

## **Implementation Report of Sustainable Procurement Partnership (SPP) Pilot 2025**

### **1. Outline of Business**

#### **(1) Background and purpose**

The Sustainable Procurement Partnership (hereinafter “SPP”) Concept Study TF is an initiative that is led by the CSR Committee and participant companies of JEITA, and aims to establish a platform to promote sustainability activities across the electrical and electronics industry with the purpose to promote, on an industry-wide basis, sustainable procurement by companies (especially small and medium size companies) in the supply chain of the industry.

The study regarding SPP has started with the thought to raise the response level of the whole industry, leaving no companies behind, by strengthening the engagement of downstream companies (large sized companies) with upstream companies (especially small and medium sized companies) that constitute the supply chain.

In FY2025, toward the full-scale operation of SPP from FY2026, small-scale pilot implementations (hereinafter “SPP Pilot”) continued from the previous year. Under the theme of “Business and Human Rights,” the aim of the SPP Pilot in FY2025 is to establish and verify operation processes by accumulating achievements through programs for “Assistance for Human Rights Due Diligence” and “Assistance for the Formulation of a Grievance Mechanism”.

SPP is promoted with the support of outside experts such as the International Labour Organization (ILO) office for Japan, the All Japan Federation of Certified Social Insurance and Labour Consultant Associations, etc.

#### **(2) Implementing structure, etc.**

##### **◇ Organizer (Secretariat)**

CSR Committee, Responsible Supply Chain WG, Sustainable Procurement Partnership Concept Study TF  
<Member Companies for FY2025>

NEC Corporation (Leader), Panasonic Holdings Corporation (Subleader), Tanaka Precious Metal Group Co., Ltd., Toshiba Corporation, Nikon Corporation, Fujitsu Limited, Mitsubishi Electric Corporation, Yokogawa Electric Corporation

##### **◇ Cooperating organizations**

ILO (International Labour Organization) office for Japan, All Japan Federation of Certified Social Insurance and Labour Consultant Associations

##### **◇ Participating companies**

Member companies of JEITA and its business partners (small and medium sized companies): 8 companies  
<Participating Companies for FY2025>

Aono Kogyo Co., Ltd., Shikoku Toso Kogyo Co., Ltd., Tateyama Machine Co., Ltd., Data Service Co., Ltd., Nikko Electric Communication Co., Ltd., Fuji Seira Co., Ltd., Waka Manufacturing Co., Ltd., Sansha Electric Manufacturing Co., Ltd.

##### **◇ Implementation period**

From September 2025 to March 2026

#### **(3) Outline of activities**

Based on dialogues with management-level personnel and engagement with working-level personnel of participating companies (small and medium sized companies), we implemented the “Assistance for Human Rights Due Diligence” program from September to December 2025, followed by the “Assistance for the Formulation of a Grievance Mechanism” program from January to February 2026, in collaboration

with the ILO office for Japan and Public Consultants on Social and Labor Insurance (“BHR Promoting Sharoshi”), etc.

#### **(4) Results of activities and future plans**

In the “Assistance for Human Rights Due Diligence” program, the goal was set to conduct risk analysis using human rights risk assessment sheets and formulate corrective action plans. Five out of the eight participating companies completed these tasks or worked on improving their internal environments. In the “Assistance for the Formulation of a Grievance Mechanism” program, the goal was to declare the establishment of a grievance mechanism, and three out of eight companies made such a declaration. Through this SPP Pilot, the Secretariat verified the processes for human rights DD and grievance mechanism construction and obtained insights regarding the providing capabilities of SPP and its operation. In FY2026, we will proceed with the full-scale launch of SPP and study mid-to-long term management plans.

## **2. Brief Summary**

### **(1) Assistance for Human Rights Due Diligence**

#### **◇ 【Day 1】 Preparation Meeting for Human Rights Due Diligence (Human Rights DD)**

To implement human rights DD, participating companies first learned the significance of these efforts to understand their necessity.

At the beginning, Ms. Yuka Miyazaki (Director, Business and Human Rights Policy Office, Ministry of Economy, Trade and Industry (METI)) explained that the Japanese government and METI are supporting corporate efforts through the "Guidelines on Respecting Human Rights in Responsible Supply Chains" and the "Reference Material on Respecting Human Rights in Responsible Supply Chains," expressing high expectations for this initiative.

Subsequently, the ILO office for Japan explained the types of human rights risks, the purpose and necessity of human rights DD, provided examples, introduced METI’s "Reference Material," and explained the basic flow of identifying human rights risks.

Participants commented that the session helped them form a concrete image of human rights DD.

#### **◇ 【Day 2】 Human Rights DD Practice Workshop**

To understand the implementation procedures and methods of human rights DD, a group work session was held to identify internal human rights risks and prioritize them for DD implementation.

BHR Promoting Sharoshi served as facilitators to support discussions among participants.

Participating companies shared issues identified beforehand within their own companies and insights gained during that process.

Using Steps 1 and 2 of the METI Reference Material work sheets, they identified human rights risks and understood their occurrence processes.

After the ILO office for Japan explained the concept of prioritization, participants used Step 3 of the work sheets to prioritize the identified risks.

Participants noted that understanding other companies' situations was very helpful and that they could organize the desired direction for human rights DD.



◇ **【Day 3】 Human Rights DD Engagement Meeting**

To support the practice of human rights DD, an exchange of opinions was held between participating companies and the Secretariat (large companies).

Participating companies submitted information regarding difficulties and barriers they faced in human rights DD in advance. During the meeting, the Secretariat provided advice and exchanged opinions, including examples of education and awareness efforts for their own employees and suppliers.

A social gathering followed to build relationships and share concerns.

Feedbacks included comments that it was helpful to realize other companies shared similar concerns.



**(2) Assistance for the Formulation of a Grievance Mechanism**

◇ **【Day 1】 Grievance Mechanism Study Meeting**

To understand the basic knowledge required to build a grievance mechanism, lectures were given by Attorney Daisuke Takahashi (Shinwa Law Office) and Attorney Yuko Gomi (Kunihiro Law Office) on its necessity and the functions it should guarantee. Subsequently, the attorneys served as group facilitators for discussions on how to gain management understanding for establishing a reporting contact point and how to increase its reliability.

Participants recognized that simply establishing a contact point is not enough; efforts to make it easier for people to speak up and the preparation of manuals and training for prompt responses are necessary.

◇ **【Day 2】 Grievance Mechanism Practice Workshop**

To further understand the practical process, a group discussion was held with facilitators Attorney Daisuke Takahashi, Attorney Takuya Kobayashi (ANSWERZ Law Office), and Mr. Ujiie (Global Compact Network Japan). They discussed feasible systems, expectations for support from outside experts and industry associations, and how to handle grievances based on hypothetical cases. Participants noted that the workshop helped them notice blind spots in their own efforts and provided new perspectives through other companies' examples.



### (3) Closing Meeting

Participating companies presented their "corrective action plans based on identified human rights risks" and "future approaches to building grievance mechanisms," sharing their future plans for human rights DD and grievance mechanism construction. Ms. Kamoshita (ILO office for Japan) commented that reaching the action plan stage from a human rights policy was a significant achievement in itself. Attorney Takahashi (Shinwa Law Office) encouraged companies to actively consider establishing external contact points and expanding education and support for contact point personnel to enhance the mechanisms. The Secretariat expressed gratitude for the participation and requested that these companies continue to cooperate as "leading companies" by sharing their experiences and knowledge during the full-scale operation from FY2026.

## 3. Outcome of Events

### (1) Assistance for Human Rights Due Diligence

#### ◇ **【Day 1】 Preparation Meeting for Human Rights Due Diligence (Human Rights DD)**

◆ Date: September 24, 2025 (Wed.) 10:30 - 12:30

◆ Method: Online (Teams)

◆ Number of Participants: 11 people from 8 companies

◆ Main Program:

• Opening Remarks from METI

Ms. Yuka Miyazaki, Director, Business and Human Rights Policy Office, Trade Policy Bureau, Ministry of Economy, Trade and Industry (METI)

• Lecture

“Overview of Human Rights DD: Evaluation and Identification of Human Rights Risks, Risk Mapping, and Stakeholder Engagement”

Ms. Mami Kamoshita, Program and Operations Officer, International Labour Organization (ILO) office for Japan

• Lecture

“About the ‘Reference Material on Respecting Human Rights in Responsible Supply Chains’”

Ms. Yuka Miyazaki, Director, Business and Human Rights Policy Office, METI

Mr. Ryusuke Tanaka, Programme Officer, International Labour Organization (ILO) office for Japan

#### ◇ **【Day 2】 Human Rights DD Practice Workshop**

◆ Date: October 23, 2025 (Thur.) 14:00 - 17:00

◆ Method: Mixed format (mainly face-to-face)

◆ Venue: TKP Tokyo Station Otemachi Conference Center, Conference Room 22A

◆ Number of Participants: 13 people from 7 companies (Offline: 10, Online: 3)

◆ Main Program:

• Workshop

1) Sharing homework results

2) Work session (Practicing Steps 1 and 2 of the METI Work Sheets)

3) Lecture: “Human Rights Risks: Connectivity and Prioritization”

Mr. Ryusuke Tanaka, Programme Officer, ILO office for Japan

4) Work session (Practicing Step 3 of the METI Work Sheets)

5) Group presentations

• Lecture

1) Stakeholder Engagement and Responding to Human Rights Risks

Ms. Mami Kamoshita, Program and Operations Officer, ILO office for Japan

◇ **【Day 3】 Human Rights DD Engagement Meeting**

- ◆ Date: November 26, 2025 (Wed.) 14:00 - 17:00
- ◆ Method: Mixed format (mainly face-to-face)
- ◆ Venue: AP Tokyo Marunouchi, Room E + F
- ◆ Number of Participants: 11 people from 5 companies (Offline: 11, Online: 0)
- ◆ Main Program:
  - Explanation of the pre-questionnaire results
  - Exchange of opinions (Engagement)
  - Social gathering

**(2) Assistance for the Formulation of a Grievance Mechanism**

◇ **【Day 1】 Grievance Mechanism Study Meeting**

- ◆ Date: January 20, 2026 (Tue.) 14:00 - 16:00
- ◆ Method: Online (Zoom)
- ◆ Number of Participants: 8 people from 7 companies
- ◆ Main Program:
  - Lecture
    - “Introduction to the ‘Guide for Establishing a Reporting Contact Point (Grievance Mechanism) for Small and Medium-sized Enterprises (Draft)’”
    - Mr. Daisuke Takahashi, Attorney at Law, Shinwa Law Office
  - Lecture
    - “Basics of Responding to Whistleblowing and Harassment Consultations: From System Design to Practical Operation”
    - Ms. Yuko Gomi, Attorney at Law, Kunihiro Law Office
  - Group Discussion
    - “How to increase management’s understanding of establishing a consultation and reporting contact point”
    - “How to enhance the reliability of the contact point and the role of management”

◇ **【Day 2】 Grievance Mechanism Practice Workshop**

- ◆ Date: February 19, 2026 (Thur.) 14:00 - 16:30
- ◆ Method: Mixed format (mainly face-to-face)
- ◆ Number of Participants: 6 people from 4 companies (Offline: 6, Online: 0)
- ◆ Main Program:
  - Group Discussion
    - “What level of system can be established? / What are the challenges in establishing it?”
    - “What kind of support is expected from outside experts, industry associations, and the government?”
    - “Discussion on hypothetical cases (How to handle grievance processes based on realistic scenarios, etc.)”

**(3) Closing Meeting**

- ◆ Date: March 25, 2026 (Wed.) 15:00 - 16:00
- ◆ Method: Online (Teams)
- ◆ Number of Participants: 5 people from 3 companies
- ◆ Main Program:
  - Presentations by each company, Q&A session, and exchange of opinions
  - Comments
    - Ms. Mami Kamoshita, Program and Operations Officer, ILO office for Japan

Mr. Daisuke Takahashi, Attorney at Law, Shinwa Law Office  
• Information on activities for FY2026

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