

Respect for Human Rights

- Policy
- Responsible Executive and Framework
- Raising Awareness
- Human Rights Due Diligence
- Grievance Mechanism
- Participation in International and Industrial Partnerships

Respect for Human Rights Materiality

Panasonic Group upholds the management philosophy that a company is a public entity of society. We recognize that we have a responsibility to protect the rights of all people involved in our businesses, including our employees^{*1}, customers, and employees of our business partners, and to contribute to their well-being and happiness. As a company operating globally, we comply with all applicable laws and regulations in our business activities while considering the human rights of all our stakeholders and respecting internationally recognized human rights as expressed in the International Bill of Human Rights and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.

The Group is committed to pursuing human rights due diligence to identify, prevent, mitigate, and address any adverse human rights impacts related to our business activities, products, services, and transactions. We also seek our suppliers, customers, or business partners to understand and implement our human rights and labor compliance policies.

Respect for human rights is one of the Group’s key material issues. For more on materiality, see [pages 6-9](#).


^{*1} Panasonic employees: (1) all regular and contracted employees having employment relationships with any Panasonic Group company, all temporary staff and seconded employees working under the control and supervision of any Panasonic Group company, and (2) all directors, executive officers, executive counselors, fellows, corporate auditors, supervisory board members, and corporate advisors (collectively, “executives”) appointed by any Panasonic Group company. The definition also includes employees with employment relationships to any key companies, subject to certain Group HR and other systems.


Policy

Panasonic Group established the Panasonic Group Human Rights and Labour Policy (hereinafter, the “Human Rights and Labour Policy”), referencing the below international standards and incorporating external experts’ opinions. This policy states that, predicated on compliance with international standards and the laws and regulations of each country that apply to our business activities and transactions, we are committed to respecting internationally recognized human rights; identifying, preventing, mitigating, and remediating the adverse impact on human rights; promoting remedy and other measures for victims; creating a rewarding working environment; and engaging in dialogue on these issues with various stakeholders. Following this policy, we have established internal rules, developed a promotion system, and advanced specific initiatives for respecting human rights and creating a rewarding work environment.

Moreover, the Panasonic Group Code of Ethics and Compliance (“Code of Ethics and Compliance”) defines the commitments that all Group employees must fulfil and positions respect for human rights as our social responsibility. We strive to raise awareness of this responsibility.

- [Main international standards used as reference]
- The United Nations Guiding Principles on Business and Human Rights
 - The United Nations International Bill of Human Rights (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights)
 - ILO Declaration on Fundamental Principles and Rights at Work and ILO Fundamental Conventions (Core Labour Standards)

 **Panasonic Group Human Rights and Labour Policy**
<https://holdings.panasonic/global/corporate/sustainability/social/human-rights/policy.html>

 **The Panasonic Group Code of Ethics & Compliance, 5. Our Social Responsibilities, 1. Respecting human rights**
<https://holdings.panasonic/global/corporate/about/code-of-conduct/chapter-5.html>

We regularly, and periodically as necessary, review these policies based on the opinions of external experts, relevant stakeholders, and their representatives. We revised our Human Rights and Labour Policy in August 2023 under the advisement of internal and external experts. This revision was meant to respond to the ILO’s adding occupational health and safety to its Core Labour Standards and to enhance and consolidate efforts to prevent forced labor in the supply chain. After reviewing the changes with the Group and its operating companies’ management and labor unions, the Group CEO approved and proclaimed the policy. The Group’s Human Rights and Labour Policy is available in Japanese and English on our website. We also demand that all our suppliers respect human rights by complying with the Panasonic Supply Chain CSR Promotion Guidelines.

 **The Panasonic Supply Chain CSR Promotion Guidelines**
https://holdings.panasonic/global/corporate/about/procurement/for-suppliers/pdf/guideline_E.pdf

Responsible Executive and Framework

The executive officer responsible for the Group’s initiatives on respecting human rights is the Group Chief Human Resources Officer (Group CHRO) (as of August 2025). The Group’s executive officers’ compensation is linked to relevant KPIs which reflect their responsible field in sustainability. The performance-linked compensation indicators for the Group CHRO include initiatives on human rights and labor compliance. The Sustainability Management Committee, chaired by the Group CEO, discusses important human rights issues under the supervision of the Board of Directors of Panasonic Holdings Corporation (PHD) and then reports these discussions to the Group Management Meeting and the Board. In fiscal 2024, the Sustainability Management Committee discussed challenges in the Social-related information disclosure, and in fiscal 2025,

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the Committee discussed challenges in promoting human rights due diligence and future action plans. We have also identified human rights and labor compliance as a Group Major Risk for fiscal 2026, with efforts to mitigate these risks at all business sites. For more details, see the “Risk Management” chapter (page 141-).

The Social Sustainability Department, under the Group CHRO, leads our day-to-day efforts to respect human rights. As the supervising organization for the Group's human rights and labor initiatives, it collaborates primarily with HR functions, and also with other related functions such as legal and procurement, to promote these initiatives at each operating company of the Group. At each operating company, a human rights due diligence promotion leader takes the initiative in addressing human rights issues identified within the company.

Refer to “Responsible Supply Chain” (page 111-) for details on our initiatives within the supply chain.

Raising Awareness

Panasonic Group has translated its Code of Ethics and Compliance, which includes respect for human rights, into 22 languages and provides regular opportunities for employees to learn about it at the time of entry into a company and promotion. Furthermore, the Human Resources Division, a key related division, offers Business and Human Rights as a basic training elective for Group HR employees in Japan. We also provide training for all seconded employees, including management personnel, posted from Japan to overseas subsidiaries to ensure they understand the Group's initiatives and Human Rights and Labour Policy, as well as international standards and the laws of each country regarding corporate responsibility to respect human rights (494 employees participated in fiscal 2025). Additionally, we have conducted training in various Asian countries where most of our manufacturing operations are located for production and human resources managers (24 Asian regional HR managers, 102 managers in Thailand, 16 managers in Taiwan, and 32 managers in India attended in fiscal 2025). We also held a lecture on Business and Human Rights for the 32 executives of the Panasonic Group Workers Unions Association in fiscal 2025.

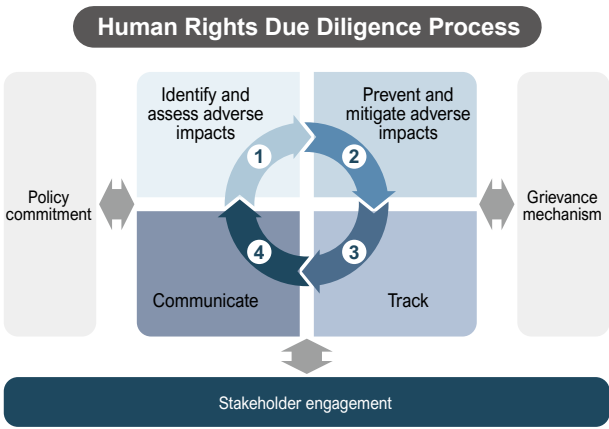
[!\[\]\(de95854c7ee024cfadc48187bbb781b2_img.jpg\) The Panasonic Group Code of Ethics & Compliance Chapter, 5. Our Social Responsibilities, 1. Respecting human rights](#)

<https://holdings.panasonic/global/corporate/about/code-of-conduct/chapter-5.html>

Human Rights Due Diligence

To respect the human rights of the stakeholders in its business activities, products and services, and transactions, the Group conducts human rights due diligence based on the UN Guiding Principles on Business and Human Rights and in reference to the OECD Due Diligence Guidance for Responsible Business Conduct. We incorporate input from external experts and

stakeholders when formulating related mechanisms and processes.



Framework for Promoting Human Rights Due Diligence

The Group recognizes the need to identify human rights risks across its value chain and business activities. Until now, the supervising organization has spearheaded efforts to identify and address human rights issues. However, each operating company in the Group engages in different business activities, and the types and anticipated severity of human rights risks are varied. Therefore, in fiscal 2025, we established a system for each operating company to proactively promote human rights due diligence taking into account their respective value chain and business characteristics. Additionally, given the complexity of supply chains associated with our operations, we strive to prevent and mitigate human rights risks in collaboration with each operating company and regional procurement departments with the support of the Global Procurement Division engaging in responsible supply chains. See “Responsible Supply Chain” (page 111-) for more details on our efforts.

We conducted practical training on human rights due diligence for the human rights promotion leaders appointed by each operating company (33 participants) in October 2024 to ensure that human rights due diligence is implemented across all operating companies. This training included lectures and case studies on the practical knowledge and skills on specific human rights due diligence process, methods to identify and assess human rights risks, and risk mitigation measures as well as lectures provided by multiple external experts to gain a deeper understanding of the international norms referenced by our group. We also conduct training tailored to specific regions and themes to prevent issues identified through human rights due diligence (see “Prohibiting Forced Labor” (page 91) for details on activities in Malaysia). We will continue to identify priority issues and regions and conduct appropriate training.

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■ Identifying and Assessing Adverse Impacts on Human Rights

In fiscal 2025, operating companies identified and assessed human rights risks within their companies where they could leverage maximum influence to prevent and mitigate adverse human rights impacts. Each operating company identified human rights risks referring to international norms and guidelines and taking into account the characteristics of its business, the countries and regions where it operates. They then identified human rights issues based on the outcomes of interviews with relevant departments and their efforts to reduce risks. Furthermore, we consolidated the human rights issues identified by each operating company and identified forced labor and occupational health and safety as salient human rights issues within the Group. Going forward, we will take steps to address the identified issues and work to identify areas within our value chain where adverse human rights impacts are largest. We engage in dialogue, discussion, and collaboration with relevant internal and external stakeholders regarding our human rights due diligence systems and their continual improvement.

We will continue to improve the process for identifying priority human rights issues and, especially in the event of imminent human rights issues, we strive to prevent, mitigate, and remedy them as promptly as possible.

Our Efforts to Date (Self-Assessment)

In fiscal 2022, we conducted a detailed self-assessment of human rights and labor issues at our overseas manufacturing companies and sites to understand risks at the Group's manufacturing sites. In fiscal 2023, we expanded the scope to include some domestic manufacturing sites, and in fiscal 2024, the assessment covered nearly all domestic and overseas manufacturing companies and sites (a total of 202). As a result, we identified 96 issues related to forced labor, child labor, young workers, discrimination, and occupational health and safety, the areas we have designated as priority, at 30 companies and sites. All the companies and sites addressed those issues following the improvement plans and completed all corrective actions by March 31, 2025.

■ Preventing, Mitigating, and Remediating Adverse Impacts on Human Rights

The Group promotes various initiatives to prevent, mitigate, and address human rights risks identified through human rights due diligence, alongside the salient human rights issues of forced labor and occupational health and safety.

Prohibiting Forced Labor

Our Human Rights and Labour Policy clearly states the prohibition of any and all forms of

forced labor. We promote efforts to establish a recruitment and employment environment free from forced labor and unfair treatment following all applicable laws and regulations, internal rules and referencing international standards and guidelines that ILO and other organizations established. In the unlikely event that the Group or a third party, such as a supplier or business partner, is found to be engaged in, or suspected of being engaged in, forced labor or any of the 11 ILO Indicators of Forced Labour^{*2}, our internal rules stipulate that we must promptly address the negative impact on human rights, including by working to cease, correct, or mitigate such conduct or providing remediation for the victims.

In the supply chain, we ask our suppliers to take steps toward preventing forced labor through the Panasonic Supply Chain CSR Promotion Guidelines. For more details, see the "Responsible Supply Chain" chapter ([page 111-](#)).

^{*2} The 11 ILO Indicators of Forced Labour: abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime

◆ Responsible Recruitment and Employment

We recognize that migrant workers who cross national and regional borders to work at our manufacturing sites and in our supply chain are particularly vulnerable. The Group also employs foreign migrant workers who work across countries. Our Group companies in Malaysia, which have the highest number of foreign migrant workers in the Group, launched the Responsible Employment Project in 2018 in collaboration with the International Organization for Migration (IOM) which addresses global migration issues and have been working to identify and correct human rights issues as well as providing training on these issues. In Malaysia, the Group companies formulated the Policy on Responsible Recruitment and Employment of Foreign Migrant Workers in April 2020 and standard operating procedures in September 2021 (applicable to recruitment and employment of foreign migrant workers in Malaysian Group companies), and have been continuously making efforts in this regard. Some specifics from this policy are as follows:


- Prohibiting companies from retaining personal documents such as passports;
- Prohibiting foreign migrant workers from bearing recruitment fees and related costs;
- Notifying foreign migrant workers of basic employment terms in a language they understand before leaving their country of origin.

In fiscal 2025, with the cooperation of the IOM, we interviewed approximately 770 foreign migrant workers at manufacturing sites of our four Group companies in Malaysia to assess the actual implementation of the policy and the standard operating procedures. As a result, we identified issues such as insufficient rules enforcement in the internal recruitment and employment process and low awareness of the grievance mechanism for foreign migrant workers. To response to the identified issues and incorporate changes in local laws, we revised the policy and procedures in April 2025 with guidance from IOM. Additionally, we provided

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all foreign migrant workers (approximately 1,700) at the manufacturing sites of the four companies with refresher training on their rights under employment contracts, internal work rules, operational safety measures, and the grievance mechanism and managers with training on discrimination and harassment.

 **Policy on the Responsible Recruitment and Employment of Foreign Migrant Workers**
https://www.panasonic.com/content/dam/Panasonic/corporate/my/corporate/sustainability/Malaysia-Panasonic-Policy-2025_English.pdf

In fiscal 2025, we expanded the Responsible Employment Project in Malaysia to manufacturing contractors and service providers. We added requirements for compliance with respect for human rights to contracts with them and conducted training on international norms pertaining to forced labor, relevant local laws and regulations, and the Group's Human Rights and Labour Policy (63 manufacturing contractors and service providers participated).

We also recognize human rights risks in the recruitment and placement processes for foreign migrant workers and have begun establishing a due diligence framework for recruitment agencies.

For countries and regions with potential risks, we leverage our experience in Malaysia to raise awareness among manufacturing companies in the Group as well as interview them about their initiatives to provide advice on and monitor the status of corrective measures. In Taiwan, we arranged a third-party audit at a Group manufacturing company in fiscal 2025 to identify human rights risks for foreign migrant workers. We implemented corrective measures to address the identified issues, including revising provisions in employment contracts that were insufficient, improving living conditions and hygiene, and enhancing disaster preparedness in dormitories, and conducted training to reinforce the operation of the grievance mechanism.

In fiscal 2025, we explained human rights risks associated with the recruitment process for foreign migrant workers to Managing Directors from all Group companies in Taiwan and Thailand and discussed preventive measures with them (10 MDs from 7 companies in Taiwan and 13 MDs from 13 companies in Thailand). In Thailand, we also held workshops on forced labor and the human rights of foreign migrant workers for all department heads (87 people from 13 companies).

The Group aims to conduct in-person training on preventing forced labor at all sites that employ foreign migrant workers. In fiscal 2025, we conducted training at 13 companies and sites (40.6%) out of a total of 32 companies and sites^{*3}.

^{*3} Companies and sites that employed foreign migrant workers as of March 31, 2025

Prohibiting Child Labor and Protecting Young Workers

Our Human Rights and Labour Policy includes a clear expectation to work toward the effective

eradication of child labor.

We comply with the laws and regulations in the jurisdiction where we recruit employees, and we require that our recruitment agencies and other business partners do the same. We also do not permit workers under the age of 18 to engage in hazardous or harmful work. In the supply chain, we request our suppliers to take the same approach in the supply chain as outlined in the Panasonic Supply Chain CSR Promotion Guidelines. For more details, see the “Responsible Supply Chain” chapter ([page 111-](#)).

Prohibition of Discrimination and Harassment

Our Human Rights and Labour Policy clearly seeks to eliminate discrimination in the field of employment and occupation. Moreover, in our Code of Ethics and Compliance, the Group prohibits discrimination, behavior that leads to discrimination, and harassment on the basis of age, gender, race, skin color, beliefs, religion, social status, citizenship, ethnicity, marital status, sexual orientation, gender identity and expression, pregnancy, medical history, viral infection status, genetic information, disability status, political affiliation or orientation, labor union affiliation, veteran status, or any similar status or characteristic. We also strive to raise awareness of this prohibition. By doing so, we work on creating workplaces where it is possible for diverse talents to form critical partnerships with mutual respect and work together dynamically. For more details, see the “Maximizing the Potential of Diverse Talent and Organizations” chapter ([page 95-](#)).

◆ Recruitment Screening

We conduct thorough screening of applicants based on their suitability, abilities, and motivation in accordance with the laws and guidelines of each country. After identifying issues with our screening that could lead to discrimination or other human rights infringements, we strive to correct them in the short term while ensuring that we take measures to prevent recurrence through awareness-raising and education.

Respect for the Freedom of Association and the Right to Collective Bargaining

Our Human Rights and Labour Policy clearly expresses our support for freedom of association and the effective recognition of the rights to collective bargaining. In each country and region, we make efforts to establish healthy relations with employees and to solve their issues by active dialogue with them. In addition, based on our Human Rights and Labour Policy, we pursue ways to respect internationally recognized human rights principles at our locations in countries that do not legally permit the formation of labor unions.

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◇ In Japan

The Group recognizes the rights of labor unions, including the right to organize, the right to collective bargaining, and the right to strike, as stipulated in the labor agreements concluded with each labor union with which the Group and its subsidiaries engage. We also prohibit discrimination against union members and any disadvantageous treatment based on union activities. Managers and employees are members of the labor union at a rate of 75.4%, jumping to 97.6% without managers (as of March 31, 2025).

Based on a common understanding that the Company’s sound development, improvements in labor and welfare conditions for employees, and social development are inseparable, the Company and the Union have established a system of Union participation in management based on equality and robust trust between labor and management. The Company and the Union discuss essential management matters in Labor-Management Council.

◇ In Europe

Following an EU directive*4 adopted in 1994, we have set up a voluntary labor agreement to provide a venue for healthy discussion between labor and management. We have also established the Panasonic European Employee Congress (PEEC). Employee representatives and company representatives also meet to exchange opinions and discuss business issues including management strategies and living support for employees.

*4 EU directive: A directive that obliges all companies employing 1,000 or more employees in two or more European Union countries to establish a pan-European labor-management consultation committee.

◇ In China

Nearly all Group-affiliated companies in China have labor unions (gōnghuì). We hold regular opinion exchanges and discussions surrounding compensation, welfare and benefits, training, and the like through initiatives including periodic labor-management dialogues, proactive joint labor-management recreational events, and advance briefings to unions concerning critical management decisions, with a focus on building good relations between labor and management.

Occupational Health and Safety

Realizing a safe and healthy work environment is also a priority, as stipulated in our Human Rights and Labor Policy. Additionally, we are prioritizing our response to the occupational health and safety issues identified as significant human rights concerns through human rights risk assessments conducted by our operating companies. The fiscal 2024 revision of our Human Rights and Labour Policy was meant to respond to ILO’s adding occupational health and safety to its Core Labour Standards. For more details, see the “Creating a Safe, Secure, and Healthy Workplace” in the “Maximizing the Potential of Diverse Talent and Organizations” chapter ([page 105-](#)).

Managing Working Hours

We have included provisions in our work rules related to proper management of working hours, break times, overtime work, holidays, leave, and other matters based on labor laws in each country and labor-management agreements (e.g. collective bargaining agreements). Our work rules also prohibit forcing workers to work overtime without their agreement as a form of present or suspected forced labor.

In Japan, the standard working day is set at 7.75 hours per day, and any extra hours worked are eligible for extra pay, going beyond the minimum required by law. We have also established internal working hour management standards that are even stricter than legal standards as part of our efforts to eliminate excessive overwork.

We also provide more annual paid leave than legally required, and employees may accumulate up to 50 days of remaining leave. We have made our system more flexible to accommodate individual needs for using annual leave, such as making hourly or half-day leave available.

On top of these system enhancements, we address the physical and mental health management of employees by allocating human resources in ways optimized for preventing uneven overtime workload distributions among specific employees, and by providing additional medical examinations for employees who have worked long hours.

Wage Management

We have established guidelines for compensation system design and aims to achieve competitive compensation levels, wherein we have set guidelines for appropriate wages, allowances, bonuses, and other types of occasional compensation or retirement pay, all based on national laws governing labor, labor-management agreements (such as collective agreements), and the like.

We also establish work rules for each country in compliance with all wage-related laws and regulations concerning minimum wages, statutory benefits, and overtime. We operate according to these regulations, pay employees directly for an agreed-upon period at agreed-upon time and provide employees with notifications of pay through pay statements or electronic data.

Grievance Mechanism


In order for us to respond quickly to remedy any complains related to human rights violations that we receive, we have established a global hotline (supporting 32 languages) as a point of contact to which our employees, business partners, and other stakeholders can report any compliance violations (including human rights or labor violations) they notice or suspect. Reports can be made anonymously, and information about the reports and the reporting person is treated confidentially. We also have internal rules in place to ensure that the internal or external

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person reporting the violation is not subject to any form of retaliation or unfair treatment. For more details, see the “Whistleblowing System” in the “Compliance” chapter ([page 146-](#)).

In addition, to encourage wider acceptance of complaints from outside our group, we participate in the industry joint grievance platform established by the Japan Electronics and Information Technology Industries Association (JEITA) CSR Committee. For more details, see the “Systems for Whistleblowing and Seeking Consultation” section under “Responsible Supply Chain” chapter ([page 115](#)).

 **Japan Center for Engagement and Remedy on Business and Human Rights (JaCER)**
<https://jacer-bhr.org/en/index.html>

Participation in International and Industrial Partnerships

Panasonic Group has been a participant in the United Nations Global Compact since January 2022. We have declared our support for the ten principles in four areas, including human rights and labor, and uphold our accountability by reporting the progress and outcomes of our human rights and labor initiatives in accordance with international standards.

We also joined the Responsible Business Alliance (RBA), an international CSR organization involved in the electronics, ICT, and automotive sectors, in October 2021 and utilize their self-assessment tools and guidance document for solving issues. Furthermore, we participate in the Responsible Mineral Initiative (RMI) under RBA, for the promotion of responsible mineral procurement.


In February 2024, the Group entered into a strategic global partnership with IOM, a specialized UN agency, with a proven track record of assisting in the responsible recruitment and employment of foreign migrant workers in Malaysia—to improve the rights of foreign migrant workers in the supply chain.

In April 2025, we joined the Global Business Initiative on Human Rights (GBI), an international organization that supports corporate efforts to respect human rights. Through collaboration with GBI, we will deepen our understanding of human rights issues facing corporations and strive to continually improve our human rights due diligence.

Panasonic Group is working to build a highly reliable management system through the above efforts.

The Group also actively communicates practical opinions on human rights from a corporate perspective to domestic and international organizations, as well as government agencies. In fiscal 2025, PHD personnel continued to participate in OECD’s Sustainable Business Expert Group, Business at OECD (BIAC) and took a leading role as vice-chair of the Corporate

Sustainability Committee of the Japanese Business Council in Europe (JBCE) consistently contributing to government policies related to human rights and due diligence in Europe. In April 2024, we spoke with the European Commission on the Corporate Sustainability Due Diligence Directive. In Japan, we are working to understand the status of primarily European legislation related to human rights due diligence and resolve common issues in the electronics industry through our participation in the Sustainability Due Diligence Working Group under the CSR Committee of the Japan Electronics and Information Technology Industries Association (JEITA). In Malaysia, we continue our dialogue with the National Human Rights Commission (SUHAKAM) on local human rights issues. In March 2025, we agreed to attend a training program in Japan organized by the Ministry of Economy, Trade and Industry (METI) on Promoting Responsible Corporate Conduct in Vietnam. We introduced the Group’s initiatives on business and human rights while engaging in discussions with the Vietnam Chamber of Commerce and Industry, as well as executives of Vietnamese electrical and electronic companies that have business with Japanese companies.

-  **United Nations Global Compact**
<https://www.unglobalcompact.org/what-is-gc/participants/149557-Panasonic-Corporation>
-  **Responsible Business Alliance (RBA)**
<https://www.responsiblebusiness.org/about/members/>
-  **Business at OECD (BIAC)**
<https://www.businessatoecd.org/about-us>
-  **Japan Business Council in Europe (JBCE)**
<https://www.jbce.org/en/>
-  **CSR Committee, Japan Electronics and Information Technology Industries Association (JEITA) (Japanese only)**
<https://home.jeita.or.jp/csr/>
-  **The Human Rights Commission of Malaysia (SUHAKAM)**
<https://suhakam.org.my/>
-  **GBI (Global Business Initiative on Human Rights)**
<https://gbih.org/>