

CSR Management

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Basic Approach to CSR

Toppan devotes itself to the fulfillment of its social responsibilities based on *TOPPAN VISION 21*, the foundation of all Group business activities.

Towards Sustainable Development

When Toppan was founded in 1900, Japan was rapidly building up its modern industries in the aftermath of the Meiji Restoration.

The printing industry was contributing to society in three important areas: 1) the printing of banknotes, bonds, and securities, crucial instruments for the establishment of modern capitalism; 2) the publication of newspapers, a medium for public discussion to stimulate the progress of civilization; and 3) the publication of translations, novels, and magazines to enlighten the public and encourage the establishment of a modern state.

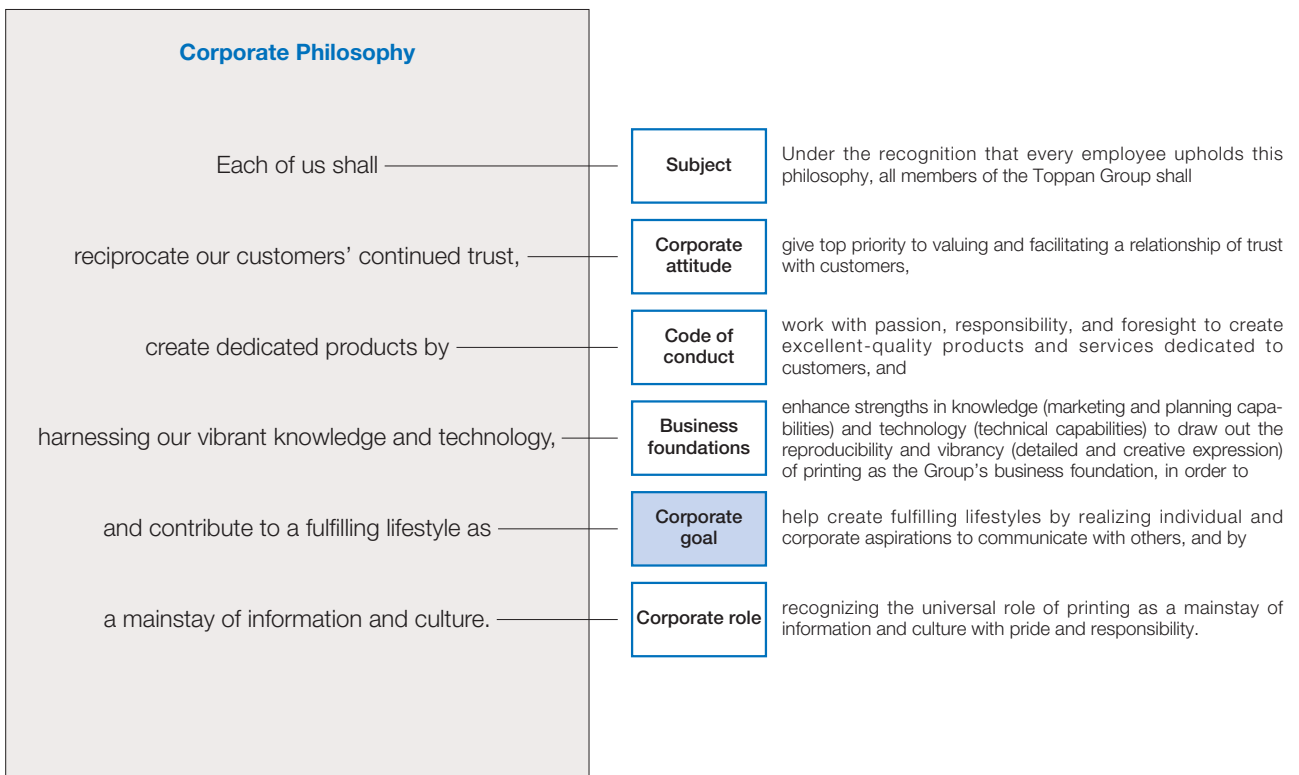
Toppan began in the last century as a provider of printing services to support the establishment of modern Japan. Today it has grown into a multifaceted

enterprise with myriad businesses centered around core printing technologies, such as IT and electronics. Toppan supports the development of information culture and the creation of fulfilling lifestyles in many ways.

Toppan has grown steadily amid the drastic changes that have taken place worldwide in the more than 100 years since its founding. These changes continue to pose threats to the earth and humankind in the 21st century. The world must contend with poverty, abuses of human rights, environmental destruction, and health problems. In Japan, meanwhile, birthrates are declining and the population is ageing.

Toppan believes it has a responsibility to help solve these problems in cooperation with all of its stakeholders through business operations conducted under its founding Corporate Philosophy of

contributing "to a fulfilling lifestyle as a mainstay of information and culture." The Company contributes as an essential corporate citizen with an active commitment to realizing sustainable development for itself and society.



Established in June 2000

■ Toppan’s Social Responsibility: Realizing an Ideal “Corporate Structure”

TOPPAN VISION 21 expresses the basic concept and directionality of the activities undertaken by Toppan to grow in harmony with society and the global environment.

TOPPAN VISION 21 consists of the “Corporate Structure” and “Business Fields.” The Corporate Structure, meanwhile, is made up of three elements: Toppan’s Corporate Philosophy, the Corporate Creed, and the Conduct Guidelines. These elements specify a complete set of values, standards, and guidelines for the business operations of the Toppan Group. The Group will fulfill its social responsibilities by realizing this Corporate Structure.

The Toppan Group regularly enlightens its employees on the basic tenets

of TOPPAN VISION 21 and the Corporate Structure through communication in workplaces, training sessions, and various tools.

Corporate Philosophy

The Corporate Philosophy is the top-level concept that underpins Toppan’s corporate activities and defines its most important values and thoughts.

Corporate Creed and Conduct Guidelines

The Corporate Creed expresses the standards that the Toppan Group applies to its corporate activities.

Built on the Corporate Philosophy and Corporate Creed, the Conduct Guidelines express the behavioral norms based on every employee’s compliance with laws, regulations, and corporate ethics.

Under no circumstances will any mem-

ber of the Toppan Group engage in a business operation that infringes the rules of society or poses any risk of environmental or social harm. The Group also understands that any failure to maintain its high standards for business operations may make it difficult to guarantee reasonable returns and benefits for society.

The Conduct Guidelines specify items that every employee in the Toppan Group should closely observe.

The Group reviews its Conduct Guidelines every year in the conviction that the guidelines must evolve over time to rationally adapt to the various changes underway in corporate and social environments.

Corporate Creed

To build our customers’ trust through sincerity, enthusiasm, and creativity in all our corporate endeavors.

To strive for total innovation from a global perspective by conducting marketing and technological development rich in originality.

To conduct fair and open business operations while acknowledging our social responsibilities and aspiring for harmony with our global environment.

To create a positive working environment by maximizing our individual talents and strengths as a team.

To enhance our corporate standing and promote the continual development of the Toppan Group through the exploration of new possibilities.

Established in June 2000

Conduct Guidelines

Chapter 1: Basic Principles

1. Respecting basic human rights
2. Maintaining public order and standards of decency
3. Complying with laws and ethics
4. Conducting fair business operations
5. Striving to improve quality
6. Appropriate management and disclosure of information
7. Environmental and safety considerations

Chapter 2: Specific Conduct Guidelines

Section 1: Building customer trust

Section 2: Reforming operations

Section 3: Fulfilling corporate responsibilities

Section 4: Creating a positive work environment

Section 5: Developing the Toppan Group

Established in June 2000; revised in April 2006

For more detailed information on the Conduct Guidelines, please see P. 30.

■ Toppan's Relationships with Stakeholders

For Toppan to operate businesses and stay viable as a corporation, it must build strong ties with various stakeholders. The Company has defined five categories of stakeholders vital for its business activities: customers, business partners, communities, employees, and shareholders/investors. Toppan strives to build closer relationships of trust with its stakeholders in these categories by thoroughly disclosing information and engaging stakeholders in dialogue.

In addition to the companies with which Toppan does business, end users and other members of society are Toppan customers. The Company understands its responsibilities to society at large and is determined to promote initiatives for the fulfillment of these responsibilities.

Communication with Stakeholders

Stakeholder dialogues are a very effective way to regularly grasp social needs. Toppan promotes and upgrades its CSR activities by incorporating stakeholder dialogues into the PDCA cycle.

Toppan held special dialogue sessions with key stakeholder representatives in fiscal 2004 and 2006, in addition to the regular dialogues it carried out in the course of business. From 2005 to 2007, the Company invited an external expert into annual in-house meetings of CSR promotion members to review its annual CSR activities.

The CSR Promotion Study Group, a body established in fiscal 2007, seeks to improve the PDCA cycle of Toppan's CSR activities using the knowledge gained through stakeholder dialogues outside the Company. In principle, the

study group meets at the end of each fiscal year to unify the channels of dialogue with external stakeholders. The second meeting was held in fiscal 2008 (→P. 22).

Toppan's Relationships with Stakeholders and Communication Tools

● For All Stakeholders

- ◎ Corporate Guide
- CSR Report
- Various guides for individual divisions
- Financial statements
- Quarterly business reports
- Website, etc.

● For Shareholders and Investors

Toppan strives to improve its corporate value through sustainable business development on the basis of stable dividends. The Company makes itself fully accountable by promptly and appropriately disclosing corporate information to ensure that shareholders and investors completely and accurately understand the Company's business activities.

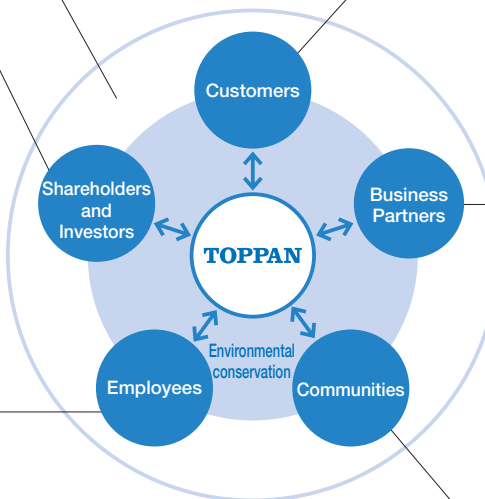
- ◎ Shareholder newsletter *Toppan Story*
- Business reports
- Annual Report
- Corporate governance reports, etc.

● For Employees (including part-time workers and temporary staff)

Toppan strives to provide comfortable workplaces where diverse employees can work to their full potential—a working environment where the dignity and lives of all employees are respected. The Company offers satisfying jobs to fulfill employees and tangibly contribute to the goals of the corporation.

- ◎ In-house newsletter *CONVEX* and Web *CONVEX*
- Overseas in-house newsletter *Interlink*
- Various pamphlets on welfare benefits, etc.

(◎: Tools for communication)



● For Customers

Toppan's customers are not just the companies with which Toppan does business. Just about every person in society is a Toppan customer, in some way or another. The Company strives to always merit the trust of customers with sincerity, enthusiasm, and creativity by satisfying customer requirements through Total Quality Assurance throughout the entire product life cycle, from planning and manufacturing to use and disposal.

- ◎ Various reports on business operations
- Various reports on products and services
- Various newsletters, etc.

● For Business Partners

Another crucial element in strong customer trust is steady relationships of trust and cooperation with business partners. Toppan does business on an equal footing with its partner companies in a fair and open manner as a matter of course. The Company strives to meet the expectations of customers and society with regard to its social responsibilities by promoting CSR procurement in cooperation with business partners.

- ◎ CSR Procurement Guidelines on the Toppan website, etc.

● For Communities

Toppan relates with communities and society through its business operations. The Company strives to win the trust of communities by contributing to society as a mainstay of information and culture.

- ◎ Plant guides
- Site Eco Report
- Annual report *Printing Museum*, etc.

Specific Concept of CSR Activities

The purpose of Toppan's CSR activities is to realize the sustainable development of society and the Company. To achieve this, Toppan must be a trustworthy, respected corporation for stakeholders of every kind. A company without this policy cannot expect to succeed in addressing social issues and needs through the creation of added-value businesses over the years.

Toppan has therefore set out material topics for its activities by combining its policy towards the balanced development of society, the economy, and the environment with a conviction that the realization of an optimally organized Corporate Structure will help the Company fulfill its social responsibilities. Toppan announced its support for the

United Nations Global Compact as an active participant in 2006. By disseminating the principles of the Global Compact across the Company, Toppan promotes CSR activities in consideration of the roles it is to play as a member of international society.

CSR Material Topics

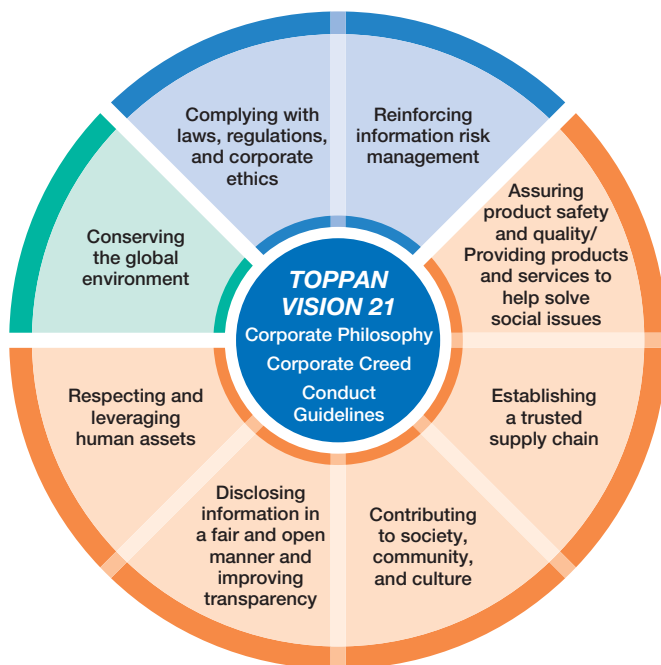
Toppan sets action points and goals for each material topic to be addressed through CSR activities and reviews the topics yearly by assessing the levels of achievement. The Company established eight topics in fiscal 2008 and has advanced its CSR initiatives ever since.

CSR Promotion Structure

The President & CEO and the Director in charge of CSR are leading a move to develop CSR activities through collabora-

tion with the relevant management divisions of the head office and the CSR Promotion Department of the Legal Affairs Division, the department undertaking administrative operation. These parties regularly convene a CSR promotion department meeting to assess the progress of each action point and discuss ways to resolve related challenges.

CSR Material Topics Based on the Corporate Structure and Stakeholders



The United Nations Global Compact sets forth 10 principles in the four areas of human rights, labour standards, environment, and anti-corruption. Toppan supports and implements the 10 principles as a socially responsible corporation.

Toppan's CSR Promotion Structure



Results for Fiscal 2008 and Future Measures

Toppan carries out various CSR activities based on the action points established for each of the eight material topics and reviews them annually. The next two pages summarize Toppan's activities and achievements in fiscal 2008 and its main measures planned out for fiscal 2009.

Stakeholders	Topics	Action Points	Targets	
All stakeholders	Complying with laws, regulations, and corporate ethics	Heightening awareness of laws, regulations, and the Conduct Guidelines through compliance promotion activities	—	
	Reinforcing information risk management	Establishing an information security management structure towards the complete elimination of information-related accidents	—	
	Conserving the global environment	(See PP. 54–56 for the results of the environment activities and future measures to promote them)	—	
Customers	Assuring product safety and quality/Providing products and services to help solve social issues	Ensuring product safety	Preventing accidents relevant to the Product Liability (PL) Law and the revised Consumer Product Safety Law of Japan	
		Quality assurance and enhancement	Enhancing customer satisfaction (analyzing the degree of customer satisfaction and applying the results to business operations under the ISO 9001 QMS) and preventing serious quality-related accidents concerning the performance and functions of products	
		Providing products and services to help solve social issues	Launching energy-related businesses for the future	
			Expanding businesses in the life sciences	
Business partners	Establishing a trusted supply chain	Performing business deals strictly compliant with the CSR Procurement Standards	Adapting to the aging society	
			Disseminating the CSR Procurement Standards to all of Toppan's business partners in Japan and encouraging these business partners to implement the standards	
			Establishing a management and assurance system for chemical substances	
Communities	Contributing to society, community, and culture	Social contributions	Enriching programs to address social issues	
			Community contributions	Expanding opportunities to communicate with local communities and making contributions suitable for local needs
			Cultural contributions	Contributing to society through the provision of high-quality information, endeavoring to elevate the roles of printing and related industries, striving to establish the study of printing culture, contributing to the communities surrounding the operational sites, and supporting educational institutions
Shareholders and investors	Disclosing information in a fair and open manner and improving transparency	Enhancing IR activities	Improving accessibility to Company information disclosed in a timely manner	
Employees	Respecting and leveraging human assets	Realizing a safe and secure working environment	Operating personnel treatment systems appropriately	
			Respecting basic human rights	
			Ensuring occupational safety and health	
			Reinforcing countermeasures against fires and disasters	
			Promoting healthcare and health enhancement	
		Leveraging diverse human assets	Supporting work-life balance by 1) shortening total working hours	
			Supporting work-life balance by 2) creating workplaces where employees can strike a balance between working and raising children	
			Creating a better working environment through partnerships between labor and management	
			Providing an open environment for recruitment	
			Supporting individual career development	
Developing and fostering human assets	Promoting positive action			
	Supporting second careers for retired employees			
	Promoting employment of persons with disabilities			
	Securing the propriety of contract- and temporary-worker-related operations			
Fostering highly motivated employees based on "conduct of high value"				

Main Activities and Achievements in Fiscal 2008	Self Evaluation	Main Measures in Fiscal 2009	For Details
<ul style="list-style-type: none"> Established Conduct Guidelines Promotion Leader systems at all Group companies in Japan Introduced Conduct Guidelines for subsidiaries in Thailand and Indonesia Checked compliance and organized employee education on the Subcontract Law of Japan (30 times; 2,369 participants) 	A	<ul style="list-style-type: none"> Fostering Conduct Guidelines Promotion Leaders who can design and implement dissemination activities by themselves Introducing Conduct Guidelines for subsidiaries in the U.S.A. 	PP. 26-27
<ul style="list-style-type: none"> Carried out head office audits primarily to check the control status of human error in the handling of important information Acquired ISO/IEC 27001 certification in three operations and expanded the certification boundaries of two operations Conducted questionnaire surveys to assess secular changes in the levels of information security management 	A	<ul style="list-style-type: none"> Revising the <i>Information Security Management Guidebook</i> and issuing and using the <i>Close Calls on the Job</i> booklets Promoting the acquisition of ISO/IEC 27001 certification for areas under tight security Reinforcing the management of confidential operations and the handling of printed securities materials 	PP. 28-29
—	—	—	PP. 52-76
<ul style="list-style-type: none"> Established a system based on the Product Safety Management Guidelines under the ISO 9001-series QMS, but failed to check compliance with the guidelines through audits 	C	<ul style="list-style-type: none"> Checking actual conditions in the establishment and operation of the system through audits 	
<ul style="list-style-type: none"> Continued product quality education using standardized in-house textbooks for the sales departments and spread the effort across Group companies in Japan Carried out internal audits on the operation status of the ISO 9001-series QMS for almost all domestic sites Promoted the granting of permissions to entitle clients to use Company patents; organized training sessions to educate the planning departments on the prevention of patent infringements 	B	<ul style="list-style-type: none"> Continuing to organize product quality education using standardized in-house textbooks for the sales departments Assembling a database of quality-related information for the prevention of quality-related accidents Selecting operational sites to be audited intensively based on product-quality conditions and improving the effectiveness of the QMSs at the sites Promoting permissions that entitle clients to use patents held by the Company; respecting the intellectual properties held by other companies 	PP. 32-33
<ul style="list-style-type: none"> Upgraded the performance of a non-platinum catalyst used in the inking process for the prototype development of fuel cell components 	B	<ul style="list-style-type: none"> Developing a new material and low-cost, high-efficiency manufacturing technologies for fuel cells 	PP. 34-35
<ul style="list-style-type: none"> Evaluated the performance of a genotype analysis system with SNP chips at cooperative medical institutions 	A	<ul style="list-style-type: none"> Providing SNP chips and genotype analysis systems to support studies on HIV treatment 	PP. 8-9
<ul style="list-style-type: none"> Researched a method for the development of products to accommodate persons with weak or age-impaired vision 	B	<ul style="list-style-type: none"> Researching and developing intuitive designs and incorporating the designs into new products 	P. 35
<ul style="list-style-type: none"> Produced and exhibited four new virtual reality (VR) reproductions of cultural assets, including the sculpture of Ashura (screened at an exhibition held in Tokyo, "National Treasure ASHURA and Masterpieces from Kohfukuji"); a total of 21 VR productions have been created to date Promoted the rental and secondary use of VR productions as a business 	A	<ul style="list-style-type: none"> Exhibiting existing VR productions on tours and producing and exhibiting five new works Continuing to promote the use of VR productions as a business 	P. 12
<ul style="list-style-type: none"> Held briefings and conducted surveys to assess the current status of about 1,000 business partners working with the planning and sales promotion departments Started interviews with some business partners 	A	<ul style="list-style-type: none"> Continuing to disseminate the Company's CSR procurement initiatives to new and existing business partners Continuing to interview business partners 	
<ul style="list-style-type: none"> Established an internal system to enhance the effectiveness of the management of chemical substances in products at business partners (based on Toppan's QMS) 	B	<ul style="list-style-type: none"> Collecting certification for the non-usage of chemical substances prohibited by the Company, and auditing to confirm the non-usage 	PP. 36-37
<ul style="list-style-type: none"> Planned a series of case presentations, study meetings, etc. to be held in cooperation with business partners (postponed due to current problems in the business environment surrounding the Company) 	B	<ul style="list-style-type: none"> Installing and smoothly operating the Supplier Hotline 	
<ul style="list-style-type: none"> Collaborated in the Campaign to Deliver Picture Books and donated about 200 picture books to children in three Southeast Asian countries and refugee camps 	B	<ul style="list-style-type: none"> Planning and organizing a new type of employee-participatory social-contribution program to support solutions for the social issues declared in the Millennium Development Goals 	PP. 40-41
<ul style="list-style-type: none"> Continued extensive community contributions through environmental beautification activities, plant tours, hands-on training sessions, etc. 	A	<ul style="list-style-type: none"> Continuing to organize various community contributions in tune with local needs at operational sites across Japan 	
<ul style="list-style-type: none"> <Printing Museum, Tokyo> Held <i>1950s Japan: The Blossoming of the Graphic Designer</i>, a temporary exhibition that attracted a higher-than-average number of visitors for school and company training Held summer vacation workshops, attracting more than 1,000 participants through intensive announcements <Toppan Hall> Sponsored 35 concerts, organized special performances to discover and foster talented young musicians from around the world, and rented the hall out to local music colleges and elementary schools 	A	<ul style="list-style-type: none"> <Printing Museum, Tokyo> Holding an exhibition entitled <i>Textbooks That Supported Modern Education in Japan—Textbooks from the Toshō Bunko and Printing Museum Collections</i> Enriching community contributions in collaboration with the Bunkyo Academy Foundation and cultural facilities in Bunkyo Ward, Tokyo <Toppan Hall> Continuing to sponsor concerts, organize special performances for the discovery and fosterage of talented young musicians, and rent out the hall 	PP. 38-39
<ul style="list-style-type: none"> Added new content to the IR website and redesigned the English version of the site Posted timely topic content for the <i>Annual Report</i> and <i>Toppan Story</i>, a newsletter for shareholders 	A	<ul style="list-style-type: none"> Participating in conferences for foreign institutional investors Intensifying individual consultations with and visits to institutional investors 	P. 50
<ul style="list-style-type: none"> Activated organizations and individuals through appropriate operation of personnel treatment systems based on the competence and achievements of individual employees 	A	<ul style="list-style-type: none"> Continuing to operate the existing personnel treatment systems and examining actual operational conditions to find and consider necessary revisions for the systems 	P. 42
<ul style="list-style-type: none"> Enlightened employees on basic human rights through rank-based training and follow-up training for younger employees 	A	<ul style="list-style-type: none"> Continuing to enlighten employees on basic human rights through rank-based training sessions 	
<ul style="list-style-type: none"> Compiled a database of information on occupational accidents and accelerated the process for grasping the details on how the accidents occurred 	A	<ul style="list-style-type: none"> Undertaking TPM activities led by the Safety and Health Committee to eliminate occupational accidents; using the database on occupational accidents to prevent recurrence 	
<ul style="list-style-type: none"> Formulated a complete set of countermeasures against large-scale disasters, including the reservation of stockpiles 	A	<ul style="list-style-type: none"> Implementing countermeasures against large-scale disasters throughout the Company 	
<ul style="list-style-type: none"> Arranged medical checkups and healthcare guidance and education in cooperation with clinics 	A	<ul style="list-style-type: none"> Offering healthcare guidance for employees in need of lifestyle improvements (calorie-control diet plans, actions to preempt lifestyle-related health problem) 	PP. 43-45
<ul style="list-style-type: none"> Took steps to manage overtime work throughout the Company; substantially decreased the number of employees working overtime for long hours and the average hours of overtime worked in the second-half of fiscal 2008 (compared with the same period a year earlier) 	A	<ul style="list-style-type: none"> Eradicating extended overtime through a review of the ways individuals work, strengthened management of overtime working hours by managerial staff, and the continuation of the various types of working systems already in place; encouraging employees to take various forms of leave 	
<ul style="list-style-type: none"> Convened labor-management committees five times to help create a working environment amenable to enhanced job satisfaction Started to operate the staggered work-hour system for childrearing Resolved to introduce a staggered work-hour system for expectant mothers 	A	<ul style="list-style-type: none"> Reviewing labor contracts and employment regulations based on the trends in relevant laws and regulations Creating a working environment where male employees can take childcare leave more easily Continuing to convene labor-management committees in order to help create a working environment amenable to enhanced job satisfaction 	
<ul style="list-style-type: none"> Held various labor-management meetings on diverse themes such as job-satisfaction enhancement and mental healthcare, in addition to the routine business councils 	A	<ul style="list-style-type: none"> Holding labor-management meetings to review schemes for regular salary revisions, discuss the Company's responses to the revised the Labor Standards Act of Japan (to be enforced from April 2010), and deliberate various other themes 	
<ul style="list-style-type: none"> Ran online training courses and other types of internship programs to provide students with expanded opportunities to experience actual work Appointed 17 non-regular employees to regular positions 	A	<ul style="list-style-type: none"> Expanding communication activities for recruitment and public relations for hiring in Japanese cities other than Tokyo 	
<ul style="list-style-type: none"> Developed the learning management system (LMS) to support individual career development 	B	<ul style="list-style-type: none"> Launching the learning management system (LMS) and using it effectively 	
<ul style="list-style-type: none"> Attained a 3.31% ratio of female managerial and supervisory staff (as of April 1, 2009) 	A	<ul style="list-style-type: none"> Promoting the appointment of female employees to managerial and supervisory positions through positive action 	PP. 46-47
<ul style="list-style-type: none"> Reemployed 83 retired employees under the Senior Reemployment System (equivalent to 60% of the employees who retired this fiscal year) 	A	<ul style="list-style-type: none"> Passing on the experiences and specialized knowledge of veteran employees to younger employees via the Senior Reemployment System 	
<ul style="list-style-type: none"> Attained a 1.93% ratio of employees with disabilities in the total workforce (as of the end of March 2009) 	A	<ul style="list-style-type: none"> Maintaining the 1.8% ratio of employees with disabilities in the total workforce, as designated by the relevant law in Japan 	
<ul style="list-style-type: none"> Held briefings to respond to laws and regulations related to non-regular employees, including the legislation responsible for Japan's "problem 2009" (the three-year-limitation for temporary workers dispatched to companies in manufacturing industries) 	A	<ul style="list-style-type: none"> Holding training sessions and conducting internal audits in the general affairs departments to cope with Japan's "problem 2009" 	
<ul style="list-style-type: none"> Rotated employees into different regions, job categories, and product specialties (including 411 managerial staff rotations) 	A	<ul style="list-style-type: none"> Shifting from personnel rotation among different job categories to personnel rotation centering on age and rank 	PP. 48-49

Evaluation criteria: S, Results achieved far surpass targets; A, Targets achieved; B, Activities fully carried out, but targets unachieved; C, Activities insufficient

Stakeholder Dialogue

Toppan seeks CSR initiatives satisfactory to all stakeholders through planning and assessment based on dialogues with society.

■ The CSR Promotion Study Group

Toppan values dialogues with society and draws great benefits from views on ways to promote CSR activities. In fiscal 2008, the Company convened the second CSR Promotion Study Group, a meeting launched in fiscal 2007 to discuss how to develop more compelling initiatives for both society and the Company itself.

Outline of the Second CSR Promotion Study Group

■ Date

From 13:30 to 16:30 on February 23 (Mon), 2009

■ Participants

Stakeholders: Five experts (see below)

Facilitator: Mr. Fumitake Sakamoto from Witan Associates Limited.

Toppan: Mr. Shingo Kaneko, Senior Managing Director, head of the Corporate Planning Division, and Director in charge of CSR; Mr. Tsuneaki Hagiwara, Senior General Manager of the Legal Affairs Division, the division in charge of CSR promotion; and 15 more persons from the divisions of the head office

Themes of the Second CSR Promotion Study Group

To seek out expert views on issues on which to focus in future CSR promotion, and to explore action points that Toppan expects to become more relevant for society and the Company (see the bottom-right chart), in consideration of recent economic conditions and subsequent changes in society.

Major Opinions from Stakeholders

1. Enhancing Corporate Competitiveness through CSR Activities

In entering a recessionary phase, companies should strive to improve their profits while attempting to circumvent additional crises. New businesses can evolve from services or activities designed to solve problems facing society. And society itself needs these businesses. Specifically, CSR procurement can prevent risks from rising in the supply chain and improve the sustainability profile of material procurement. Supporting work-life balance and leveraging diverse human resources, meanwhile, can improve productivity.



Mr. Yukio Okubo
General Manager, Works Institute, Recruit Co., Ltd.

Founded the Works Institute, installed as General Manager there in 1999. Specializes in human resource management, labor policies, and career issues.



Mr. Toshihiko Goto
Chair, Environmental Auditing Research Group

Plays an active part in overall CSR topics focused on the environment as a member of the Board of Japan, Global Compact Japan Network.



Ms. Mizue Tsukushi
President & CEO, The Good Bankers Co., Ltd.

Takes charge of investment advisory, planning and development, and research services for financial products categorized as socially responsible investments (SRI).



Mr. Toshihiko Fujii
Consulting Fellow, Research Institute of Economy, Trade and Industry, Incorporated Administrative Agency (IAA)

Took charge of lobbying against EU and product-related environmental regulations as a member of the Ministry of Trade and Industry (the current Ministry of Economy, Trade and Industry) of Japan. Specializes in European CSR.



Ms. Mariko Mikami
Journalist; Visiting Associate Professor, Institute of Innovation Management, Graduate School of Shinshu University

Plays an active role in national newspapers, business journals, television, and other global media as a scholar and reporter on themes such as organization, accounting, finance, M&As, and industry-creation.



Mr. Fumitake Sakamoto
Facilitator
Senior Consultant, Witan Associates Limited.

Consults on PR and CSR activities for corporations and provides management assistance for NPOs.

2. Improving Fairness in Personnel Policies

In Europe, the birthplace of corporate social responsibility (CSR), companies must provide in-house education to help employees acquire the levels of competence necessary to qualify them for recruitment to new positions if they are made redundant. If the regular employees in a company receive better in-house training than the non-regular employees, the company must level the inequity through CSR activities.

When a company drives globalization, it should treat its employees fairly all over the world.

3. Enhancing a Company's Sensitivity to Society

As entities, companies should persistently carry out their businesses while helping resolve social problems. Amid the drastic changes now surrounding companies, better foresight of the coming social responsibilities to be fulfilled and more proactive approaches to implementing initiatives to address them will reliably strengthen competitiveness and garner support from the public. Thus, companies should work steadily to enhance their sensitivities to social trends and public opinion.

4. Bringing Innovative Changes into Reality

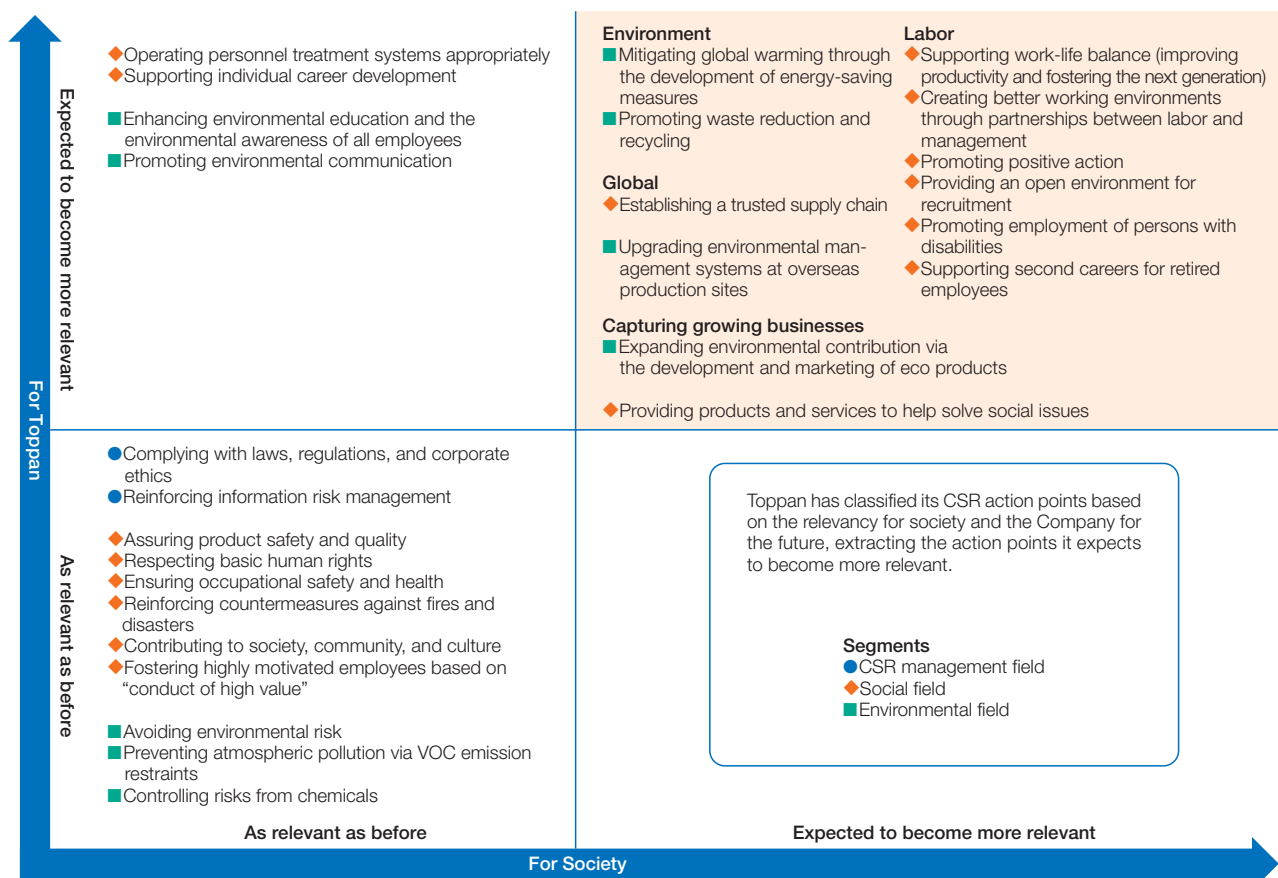
International society has agreed on the benefits to be gained by halving CO₂ emissions by 2050. The years in which to achieve this ambition are few. If we fail to act at once, we can never hope to succeed.

Eco businesses have entered an era to be redefined. Global warming, drought, and other ecological crises are predicted scientifically. Based on the ecological predictions, companies should model new competitive businesses with prospects for strong quantifiable benefits for society in concrete forms.

Responding to the Opinions Obtained

To prepare for the study group meeting, Toppan chose a new set of action points that it expects to become more relevant for society and the Company. From fiscal 2009, Toppan will take the opinions of the study group to heart and deepen its focus on the action points that it expects to become more relevant.

Action Points that Toppan Expects to Become More Relevant for Society and the Company



Corporate Governance

Toppan is reinforcing corporate governance by strengthening its auditing and supervisory functions and improving the transparency of its corporate management.

Corporate Governance

Toppan is equipped with a Board of Corporate Auditors under the Company Law of Japan and has strengthened its governance system by establishing a Management Audit Office, Compliance Department, and Ecology Center.

The Company advances its corporate management under the Related Company Administration Regulations prescribed to ensure the propriety of operations within the Toppan Group.

The Directors, Board of Directors, and Various Meetings

Toppan has 29 directors on its board (as of the end of March 2009). Board meetings are held monthly and whenever a pressing matter requires action or deliberation.

Especially important management themes are deliberated beforehand in the Management Committee made up of directors selected by the President & CEO. The goal is to lay weight on managerial efficiency in business judgment. Directors from the head office and other directors acting as division chiefs come to these meetings to discuss and examine measures and policies directly related to the Company's businesses from various perspectives.

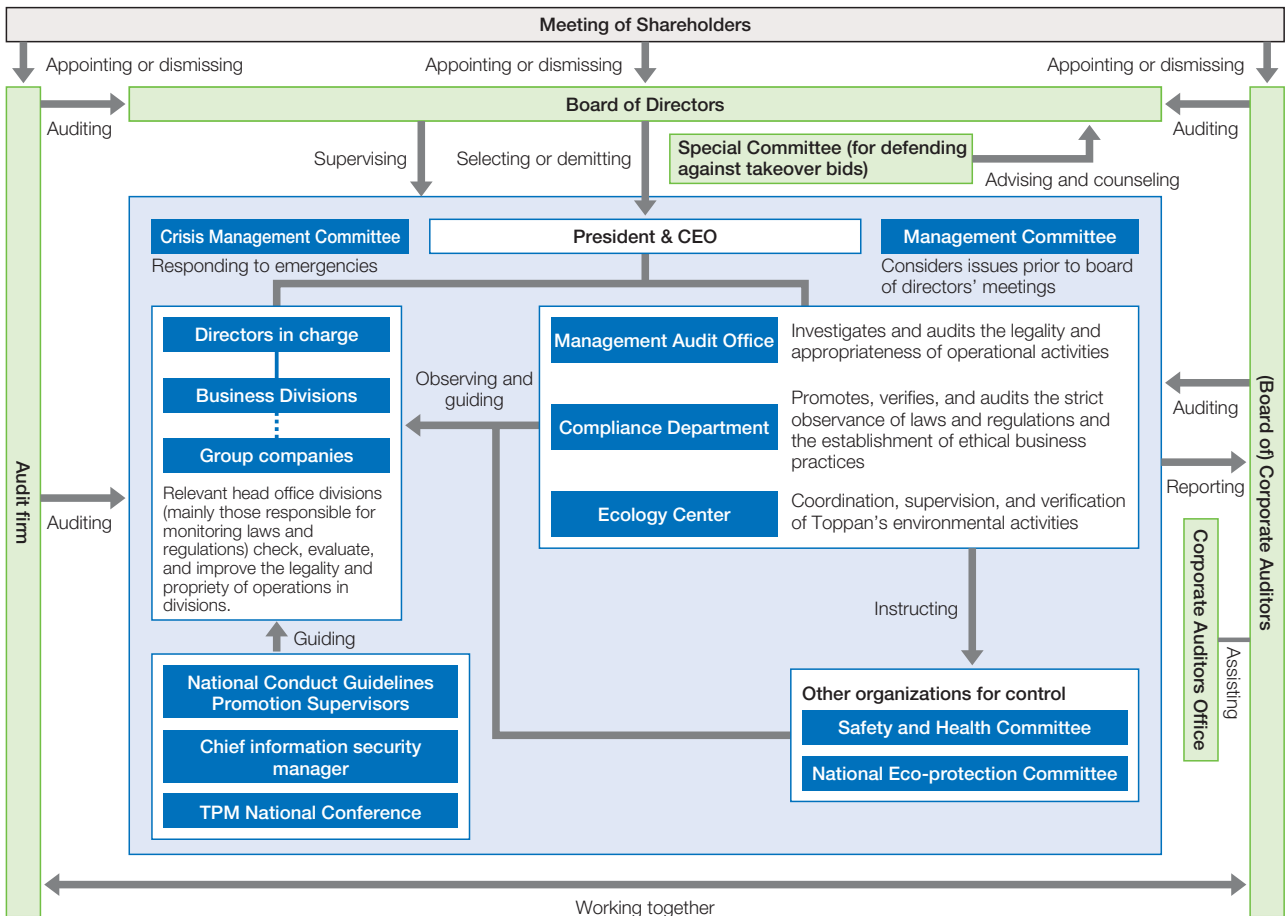
Corporate Auditors, Board of Corporate Auditors, and Audit Firm

Three of the five corporate auditors are external (as of the end of March 2009). The corporate auditors regularly hold board meetings, attend meetings of the Board of Directors and Management

Committee, and carry out audits for operational sites. They audit and advise the Company from a preventive perspective to ensure the legality and effectiveness of the operations of the directors and departments and smooth and appropriate corporate management in line with company policies and regulations.

Toppan strives to audit effectively through the cooperative efforts of the Board of Corporate Auditors, the audit firm KPMG AZSA & Co., and internal audit-related departments in the Company (notably, the Management Audit Office). The Board of Corporate Auditors of the Toppan Group also regularly meets to improve the effectiveness of the audits by the corporate auditors on a Group-wide basis. Toppan has had KPMG AZSA verify the propriety of the

Toppan's Corporate Governance Structure



Company's accounts through audits to enhance the reliability and transparency of the Company's financial information.

Remuneration to Directors and Corporate Auditors

Remuneration to directors is determined at the Board of Directors by the endorsement of the Meeting of Shareholders. The amounts remunerated are set based on considerations of the performance, responsible roles, and fulfillment of the operational targets of each director. In fiscal 2008, the total annual remuneration to directors was 1,207 million yen* and the total annual remuneration to corporate auditors was 108 million yen.

*Including the remuneration paid to three directors who worked at the Company on April 1, 2008 and retired after the completion of the ordinary general meeting of shareholders in June 2008.

Strengthening Audit Functions

The Management Audit Office established independently from the operating departments fairly and objectively audits all of the corporate management systems and business operations from the viewpoints of legality and rationality.

The office provides feedback to the

relevant departments on the problems pointed out by the audits, proposes measures for improvement when necessary, and reports the audit results to the President & CEO, directors in charge of relevant departments, and the corporate auditors whenever necessary.

In fiscal 2008, the office conducted operational evaluations of internal control for all of Company divisions and subsidiaries around the world. It also carried out regular management audits and operation audits for nine departments.

The Compliance Department in the Legal Affairs Division spearheads the Company's initiatives to ensure the strict observance of laws and regulations and to firmly establish ethical business practices. The department facilitates the complete awareness of the Conduct Guidelines and organizes employee education on compliance with existing laws and regulations. It also implements internal audits on information security (→PP. 26–29).

The Ecology Center in the Corporate Manufacturing, Technology & Research Division supervises the Company's environmental activities by conducting internal audits at each operational site and

monitoring the progress of improvements (→P. 52).

Risk Management Structure

Toppan manages risk comprehensively to avoid risk and minimize the losses incurred when events at risk occur.

The Rules on Risk Management have been established to resolve matters regarding risk avoidance and the minimization of loss when an event at risk occurs. In accordance with these rules, the Company has set up a risk management structure under which the responsibilities for risk management are allotted to specific divisions in the head office based on the types of risk involved. Under this structure, the directors in charge of each relevant division are responsible for taking measures to prevent, avoid, and correct each type of risk. Toppan reviews risks to be managed once a year and examines countermeasures to be taken in line with the rules. The Company also holds a regular Risk Management Liaison Meeting for the persons in charge of risk management in the head office divisions to share information on a continuous basis and respond to risk practically.

Risk to Be Managed and the Relevant Head Office Divisions in Charge

	Risk to Be Managed	Division in Charge
Accidents involving products or product liability	Accidents or complaints related to products	Corporate Manufacturing, Technology & Research
	Accidents related to main systems	Business System
Accidents or disasters related to company operations	Occupational accidents, traffic accidents, and other accidents involving employees	Personnel & Labor Relations
	Incidents related to notes or accounts receivable	Finance & Accounting
	Legal problems with orders received	Legal Affairs
	Leakage of personal information or internal confidential information	Legal Affairs
	Accidents or disasters related to fires or explosions	Corporate Manufacturing, Technology & Research
	Illegal activity related to the storage of solvents, management of dangerous chemicals, etc.	Corporate Manufacturing, Technology & Research
Defamation, slander, and other criminal damages	Damage to the company's internal computer system due to cyber terrorism, illegal access or use of company information, and leakage of personal information or internal information	Business System
	Crimes against the company (threats, kidnapping, robbery)	Personnel & Labor Relations
Relationship with antisocial organizations	Unreasonable demands from antisocial organizations, transactions conducted between business partners and antisocial organizations	Legal Affairs
Natural disasters	Material losses or personal accidents suffered by customers or the company due to earthquakes, wind or water damage, lightning, etc.	Personnel & Labor Relations
Risk in business management	Shareholder derivative lawsuits, hostile takeovers	Legal Affairs
Unlawful activities related to external contracts	Violations of the Subcontract Law of Japan, illegal transactions with business partners	Corporate Manufacturing, Technology & Research
Infringement of intellectual property	Infringements of patents, trademarks, copyrights	Legal Affairs
Environmental problems	Violations of environmental laws or standards, illegal disposal of industrial waste	Corporate Manufacturing, Technology & Research
Risk in overseas business activities	Product accidents, environmental problems, fires or natural disasters, damage to human or physical resources caused by international conflicts or terrorism, etc.	Corporate Planning

Compliance Promotion Activities

The Toppan Group thoroughly implements its Conduct Guidelines to ensure full compliance with laws, regulations, and corporate ethics at all times.

Disseminating the Conduct Guidelines

The Conduct Guidelines consist of seven Basic Principles and 43 Specific Conduct Guidelines (→P. 30) to express the behavioral norms by which every employee at the Toppan Group complies with laws, regulations, and corporate ethics.

Conduct Guidelines Promotion Leaders

Toppan has introduced a Conduct Guidelines Promotion Leader system to disseminate the Conduct Guidelines in the workplace and ensure full compliance with the guidelines. Under this system, a team of Conduct Guidelines Promotion Supervisors (the “Supervisors”) and Leaders (the “Leaders”) has been deployed in all operational sites, including the Group production companies. In total, 626 Leaders are now operating across Japan. A cumulative total of 2,445 employees have worked as Leaders since the commencement of the system in 2004. In keeping with the principle of one-year terms, Toppan reelected Leaders in fiscal 2008 to ensure that more employees would have the opportunity to serve as Leaders. Most of newly

elected Leaders were department supervisors. While the current ratio of female Leaders is 4.3% (27 Leaders), the Company will maintain its assertive efforts to increase this rate with the aim of fostering more female Leaders.

From fiscal 2008, the system has been implemented throughout all Group companies in Japan, with semiannual specialist training sessions for Leaders held jointly with the Group companies.

Dissemination Activities by Conduct Guidelines Promotion Leaders

The Leaders have formulated an optimal dissemination plan and devoted themselves to develop activities based on the plan. In setting the plan, they have tailored the details to business operations, staff compositions, and working environments at their relevant workplaces.

The National Meeting of Conduct Guidelines Promotion Supervisors is held each October to share and discuss the various outstanding dissemination activities in the operational sites across Japan.

Using Tools to Promote the Conduct Guidelines

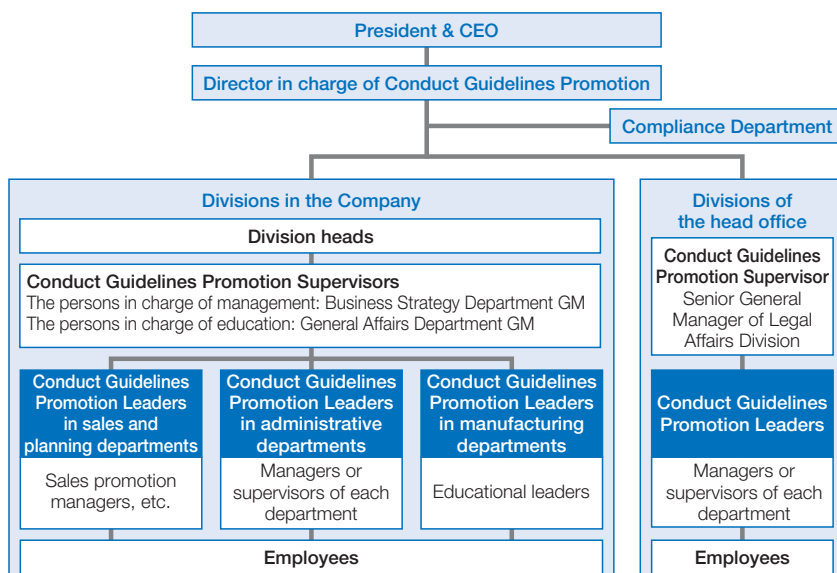
Toppan gives every employee a *Conduct*

Guidelines Casebook, a Q&A style casebook describing actual situations that can arise in daily work. The Leaders use the casebook to disseminate information and the Company uses it to provide rank-based education on compliance.

The Conduct Guideline Notifications posted on the Company intranet heighten employee awareness on the latest important issues to do with conduct in the workplace. The notifications issued in fiscal 2008 provided news and information on topics such as insider trading, transactions under the Sub-contract Law of Japan, information leakages, collusion and cartel, driving under the influence of alcohol, and the use of illegal drugs.

In fiscal 2008, Toppan also prepared a *Conduct Guideline Handbook*, a collection of actual cases to illustrate the seven Basic Principles of the Conduct Guidelines in a brief, easy-to-understand style. From fiscal 2009, the Leaders at the workplaces will begin to use this handbook as a tool for directing pervasive measures for the stimulation of a deepened understanding of the guidelines among all Company employees.

Structure to Promote the Conduct Guidelines



Training for the Conduct Guidelines Promotion Leaders



Conduct Guidelines Casebook (left) and Conduct Guideline Handbook (both in Japanese)

■ Operating the Toppan Helpline

The Toppan Helpline, the Company's internal reporting system established in 2003, complies with the Whistleblower Protection Act enforced in Japan from April 2006. When a legal violation or injustice is discovered, it is to be reported to superiors for deliberation. When an employee's superiors fail to settle a problem, the employee is encouraged to call the Helpline to report the matter with his or her real name. In fiscal 2008, the Helpline was renamed the Toppan Group Helpline and expanded to cover all Group companies. It is kept open for use by all directors and employees of the Group, including temporary staff and part-time workers.

In fiscal 2008, the Helpline was used in four cases involving power harassment, the improper use of company expenses, and other inappropriate actions. All four cases were strictly investigated and properly handled to prevent recurrence.

■ Promoting Compliance in Overseas Group Companies

To promote compliance in overseas Group companies, the Toppan Group introduced Conduct Guidelines for subsidiaries in Beijing and Shanghai in fiscal 2006 and in Taiwan in fiscal 2007.

In fiscal 2008, the Group introduced Conduct Guidelines for subsidiaries in Thailand and Indonesia and launched initiatives to disseminate the guidelines. The Eastern Asian subsidiaries organized specialist training for the Conduct Guidelines Promotion Leaders to further facilitate the guidelines.

■ Compliance Education Compliance Education

Toppan has held specialist training series for Conduct Guidelines Promotion Leaders for several years. Two of the series were held in Japan in fiscal 2008. In the first, 655 Leaders were trained in 31 sessions across the country, from August to October 2008. In the second, 561 Leaders were trained in 27 sessions, from February to March 2009.

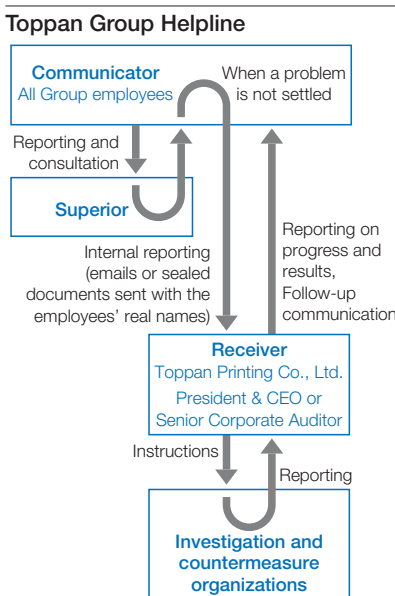
Toppan also implemented an ongoing series of compliance education in rank-based training sessions for new employees and newly appointed supervisors and managerial staff.

Education on Compliance with the Subcontract Law of Japan

To attain full compliance with the relevant laws and regulations in transactions with subcontractors, Toppan held 30 educational and verification sessions on compliance with the Subcontract Law throughout Japan in fiscal 2008. The sessions were conducted mainly for the production management departments and planning and sales promotion departments. About 2,400 employees took part.

■ Briefing on Compliance

In fiscal 2008, Toppan was not involved in any violations of laws or regulations with major impacts on society. The Company received no criminal punishments, administrative penalties, or administrative guidance.



Training for the Conduct Guidelines Promotion Leaders in China



Tools for promoting the Conduct Guidelines used in Thailand and Indonesia

Information Risk Management

To secure customer trust and assurance:

The Company has striven to prevent any form of information leakage, from unauthorized data extraction to human error.

Preventing Unauthorized Information Extraction and Human Error

As a company operating in the information communication industry, Toppan handles a great deal of personal information and other types of data entrusted by customers. Ensuring information security and preventing information leakage are vital to the advancement of Toppan's businesses.

In May 2008, the Company rechecked all the areas under tight security designated for the handling of personal information and reviewed the risk levels and management measures in each area.

Toppan also reviews its in-house rules on the handling of printed securities materials and confidential operations to standardize them whenever needed.

To minimize human errors and other operational mishaps at the workplace, Toppan issued *Close Calls on the Job, Vol. 1* and *Vol. 2*, in-house booklets describing problems that can potentially result from operational mishaps. The goal is to facilitate a thorough awareness of the rules to be observed by employees in daily operations.



Close Calls on the Job, Vol. 1 and Vol. 2
(in Japanese)

Reinforcing Management under ISO/IEC 27001 and Promoting ISO/IEC 27001 Certification

Following the full-scale revision of in-house rules and bylaws in fiscal 2007 based on ISO/IEC 27001, the global standard for information security management systems (ISMS), Toppan has comprehensively promoted certification acquisition for operations in sites in the Electronics field and in areas under tight security designated for the handling of personal information across the Company.

In fiscal 2008, three operations were newly certified and the boundaries of two operations were expanded.

Certified operational sites evaluate possible risks after sorting out all information assets, including intermediate products resulting from the information-handling processes. These sites then adopt countermeasures suitable for each risk level from among the management measures specified in the appendix of the ISO/IEC 27001 standard. The adopted measures are reviewed on a regular basis to support necessary and sufficient reinforcement.

ISO/IEC 27001 Certification

- **Information and Communication Division**
 - TOPICA (December 2001)
 - Asaka Securities Printing Plant, Toppan Communication Products Co., Ltd.—Information and Communication Manufacturing Subdivision (June 2006)
 - IT Development Department, Toppan Idea Center; Contents Division, Toppan Graphic Communications Co., Ltd. (July 2008)
 - Takino Securities Printing Plant, Toppan Communication Products Co., Ltd.—Information and Communication Manufacturing Subdivision (November 2008)
- **Electronics Division**
 - Photomask departments, Semiconductor Related Subdivision (January 2008)
- **Toppan Multisoft Ltd.**
 - Data Center (February 2008)
- **Mapion Co., Ltd.** (August 2008)

Strengthening Information Management Foundations through Human Asset Development

Toppan treats human asset development as its most crucial initiative for tightening information security management.

In fiscal 2008, the Company added a host of illustrations to its *Information Security Management Guidebook* to bolster information security management by all employees, including temporary staff. A total of 84 briefings on the revised guidebook were held across Japan, chiefly to inform employees of the familiar rules on management for the handling of manuscripts and artworks, regular password changes, and other routines. After the briefings, the employees were tested to assess their understanding of the rules.

Toppan fosters in-house proponents of information security by holding training sessions for employees who seek qualification to serve as internal assistant auditors responsible for auditing the ISMS. The sessions have been held three times a year since fiscal 2007 (in September, October, and December in fiscal 2008). Internally qualified employees are encouraged to acquire higher qualification as ISMS assistant auditors. There are now 91 ISMS-qualified staff working at Toppan, including applicants who have passed the training session.



Information Security Management Guidebook
(in Japanese)

■ Enhancing the Effectiveness of Internal Audits

In fiscal 2008, Toppan reviewed the internal audit mechanisms to maintain and improve its information management system on an ongoing basis. Based on this review, the Company established an internal audit system centering on the following four procedures.

Preliminary Survey of Actual Conditions for All Employees

Prior to internal audits, the Company surveyed the entire Toppan workforce (21,307 employees in total, including temporary staff) on the actual status of compliance with 46 familiar rules (e.g., the restriction against removing PCs from the workplace). The department trends clarified through survey results have been used as basic data for internal audits.

Directive Audits by the Head Office

The Information Security Management Promotion Committee conducted exhaustive questionnaires and onsite interviews with information security managers and

relevant staff in divisions. The whole process took one to two days per audit.

Internal Audits in Divisions

Each division conducted an advisory internal audit according to a standard checklist of 182 items for the 325 Company departments and the Group production companies.

Audits on the Processes for Handling Personal Information

The Company audited all of the processes for handling personal information. The audits were conducted from a quality-control perspective to impose the appropriate procedures for preventing information-related accidents.

■ Reinforcing Quality Control of Websites

Toppan installed a security-check tool on a test basis for constructing and operating risk-free websites. The tool proved to be effective for correcting glitches that went undetected by other means. In fiscal 2009, the Company will deploy the tool in full-scale operation.

■ Reinforcing Cooperation within the Group

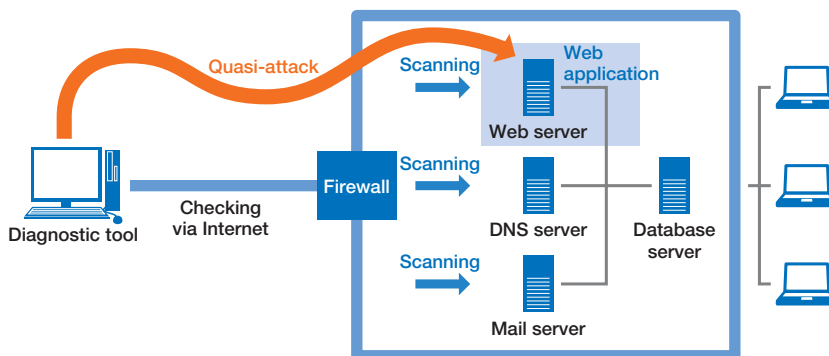
The Toppan Group holds a quarterly Information Security Promotion Meeting for Related Companies to reinforce the information management systems at domestic Group companies by checking the progress of the various measures in place. In fiscal 2008, Toppan held three ISMS introductory training sessions with internal lecturers and several sessions to individually respond to the demands from Group companies.

■ Participating in the Rating Business

I. S. Rating Co., Ltd., a rating company specialized in information security in Japan, was founded in May 2008. Toppan participated as a member of the study group assigned to prepare for the foundation of this company from the very beginning. Toppan also underwent a trial review by the company in October 2008.

To honor the trust of customers, Toppan will strive to establish a more stringent, publicly laudable management system for the prevention of information-related accidents.

Security Level Checks for Web Applications



Activities in Fiscal 2008

- **Meetings of Information Security Managers:**
May 2008, February 2009
- **Regular meetings of the Information Security Management Promotion Committee:** weekly
- **Information Security Promotion Meetings for Related Companies:** April, July, and October 2008, January 2009
- **Various surveys**
 - Audit on the handling of personal information: from April 2008 to February 2009
 - Survey of actual conditions in Web-related businesses: quarterly; May, August, and November 2008, February 2009
 - Survey of actual conditions in all areas under tight security: May 2008
 - Report on the results of monitoring of all areas under tight security: monthly
- **Education**
 - Regular training for information security: from July to October 2008
 - Internal auditor training: from September to October 2008
 - Training for personnel handling Web-related businesses: from September to October 2008
 - Training for ISMS internal auditor qualification: September, October, and December 2008
- **Issuance of *Close Calls on the Job* booklets:**
October 2008, April 2009
- **Other**
 - Undergoing a review via a trial version of the indication evaluation organized by a rating company specialized in information security: October 2008

Conduct Guidelines and Information Management Policy

Conduct Guidelines

Chapter 1: Basic Principles

1. Respecting basic human rights

We will act in a way that our individual talents and abilities can be demonstrated to their maximum potential based on the concept of respect for people. We will respect basic human rights and in every regard work to ensure the dignity of individuals.

2. Maintaining public order and standards of decency

We will always be aware of our involvement with society, act with good sense, and never act in a way that disturbs public order or that defies common sense. We will sufficiently consider the effects of our operations on society and not act in a way that goes against public order and standards of decency.

3. Complying with laws and ethics

We will conduct ourselves in a way that complies with the laws and ethics in society. We will comply with overseas and domestic laws, regulations, commercial practices, government notifications, and operational and industrial standards applicable to our corporate endeavors. Compliance with these laws and regulations forms the minimum standard of society's rules and we will uphold them without fail. In addition, we will act with a high sense of ethical and moral awareness in carrying out our operations. Even in situations when legal issues do not arise, we still cannot allow humanitarian, moral, or ethical problems to develop.

4. Conducting fair business operations

We will conduct all foreign and domestic operations in a fair manner. As an upstanding corporate citizen, we will be aware of our social responsibilities and carry out sound operations that will not damage our reputation in society.

5. Striving to improve quality

With regards to the "dedicated products" that we provide to customers, we will strive to improve quality based on the concept of "Total Quality Assurance," not just in the direct manufacturing and quality management sections but throughout the entire Company, including sections related to sales, research, and administration.

6. Appropriate management and disclosure of information

Fully recognizing the importance of information, all employees will undertake its appropriate management. Even if it affects us adversely, we will not conceal information but actively undertake its appropriate disclosure and increase the transparency of our operations.

7. Environmental and safety considerations

We will carry out operations in harmony with the global environment. We will protect the precious environment bequeathed to us by nature and perform corporate operations that strive for reduced use of limited resources and facilitate recycling.

Furthermore, we will conduct safe production activities, ensure product safety, and aim to facilitate a healthy and secure society to live in.

Chapter 2: Specific Conduct Guidelines

Section 1: Building customer trust

1. Doing our best for the customer
2. Maintaining customer trust
3. Appropriate management of customer property
4. Protecting information about customers
5. Appropriate handling of personal information
6. Protecting confidential corporate information

Section 2: Reforming operations

1. Complying with international rules and respecting the culture and commercial practices of overseas countries
2. Striving to improve knowledge, skills, and technology
3. Fulfillment of work responsibilities
4. Securing and utilizing intellectual property
5. Respecting the rights and interests of others
6. Striving to improve the current situation and targeting new possibilities

Section 3: Fulfilling corporate responsibilities

1. Compliance with antitrust laws
2. Prohibition of unlawful practices in dealings with support companies
3. Prohibition of unlawful acts against corporate competitors
4. Prohibition of receipt or provision for personal gain or rebate
5. Prohibition of bribery
6. Prohibition of inappropriate entertainment practices
7. Prohibition of illegal political contributions and donations
8. Prohibition of providing unjust benefits
9. Prohibition of support for antisocial activities
10. Prohibition of insider trading
11. Prohibition of unlawful import and export transactions
12. Prohibition of child labor and forced labor
13. Curtailment and reduction of environmental impact
14. Promotion of environmentally friendly activities

Section 4: Creating a positive work environment

1. Striving for a lively and vibrant workplace
2. Striving for a safe and clean workplace
3. Following Company rules
4. Protecting corporate property
5. Avoiding conflicts of corporate interests
6. Prevention of discriminatory practices
7. Prevention of sexual harassment and power harassment
8. Prohibition of private activities
9. Appropriate use of the Internet
10. Appropriate management of information and records
11. Prevention of tacit approval, false reporting, and concealment of illegal conduct
12. Prevention of retaliation against a person who reports misconduct

Section 5: Developing the Toppan Group

1. Taking pride in the Toppan brand
2. Developing the Toppan brand
3. Strengthening cooperation between Group companies
4. Appropriate disclosure of information
5. Promoting communication with shareholders and investors

Established in June 2000 Revised in April 2006

Information Management Policy

1. Employees shall comply with all internal rules on information management and manage information appropriately in full observance of the law and social order.
2. Employees shall collect information for appropriate purposes using appropriate methods.
3. Employees shall recognize the value of information as an asset and use information safely and efficiently for the stated purpose of use.
4. Employees shall safely manage information handled on behalf of customers to secure customer trust.
5. To ensure the appropriate management of information at all times, the Company and its employees shall improve its information management system based on periodic reviews of social circumstances, technology trends, and the latest revisions in information systems.

Established on April 1, 2001