attendance by Audit & Supervisory Board Members: 100% (outside Audit & Supervisory Board Members: 100%)

2. Management Executive Committee

● Usually, the Management Executive Committee meets once a week to deliberate on important business issues under the authority of the president to assist in the execution of the president's duties.

● The Committee membership is basically composed of the president, vice presidents, and general managers.

● Meetings of the Management Executive Committee, held once a month, are attended by outside officers and general managers of the Company's mills in order to share information on monthly financial results among management.

Enhancement of Corporate Governance

3. Group Management Strategy Committee

- The Company's Group Management Strategy Committee meets as necessary and deliberates on management strategies by business segment and other important matters related to the Group.
- The Committee comprises internal directors and internal Audit & Supervisory Board Members, the presidents of major Group companies, and executive officers in Tokyo and general managers. Outside officers also participate.

4. Audit & Supervisory Board Members and Audit & Supervisory Board

- In addition to meetings of the Board of Directors, Audit & Supervisory Board Members attend other important meetings, such as the Management Execution Committee and the Group Management Strategy Committee, and strictly monitor the execution of duties by directors. They also conduct on-site inspections of the Company's departments, offices and Group companies, and also strictly audit whether company operations are being carried out legally and appropriately.
- The Audit & Supervisory Board periodically holds regular meetings with the representative director, working to deepen mutual understanding.
- The Audit & Supervisory Board also strives to enhance group audits by strengthening cooperation with Audit & Supervisory Board Members of each Group company.
- The Audit & Supervisory Board consists of four Audit & Supervisory Board Members.

Status of Meetings of the Audit & Supervisory Board (FY2024)

Number of Audit & Supervisory Board meetings: 14
Average rate of attendance by Audit & Supervisory Board Members: 100% (outside Audit & Supervisory Board Members: 100%)

5. Management Audit Office

- The Management Audit Office is directly under the President's control. It conducts an internal audit of the Company and each Group company. It also conducts a comprehensive evaluation of the maintenance and operation of the internal control system as it relates to financial reporting. In FY2024, the results of the internal audit were reported twice to the president and representative director of the Company, full-time Audit & Supervisory Board Members, etc., and twice to outside directors and Audit & Supervisory Board Members.
- The Management Audit Office coordinates between audits by Audit & Supervisory Board Members and internal audits, such as by holding monthly information exchange meetings with Audit & Supervisory Board Members.

6. Personnel & Remuneration Advisory Committee

- To further enhance corporate governance, the Company has established the Personnel and Remuneration Advisory Committee as an advisory body to the Board of Directors, which consists of three outside directors who are independent officers, the President and Representative Director of the Company, and the General Manager of the General Affairs and Human Resources Division.
- The Committee is chaired by the Company's president and representative director, and appropriate involvement and advice are obtained from independent outside directors who are members of the Committee. In principle, the chairperson chairs the Committee, but for deliberation items that require particular independence and objectivity, it is chaired by independent outside directors.
- The Committee receives questions from the Board of Directors regarding the selection processes, qualifications, and reasons for nomination of candidates for Directors and Audit & Supervisory Board Members, the criteria for judging the independence of independent outside officers, and the remuneration system for corporate officers of the Company, and considers the appropriateness of these matters, with appropriate involvement and advice from independent outside directors, and reports back based on an assessment of the Company's business performance and other factors.
- The Board of Directors shall make decisions regarding nomination of directors and Audit & Supervisory Board Members, and compensation for directors etc., after receiving reports from the Personnel & Remuneration Advisory Committee.

Meetings of the Personnel & Remuneration Advisory Committee (FY2024)

Number of meetings: 6

Average attendance rate of outside directors: 100%

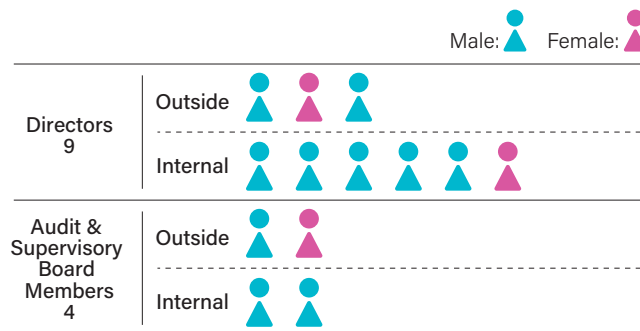


Enhancement of Corporate Governance

3 Composition of the Board of Directors

- The Board of Directors comprises internal directors who excel in their respective business performance and management skills and outside directors who have specialized knowledge and extensive expertise. This ensures a balance and diversity of knowledge, experience, and skills throughout the Board.
- Three of the nine directors are outside directors (including 1 female director).
- Two of the four Audit & Supervisory Board Members are outside Audit & Supervisory Board Members (including 1 female member).
- The skills that the Company expects to be demonstrated by each director are identified based on the basic policy of the "2030VISION" and the important management issues (materiality) for realizing the Group Mission.

Composition of the Board of Directors (As of June 27, 2025)



  **WEB** **List of corporate officers of Nippon Paper Industries**
<https://www.nipponpapergroup.com/english/about/corporate/officers/>

  **WEB** **Skill Matrix of Directors**
(NIPPON PAPER GROUP Integrated Report 2025, P.55)
https://www.nipponpapergroup.com/english/csr/npg_ir_e_2025_54-55.pdf

1. Nomination Policy of Director Candidates

Director candidates are determined by the Board of Directors, on condition that they meet all of the following requirements.

- (1) A person who has a wealth of knowledge and experience in the business management and business operations of the Group
- (2) A person who fully understands the social responsibilities and mission of the Company's business activities and who can fairly and accurately carry out business management and business operations based on principles of strict self-discipline

2. Nomination Policy of Candidates for Audit & Supervisory Board Members

Audit & Supervisory Board Member candidates are determined by the Board of Directors from among a wide range of diverse talent, on condition that they meet all of the following requirements.

- (1) A person who has a wealth of knowledge and experience in the business management and business operations of the Group
- (2) A person who is capable of auditing the status of business execution by the Company's directors from a fair and objective standpoint, and of contributing to the improvement of the soundness and transparency of management.

3. Outside Directors and Outside Audit & Supervisory Board Members

- The Company designates three outside directors and two outside Audit & Supervisory Board Members as independent officers who meet the qualifications for independent officers.
- Candidates for outside director and outside Audit & Supervisory Board Member are selected from a wide range of diverse talent, on the condition that they meet both of the following requirements, in addition to the requirements for externality stipulated by laws and regulations (not having been a director, employee, etc., of the Company or its subsidiaries in the past).
 - (1) Persons who meet the independence criteria set by the Tokyo Stock Exchange and are recognized as having no risk of conflicts of interest with ordinary shareholders
 - (2) Persons who understand the Company's management philosophy and fully understand the Group's social responsibilities and roles
- In addition to requirements (1) and (2) above, outside director candidates will be selected by the Board of Directors on condition that they are fully aware of their role as outside directors and are able to utilize their specialized knowledge and experience in fields such as corporate management, economics, legal affairs, accounting, taxation, and auditing, and to supervise the directors and management of the Company and provide accurate and appropriate opinions and advice.
- In addition to requirements (1) and (2) above, outside Audit & Supervisory Board Member candidates will be selected by the Board of Directors, and with the consent of the Audit & Supervisory Board, on condition that they are fully aware of their role as outside Audit & Supervisory Board Member, and are able to utilize their specialized knowledge and experience in fields such as corporate management, economics, legal affairs, accounting, taxation, and auditing, and to audit the directors' execution of their duties from a neutral and objective standpoint, and to contribute to the soundness and transparency of management.

Enhancement of Corporate Governance

4. Successor to the President

- Candidates for the president's successor are developed by having them successively hold important positions such as executive officers and directors.
- In the Personnel & Remuneration Advisory Committee, established as an advisory body to the Board of Directors, the president explains medium- to long-term management issues and exchanges opinions with the outside directors to win the confidence of the committee. At the same time, ever deepening discussions are being held on the qualities that a president should possess and the responsibilities that a president should fulfill in light of future management issues.
- The Personnel and Remuneration Advisory Committee discusses corporate officer personnel affairs, including the appointment and dismissal of the president, and reports to the Board of Directors. Having received these reports, the Board of Directors examines the contents of the reports, the progress of discussions, and other relevant aspects and then decides on candidates.
- Through these processes, the Board of Directors supervises the formulation and operation of the president succession plans.
- Further, from the perspective of securing talent who will be capable of shouldering responsibility for the running of the Company in the future, the Company implements rotations between various job types and business sites, especially for career-track employees, and promotes them quickly to important posts and positions where they can assist management, such as general manager positions or top management positions at affiliated companies and overseas subsidiaries, thereby exposing them to high level and high intensity operations and duties, to develop and select the next generation of corporate officer candidates.

5. Policy for Training of Directors and Audit & Supervisory Board Members

- The Company continuously provides information on a range of matters (economic conditions, industry trends, regulatory compliance, corporate governance, financial accounting, etc.) necessary for executive officers and directors to fulfill their roles and functions and also provides support for the execution of duties by executive officers and directors by securing opportunities for them to participate in the external training that they desire.
- At the time of their appointment and in a timely manner during their terms of office, the Company provides outside directors and outside Audit & Supervisory Board Members with briefings about the Group's management strategies, management plans, the status of various businesses, the management environment, and management challenges, etc., given by the various related departments or staff members in charge. This ensures opportunities for the formation of sufficient understanding among them.

4 Policy for Determining Remuneration for Directors and Audit & Supervisory Board Members

- The remuneration system for internal directors consists of fixed, performance-linked, and stock remunerations. The composition ratios are set appropriately based on the purpose of each type of remuneration.
- The standard amount of monthly remuneration for internal directors shall be decided according to their responsibilities within the Company. Of that, 70% shall be fixed and the remaining 30% shall be, in principle, paid after adjustment based on the degree of achievement of the Medium-Term Business Plan. The standard amount is determined using objective survey data from outside sources and considering factors including the Company's performance, the scale of business, and managerial circumstances. Performance indices are established to effectively function as motivation to achieve performance targets and reevaluated as necessary in response to changes in circumstance.
- Following a report by the Personnel & Remuneration Advisory Committee, the achievement of greenhouse gas emissions reductions targets under 2030VISION and the achievement of employee engagement targets were included as non-financial indicators in the performance evaluation criteria for internal directors from July 2024.
- The Company has introduced "Board Benefit Trust (BBT)" as a stock compensation plan since FY2019 for internal directors separately from their monthly compensation. The objective of BBT is to further clarify the link between the compensation provided to directors and the Company's share value and thereby increase directors' motivation to contribute to improving the Company's medium- to long-term performance and increasing its corporate value by sharing the benefits and risks associated with share price fluctuations with shareholders.
- Monthly remuneration for outside directors and outside Audit & Supervisory Board Members shall be fixed. In light of their responsibilities, contributions to the executive shareholding association are on a voluntary basis.

Enhancement of Corporate Governance

Remuneration for Internal Directors (Nippon Paper Industries)

	Fixed remuneration	Performance-based remuneration	Stock remuneration
Method	Cash payment		Points granted
Payment allowance	Up to ¥700 million per year		Up to 25,000 points per year (1 point = 1 share)
Payment period	Monthly (no bonuses or retirement benefits)		Director resignation (cumulative points converted to shares)
Calculation method	Determined according to their respective responsibilities		Points granted according to their respective responsibilities
	70% paid as fixed remuneration	30% paid, in principle, after adjustment based on the degree of achievement of the Medium-Term Business Plan	
Performance standards	—	Financial Indicators 70%: Consolidated results (net sales and operating income) 30%: Non-consolidated results (net sales and operating income) Non-financial Indicators 1. Achievement of greenhouse gas emissions reduction targets under 2030VISION 2. Achievement of employee engagement targets	—
Other	Fixed amounts contributed to the Company's executive shareholding association		—

5 Assessment of Board Effectiveness

- Since FY2015, an evaluation of the effectiveness of the Board of Directors has been conducted once a year.
- The Secretariat of the Board of Directors evaluates the effectiveness of the Board of Directors by conducting a questionnaire survey of Directors and Audit & Supervisory Board Members regarding the operation of the Board of Directors and discussions at its meetings.
- The Company receives advice from an external organization on self-assessment and analysis obtained from the surveys. The anonymity of the surveys is ensured by sending the responses to the external organization.



Assessment of Board Effectiveness

<https://www.nipponpapergroup.com/english/ir/governance/evaluation/>

Total Amount of Remuneration, etc. for Directors and Audit & Supervisory Board Members* (FY2024) (Nippon Paper Industries)

	Number of executives	Total amount of remuneration, etc. by Type			Total amount
		Fixed remuneration	Performance-based remuneration	Stock remuneration	
Directors	9	¥306 million	¥89 million	¥26 million	¥422 million
(Outside directors)	(3)	(¥43 million)	(—)	(—)	(¥43 million)
Audit & Supervisory Board Members	4	¥62 million	—	—	¥62 million
(Outside Audit & Supervisory Board Members)	(2)	(¥15 million)	(—)	(—)	(¥15 million)

* Figures are rounded down to the nearest million yen

Risk Management

1 Basic Policy

Basic Policy

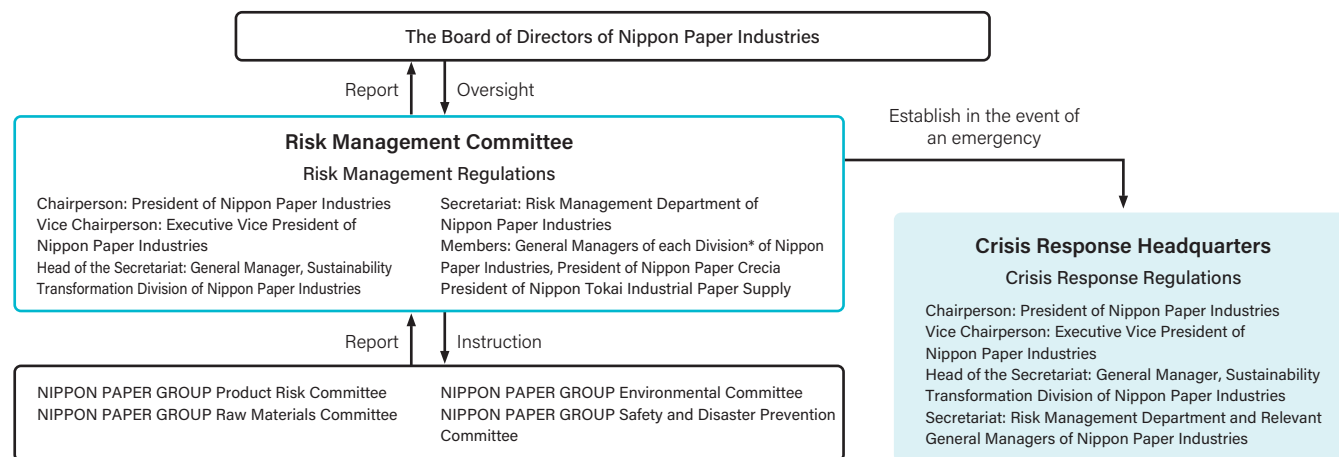
- ① Prioritizing human life and safety
- ② Continuing business

Under these policies, the Group will follow and comply with the guidance and recommendations of national and regional governments.

Risks for NIPPON PAPER GROUP are all possibilities that may cause physical, economic, or credit loss or disadvantage to the Group, specifically the following seven items:

- (1) Legal and regulatory compliance risk
- (2) Labor-related risk
- (3) Business-related risk
- (4) Finance-related risk
- (5) Disaster-related risk
- (6) Information systems-related risk
- (7) Other risks

2 Promotion Structure



* Sustainability Transformation Division, Personnel & General Affairs Division, Corporate Planning Division, Biomass Material Business Division, Financial Division, Raw Materials and Purchasing Division, Research & Development Division, Technical & Engineering Division, Energy Business Division, Sales Planning Division, Paper-Pak Sales Division, Chemical Sales Division

1. Risk Management System

- Under the supervision of the Board of Directors of Nippon Paper Industries, the Company has established its Risk Management Committee, which is chaired by the president and representative director, and holds meetings at least once a year (FY2024: 1 meeting).
- In normal times, the Risk Management Committee periodically identifies and evaluates the Group's risks in accordance with the Risk Management Regulations, and discusses and deliberates measures to mitigate its risks and measures to be taken when they occur.
- In times of emergency, a Crisis Response Headquarters is established in accordance with the Crisis Response Regulations. The Crisis Response Headquarters promptly implements initial emergency responses and BCP (Business Continuity Plan) in response to risks such as earthquakes, typhoons, and outbreaks of infectious diseases.

- Risks related to product safety, raw materials procurement, the environment, and safety and disaster prevention are discussed and deliberated by committees that are chaired by the general managers of the relevant division.

2. Reports to the Board of Directors

- The results of discussions and deliberations by committees chaired by the general managers of each responsible division of risks related to product safety, raw material procurement, the environment, and safety and disaster prevention are reported to the Board of Directors through the Risk Management Committee.
- In FY2024, in addition to the Group's business risks and the content of reports from the various committees, the Board of Directors also received reports on the response status of crisis response training for the scenario of a Tokyo Inland Earthquake and BCM (Business Continuity Management).

Risk Management

3 Risk Management Activities

1. Risk Identification

- In FY2024, risk surveys were conducted for the Company's head office and mills, consolidated subsidiaries in Japan, three non-consolidated subsidiaries, and three overseas consolidated subsidiaries. In addition to identifying risks, the surveys also confirmed risks that materialized in FY2024 and those whose significance will increase in the future.
- Based on the results, the relevant departments and the Risk Management Committee have discussed and identified the business risks of the Group as follows.

Major Business Risks of the Corporate Group (FY2024)

	Summary	Main initiatives to mitigate risks
Major risks associated with management strategies	Risks related to securing human resources	<ul style="list-style-type: none"> ● Proactive recruitment and development of human resources with diverse backgrounds ● Creation of a work environment that supports flexible work styles ● Automation and labor-saving at operational sites
	Risks related to delays in the improvement of profit from Opal	<ul style="list-style-type: none"> ● Optimization of manufacturing footprint at Maryvale mill and stabilization of operations ● Increase of production capacity and improvement of productivity through capital investment in the Packaging Business
	Risks related to climate change	<ul style="list-style-type: none"> ● Reduction of GHG emissions by energy savings and increasing the proportion of renewable and waste energy ● Utilization of J-Credit scheme ● Promotion of elite trees
	Risks related to declines in demand for graphic paper	<ul style="list-style-type: none"> ● Improvement of competitiveness through reorganization of production structure for graphic paper ● Maintenance and expansion of sales volume through development of environmentally friendly products and expansion of their lineup ● Expansion of exports through development of products for overseas markets and reinforcement of sales and supply chain structure
	Risks related to delays in the expansion of Biomass Material Business	<ul style="list-style-type: none"> ● Application development, commercialization, and sales expansion for biomass material products ● Promotion of open innovation ● Aggressive intellectual property strategies
	Risks related to supply chain management	<ul style="list-style-type: none"> ● Procurement from multiple regions and multiple sources ● Review of inventory levels ● Expansion of flexibility and procurement network by strengthening horizontal cooperation within NIPPON PAPER GROUP ● Joint marine shipping with other companies ● Introduction of a truck arrival booking system
	Risks related to natural disasters and infectious diseases	<ul style="list-style-type: none"> ● Establishment of the Crisis Response Headquarters ● Maintaining BCP ● Regular implementation of various drills based on disaster scenarios ● Thorough measures to prevent outbreaks of infectious diseases
Main risks associated with the business environment and business activities	Risks related to production facilities	<ul style="list-style-type: none"> ● Planned measures against deterioration with aging ● Preventive maintenance
	Risks related to compliance	<ul style="list-style-type: none"> ● Regular education and training ● Compliance awareness surveys
	Risks related to worker health and safety	<ul style="list-style-type: none"> ● Operation of the occupational safety and health management system
	Risks based on product liability	<ul style="list-style-type: none"> ● Supervision by the Group Product Risk Committee ● Utilization of product liability insurance
	Risks related to environmental laws and regulations	<ul style="list-style-type: none"> ● Dissemination and compliance with environmental laws and regulations
	Risks related to information systems	<ul style="list-style-type: none"> ● Construction and operation of systems in preparation for cyber-attacks ● Enhancement of the personal information management system
	Risks related to intellectual property disputes	<ul style="list-style-type: none"> ● Protection of intellectual property rights ● Internal training

2. Maintaining BCP

- In response to the large-scale natural disasters that have occurred frequently in recent years, the Company continues to develop BCP based on the BCM framework that was worked on in FY2020.
- Each department of the Company (head office) compiles the BCP and disseminates them internally. Based on the BCP, in addition to stockpiling food and daily necessities, the Company has added equipment that will be needed when the Crisis Response Headquarters is set up, and has also selected priority operations.
- The Company (mills) is working to revise the existing BCP to incorporate earthquakes, tsunamis, typhoons, floods, and volcanic eruptions as expected disasters.
- 30 Group companies have prepared their crisis response rules.

3. Enhancement of Crisis Management

- The Company (head office) conducts training on the smooth establishment of Crisis Response Headquarters under the BCM framework to improve crisis management capabilities, including initial incident response.
- In FY2023, Crisis Response Headquarters setup training was conducted online for the scenario of a large-scale disaster on weekends and holidays.
- In FY2024, crisis response training was conducted for the scenario of a Tokyo Inland Earthquake, the transfer of part of the functions of the head office to the Iwakuni mill, and the setting up of a Crisis Response Headquarters.



Business Risks

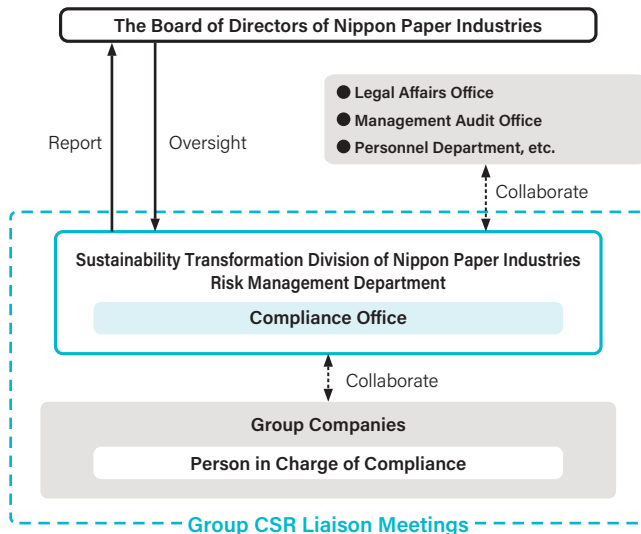
<https://www.nipponpapergroup.com/english/ir/policy/risk/>

Compliance

1 Basic Policy

-   **P88 NIPPON PAPER GROUP Standards of Business Conduct**
-   **P89 NIPPON PAPER GROUP Code of Conduct**
-   **P83 Corporate Governance Policy**
-   **WEB Basic Policies of Nippon Paper Industries Concerning Privacy Protection**
<https://www.nipponpapergroup.com/english/terms/#ancPolicy>
-   **P90 Nippon Paper Group Basic Policy on Prevention of Bribery to Public Officials**
-   **P91 Nippon Paper Group Basic Policy on Compliance with Competition Laws**
-   **P87 Basic Policies to Establish the Internal Control Systems**

2 Promotion Structure



- In the NIPPON PAPER GROUP CSR Liaison Meetings, the Compliance Office in the Sustainability Transformation Division works to enhance cooperation on compliance with the staff responsible for compliance at Group companies.
- The Division reports to the Board of Directors on compliance-related activities. In FY2024, reports were made on the operational status of the internal whistleblower system and the achievements of compliance training.
- The operational status of the internal whistleblower system is reported to the Board of Directors of the Company, and in addition, to Audit & Supervisory Board members and the Management Executive Committee, on a quarterly basis.
- A compliance awareness survey was conducted of the Company and selected Group company employees in FY2023, and of the employees of the remaining Group companies in FY2024, to assess the actual status of compliance. The survey results were reported in Management Executive Committee meetings and the like, and the Company is using the results to implement measures such as making the whistleblowing system easier to use.


3 Standards of Business Conduct and Code of Conduct

- To realize the Group Mission and live up to the Group's social responsibility as a modern corporation, in October 2024, what were then known as the Action Charter and the Codes of Conduct were revised with the approval of the Board of Directors.
- Previously, only the Action Charter applied to the entire Group, and each company created its own codes of conduct. The Company revised the Company's Codes of Conduct, making it a code shared by the entire Group, to earn the trust of society and heighten the brand value of the Group by having all employees share the same values and engage in conduct governed by consistent standards.
- The Sustainability Transformation Division is the driving force working on firmly establishing the Standards of Business Conduct and the Code of Conduct throughout the Group.

4 Personal Information Protection

- The "Basic Policies of Nippon Paper Industries Concerning Privacy Protection" has been established to facilitate the management of personal information.
- In accordance with the intention of the Act on the Protection of Personal Information, the Company tracks and manages the timing of acquisition and purpose of use of personal information held by each department in management ledgers.
- The ledgers are reviewed annually to ensure proper management.
- No formalized complaints were reported on customer data loss in FY2024.

5 Information System Security

- The Company has established "Information System Security Measures Rules" and is implementing information system security measures.
- The Company has established an information system security structure in which the General Manager of the Financial Division is the Chief Information System Security Supervisor (officer in charge of information system security). Security incidents and other matters are reported to the Board of Directors every year through the Risk Management Committee.
- One security incident in a Group company was reported in FY2024.
- In order to stop the spread of damage and prevent recurrence in the event of an incident such as a cyber-attack or virus infection, the Company has established a response system and procedures, and is providing training on this for Group employees.  **P12**

Compliance

6 Preventing Corruption

- To realize the Group Mission, the Group has set "Fairness" as a priority value for employees.
- In its various training programs, the Group educates its employees on the content related to anti-corruption (prevention of bribery and compliance with competition laws), such as inappropriate relationships with local governments and public officials in Japan and overseas with whom business activities are conducted, and not giving inappropriate benefits to, or receiving them from, customers and business partners in sales and purchasing activities. Also, the Company strives to correct any suspicious cases that may occur.
- In FY2023, the Japan Fair Trade Commission issued a cease and desist order and another order to a Group company. All Group companies, including the Group company in question, have been thoroughly implementing initiatives for ensuring compliance with the Antimonopoly Act, including various types of training, and are working to prevent any reoccurrence.
- In its "Declaration of Partnership Building," the Company declares that it will strive to comply with desirable business practices between main contractors and subcontractors, and actively work to correct any business practices and trading practices that may hinder the building of partnerships with business partners.

7 Intellectual Property Rights Protection

The Group appropriately manages the information it receives through its business activities and respects others' intellectual property rights.

8 Whistleblower System (Remedial Measures)

1. Mechanism of the Internal Whistleblower System

- The Company has established a "NIPPON PAPER GROUP Helpline," which allows employees to directly report and consult regarding human rights (harassment, working conditions, and other potential risks or concerns), corruption (bribery, violations of competition laws, and other illicit activities), environment-related laws and regulations, outside the everyday chain of command.

- Upon receiving reports, the Compliance Office conducts fact-finding investigations regarding any concerns about violations of laws or corporate ethics. In accordance with the seriousness of the incident, the Company takes corrective actions and measures to prevent recurrence, such as internal disciplinary action, warnings and guidance, and awareness-raising activities for employees through e-learning, etc., while giving consideration to the whistleblower.
- Reports and requests for advice are accepted through multiple channels such as telephone, email, and mail. In addition, contact via chat service has been available since April 2024.
- The utmost care is taken to protect the privacy of whistleblowers.
- The whistleblower system can be used anonymously, but if a report is anonymous, there is a limit to how far the report can be investigated. Therefore, it is recommended that reporters provide their real names as much as possible.
- In accordance with the amended Whistleblower Protection Act of June 2022, employees who have left the company not more than one year ago are added to the scope of users of the system, and the Company prohibits any disadvantageous treatment as a result of whistleblowing, and protects the whistleblower's personal information, as stipulated in the Company's internal rules.
- The Company regularly informs employees about the consultation desk by distributing compliance cards to all group employees, contractors and other parties, and by including information about it in each corporate newsletter.

2. Operational Status of the Whistleblower System and Responses

- In FY2024, there were 69 requests for consultation and reports (FY2023: 43 cases, FY2022: 61 cases,) of which about 50% were related to harassment, and about 20% were doubts about labor-related rules and their operation, while about 10% had doubts about business instructions and responses.

- In order to further strengthen efforts to prevent harassment, which occurs frequently, the Company is continuing to conduct the following harassment training.

- e-learning and video-based training for all employees* (ongoing initiative started in FY2023)

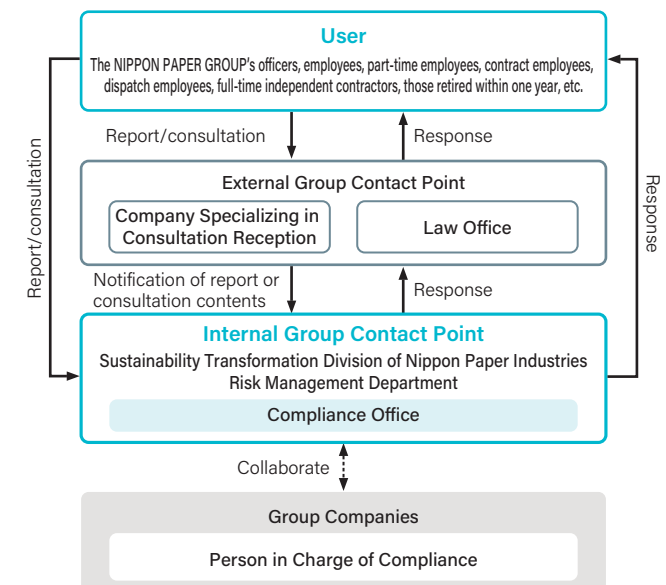
* This includes both dispatched and part-time employees

- Online training for head office managers (FY2024)
- Face-to-face training for head office department heads (FY2024)

3. Receipt of Opinions from Those Who Are Not Eligible for the Use of the Helpline

Opinions from third parties (customers, business partners, and other agencies) not covered by the NIPPON PAPER GROUP Helpline are accepted through "Contact Us" on the Group's website [→ WEB](#) and are handled appropriately by the Company's Compliance Office and other relevant departments.

Internal Whistleblower System



Compliance

9 Employee Training and Education

Achievements in Compliance-related Employee Training and Education (FY2024)

The Group systematically and continuously conducts activities to raise awareness of the importance of compliance among employees.

Responsible department	Topic / Title	Target participants	Number of participants	Number of events (frequency)
Risk Management Department/ Compliance Office	Compliance General	New employees of NIPPON PAPER GROUP	94	1
		New managers of Nippon Paper Industries	48	1
		Newly appointed corporate officers of NIPPON PAPER GROUP and mill managers of Nippon Paper Industries	22	1
		Corporate officers and mill managers of Nippon Paper Industries	40	1 (once a year)
	Harassment-related topics	Group employees	7,915	1
	The Antimonopoly Act	Group employees	2,176	2
	Quality compliance	Employees of Nippon Paper Industries	56	1
	Thoroughly establishing the Standards of Business Conduct and the Code of Conduct	Group employees	6,606	1
Legal Affairs Office ^{*1}	Compliance with anti-bribery/competition laws	Group employees(excluding mill operators)	4,470 ^{*2}	1
	Raising sensitivity to legal risks	Managers of Nippon Paper Industries	1,401 ^{*2}	1
Intellectual Property Department	Basic information, etc. concerning patents	Group employees	817 in total	23 sessions in total
Information Systems Department	Prevention of information leakage incidents, etc.	Group employees	6,435 ^{*2}	1 (once a year)


^{*1} Semi-annual lectures are held one at a time in order. The lectures cover the six topics of prevention of insider trading, exclusion of anti-social forces, protection of personal information, preparation and storage of contracts, compliance with anti-bribery/competition laws, and raising sensitivity to legal risks

^{*2} For those including contractors, etc.

Communication with Stakeholders

1 Basic Policy

 [→P88](#) **NIPPON PAPER GROUP Standards of Business Conduct**

 [→P83](#) **Corporate Governance Policy**

 [→WEB](#) **Corporate Governance Report**
<https://www.nipponpapergroup.com/english/ir/governance/>

 [→P91](#) **Disclosure Policy**

2 Communication with Investors

1. Annual General Meeting

- In order to vitalize general shareholders' meetings and facilitate the exercising of voting rights, Nippon Paper Industries works to provide and disclose company information in a timely and appropriate manner, including the notices of convocation of the general meeting of shareholders.
- The Company is working hard to improve the notice of convocation of the general meeting of shareholders from the standpoint of enhancing its content, in addition to making it easier to read and understand. The "Issues to be Addressed" section of the Business Report includes details on the progress and challenges facing initiatives aimed at achieving the goals of Medium-Term Business Plan 2025.
- The notice of convocation of the general meeting of shareholders is disclosed in Japanese and English, and the English version also includes the contents of business reports and financial statements.
- In addition to participating in the electronic voting platform, the Company is working to raise awareness of how to exercise voting rights using smartphones, and other devices, and is creating an environment for exercising voting rights, which is an important right for all shareholders.

2. IR Activities

- The Company's Corporate Planning Department, along with other relevant departments, engages in constructive dialogues with shareholders and investors, and gathers management analysis and opinions from the perspective of capital providers.

- In addition, IR activities are regularly reported at the Group Management Strategy Committee Meeting.
- The Company mails shareholder newsletters to shareholders twice a year.

IR Activities (FY2024)

	Number of events
Financial results and Management briefings	2
Financial results briefings	2
Individual meetings	135
of which, ESG related meetings	4
Small meetings with Outside directors	1
R&D presentation meeting	1 *
Publication of integrated reports	1

* Conducted in April, 2025

CASE STUDY

R&D Presentation Meeting (Nippon Paper Industries)

In April 2025, analysts, institutional investors, and members of the media were invited to R&D presentation meeting to explain the roles of the Group's Research and Development Division and the latest technology trends related to the transformation of the Group's business structure. The Group explained its strategies for using its technologies, which leverage wood resources to their fullest, to expand new businesses in a wide range of areas. The briefings covered the markets and features of individual new products, the status of development and sales, future outlook information, and more, and there were also question-and-answer sessions.

 [→WEB](#) **IR Library**
<https://www.nipponpapergroup.com/english/ir/library/>

3 Communication with Stakeholders other than Investors

- NIPPON PAPER GROUP publishes information on its corporate activities on its website and on social media, and it welcomes questions and opinions.
- The Company is striving to improve its corporate activities and initiatives by conducting communication activities, including individual dialogues, with diverse stakeholders.

Main Communication Activities

Stakeholder	Primary means of communication
Employees	<ul style="list-style-type: none"> ● Employee Engagement Survey →P73 (once a year) ● Labor-management conference →P73 (usually twice a year) ● Personnel request surveys/interviews (once a year) ● Helpline (internal whistleblower system) →P11 ● Corporate newsletter (printed version: 4 times a year; online version: as needed) ● Intranet ● Digital signage ● Communication between General Managers and junior career-track employees in other departments →P73
Customers/ Consumers	<ul style="list-style-type: none"> ● Dialogue through sales activities ● The information desk
Suppliers	<ul style="list-style-type: none"> ● Dialogue through sales activities ● Supplier questionnaire surveys →P16 (once a year) ● Local interviews and exchanges of opinion
Local communities	<ul style="list-style-type: none"> ● The School of Friendship for Forests and Paper →P78 ● Environmental communication →P27 ● The information desk
NPOs/NGOs	<ul style="list-style-type: none"> ● Exchange of opinions on human rights →P65 (at least once a year)
Students	<ul style="list-style-type: none"> ● Internships/open day ● Lectures ● Seminars in schools

 [→WEB](#) **NIPPON PAPER GROUP Social Media Gallery (Japanese only)**
<https://www.nipponpapergroup.com/about/sns/>