



Japan.

Committed
to the SDGs

National Action Plan on Business and Human Rights (Revised Edition)

(Provisional Translation)

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Inter-Ministerial Committee on Policy Promotion
for the Implementation of Japan's National Action
Plan on Business and Human Rights

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With the increasing recognition of the importance of the international roles that businesses play in economic development, the impact of business activities on society has been attracting growing interest. This led to the publication of policies concerning business activities in the 1970s, as exemplified by (i) the “[OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#)” (The OECD Guidelines for Multinational Enterprises)¹ formulated by the Organisation for Economic Co-operation and Development (OECD) requesting business enterprises to engage in responsible business conduct; and (ii) the “[Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy](#)” (the ILO MNE Declaration)² formulated by the International Labour Organization (ILO). Furthermore, as attention to respect for human rights in business activities increased, the 17th session of the Human Rights Council in 2011 unanimously endorsed the “[Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework](#)” (the UNGPs)³, which are built on three pillars: (1) “the State duty to protect human rights,” (2) “the corporate responsibility to respect human rights,” and (3) “access to remedy.”

To ensure steady implementation of the UNGPs, and taking into account relevant international instruments such as the OECD Guidelines for Multinational Enterprises and the ILO MNE Declaration, the Government of Japan (Government) formulated in October 2020 the “[National Action Plan on Business and Human Rights \(2020-2025\)](#)” (the Former Action Plan)⁴, conducting “Measures of the Government as an Actor Regarding State Duty to Protect Human Rights,” “Measures of the Government Promoting Corporate Responsibility to Respect Human Rights,” and “Measures Regarding Access to Remedy.” As a result, the Government’s response to business and human rights has rapidly advanced. The main achievements of the Government based on the Former Action Plan include the following.

From September to October 2021, [a survey was conducted on the status of Japanese companies’ efforts regarding business and human rights](#)⁵. As a result, more than half of the responding companies expressed to the Government a demand for establishing guidelines to support voluntary initiatives. Many stakeholders also voiced expectations for the Government to take the initiative in promoting respect for human rights in business activities. In light of the above, in September 2022, the Government formulated the “[Guidelines on Respecting Human Rights in Responsible Supply Chains](#)” (the Guidelines)⁶. The Guidelines are intended to provide all business enterprises operating in Japan with a concrete explanation of the initiatives required of business enterprises to respect human rights, based on international standards such as the UNGPs, the OECD Guidelines for Multinational Enterprises, and the ILO MNE Declaration,

¹ The “OECD Guidelines for Multinational Enterprises” were developed in 1976 and renamed in 2023 to the present name, “OECD Guidelines for Multinational Enterprises on Responsible Business Conduct” (<https://www.mofa.go.jp/mofaj/files/100514804.pdf>)

² ILO “Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (6th Edition)” (2022). (https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_emp/%40emp_ent/%40multi/documents/publication/wcms_094386.pdf)

³ Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework (<https://www.mofa.go.jp/mofaj/files/100165917.pdf>)

⁴ Inter-Ministerial Committee on Japan’s National Action Plan on Business and Human Rights “National Action Plan on ‘Business and Human Rights’ (2020-2025)” (October 2020). (<https://www.mofa.go.jp/mofaj/files/100173319.pdf>)

⁵ Ministry of Economy, Trade and Industry and Ministry of Foreign Affairs, “Aggregated Results of the ‘Questionnaire on the Status of Efforts to Respect Human Rights in the Supply Chains of Japanese Companies’” (November 2021). (<https://www.mofa.go.jp/mofaj/files/100265103.pdf>) (in Japanese)

⁶ “Guidelines on Respecting Human Rights in Responsible Supply Chains” by the Inter-Ministerial Committee on the Implementation of Japan’s National Action Plan on Business and Human Rights (September 2022). (<https://www.meti.go.jp/policy/economy/business-jinken/guidelines/provisionalenglishtranslation.pdf>)

in order to promote efforts to respect human rights in their supply chains.⁷

In April 2023, recognizing that the Government itself is an economic actor and should lead by example in promoting respect for human rights, [a policy on human rights considerations in public procurement](#)⁸ was decided. Specifically, it was decided to promote the requirement of inclusion of the statement in tender documents, contracts, and other documents related to public procurement that bidders and contractors will make efforts to respect human rights in light of the Guidelines, and all relevant ministries and agencies have taken measures in line with this decision.

In addition to these initiatives, relevant ministries and agencies have carried out various efforts, including (i) holding seminars and events both in Japan and abroad for Japanese business enterprises - including those expanding overseas and small and medium enterprises (SMEs) - and their suppliers;⁹ (ii) compiling collections of good practices on corporate human rights due diligence (the Human Rights DD)¹⁰ initiatives, such as [“A Compilation of Case Studies on Business and Human Rights: Towards the Expansion and Establishment of Efforts Based on the UN Guiding Principles on Business and Human Rights,”](#)¹¹ [“Responsible Business Conduct and Human Rights Due Diligence: Good Practices of Japanese Companies,”](#)¹² and [“Business and Human Rights: First Steps - A Compilation of Initiatives for SMEs;”](#)¹³ (iii) preparing various guidance documents, such as the [“Reference Material on Practical Approaches for Business Enterprises to Respect Human Rights in Responsible Supply Chains”](#) (the Practical Reference Material)¹⁴, released in April 2023, and the [“Guidebook for Respecting Human Rights in Food Enterprises,”](#)¹⁵ released in December of the same year; (iv) issuing the [“Business and Human Rights at Work Checklist”](#)¹⁶ in October 2024; (v) releasing the [“Quick Guide to Business and Human Rights”](#)¹⁷ and establishing consultation desks operated by the Japan External Trade Organization (JETRO); (vi) fostering professional human resources in cooperation with international organizations and the Japan Federation of Labor and Social Security Attorney’s Associations; (vii) sharing information through bilateral frameworks and international conferences; and (viii) carrying out awareness-raising activities using websites and pamphlets.

Regarding access to remedy, following the enforcement in June 2022 of the [“Act Partially Amending the Whistleblower Protection Act”](#) (Act No. 51 of 2020; the Amendment Act of 2020)¹⁸, business operators with more than 300 employees are required to establish a system to respond appropriately to internal whistleblowing (obligation to make efforts for business operators with 300 or fewer employees) The Consumer Affairs Agency created a

⁷ “Supply chain” means “upstream” in relation to the procurement and securing of raw materials, resources for a business enterprise’s products and services, facilities, and software, and also “downstream,” in relation to the sale, consumption, and disposal of its products and services. See p. 6 of the Guidelines.

⁸ On Human Rights Considerations in Public Procurement (developed by the Inter-Ministerial Committee on the Implementation of Japan’s National Action Plan on Business and Human Rights on April 3, 2023). (https://www.cas.go.jp/jp/seisaku/business_jinken/dai7/siryou4.pdf) (in Japanese)

⁹ “Suppliers” means business enterprises in the supply chains and other business partners and is not limited to direct business partners. See p. 6 of the Guidelines.

¹⁰ Human rights due diligence (DD) is a series of measures conducted to identify, prevent, and mitigate adverse impacts of business activities on human rights, assess the effectiveness of the initiatives, as well as explain and disclose information on how such impacts were addressed.

¹¹ Ministry of Foreign Affairs, “A Compilation of Case Studies on Business and Human Rights: Towards the Expansion and Establishment of Efforts Based on the UN Guiding Principles on Business and Human Rights” (2021). (<https://www.mofa.go.jp/files/100348374.pdf>)

¹² ILO and The Japan External Trade Organization (JETRO), “Responsible Business Conduct and Human Rights Due Diligence: Good Practices of Japanese Companies Operating in Bangladesh, Cambodia and Viet Nam, Trade, Investment and Labour Nexus and a Way Forward” (2024). (https://www.jetro.go.jp/ext_images/world/scm_hrm/JETRO_RBC_HRDD2024en_r.pdf)

¹³ Ministry of Justice, “Business and Human Rights: First Steps - A Collection of Initiatives for Small and Medium-sized Enterprises” (March 2025). (<https://www.jinken-library.jp/database/docs/R6-business-jireishu.pdf>) (in Japanese)

¹⁴ Ministry of Economy, Trade and Industry, “Reference Material on Practical Approaches for Business Enterprises to Respect Human Rights in Responsible Supply Chains” (April 2023). (https://www.meti.go.jp/english/press/2023/pdf/0404_002a.pdf) For attached materials, see Ministry of Economy, Trade and Industry website. (https://www.meti.go.jp/english/policy/economy/biz_human_rights/index.html)

¹⁵ Ministry of Agriculture, Forestry and Fisheries, “Guidebook for Respecting Human Rights in Food Enterprises” (December 2023). (<https://www.maff.go.jp/j/shokusan/kokusaihan/jinkentebiki.html>)

¹⁶ Ministry of Health, Labour and Welfare International Department / ILO Office in Japan, “Business and Human Rights at Work Checklist.” (<https://www.mhlw.go.jp/content/10500000/001511269.pdf>)

¹⁷ JETRO, “Quick Guide to Business and Human Rights: How to Respect Human Rights in Domestic and International Business and Supply Chains.” (https://www.jetro.go.jp/ext_images/world/scm_hrm/pdf/202401.pdf) (in Japanese)

¹⁸ The Act Partially Amending the Whistleblower Protection Act (Act No. 51 of 2020). (https://www.caa.go.jp/en/policy/consumer_partnerships/assets/consumer_partnerships_cms205_250825_01.pdf)

“Whistleblowing System Implementation [Support Kit](#)”¹⁹ in December 2023, and conducts awareness-raising activities to ensure and promote the establishment of whistleblowing systems among business operators. In addition, the Consumer Affairs Agency implements administrative measures based on the provisions of the Act, and also analyzes issues through various surveys.²⁰ Furthermore, based on Article 5 of the Supplementary Provisions of the Amendment Act of 2020, a review committee composed of experts was convened by the Consumer Affairs Agency starting in May 2024 to examine issues in light of recent changes in the domestic and international environment surrounding the whistleblower protection system and the implementation status after the amendment, and the committee compiled and published a report in December 2024. Based on this report, the Bill for the “[Act Partially Amending the Whistleblower Protection Act](#)” (Act No. 62 of 2025; the Amended Whistleblower Protection Act)²¹ was submitted during the 217th Diet session and enacted in June 2025. The Amended Whistleblower Protection Act aims to: (i) establish and fully implement systems for business operators to appropriately respond to whistleblowing; (ii) expand the scope of whistleblowers; (iii) address factors that discourage whistleblowing; and (iv) strengthen measures to prevent and remedy disadvantageous treatment on the grounds of whistleblowing. The Amended Whistleblower Protection Act comes into effect on December 1, 2026. Moreover, the June 2023 revision of the OECD Guidelines for Multinational Enterprises, which clarified the scope of due diligence that applies to businesses in downstream supply chains, has further strengthened the functions of [National Contact Points \(NCPs\)](#)²². The Japanese NCP has also made efforts to promote the use of NCPs through preparing a Japanese translation of the said guidelines, revising Case-handling procedures, and conducting awareness-raising activities targeted at stakeholders both inside and outside Japan, including those conducted through overseas diplomatic missions.

Efforts are also being made to visualize the fact that business enterprises are naturally engaged in respecting human rights, through the disclosure of sustainability-related non-financial information by business enterprises. In July 2022, Ministry of Health, Labour and Welfare revised its “[Ordinance on General Employer Action Plans Based on the Act on the Promotion of Women’s Active Engagement in Professional Life](#),”²³ making it mandatory for businesses above a certain size to publicize pay differences between men and women. In June 2025, the “[Act for Partial Revision of the Act on Comprehensive Promotion of Labor Policies, and Stabilization of Employment and Enrichment of Working Life and Other Laws](#)” (Act No. 63 of 2025)²⁴, including the “[Act on the Promotion of Women’s Active Engagement in Professional Life](#)” (Act No. 64 of 2015)²⁵, was enacted, and thereby expanding the scope of businesses mandated publication of pay differences between men and women and requiring publication of the ratio of woman in managerial position. In January 2023, [the revision of the “Cabinet Office Order on Disclosure of Corporate Affairs”](#) and other ordinances²⁶ led to the creation of a new section in annual securities reports for “Sustainability-Related Policies and Initiatives,” and in the same year and in December 2024, a [casebook of good practices](#)²⁷, including examples of human rights disclosures, was released as reference examples for incorporating Sustainability-Related Policies and Initiatives in annual securities reports.

In this context, in addition to the “[Eruboshi](#)” certification system to recognize employers

¹⁹ Consumer Affairs Agency, “Whistleblowing System Implementation Support Kit.” (https://www.caa.go.jp/policies/policy/consumer_partnerships/whistleblower_protection_system/hajimete) (in Japanese)

²⁰ Consumer Affairs Agency Whistleblower Protection System “Research and Studies.” (https://www.caa.go.jp/policies/policy/consumer_partnerships/whistleblower_protection_system/research) (in Japanese)

²¹ Consumer Affairs Agency, “Act Partially Amending the Whistleblower Protection Act” (Act No. 62 of 2025). (https://www.caa.go.jp/policies/policy/consumer_partnerships/whistleblower_protection_system/overview) (in Japanese)

²² National Contact Points (NCPs). (https://www.mofa.go.jp/ecm/oecd/page22e_000946.html)

²³ the Ministerial Ordinance on General Employer Action Plans Based on the Act on the Promotion of Women’s Active Engagement in Professional life (<https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/0000091025.html>) (in Japanese).

²⁴ Act for Partial Revision of the Act on Comprehensive Promotion of Labor Policies, and Stabilization of Employment and Enrichment of Working Life and Other Laws (Act No. 63 of 2025) (https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/koyou_roudou/koyoukintou/zaitaku/index_00003.html) (in Japanese)

²⁵ The Act on the Promotion of Women’s Active Engagement in Professional Life (Act No. 64 of 2015). (<https://www.japaneselawtranslation.go.jp/en/laws/view/4163/en>)

²⁶ Partial Revision of the Cabinet Office Order on Disclosure of Corporate Affairs. (<https://www.fsa.go.jp/news/r4/sonota/20221107/20221107.html>) (in Japanese)

²⁷ Financial Services Agency, “FY 2024 Edition of the Reference Casebook of Good Practices on the Disclosure of Narrative Information” Final version released. (<https://www.fsa.go.jp/news/r6/singi/20250324-2.html>) (in Japanese)

demonstrating outstanding performance in promoting women's advancement under the Act on the Promotion of Women's Active Engagement in Professional Life, in June 2020, the higher-level "[Platinum Eruboshi](#)" special certification system was introduced.²⁸ The Government and incorporated administrative agencies have implemented initiatives to award additional points in public procurement evaluations to employers holding Eruboshi or Platinum Eruboshi certifications.

The review of the Technical Intern Training Program and Specified Skilled Worker System has also progressed, and in June 2024, the "[Amendment Act of the Immigration Control and Refugee Recognition Act and the Act on Proper Technical Intern Training and Protection of Technical Intern Trainees](#)" (Act No. 60 of 2024)²⁹ was enacted, which includes measures such as (i) the creation of a new Employment-for-Skill-Development Program that is aimed at developing and securing human resources through employment and that replaces the Technical Intern Training Program, (ii) the establishment of the Employment-for-Skill-Development Organization, and (iii) the optimization of the Specified Skilled Worker System.

In addition, efforts have progressed to address human rights issues associated with the development of new technologies, and with regard to discrimination including hate speech, initiatives are being promoted to eliminate discrimination, including human rights violations on the Internet, considering the purpose of laws such as the "[Act on the Promotion of Efforts to Eliminate Unfair Discriminatory Speech and Behavior against Persons with Countries of Origin other than Japan](#)" (Act No. 68 of 2016)³⁰, the "[Act on the Promotion of the Elimination of Buraku Discrimination](#)" (Act No. 109 of 2016)³¹, and the "[Act on Promoting Measures to Achieve a Society in which the Pride of Ainu People is Respected](#)" (Act No. 16 of 2019)³².

Regarding the use of AI and human rights, based on the fact that the preambles of the "[International Guiding Principles](#)"³³ and "[International Code of Conduct](#)"³⁴ under the [Hiroshima AI Process](#)³⁵, which were formulated under Japan's G7 presidency, explicitly mention adherence to the UNGPs, initiatives have been made to promote the appropriate use of AI, including the formulation of the "[AI Guidelines for Business](#),"³⁶ which takes into account international discussions on AI. Furthermore, to enable business enterprises to actively conduct measures for respecting human rights in a fair and predictable environment, Japan has conducted dialogues and cooperation with other countries.³⁷ The "[G7 Trade Ministers' Statement](#)"³⁸ in April 2023 and the "[G7 Hiroshima Leaders' Communiqué](#)"³⁹ in May 2023 included commitments not only to ensuring respect for human rights and international labor standards in business activities and global supply chains, but also to further strengthening resilience, predictability, and certainty for businesses. In the "[G7 Trade Ministers' Statement](#)"⁴⁰ in October of the same year, the commitments to achieving the goal of strengthening outreach and engagement on business and human rights even beyond the G7 were reaffirmed.

²⁸ Ministry of Health, Labour and Welfare, "Special Page on Female Participation Act (Eruboshi Certification / Platinum Eruboshi Certification)." (<https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/0000091025.html>) (in Japanese)

²⁹ The Amendment Act of the Immigration Control and Refugee Recognition Act and the Act on Proper Technical Intern Training and Protection of Technical Intern Trainees (Act No. 60 of 2024). (<https://www.moj.go.jp/isa/content/001420067.pdf>) (in Japanese)

³⁰ The Act on the Promotion of Efforts to Eliminate Unfair Discriminatory Speech and Behavior Against Persons with Countries of Origin Other than Japan (Act No. 68 of 2016). (<https://www.japaneselawtranslation.go.jp/en/laws/view/4081>)

³¹ The Act on the Promotion of the Elimination of Buraku Discrimination (Act No. 109 of 2016). (<https://www.apaneselawtranslation.go.jp/en/laws/view/4080>)

³² The Act on Promoting Measures to Achieve a Society in Which the Pride of Ainu People Is Respected (Act No. 16 of 2019). (<https://www.japaneselawtranslation.go.jp/en/laws/view/4538>)

³³ "Hiroshima Process International Guiding Principles for Organizations Developing Advanced AI System" (Provisional Translation). (https://www.soumu.go.jp/hiroshimaai/ai-process/pdf/document04_en.pdf)

³⁴ "Hiroshima Process International Code of Conduct for Organizations Developing Advanced AI Systems" (Provisional Translation). (https://www.soumu.go.jp/hiroshimaai/ai-process/pdf/document05_en.pdf)

³⁵ Hiroshima AI Process (<https://www.soumu.go.jp/hiroshimaai/ai-process/en/index.html>)

³⁶ Ministry of Internal Affairs and Communications and Ministry of Economy, Trade and Industry, "AI Guidelines for Business." (https://www.soumu.go.jp/main_sosiki/kenkyu/ai_network/02ryutsu20_04000019.html); (https://www.meti.go.jp/shingikai/mono_info_service/ai_shakai_jisso/20240419_report.html)

³⁷ As an example: Memorandum of Cooperation on the Japan - U.S. Task Force on the Promotion of Human Rights and International Labor Standards in Supply Chains (January 7, 2023). (<https://www.meti.go.jp/press/2022/01/20230107003/20230107003.html>) (in Japanese)

³⁸ G7 Trade Ministers' Statement, April 4, 2023 (Provisional Translation). (<https://www.mofa.go.jp/mofaj/files/100487087.pdf>)

³⁹ G7 Hiroshima Leaders' Communiqué (May 20, 2023) (Provisional Translation). (https://www.mofa.go.jp/mofaj/gaiko/summit/hiroshima23/documents/pdf/Leaders_Communique_01_en.pdf?v20231006)

⁴⁰ G7 Trade Ministers' Statement Osaka-Sakai, October 29, 2023 (Provisional Translation). (<https://www.mofa.go.jp/mofaj/files/100573173.pdf>)

In addition to these initiatives, the Government has collaborated with international organizations to support Japanese business enterprises - particularly in Asia - in furthering respect for human rights in supply chains, ensuring compliance with international labor standards, and assisting foreign governments in the formulation and implementation of their national action plans on business and human rights.

[The Inter-Ministerial Committee on Policy Promotion for the Implementation of Japan's National Action Plan on Business and Human Rights](#) (the Committee)⁴¹ has conducted [annual reviews](#)⁴² on the status of the implementation of the Former Action Plan, considering the specific progress of each measure and evaluations based on the “indicators in five priority areas.”

Progress has been made in the “future measures planned” set out in each area outlined in the Former Action Plan, as shown in the “List of Implementation Status of Action Plan Measures” in the annual reviews, and steady progress is being made toward achieving the goals of the Former Action Plan (i.e., (i) to protect and promote human rights for society as a whole, including international society; (ii) to ensure policy coherence in relation to business and human rights; (iii) to ensure and enhance the international competitiveness and sustainability of Japanese business enterprises; and (iv) to contribute to achieving the Sustainable Development Goals (SDGs)). For example, initiatives to promote respect for human rights and Human Rights DD in domestic and international supply chains are advancing. According to the [Third Survey on the Charter of Corporate Behavior](#)⁴³, (the Keidanren Survey) conducted by the Japan Business Federation (Keidanren) (from August to September 2023) and published in January 2024, 76% of business enterprises responded that they were advancing initiatives based on the UNGPs, a significant increase from 36% recorded in [the Second Keidanren Survey](#)⁴⁴ (conducted from July to August 2020). Under this “National Action Plan on Business and Human Rights, Revised Edition (the New Action Plan),” continued efforts are expected to promote respect for human rights in the activities of Japanese business enterprises and in global supply chains, as well as to improve the business environment.

Regarding contributions to the achievement of the SDGs, business and human rights initiatives were highlighted in Japan's third [“Voluntary National Review \(VNR\) for the implementation of 2030 Agenda”](#)⁴⁵ in 2025, the first in four years. Specifically, the review mentions the Government's efforts - such as collaborating with international organizations including the United Nations Development Programme (UNDP) and the ILO - to support the formulation and implementation of action plans by local governments, particularly in countries where Japanese business enterprises operate.

2

Initiatives by Japanese Business Enterprises and International Trends

Since the formulation of the Former Action Plan, both the initiatives undertaken by Japanese business enterprises and international trends regarding business and human rights have rapidly evolved.

For example, according to the Third Keidanren Survey, the percentage of the business enterprises that have formulated a policy on respecting human rights - combining (i) those that have formulated their own policies and (ii) those that have applied group-wide policies - reached 91% overall, a significant increase from 65% in the Second Keidanren Survey.

⁴¹ Cabinet Secretariat, “The Inter-Ministerial Committee on Policy Promotion for the Implementation of Japan's National Action Plan on Business and Human Rights.” (https://www.cas.go.jp/jp/seisaku/business_jinken/index.html) (in Japanese)

⁴² Ministry of Foreign Affairs, Government Report on the Implementation of the Action Plan on Business and Human Rights. (https://www.mofa.go.jp/mofaj/tp/hr_ha/page24_001838.html) (in Japanese)

⁴³ Japan Business Federation (Keidanren), “Results of the Third Survey on the Charter of Corporate Behavior” (January 16, 2024). (https://www.keidanren.or.jp/policy/2024/005_kekka.pdf) (in Japanese)

⁴⁴ Keidanren, “Results of the Second Survey on the Charter of Corporate Behavior - Implementation Status of the Charter of Corporate Behavior under COVID-19” (October 13, 2020). (https://www.keidanren.or.jp/policy/2020/098_honbun.pdf) (in Japanese)

⁴⁵ “Voluntary National Review (VNR) 2025, Report on the implementation of 2030 Agenda.” (https://www.mofa.go.jp/policy/oda/sdgs/pdf/vnr2025_00_full_en.pdf)

According to the [2024 Survey on Japanese Companies' Overseas Business Expansion](#)⁴⁶ conducted by JETRO (from November to December 2024), reasons given for implementing (including planning or considering) the Human Rights DD include “recognizing respect for human rights as a corporate responsibility” and “considering the importance of sustainability management.”

Behind this growing awareness among business enterprises are not only awareness-raising activities by the Government, but also various initiatives including, for example, (i) the formulation of the “[Handbook for Management that Respects Human Rights](#)”⁴⁷ by Keidanren in January 2021; (ii) the formulation of the “[Responsible Business Conduct Guidelines](#)”⁴⁸ by the Japan Electronics and Information Technology Industries Association in March 2020 (revised in March 2023); and (iii) the development of the “[Guideline for Responsible Business Conduct for the Textile and Clothing Industry of Japan](#)”⁴⁹ by the Japan Textile Federation in July 2022.⁵⁰

However, in the same JETRO survey, while 76% of large companies responded that they had developed a human rights policy, the proportion among SMEs remained at only 32.5%. Although both figures increased compared to the previous year, there remains a significant difference depending on company size.

Internationally, as legal frameworks related to business and human rights are being established,⁵¹ particularly in the United States and Europe, the need to promote respect for human rights and comply with related regulations is further increasing for Japanese business enterprises with supply chains spanning multiple countries and regions to ensure international competitiveness. Although there are differences in the details among countries, the Human Rights DD-related laws require business enterprises, among others, (i) to conduct risk analysis and preventive measures, (ii) to conduct disclosures such as preparing and releasing human rights reports and statements, and (iii) to establish a grievance mechanism for human rights violations. In particular, the EU brought into force the “[Corporate Sustainability Reporting Directive](#)” (CSRD)⁵² in January 2023, which requires disclosure of sustainability-related information, and subsequently, the “[Corporate Sustainability Due Diligence Directive](#)” (CSDDD)⁵³ in July 2024, which mandates due diligence concerning human rights and the environment. These regulations also apply to the ultimate parent companies of non-EU business enterprises or groups that meet certain criteria regarding size or sales within the EU. In February 2025, the European Commission announced an omnibus proposal to simplify the sustainability-related due diligence and disclosure obligations, including the CSRD and CSDDD, which proposal has achieved a political consensus within the EU Council and the European Parliament and is expected to be formally approved and put into effect. In the Third Keidanren Survey, business enterprises were also asked about overseas laws and regulations to which they were currently responding or plan to respond. Among the responses, 46% cited the EU’s CSRD, 44% the UK’s “Modern Slavery Act 2015,” and 38% the EU’s CSDDD, indicating that Japanese business enterprises operating overseas are required to respond to various foreign legal frameworks.

Corporate disclosure of sustainability-related non-financial information is now actively

⁴⁶ JETRO, “FY 2024 Survey on the International Operations of Japanese Firms: JETRO Overseas Business Survey” (March 2025). (https://www.jetro.go.jp/ext_images/en/reports/survey/pdf/jafirms2024.pdf)

⁴⁷ Keidanren, “Handbook for Management that Respects Human Rights” (<https://www.keidanren.or.jp/policy/cgcb/2021handbook.pdf>) (in Japanese)

⁴⁸ Japan Electronics and Information Technology Industries Association, “Guidelines for Responsible Business Conduct – Promoting Responsible Business Conduct in Supply Chains – (Revised Edition of the “Supply Chain CSR Promotion Guidebook”).” (<https://www.jeita.or.jp/cgi-bin/public/detail.cgi?id=769&cateid=1>) (in Japanese)

⁴⁹ Japan Textile Federation, “Guideline for Responsible Business Conduct for the Textile and Clothing Industry of Japan.” (<https://jtf-net.com/>)

⁵⁰ Other initiatives are progressing among various industries: the Japan Photovoltaic Energy Association has created the “Guidance on Respecting Human Rights in the Supply Chain of the Solar Power Industry: A Practical Guide,” the Japan Department Stores Association has published the “Guide to Human Rights Due Diligence for Department Stores,” and the Japan Commercial Broadcasters Association has made the “Guidebook for Business and Human Rights in Commercial Broadcasting.”

⁵¹ Since the formulation of the Former Action Plan, the following countries have established laws regarding Human Rights DD: e.g. Norway’s “Act Relating to Enterprises’ Transparency and Work on Fundamental Human Rights and Decent Working Conditions” (effective July 2022); Germany’s “Act on Corporate Due Diligence Obligations in Supply Chains” (effective January 2023); Switzerland’s “Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour” (due diligence obligations effective January 2023); Canada’s “Fighting Against Forced Labour and Child Labour in Supply Chains Act” (effective January 2024); and the EU’s “Corporate Sustainability Due Diligence Directive” (effective July 2024).

⁵² European Commission, “Corporate sustainability reporting” (https://finance.ec.europa.eu/capital-markets-union-and-financial-markets/company-reporting-and-auditing/company-reporting/corporate-sustainability-reporting_en)

⁵³ European Commission, “Corporate sustainability due diligence” (https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence_en)

demanded by institutional investors as well. The G7 Hiroshima Leaders' Communiqué expressed support for the International Sustainability Standards Board (ISSB) in its efforts to finalize general sustainability reporting standards and achieve a disclosure framework. In Japan, the Sustainability Standards Board of Japan (SSBJ), established in 2022, advanced the development of [sustainability disclosure standards](#)⁵⁴, with participation from organizations such as Keidanren, and released the standards in March 2025. Japan needs to ensure that, through public-private collaboration, and while adapting to the various international developments in disclosure standards, Japanese business enterprises are not placed at a disadvantage.

Regarding the establishment of a grievance mechanism, business enterprises have taken measures such as setting up internal reporting channels and hotlines within the company or through third-party organizations to accept consultations not only from their own employees but also from employees and workers of business partners, community residents, customers, consumers, and others concerning human rights issues or compliance violations. Furthermore, recognizing that human rights risks present in supply chains are extensive and diverse, initiatives are being advanced beyond individual corporate efforts. These include joining platforms composed of legal experts, civil society and non-profit organizations, industry associations, and others, to broadly accept complaints from outside the company, and resolving human rights issues through dialogue based on agreements between business enterprises and labor unions.

Since Japan formulated the Former Action Plan in 2020, a total of 23 countries and regions have newly formulated or revised their own national action plans on business and human rights.⁵⁵ In particular, within the Asian region, Taiwan, Pakistan, Mongolia, Vietnam, Indonesia, Nepal, Kyrgyzstan, and Malaysia have newly formulated action plans, while Thailand has published a revised edition. In this context, the Government has been supporting the formulation and implementation of such action plans through contributions to the UNDP. The trend toward developing action plans in the Asia-Pacific region, where many Japanese business enterprises operate, is important for Japan with the objective of not only contributing to improving the human rights situation in the region, but also helping Japan contribute to respecting for human rights throughout society, including international society, and ensuring conditions for fair competition (a level playing field), thereby securing and enhancing the international competitiveness and sustainability of Japanese business enterprises.

3

Goals to Be Pursued Through the Revision and Implementation of the NAP

In the Former Action Plan, it was clearly stated that the purpose of formulating and implementing the Japan's National Action Plan on Business and Human Rights (the NAP) was to promote responsible business activities through ensuring policy consistency among relevant ministries and agencies, as well as fostering greater understanding and awareness among business enterprises regarding business and human rights, thereby contributing to the protection and promotion of human rights for society as a whole, including international society; and to enhance trust in and the reputation of Japanese business enterprises while contributing to ensuring and enhancing their international competitiveness and sustainability. Based on the idea that the achievement of the SDGs and the protection and promotion of human rights are interrelated and mutually reinforcing, the formulation of the Former Action Plan was positioned as one of Japan's efforts to achieve the SDGs and as part of the country's growth strategy (see the "[SDGs Implementation Guiding Principles Revised Edition](#)"⁵⁶ and the "[Growth Strategy 2018](#)"⁵⁷).

⁵⁴ Sustainability Standards Board of Japan: "SSBJ issues Inaugural Sustainability Disclosure Standards to be applied in Japan" (https://www.ssb-j.jp/en/ssbj_standards/2025-0305.html)

⁵⁵ As of December 2025.

⁵⁶ "SDGs Implementation Guiding Principles Revised Edition" (decided by the SDGs Promotion Headquarters on December 22, 2016, partially revised on December 20, 2019). (https://www.mofa.go.jp/mofaj/gaiko/oda/sdgs/pdf/kaitei_2019_en.pdf)

⁵⁷ Cabinet Secretariat General Bureau for Japan's Economic Revitalization, "Future Investment Strategy 2018" (June 2018). (https://www.cas.go.jp/jp/seisaku/seicho/pdf/miraitousi2018_pr.pdf) (in Japanese)

In addition, the “[SDGs Implementation Guiding Principles](#)”⁵⁸ revised in December 2023 state that efforts related to “business and human rights,” responsible supply chains, and corporate social responsibility are essential for contributing to the creation of a sustainable economy, society, and environment as targeted by the SDGs, and that such efforts are important for each business enterprise to enhance the trust from the international community and gain favorable recognition from global investors.

In the New Action Plan, the purpose and positioning of the Former Action Plan remain unchanged. When implementing the New Action Plan, it is important to position efforts by business enterprises to respect human rights based on the UNGPs also as actions that can contribute to the sustainable and stable growth of business enterprises. Business enterprises that continue to fulfill their responsibility to respect human rights not only contribute to the realization of a fair and sustainable economy and society, but are also able to maintain and gain public trust, as well as maintain and enhance their corporate value. This consequently serves to establish a virtuous cycle that promotes greater respect for human rights throughout society and further advances business.

For that reason, the protection of human rights is the duty of the state, and it is necessary for the Government to take consistent and appropriate measures, to enhance the resilience, predictability, and certainty of business for Japanese business enterprises. Based on the status of Japanese business enterprises’ initiatives regarding business and human rights and international trends as outlined in Section 2 above, efforts will be undertaken, including awareness-raising and promotion to encourage further initiatives by Japanese business enterprises, including SMEs. While business enterprises are expected to advance initiatives as much as possible regarding structural issues, such as social problems that are difficult for individual companies to resolve, the Government will also cooperate with governments of other countries and international organizations to strive for solutions to structural issues at the societal level. It is also important for Japan to strive to ensure a level playing field so that Japanese business enterprises advancing pioneering initiatives receive proper recognition, while working to improve the human rights situation in the international community by promoting respect for human rights along the supply chains extending to other countries.

Taking these factors into account, and following on from the Former Action Plan, the formulation and implementation of the New Action Plan aim to achieve the following four points:

Goals to be pursued through the formulation and implementation of the New Action Plan

- (1) To protect and promote human rights for society as a whole, including international society;
- (2) To ensure policy coherence in relation to business and human rights;
- (3) To ensure and enhance the international competitiveness and sustainability of Japanese business enterprises; and
- (4) To contribute to achieving the SDGs.

4 The NAP Revision Process

Under the Former Action Plan, relevant ministries and agencies conducted annual reviews of related measures, and following discussions at the [Roundtable for Promoting the NAP and the Working Group for Promoting the NAP](#)(the Roundtable and the Working Group)⁵⁹, the status of implementation was reported to the Committee. In April 2024, in accordance with Chapter 4, Section 5 of the Former Action Plan, the Committee held discussions on relevant international trends and the current status of efforts by Japanese companies (the third-year exchange of opinions). These discussions served to confirm the progress made to date and share challenges

⁵⁸ Sustainable Development Goals (SDGs) Implementation Guiding Principles (Revised Edition) (decided by the SDGs Promotion Headquarters on December 19, 2023). (https://www.mofa.go.jp/mofaj/gaiko/oda/sdgs/pdf/kaitei_2023_en.pdf)

⁵⁹ Ministry of Foreign Affairs, “Towards formulating the National Action Plan on ‘Business and Human Rights’.” (https://www.mofa.go.jp/mofaj/fp/hr_ha/page23_003546.html) (in Japanese)

for Japan in advancing its future efforts.

Prior to the third-year exchange of opinions, in March of the same year, the Roundtable and the Working Group compiled the "[Stakeholder Report on the Review of the Third Year of the NAP for the Exchange of Views on 'Business and Human Rights'](#)" (the Stakeholder Report)⁶⁰, which summarized stakeholders' opinions including 23 proposals consisting of seven items. In addition, from July 24 to August 4, 2023, the Working Group on Business and Human Rights visited Japan, and on May 28, 2024, released its [final report](#)⁶¹, which included recommendations regarding the revision of the NAP.

At the Committee in May 2024, approval was granted to embark on the revision of the Former Action Plan, and the draft outline of the New Action Plan was, following consultation at the Roundtable and the Working Group, approved by the Committee in December of the same year. The draft of the New Action Plan was prepared, taking into account the various issues addressed in the Stakeholder Report and other materials as well as subsequent discussions, and was approved by the Committee in May 2025. Regarding this draft, opinions were exchanged at the Roundtable and the Working Group in July 2025, where various proposals were made, ranging from the implementation framework of the New Action Plan to themes within each priority area, and written opinions and recommendations were submitted. These opinions were reflected in the draft based on considerations by relevant ministries and agencies. Furthermore, the content was further enhanced following a public comment period in October of the same year, and on December 24, 2025, the New Action Plan was approved by the Committee.

5

Identification of Priority Areas

In the Former Action Plan, related initiatives were classified and organized from three perspectives, in accordance with the three pillars of the UNGPs: "the State duty to protect human rights," "the corporate responsibility to respect human rights," and "access to remedy."

The New Action Plan, while maintaining the three pillars of the UNGPs, clearly indicates the priority areas Japan should focus on by seeking to clarify the challenges Japan must address and the direction it should pursue in a way that is easily understood both domestically and internationally, and by reframing from the perspective of more effective implementation of the NAP the conventional measures taken by relevant ministries and agencies, traditionally approached by individual policy areas as isolated points or areas, so as to treat these measures in a more cross-cutting and comprehensive manner from the perspective of business and human rights.

The priority areas set out in Chapter 2 of the New Action Plan do not necessarily represent the entirety of business and human rights issues in Japan, nor do they exclude those who possess human rights (rights holders) that are not mentioned in Chapter 2, Section 2: "Promotion of Policies to Ensure 'No One Will be Left Behind'" from measures for human rights protection. Currently, some relevant ministries and agencies are implementing or considering various measures that contribute to achieving goals that Japan aims to pursue through its business and human rights initiatives moving forward. In the New Action Plan, by organizing the relationship between the measures administered by various ministries and agencies and the business and human rights, Japan will be able to clearly demonstrate both domestically and internationally which areas it intends to focus on and how it plans to address the various challenges surrounding business and human rights.

Based on this approach, the New Action Plan identifies the following eight priority areas. For each area, it sets out the Government's initiatives and recognition of the issues, as well as the

⁶⁰ Stakeholder Report on the Review of the Third Year of the NAP for the Exchange of Views on 'Business and Human Rights'. (<https://www.mofa.go.jp/mofaj/files/100660230.pdf>) (in Japanese)

⁶¹ Working Group on the issue of human rights and transnational corporations and other business enterprises, "Visit to Japan – Report of the Working Group on the issue of human rights and transnational corporations and other business enterprises," A/HRC/56/55/Add.1 (1 May 2024). (<https://docs.un.org/en/A/HRC/56/55/Add.1>)

Note: The Government's comments are published as an annex to the visit report (Comments by the State, A./HRC/56/55/Add.2 (28 May 2024)).

direction of measures and examples of specific initiatives.

- 1 Human Rights Due Diligence and Supply Chains
- 2 Promotion of Policies to Ensure That “No One Will be Left Behind”
- 3 Thematic Human Rights Issues
- 4 Promotion of the Implementation of the UNGPs
- 5 Corporate Information Disclosure
- 6 Public Contracts Including Public Procurement and Subsidized Projects, Etc.
- 7 Access to Remedy
- 8 Implementation and Establishment of Monitoring System



(1) Recognition of Issues and Measures Taken

As outlined in Chapter 1, the recognition and implementation of Human Rights DD is increasing, particularly among large companies, but there remains the challenge of further promoting both practical initiatives to address human rights risks in supply chains and understanding among SMEs, which make up the majority of domestic businesses in Japan, along with large companies.⁶² Within business enterprises, attention and awareness are increasingly focused on human rights risks in their own, their group companies', and business partners' workplaces, such as occupational safety and health, excessive working hours, harassment, and discrimination. Awareness of the problems is also growing, such as human rights risks faced by rights holders among socially vulnerable groups, including foreign workers, women, LGBTQ individuals, persons with disabilities, and non-regular workers.⁶³

Furthermore, among Japanese business enterprises operating overseas and those engaged in business with foreign partners, there is an urgent need to respond to legal systems in the United States and Europe that require the implementation of Human Rights DD and mandatory information disclosure.⁶⁴ Business enterprises that have insufficient measures to respect human rights may face consequences such as suspension of transactions or exclusion from investment opportunities. While some business enterprises have begun exchanging information and engaging in dialogue with stakeholders, further efforts to promote meaningful engagement with stakeholders are expected.

Moreover, in regions affected by armed conflicts or by widespread violence or serious harm caused by criminal groups, stakeholders are likely to suffer severe adverse impacts on their human rights. Business enterprises may inadvertently become involved in conflicts simply by conducting business as usual in these regions. Special consideration is necessary even when withdrawing from these regions. Due to these circumstances, Japanese business enterprises operating in areas affected by conflicts are required to implement Human Rights DD that is commensurate with the high risks involved (heightened Human Rights DD).

In order for Japanese business enterprises to strengthen respect for human rights throughout their global supply chains, they are increasingly required to implement measures for local workers employed by their overseas suppliers, in addition to their own or their local subsidiaries' initiatives, to ensure compliance with international standards as well as with local laws. To ensure that Japanese business enterprises who have implemented robust human rights protection measures are properly recognized, it is necessary to secure a level playing field by supporting host country governments in their efforts to further protect and promote human rights.

In this respect, to enhance predictability and transparency for business enterprises and their supply chains when making investments or conducting business, Japan engages in dialogue and cooperation with other countries through platforms such as the G7 and OECD. By utilizing ODA and working with relevant ministries and agencies, Japan also provides legal technical assistance to countries where Japanese business enterprises operate, including drafting and amending laws that guarantee human rights under the rule of law and form the foundation for free economic activities, strengthening the functions and improving the practices of legal organizations, conducting capacity-building of legal professionals, and improving access to

⁶² According to the Third Keidanren Survey (p. 21), among companies with 499 or fewer employees, approximately 70% either "have not yet begun initiatives" or "do not understand the details."

⁶³ The Third Keidanren Survey, pp. 28-29.

⁶⁴ Stakeholder Report, p. 35.

justice, as well as technical cooperation on business and human rights.⁶⁵

Regarding development cooperation and development finance, the “[Development Cooperation Charter](#)”⁶⁶ revised in 2023 positions human security as a guiding principle underlying all of Japan’s development cooperation and outlines a policy of conducting human-centered development cooperation. Furthermore, to ensure the appropriateness of development cooperation, adequate attention is given to the situation surrounding the protection of basic human rights in recipient countries. At the same time, Japan implements development cooperation with through consideration for ensuring fairness, aiming to promote diverse and inclusive societies where all people, including those in socially vulnerable positions, can participate in and benefit from development. The Japan International Cooperation Agency (JICA), the Japan Bank for International Cooperation (JBIC), and Nippon Export and Investment Insurance (NEXI) have formulated their respective guidelines for environmental and social considerations,⁶⁷ implemented necessary information disclosure based on these guidelines, and introduced relevant objection procedures, which ensure appropriate consideration not only for impacts on human health and safety and the natural environment, but also for societal impacts, including respect for human rights. In 2022, reflecting progress in discussions within the international framework on environmental and social considerations and human rights, these guidelines and objection procedures were revised, and efforts were undertaken to ensure their effective implementation. In accordance with these guidelines, JICA implements cooperation projects while respecting internationally recognized human rights standards and environmental and social considerations, as well as complying with laws and standards in the host countries. JBIC and NEXI have clarified that the environmental and social considerations required by these guidelines for relevant projects include measures to respect human rights. When deemed necessary to ensure that borrowers and project operators implement environmental and social considerations, JBIC and NEXI take actions such as leveraging loan agreements and attaching environmental and social consideration conditions to insurance contracts. In 2023, JBIC established and released its human rights policy, demonstrating its organizational commitment to respecting human rights.

In addition, as part of efforts related to Human Rights DD, in the labor sector, under the “[ILO Declaration on Fundamental Principles and Rights at Work](#)” (ILO Declaration)⁶⁸, the Government has worked on labor policies to respect, promote, and realize the five principles concerning fundamental rights ((i) freedom of association and the effective recognition of the right to collective bargaining; (ii) the elimination of all forms of forced or compulsory labor; (iii) the effective abolition of child labor; (iv) the elimination of discrimination in respect of employment and occupation; and (v) a safe and healthy working environment) and has strived to promote decent work. In recent years, Japan ratified the ILO “[Convention Concerning the Abolition of Forced Labour \(No. 105\)](#)”⁶⁹ in July 2022, and in May 2025, the Diet approved the conclusion of the ILO “[Convention Concerning Occupational Safety and Health and the Working Environment \(No. 155\)](#)”⁷⁰.

The Government will continue to accurately identify the needs of business enterprises, engage in dialogue with various stakeholders, and discuss policies to create an environment that enables business enterprises to promote respect for human rights.

⁶⁵ At the Research and Training Institute of Ministry of Justice, under the framework of legal system development support, the joint research project on business and human rights for young leaders from Japan and ASEAN countries was conducted every year (from August to September 2024, August 2025) (<https://www.moj.go.jp/KANBOU/KOHOSHI/no87/8.html>) (in Japanese). An example of JICA’s international technical is “Project for Mainstreaming Child Protection through Child Labour Free Zones” (<https://www.jica.go.jp/oda/project/202109061/index.html>) (in Japanese).

⁶⁶ Development Cooperation Charter (Cabinet Decision, June 9, 2023) (<https://www.mofa.go.jp/files/100514705.pdf>)

⁶⁷ JICA, “Guidelines for Environmental and Social Considerations” (https://www.jica.go.jp/about/policy/environment/guideline/_icsFiles/afiedfile/2023/12/25/kankyoEN.pdf);

JBIC, “Guidelines for Confirmation of Environmental and Social Considerations” (https://www.jbic.go.jp/en/business-areas/environment/image/Environmental_Guidelines_2022.pdf);

NEXI, “Guidelines on Environmental and Social Considerations in Trade Insurance” (https://www.nexi.go.jp/en/environment/pdf/ins_kankyou_gl-e.pdf).

⁶⁸ ILO, “ILO Declaration on Fundamental Principles and Rights at Work” (<https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work/about-declaration>)

⁶⁹ Ministry of Foreign Affairs, “Convention Concerning the Abolition of Forced Labour (No. 105)” (https://www.mofa.go.jp/mofaj/ila/st/page22_003829.html)

⁷⁰ Ministry of Foreign Affairs, “Convention Concerning Occupational Safety and Health and the Working Environment (No. 155)” (https://www.mofa.go.jp/mofaj/ila/st/pagew_000001_00013.html)

(2) Directions of Measures and Examples of Specific Initiatives

- (i) Continue dialogue with multi-stakeholders regarding information provision and support measures that promote business enterprises' efforts to respect human rights within supply chains.
 - Continue the Roundtable and the Working Group. [Ministry of Foreign Affairs, All Ministries] (3, 8; refers to the number of the relevant UNGPs; the same applies hereinafter.)
 - Consider opportunities for identifying issues and discussing appropriate measures on a theme-by-theme basis. [All Ministries] (3, 8)
- (ii) Ensure that independent administrative agencies and other entities undertake initiatives to respect human rights in accordance with the UNGPs.
 - Consider promoting initiatives for respect for human rights in accordance with the UNGPs and the Guidelines within each organization, including encouragement of formulating human rights policies, disclosing information in business reports, and reporting on initiatives. [All Ministries] (4, 8)
 - In the fields of development cooperation and development finance, carry out effective implementation and necessary revision of the respective guidelines for environmental and social considerations formulated by JICA, JBIC, and NEXI. [Ministry of Foreign Affairs, Ministry of Finance, Ministry of Economy, Trade and Industry] (4, 8)
- (iii) Promote the implementation of the UNGPs through dialogue and collaboration with foreign countries.
 - Contribute to the progress in international initiatives, including support for the dissemination and formulation of national action plans on business and human rights by foreign governments through contributions to international organizations and forums. [Ministry of Foreign Affairs] (1, 2, 8, 10)
 - Engage in dialogues on business and human rights with foreign governments (including regional level such as Southeast Asian countries), businesses, and civil society. [Ministry of Foreign Affairs, Ministry of Health, Labour and Welfare, Ministry of Economy, Trade and Industry] (1, 8, 10)
 - Under the framework for legal technical assistance, conduct training for developing country governments on related policies, and implement joint study and symposiums to study and share issues faced by governments, businesses, and other entities, particularly in Asian countries and other countries, as well as good practices. [Ministry of Justice, Ministry of Foreign Affairs] (1, 8, 10)
- (iv) Continue efforts to conclude and implement economic partnership agreements (EPA/FTA) and investment agreements that benefit not only industries but also a wide range of people, including workers. [Ministry of Foreign Affairs, Ministry of Finance, Ministry of Agriculture, Forestry and Fisheries, Ministry of Economy, Trade and Industry] (9, 10)
- (v) Continue efforts to realize decent work, including the promotion of labor policies which respect, promote, and realize the fundamental rights principles set forth in the ILO Declaration.
 - Continue efforts to pursue ratification of ILO fundamental conventions and other unratified ILO conventions that the Government has deemed appropriate to ratify, effectively implement ratified ILO conventions within national laws and practices, and cooperate internationally through the ILO contributing to the compliance with, promotion of, and improvement of labor standards in developing countries. [Ministry of Foreign Affairs, Ministry of Health, Labour and Welfare] (1, 2, 3, 8)
 - Continue to promote measures to ensure that workplaces are free of harassment in accordance with the "[Act on Comprehensively Advancing Labor Measures, and Stabilizing the Employment of Workers, and Enriching Workers' Vocational Lives](#)" (Act No. 132 of 1966)⁷¹. [Ministry of Health, Labour and Welfare] (1,3,8)

⁷¹ Act on Comprehensively Advancing Labor Measures, and Stabilizing the Employment of Workers, and Enriching Workers' Vocational Lives (Act No. 132 of 1966) (<https://laws.e-gov.go.jp/law/341AC0000000132>) (in Japanese)

- (vi) Improve trading conditions and business practices for SMEs and other entities.⁷² [Ministry of Economy, Trade and Industry, Japan Fair Trade Commission] (1,3)

2

Promotion of Policies to Ensure That “No One Will be Left Behind”

(1) Gender Equality

A. Recognition of Issues and Measures Taken

In order to realize the protection of human rights in corporate activities, it is important to promote efforts toward gender equality, including measures that support sexual minorities.

There is an urgent need to address discrimination and violence based on gender. Companies are recognizing gender-related issues primarily as important risks in the context of discrimination and workplace harassment against women and sexual minorities.⁷³ In fact, the number of consultations about harassment is significant.⁷⁴ Social interest in the impact of sexual violence associated with corporate activities is also increasing. The Government is strengthening efforts such as promoting awareness and education throughout society, including corporate entities, to address sexual crimes and sexual violence;⁷⁵ and requiring employers to implement measures to prevent sexual harassment in the workplace.⁷⁶ Furthermore, in June 2023, the “[Act on the Promotion of Public Understanding of the Diversity of Sexual Orientation and Gender Identity](#)” (Act No. 68 of 2023)⁷⁷ was enacted, which promotes public understanding of the diversity of sexual orientation and gender identity.

In addition, although momentum is steadily increasing to promote female participation in Japan, disparities remain among companies regarding the appointment of women, and among regions regarding efforts to encourage female participation.⁷⁸ Regarding gender disparities in the workplace, the Government has implemented measures such as formulating General Employer Action Plans based on the Act on the Promotion of Women’s Active Engagement in Professional Life, promoting the disclosure of relevant information, and certifying outstanding employers.⁷⁹ Furthermore, the Government is taking steps to encourage men to take childcare leave,⁸⁰ along with other policies that consider the realities of workplace environments. As a result, the number of employed women, the proportion of female managers, and the ratio of women in executive positions have all shown an upward trend. However, challenges remain, including persistent traditional gender role attitudes, wage gaps between men and women, the large number of women in non-regular employment, and the disproportionate burden of housework, parenting, and caregiving on women. It is essential to continue efforts to address these challenges, as well as to advance gender mainstreaming by incorporating gender

⁷² Examples include the Act against Delay in Payment of Subcontract Proceeds, Etc. to Subcontractors (Act No. 120 of 1956; “Subcontract Act”) (<https://laws.e-gov.go.jp/law/331AC0000000120/>) (in Japanese), and the Act on Ensuring Proper Transactions Involving Specified Entrusted Business Operators (Act No. 25 of 2023; “Freelance Act”) (<https://www.japaneselawtranslation.go.jp/en/laws/view/4795>), which require fair pricing in transaction relations. Pursuant to the Act to amend the Subcontract Act and the Act on the Promotion of Subcontracting Small and Medium-sized Enterprises (Act No. 41 of 2025), the official title of the Subcontract Act will be changed to the “Act Against Delay in Payment of Fees, etc. to Small and Medium-sized Entrusted Business Operators in Manufacturing and Other Specified Fields.” (The Act on Proper Transactions with Small and Medium-Sized Entrusted Business Operators, commonly known as the “SME Transactions Act”), effective January 1, 2026.

⁷³ The Third Keidanren Survey, p. 28.

⁷⁴ According to Ministry of Health, Labour and Welfare’s report, “Status of Enforcement of Employment Equality-Related Laws by the Employment Environment and Equality Division FY2024” (p. 4), the number of consultations regarding sexual harassment received by Labour Bureaus exceeded 7,700 cases in FY2023 (<https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/0000167772.html>) (in Japanese).

⁷⁵ Gender Equality Bureau Cabinet Office, “Elimination of Violence Against Women” (https://www.gender.go.jp/policy/no_violence/index.html) (in Japanese)

⁷⁶ Ministry of Health, Labour and Welfare, “Preventing Harassment in the Workplace (Sexual Harassment / Harassment Related to Pregnancy, Childbirth, Childcare Leave, Etc. / Power Harassment).” (https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/koyou_roudou/koyoukintou/seisaku06/index.html) (in Japanese)

⁷⁷ Act on Promotion of Public Understanding of the Diversity of Sexual Orientation and Gender Identity (Act No. 68 of 2023). (<https://www.japaneselawtranslation.go.jp/en/laws/view/4835>)

⁷⁸ Gender Equality Bureau, Cabinet Office, “*Kyōdō Sankaku*” (Comprehensive Monthly Information Magazine), July 2024 issue, p. 2 (July 10, 2024).

⁷⁹ Ministry of Health, Labour and Welfare, “Special Page on the Act on Promotion of Female Participation and Career Advancement in the Workplace (Eruboshi Certification & Platinum Eruboshi Certification)” (<https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/0000091025.html>) (in Japanese); Ministry of Economy, Trade and Industry, “Selection of Listed Companies Excelling in Promoting Female Participation (“Nadeshiko Brand”)” (https://www.meti.go.jp/english/policy/economy/human_resources/index.html#nadeshiko).

⁸⁰ Ministry of Health, Labour and Welfare, “Ikumen Project” (<https://ikumen-project.mhlw.go.jp/>) (in Japanese).

perspectives into all policies. Considering the initiatives and issues mentioned above, creating an environment where all individuals, including sexual minorities and those from diverse backgrounds, can choose different lifestyles and work styles according to their life stages will contribute to realizing a sustainable and competitive Japanese society.

B. Directions of Measures and Examples of Specific Initiatives

- (i) Implement the design, operation, and review of systems from a human rights-protecting perspective with a view to giving consideration to the circumstances of rights holders in socially vulnerable positions and to ensuring that “no one will be left behind.”
 - Implement initiatives to eliminate gender-based discrimination, violence, and harassment in corporate activities, as well as to provide support and remedy for victims.⁸¹ [Cabinet Office, National Police Agency, Financial Services Agency, Ministry of Internal Affairs and Communications, Ministry of Justice, Ministry of Health, Labour and Welfare, Ministry of Economy, Trade and Industry] (1, 3, 8, 25, 27, 29)
 - Implement and review of various systems impacting female employees’ workplace environments, such as maternity and childcare leave systems (for both mothers and fathers), support for balancing work and caregiving responsibilities,⁸² and assistance for non-regular workers. [Ministry of Health, Labour and Welfare] (1, 3, 8)
 - Raise awareness of unpaid work, such as housework, childcare, and caregiving, and encourage equitable sharing of these responsibilities. [Cabinet Office, Ministry of Health, Labour and Welfare] (1, 3, 8)
- (ii) Provide information and good practices obtained through gender-equality initiatives to help companies identify human rights risks and promote efforts to respect human rights.
 - Provide compilations of case studies and other resources on measures to create workplace environments where diverse human resources can thrive.⁸³ [Ministry of Health, Labour and Welfare] (3)
- (iii) Implement initiatives to overcome business and human rights challenges related to gender equality.
 - Implement initiatives to promote female participation and advancement in the field of employment.⁸⁴ [Cabinet Office, Ministry of Health, Labour and Welfare] (1, 3, 8)
 - Implement initiatives to promote female participation in the decision-making level.⁸⁵ [Cabinet Office] (1, 3, 8)
 - Implement initiatives to avoid persistent gender disparities in employment numbers across industries and to promote female participation and advancement in various fields, regardless of business type. [Cabinet Office, Ministry of Education, Culture, Sports, Science and Technology, Ministry of Economy, Trade and Industry, Ministry of Land, Infrastructure, Transport and Tourism, Ministry of Agriculture, Forestry and Fisheries] (1, 3, 8)
 - Implement initiatives to realize diverse work styles that allow individuals to choose working arrangements according to the age of their children.⁸⁶ [Ministry of Health, Labour and Welfare] (1, 3, 8)
 - Proceed with the discussion on specific systems concerning the surnames of married couples, with a close eye on the opinions of various citizen groups and discussions

⁸¹ Headquarters for Creating a Society in which All Women Shine and Headquarters for the Promotion of Gender Equality, “Priority Policy for Women’s Empowerment and Gender Equality 2025 (Women’s Version of the Basic Policy 2025)” (June 10, 2025) (https://www.gender.go.jp/policy/sokushin/pdf/sokushin/jyuten2025_honbun.pdf) (in Japanese).

⁸² With the enactment of the revised Childcare and Family Care Leave Act in 2024, support systems for balancing work and caregiving responsibilities to prevent job resignations due to caregiving responsibilities will be strengthened (these measures will be implemented sequentially beginning in April 2025).

⁸³ For example, Ministry of Health, Labour and Welfare, “Creating Workplace Environments Where Diverse Human Resources Can Flourish – Introduction of Corporate Initiatives Related to Sexual Minorities” (<https://www.mhlw.go.jp/content/000808159.pdf>) (in Japanese).

⁸⁴ See: Study Group on Promoting Female Participation and Career Advancement in the Field of Employment, Report of the Study Group on Promoting Participation and Career Advancement in the Field of Employment, “Toward Creating Work Environments Where All Workers, including Women, Can Flourish with Peace of Mind” (August 8, 2024) (<https://www.mhlw.go.jp/content/11909500/001285696.pdf>) (in Japanese).

⁸⁵ Women’s Version of the Basic Policy 2025, pp. 5, 22.

⁸⁶ With the enactment of the revised Childcare and Family Care Leave Act in 2024, measures to enable employees to adopt more flexible working styles according to the age of their children were expanded (these measures will be implemented sequentially beginning in April 2025).

- taking place in the Diet, and based on the judicial rulings.⁸⁷ [Ministry of Justice] (1, 8)
- Expand the use of maiden names as aliases and implement initiatives to promote public awareness of this practice.⁸⁸ [Relevant Ministries and Agencies] (1, 3, 8)
 - Award additional points to business enterprises with certification under the Act on the Promotion of Women's Active Engagement in Professional Life and other laws upon public procurement. [Cabinet Office, Ministry of Health, Labour and Welfare] (1, 3, 6)
 - Collect information on measures that prevent the entrenchment of rigid gender role perceptions, as well as examine awareness-raising methods and disseminate information. [Cabinet Office] (3)

(2) Foreign Workers

A. Recognition of Issues and Measures Taken

In order for foreign workers to work with peace of mind in Japan and to thrive as members of companies and local communities, the Government aims to realize a diverse and vibrant society of harmonious coexistence where Japanese and foreign nationals mutually respect and can live safely and comfortably.⁸⁹ In this context, four mid- to long-term priority areas have been identified: (i) Japanese language education and other initiatives for smooth communication and social participation; (ii) Providing information to foreign national and strengthening consultation systems for foreign national; (iii) Support according to life stage and life cycle; and (iv) Initiatives to build the foundations for a symbiotic society. Advancing such measures and enabling foreign nationals to work actively in Japan while advancing their careers will make Japan an attractive country to work by. This is also an important aspect of enhancing Japan's international competitiveness.⁹⁰

Specifically, in addition to establishing attractive workplace environments through ensuring that employers comply with relevant laws and regulations and provide appropriate treatment and working conditions, and fostering mutual understanding with Japanese employees, it is crucial to consistently implement measures to provide appropriate support for foreign nationals in their professional, daily, and social lives.⁹¹ In practice, regarding the acceptance and retention of foreign care workers, there are cases in which local governments conclude agreements with overseas counterparts to carry out measures tailored to local circumstances, and cases in which private businesses provide pre-entry training to improve Japanese-language communication skills. These examples demonstrate that creative and innovative measures are also being advanced.

The Employment-for-Skill-Development Program, which is scheduled to begin operation in April 2027, aims to clarify career advancement pathways for foreign nationals by enhancing continuity with the Specified Skilled Worker System. This program will enable many foreign nationals to develop skills and allow industries to recruit individuals who can provide long-term contribution. In addition, to ensure the proper implementation of the program and to protect Skill Development Employees, strict criteria have been established for authorizing Supervising and Support Organizations to provide management support services. Furthermore, transfers of workplace based on the employees' own wishes are planned to be permitted under certain conditions, which have not been an option under the Technical Intern Training Program.

While the presence of foreign residents from overseas contributes to a stable labor force supply and regional revitalization, realizing a society of harmonious coexistence with foreign workers requires addressing various issues, such as differences in religion, lifestyle customs, and work culture; strengthening the foundations of residency management; multilingual administrative services; taxation and social security; family reunification; children's education;

⁸⁷ Women's Version of the Basic Policy 2025, p. 40

⁸⁸ Women's Version of the Basic Policy 2025, p. 40

⁸⁹ Ministerial Conference on Acceptance and Coexistence of Foreign Nationals, "Roadmap for Realizing a Society of Harmonious Coexistence with Foreign Nationals" (partially revised on June 6, 2025) (<https://www.moj.go.jp/isa/content/001447751.pdf>)

⁹⁰ Ministerial Conference on Acceptance and Coexistence of Foreign Nationals, "Comprehensive Measures for Acceptance and Coexistence of Foreign Nationals" (revised in FY2025) (June 6, 2025), p. 2 (<https://www.moj.go.jp/isa/content/001449496.pdf>)

⁹¹ Ministry of Health, Labour and Welfare, "Guidelines for employers to properly deal with improvement of employment management, etc. for foreign workers" (Public Notice of Ministry of Health, Labour and Welfare No. 276 of 2007) (<https://www.mhlw.go.jp/content/000601382.pdf>) (in Japanese).

and mutual understanding among local residents.⁹²

As described above, it is an important step toward achieving decent work that foreign nationals will be able to live and work securely, and improve their skills and expertise through appropriate employment by each company and acceptance by local communities. In addition to addressing issues common to Japanese workers, such as long working hours and harassments, it is important to tackle issues affecting employers, workers, and the broader local community, as well as issues faced by foreign nationals who find it difficult to speak up about human rights violations due to language and cultural barriers, disparities in access to information, and other similar factors. Comprehensive resolution of these issues can improve overall productivity and economic growth, and foster a society of harmonious coexistence between Japanese and foreign nationals.

B. Directions of Measures and Examples of Specific Initiatives

- (i) Implement the design, operation, and review of systems from a human rights-protecting perspective with a view to giving consideration to the circumstances of rights holders in socially vulnerable positions and to ensuring that “no one will be left behind.”
 - Provide multilingual support for consultations from foreign nationals seeking advice or assistance with their concerns.⁹³ [Ministry of Justice, Ministry of Foreign Affairs of Japan, Ministry of Health, Labour and Welfare] (1, 3, 5, 8, 25, 27, 31)
 - Provide support for business matching and the employment of foreign nationals in various industries.⁹⁴ [Ministry of Health, Labour and Welfare, Ministry of Agriculture, Forestry and Fisheries, Ministry of Land, Infrastructure, Transport and Tourism] (1, 3, 5, 8)
 - Strengthen the collaboration between the Japan Legal Support Center (The JLSC) and organizations that support foreign nationals.⁹⁵ [Ministry of Justice] (1, 3, 5, 8, 25, 26, 31)
 - Support for policies of acceptance and coexistence of foreign nationals by local governments. [Ministry of Justice] (1, 8)
 - Implement training for employers and other relevant parties who hire foreign workers, aimed at imparting knowledge on employment and labor-management practices for foreign workers. [Ministry of Health, Labour and Welfare] (1, 3)
- (ii) Provide information and good practices obtained through initiatives for foreign workers to help companies identify human rights risks and to promote efforts to respect human rights.
 - Conduct surveys and analyses of working conditions for foreign nationals. [Ministry of Health, Labour and Welfare] (3)
 - Develop and disseminate methods and case studies on accepting foreign nationals and improving their workplace environments.⁹⁶ [Ministry of Health, Labour and Welfare, Ministry of Agriculture, Forestry and Fisheries, Ministry of Economy, Trade and Industry, Ministry of Land, Infrastructure, Transport and Tourism] (3)
- (iii) Implement steady legal reforms to address issues related to the Technical Intern Training Program.
 - Revise the Technical Intern Training Program and implement the Employment for Skill Development Program.⁹⁷ [Ministry of Justice, Ministry of Health, Labour and Welfare] (1, 3, 5, 8)

⁹² See: Ministerial Conference on Acceptance and Coexistence of Foreign Nationals, “Comprehensive Measures for Acceptance and Coexistence of Foreign Nationals” (revised in FY2024); and Ministry of Justice, “5th Basic Plan for Immigration Control” (September 2015). (<https://www.moj.go.jp/isa/content/930003136.pdf>) (in Japanese)

⁹³ Japan Platform for Foreign Workers towards Responsible and Inclusive Society (JP-MIRAI) is a support platform for foreign workers. It has the membership of 750 organizations and individuals. JP-MIRAI provides information, protects human rights, provides consultation services, and operates “JP-MIRAI Portal” in 23 languages that offers daily life information and JP-MIRAI Assist” for individual consultation. JP-MIRAI also supports ethical recruitment practices for foreign workers and promotes improvements in their working environments (<https://jp-mirai.org/?lang=en>).

⁹⁴ Immigration Services Agency, “Roadmap for the Realization of a Society of Harmonious Coexistence with Foreign Nationals” (Established on June 14, 2022; Partially amended on June 9, 2023 and June 21, 2024). (https://www.moj.go.jp/isa/support/coexistence/04_00033.html?h=en)

⁹⁵ Japan Legal Support Center (The JLSC), “Case Studies of Collaboration Between Foreign Supporters/Support Organizations and the JLSC.” (<https://www.houterasu.or.jp/site/jichitaifukushi/gaikokujin-renkei.html>) (in Japanese)

⁹⁶ Ministerial Conference on Acceptance and Coexistence of Foreign Nationals, “Roadmap for Realizing a Society of Harmonious Coexistence with Foreign Nationals” (Established on June 14, 2022; Partially amended on June 9, 2023 and June 21, 2024), pp. 29 and 30. (<https://www.moj.go.jp/isa/content/001447751.pdf>)

⁹⁷ Ministry of Justice, “Overview of the Revised Act (Establishment of the Employment-for-Skill-Development Program, etc.)” (<https://www.moj.go.jp/isa/content/001415280.pdf>) (in Japanese)

(3) Children and Young People

A. Recognition of Issues and Measures Taken

The intersections between business and children’s human rights extend far beyond the issue of child labor. Based on the Convention on the Rights of the Child, the “[Children’s Rights and Business Principles](#),”⁹⁸ which complement the UNGPs, state that children and young people should be respected as subjects of human rights; that they are consumers, economic actors, and important members of the local communities; and that they are important stakeholders who will shape future generations. The principles also highlight the diversity of ways in which business affects children. This includes the impact of their overall business operations – such as their products and services and their marketing and sales practices. Therefore, it is important for businesses to not only strive to protect the human rights of children and young people, but also actively support the entire environment surrounding them—including their families, educational institutions, and local communities—so as to prevent any negative impacts on their rights and promote their healthy development through concrete measures.

To date, the Government has taken various measures to protect the human rights of children and young people. In addition, measures taken by Japanese internet-related businesses, such as the blocking of child abuse materials online, have received international recognition.⁹⁹ However, with the increasing digitization of society and the growing number of young internet users, it is necessary to clearly recognize and address emerging business and human rights issues facing children and young people today, such as excessive commercial exploitation through corporate marketing activities, breaches of online personal data and access to harmful online content, and unfair working conditions in part-time employment. In addition, measures to address sexual crimes and sexual violence against children and young people are becoming increasingly important.

The Children and Families Agency, established in April 2023, centrally promotes policies that affect children in accordance with the “[Basic Act on Children’s Policy](#)” (Act No. 77 of 2022)¹⁰⁰ and the “[General Principles for Child-Related Measures](#),”¹⁰¹ which set forth core policies such as “to recognize children and young people as independent actors holding rights” and “to seek their best interests.” The “[Action Plan for Achieving a Children-Centered Society](#),”¹⁰² which outlines specific initiatives in accordance with the General Principles for Child-Related Measures, includes the following concrete initiatives: creating an environment in which children can safely and securely use the Internet; measures to prevent sexual violence against children and young people; ending violence against children; supporting the employment of young people; assisting people taking care of children, such as by promoting dual-income and co-parenting models; and supporting single-parent families. Furthermore, the Government has also committed to promoting and protecting children’s rights based on the NAP.

In June 2024, the “[Act on Measures for the Prevention of Sexual Violence Against Children by School Operators and Private Education and Childcare Providers](#)” (Act No. 69 of 2024; Prevention of Sexual Violence against Children Act)¹⁰³ was enacted. In addition, the “[Children’s Rights Hotline](#)”¹⁰⁴ has been established to provide consultation services for cases of human rights violations or potential violations. The Hotline offers support to both children and their guardians. Furthermore, consultation services accessible via social media platforms have been set up for cases of sexual violence against young people. Awareness-raising activities are also

⁹⁸ UNICEF, UN Global Compact, Save the Children, “Children’s Rights and Business Principles.” (<https://www.unicef.org/media/96136/file/Childrens-Rights-Business-Principles-2012.pdf>)

⁹⁹ Special Rapporteur on the sale of children, child prostitution and child pornography “Report of the Special Rapporteur on the sale of children, child prostitution and child pornography on her visit to Japan” (A/HRC/31/58/Add.1), Sections 42 to 48. (<https://documents.un.org/doc/undoc/gen/g16/041/73/pdf/g1604173.pdf>)

¹⁰⁰ Outline of the Basic Act on Children’s Policy (https://www.cfa.go.jp/assets/contents/node/basic_page/field_ref_resources/9eb39a0d-e312-445b-acc1-d7fad22147e9/cb0edbb3/en-01.pdf)

¹⁰¹ Children and Families Agency, “General Principles for Child-Related Measures” (December 22, 2023) [Explanatory Material]. (https://www.cfa.go.jp/assets/contents/node/basic_page/field_ref_resources/f3e5eca9-5081-4bc9-8d64-e7a61d8903d0/491f4994/20240123_policies_kodomo-taikou_25.pdf)

¹⁰² Action Plan for Achieving a Children-Centered Society (Decided by the Council for the Promotion of Child-Related Measures every year beginning in 2024). (<https://www.cfa.go.jp/policies/kodomo-taikou/>)

¹⁰³ Act on Measures for the Prevention of Sexual Violence Against Children by School Operators and Private Education and Childcare Providers (Act No. 69 of 2024; Prevention of Sexual Violence against Children Act). (<https://www.cfa.go.jp/policies/child-safety/efforts/koseibouhou>)

¹⁰⁴ Ministry of Justice, “Telephone Consultation Services for Issues Such as Bullying (Children’s Rights Hotline).” (<https://www.moj.go.jp/ENGLISH/HB/counseling/hotline.html>)

conducted through posters and other means.

In August 2025, a working group composed of experts and officials from the relevant ministries and agencies¹⁰⁵ compiled and organized the issues and points for discussion concerning the protection of young people in relation to Internet use. The relevant ministries and agencies will continue to coordinate their efforts to advance the necessary deliberations and measures.

Building on these existing measures, continued action to protect and promote the human rights of children and young people is expected to contribute to a stable, inclusive, and highly sustainable business environment.

B. Directions of Measures and Examples of Specific Initiatives

- (i) Implement the design, operation, and review of systems from a human rights-protecting perspective with a view to giving consideration to the circumstances of rights holders in socially vulnerable positions and to ensuring that “no one will be left behind.”
 - Disseminate the “Children’s Rights and Business Principles” and, in accordance with such Principles, promote initiatives that take into consideration child labor and other human rights issues affecting children and young people. [Children and Families Agency, Ministry of Health, Labour and Welfare, Relevant Ministries and Agencies] (1, 3, 8)
 - Promote the dissemination and awareness-raising of the human rights of children. [Children and Families Agency, Ministry of Justice, Ministry of Education, Culture, Sports, Science and Technology] (3, 8)
 - Continue cooperation in the dissemination and raising awareness of the “[Children’s Rights in Sport Principles](#)”¹⁰⁶ to relevant industries and organizations. [Japan Sports Agency] (3, 8)
 - Implement the “[Basic Plan on Measures for Providing Safe and Secure Internet Use for Young People](#)”¹⁰⁷ steadily. [National Police Agency, Consumer Affairs Agency, Children and Families Agency, Ministry of Internal Affairs and Communications, Ministry of Justice, Ministry of Education, Culture, Sports, Science and Technology, Ministry of Economy, Trade and Industry] (1, 3, 8)
 - Address digital advertising content that may have harmful impacts on children. [Children and Families Agency, Ministry of Internal Affairs and Communications, Ministry of Economy, Trade and Industry, Relevant Ministries and Agencies] (1, 3, 8)
 - Implement the “[Plan for the Prevention of Sex Crime Against Children 2022](#)”¹⁰⁸ steadily. [Cabinet Secretariat, Cabinet Office, National Police Agency, Children and Families Agency, Ministry of Internal Affairs and Communications, Ministry of Justice, Ministry of Foreign Affairs of Japan, Ministry of Education, Culture, Sports, Science and Technology, Ministry of Health, Labour and Welfare, Ministry of Economy, Trade and Industry, Japan Tourism Agency] (1, 3, 8)
 - Promote comprehensive measures to prevent sexual violence against children, including the enforcement of the Prevention of Sexual Violence against Children Act.¹⁰⁹ [Cabinet Office, National Police Agency, Children and Families Agency, Ministry of Internal Affairs and Communications, Ministry of Justice, Ministry of Education, Culture, Sports, Science and Technology, Ministry of Health, Labour and Welfare, Ministry of Economy, Trade and Industry] (1, 3, 8)
 - Promote measures to end violence against children through the steady

¹⁰⁵ Children and Families Agency, “Working Group on the Protection of Young People in Relation to Internet Use” (<https://www.cfa.go.jp/councils/internet-kaigi/>) (in Japanese)

¹⁰⁶ UNICEF, “Children’s Rights in Sport Principles” (<https://childinsport.jp/en/>)

¹⁰⁷ The Sixth Basic Plan on Measures for Providing Safe and Secure Internet Use for Young People (Decided by the Council for the Promotion of Child-Related Measures in September 2024) (https://www.cfa.go.jp/assets/contents/node/basic_page/field_ref_resources/04628de7-d704-4ed2-ae11-7dfa859ded0e/c65dfd5b/20260206_policies_youth-kankyoku_internet_torikumi_guideline_07.pdf)

¹⁰⁸ Ministerial Meeting Concerning Measures Against Crime, “Plan for the Prevention of Sex Crimes Against Children 2022.” (https://www.cfa.go.jp/assets/contents/node/basic_page/field_ref_resources/2bcfc66c-7ca3-42a2-9248-4ff53bac61ea/c51af327/20231013_policies_child-safety_efforts_masterplan_en_2022_bp.pdf)

¹⁰⁹ Joint Meeting of the Inter-Ministerial Conference on Strengthening Measures Against Sexual Crimes and Sexual Violence and the Inter-Ministerial Liaison Conference on Measures Against the Sexual Exploitation of Children, “Promotion of Comprehensive Measures to Prevent Sexual Violence Against Children.” (https://www.cfa.go.jp/assets/contents/node/basic_page/field_ref_resources/72e390fad00-44e9-af2e-084e71c76b93/afdc655c/20240723_policies_child-safety_efforts_kinkyutaisaku_10.pdf) (in Japanese)

- implementation of the “[National Action Plan to End Violence against Children](#).”¹¹⁰ [Cabinet Office, National Police Agency, Children and Families Agency, Ministry of Justice, Ministry of Foreign Affairs of Japan, Ministry of Education, Culture, Sports, Science and Technology] (1, 3, 8)
- Provide multilingual support for consultations with children and young people facing problems. [Ministry of Justice] (1, 25, 27, 31)
 - Provide employment support for young people. [Ministry of Education, Culture, Sports, Science and Technology, Ministry of Health, Labour and Welfare] (1, 3, 8)
 - Provide support for people taking care of children through the promotion of dual-income and co-parenting models. [Ministry of Health, Labour and Welfare] (1, 3, 8)
 - Provide support for single-parent families, including employment assistance. [Children and Families Agency, Ministry of Health, Labour and Welfare] (1, 3, 8)
 - Provide support for measures aimed at the eradication of child labor and related issues through international organizations and other entities. [Ministry of Foreign Affairs of Japan, Ministry of Health, Labour and Welfare] (10)
- (ii) Provide information and good practices obtained through initiatives for children and young people to help companies identify human rights risks and promote efforts to respect human rights.
- Introduce practices centered on children and young people.¹¹¹ [Children and Families Agency] (3)
 - Consider measures to make companies’ efforts to create child- and parenting-friendly environments more visible. [Children and Families Agency] (3)

(4) Persons with Disabilities

A. Recognition of Issues and Measures Taken

As prescribed in the “[Basic Act for Persons with Disabilities](#),” (Act No. 84 of 1970)¹¹² the Government has continually worked to realize a society of coexistence with mutual respect for personality and individuality whether or not they have a disability.¹¹³ In April 2024, the “[Act for Partial Revision of the Act for Eliminating Discrimination against Persons with Disabilities](#)” (Act No. 56 of 2021)¹¹⁴ was enacted. This Act requires companies to provide reasonable accommodation for persons with disabilities when conducting operations such as the provision of goods and services.¹¹⁵

Nonetheless, many risks of human rights violations still exist in corporate activities, such as a lack of informational and physical accessibility, unfair discrimination in recruitment and promotion, harassment, and unjust dismissal on the grounds of disability. In particular, there are still challenges concerning the lack of understanding of people with less visible disabilities, such as mental health conditions and developmental disorders, as well as the inadequate provision of reasonable accommodations for them.

To address this situation, it is important to ensure that persons with disabilities who wish to work can fully utilize their abilities according to their aptitudes so that they can lead high-quality, independent lives. The Government is also working to secure more diverse employment opportunities and to foster those who support employment assistance, among other measures.¹¹⁶ Under the “[Act to Facilitate the Employment of Persons with Disabilities](#)” (Act No.

¹¹⁰ Children and Families Agency, “National Action Plan to End Violence against Children.” (<https://www.cfa.go.jp/policies/international/evac/>)

¹¹¹ Children and Families Agency, “Introducing the Child-Centered Action” (<https://www.cfa.go.jp/policies/kodomo-mannaka/case/>) (in Japanese)

¹¹² Basic Act for Persons with Disabilities (Act No. 84 of 1970) (<https://www.japaneselawtranslation.go.jp/en/laws/view/4929>)

¹¹³ Cabinet Office, “Comprehensive Promotion of Policies for Persons with Disabilities -Basic Framework-.” (<https://www8.cao.go.jp/shougai/suishin/wakugumi.html>) (in Japanese)

¹¹⁴ Act for Partial Revision of the Act for Eliminating Discrimination against Persons with Disabilities (Act No. 65 of 2013). (<https://laws.e-gov.go.jp/law/425AC0000000065>) (in Japanese)

¹¹⁵ In cases of violations or similar circumstances, Minister of Health, Labour and Welfare is authorized to provide advice, guidance, or recommendations to employers who have violated the Act (Article 12).

¹¹⁶ Cabinet Office, “Basic Programme for Persons with Disabilities (Fifth)” (March 2023), p. 55 (<https://www8.cao.go.jp/shougai/suishin/pdf/kihonkeikaku-r05.pdf>) (in Japanese).

123 of 1960; Disabled Persons Employment Promotion Act)¹¹⁷, employers are required to prohibit discrimination against employees with disabilities and to provide reasonable accommodation (companies must endeavor to provide reasonable accommodation) when employing persons with disabilities.¹¹⁸ In addition, in April 2023, the “[Act for Partial Revision of the Act on Providing Comprehensive Support for the Daily Life and Life in Society of Persons with Disabilities](#)” (Act No. 104 of 2022)¹¹⁹ was enacted. This Act was clarified to specify that employers’ responsibilities include implementing measures for developing and enhancing vocational skills, in addition to providing appropriate employment opportunities and ensuring proper employment management. This clarification was made from the perspective that it is important to further promote the creation of environments in which persons with disabilities can continue to play indispensable roles as human resources for corporate growth and development.

As a consultation service for both labor and management, Public Employment Security Offices accept consultations from workers with disabilities and employers regarding the prohibition of discrimination and reasonable accommodation. Prefectural Labour Bureaus provide support as well as necessary advice and guidance when a request for assistance is made regarding the resolution of disputes between workers with disabilities and employers. In addition, upon application from the involved parties, there is a system in which the Dispute Coordination Committee may conduct mediation. Direct support is also available, including legal measures and consultation services. Regarding the employment of persons with disabilities, the number of employed persons with disabilities has increased for 22 consecutive years.¹²⁰ In addition, there has been a steady increase in the number of employers accredited as SMEs with excellent initiatives concerning employment of persons with disabilities.¹²¹

In this way, by securing adequate employment opportunities for persons with disabilities and through specific systems that ensure respect for them within the economic society and that safeguard their rights and interests, it is expected that the human rights of persons with disabilities can be safeguarded and a more inclusive society can be realized. If businesses develop accordingly, this could serve as an important opportunity for Japan to achieve a sustainable society.

B. Directions of Measures and Examples of Specific Initiatives

- (i) Implement the design, operation, and review of systems from a human rights-protecting perspective with a view to giving consideration to the circumstances of rights holders in socially vulnerable positions and to ensuring that “no one will be left behind.”
 - Implement various initiatives accompanying the revisions of the Act for Eliminating Discrimination against Persons with Disabilities and the Act on Employment Promotion Etc. of Persons with Disabilities. [Cabinet Office, Ministry of Health, Labour and Welfare] (1, 3, 8)
 - Provide consistent employment support before and after hiring through collaboration among relevant local organizations.¹²² [Ministry of Health, Labour and Welfare] (1, 3, 8)
 - Provide pensions and various allowances, implement tax incentive measures, and operate support programs under an appropriate combination of employment-promotion measures and welfare policies.¹²³ [Ministry of Health, Labour and Welfare] (1, 3, 8)
 - Promote measures tailored to the characteristics of disabilities to achieve an

¹¹⁷ Act to Facilitate the Employment of Persons with Disabilities (Act No. 123 of 1960). (<https://www.japaneselawtranslation.go.jp/en/laws/view/3845>)

¹¹⁸ Ministry of Health, Labour and Welfare, “Prohibition of discrimination against persons with disabilities and the obligation to provide reasonable accommodation in the field of employment.” (https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/koyou_roudou/koyou/shougaishakoyou/shougaisha_h25/index.html) (in Japanese)

¹¹⁹ Act on Providing Comprehensive Support for the Daily Life and Life in Society of Persons with Disabilities (Act No. 123 of 2005). (https://www.mhlw.go.jp/stf/topics/bukyoku/soumu/houritu/208_00002.html) (in Japanese)

¹²⁰ According to Ministry of Health, Labour and Welfare’s “Results of the 2024 Survey on the Employment Status of Persons with Disabilities,” (https://www.mhlw.go.jp/stf/newpage_47084.html) (in Japanese) the actual employment rate of persons with disabilities was 2.15% in 2020, 2.20% in 2021, 2.25% in 2022, 2.33% in 2023, and 2.41% in 2024.

¹²¹ Ministry of Health, Labour and Welfare, “Accredited Employers under the Accreditation System for SMEs with Excellent Initiatives Concerning Employment of Persons with Disabilities (Monisu Accreditation System).” (https://www.mhlw.go.jp/stf/monisu_00002.html) (in Japanese)

¹²² Cabinet Office, “Basic Programme for Persons with Disabilities (Fifth)” (March 2023), p. 55.

¹²³ Cabinet Office, “Basic Programme for Persons with Disabilities (Fifth)” (March 2023), p. 56.

environment “Barrier-free Mindset,” based on the “[Action Plan Toward a Society of Coexistence Without Prejudice or Discrimination Against Persons with Disabilities](#),”¹²⁴ including understanding the “social model of disability.” [Cabinet Office, All Ministries] (1, 3, 8)]

- Promote measures by the Japan Legal Support Center (The JLSC) to ensure the provision of reasonable accommodation for persons with disabilities.¹²⁵ [Ministry of Justice] (25, 26)
- Provide subsidies for workplace environment-related initiatives undertaken by companies [Ministry of Health, Labour and Welfare] (1, 3, 8)
- (ii) Provide companies with information and good practices obtained through initiatives for persons with disabilities to help them identify human rights risks and promote measures to respect human rights.
 - Publish records of consultations and responses related to discrimination against persons with disabilities and reasonable accommodations.¹²⁶ [Cabinet Office, Ministry of Health, Labour and Welfare] (1, 3, 8)

(5) Elderly Persons

A. Recognition of Issues and Measures Taken

Against the backdrop of rising life expectancy and falling birth rates, Japan is undergoing rapid population aging,¹²⁷ which is resulting in substantial changes to local communities and family relationships. In this context, concerns have arisen that elderly persons may lose opportunities for social participation due to their age, and that more elderly persons may live alone. Therefore, it is necessary to promote the creation of a society in which elderly persons can live peacefully in their communities.

In terms of employment, the “[Act on Employment Security of Elderly Persons](#)” (Act No. 68 of 1971)¹²⁸ prescribes that companies must provide employment opportunities until the age of 65 and make efforts to provide job opportunities until the age of 70. In addition, providing reemployment support at the Life-long Active Support Desks of Public Employment Security Offices and offering diverse employment opportunities through Silver Human Resources Centers is helping to develop an environment that supports elderly persons who wish to continue working after retirement. This also helps secure Japan’s labor force, which is shrinking.

Additionally, to support elderly persons without family or relatives and ensure they can safely and securely utilize lifetime support services for elderly persons, measures are being implemented based on the “[Guidelines for Lifetime Support Service Providers for Elderly Persons](#),”¹²⁹ which were developed in June 2024 through coordination among relevant ministries and agencies, to ensure proper business operation by service providers and to promote the sound development of these services.

Furthermore, as damage from special fraud and similar crimes is expanding across a wide range of age groups, including the elderly, relevant ministries and agencies, together with private-sector businesses, are cooperating to promote various countermeasures based on the

¹²⁴ Cabinet Office, “Action Plan Toward a Society of Coexistence Without Prejudice or Discrimination Against Persons with Disabilities” (<https://www.cas.go.jp/jp/seisaku/kyouseishakai/pdf/koudoukeikaku.pdf>) (in Japanese)

¹²⁵ Rules for Eliminating Discrimination Against Persons with Disabilities (The Japan Legal Support Center, Rule No. 28 of 2015), Article 4 (<https://www.houterasu.or.jp/uploaded/attachment/3026.pdf>) (in Japanese)

¹²⁶ Ministry of Health, Labour and Welfare, “Publication of the Results of Consultations, etc. Concerning the Prohibition of Discrimination against Persons with Disabilities and the Obligation to Provide Reasonable Accommodation in the Field of Employment (FY2023)” (June 28, 2024) (https://www.mhlw.go.jp/stf/newpage_41002.html) (in Japanese) and Cabinet Office, “Database of Case Examples on Eliminating Discrimination against Persons with Disabilities” (<https://jireidb.shougaisa-sabetukaishou.go.jp/>) (in Japanese).

¹²⁷ The proportion of elderly persons in the total population (the aging rate) reached 29.3% in 2024, making Japan a super-aged society. (Cabinet Office, “2025 Edition of the White Paper on an Aging Society” (https://www8.cao.go.jp/kourei/whitepaper/w-2025/zenbun/07pdf_index.html) (in Japanese).

¹²⁸ Act on Employment Security of Elderly Persons (Act No. 68 of 1971) (<https://www.japaneselawtranslation.go.jp/en/laws/view/4630>)

¹²⁹ Cabinet Secretariat (Elderly Support Coordination Team on Guarantors and Related Matters) and others, “Guidelines for Lifetime Support Service Providers for the Elderly Persons” (June 2024). (<https://www.mhlw.go.jp/content/001262636.pdf>) (in Japanese)

“[Comprehensive Measures to Protect People from Frauds 2.0](#),”¹³⁰ which was decided by the Ministerial Meeting Concerning Measures Against Crime on April 22, 2025.

Accordingly, it is necessary to appropriately address the situations faced by elderly persons and promote and review various initiatives so that companies and businesses can respond to the further progression of an aging population.

B. Directions of Measures and Examples of Specific Initiatives

(i) Implement the design, operation, and review of systems from a human rights-protecting perspective with a view to giving consideration to the circumstances of rights holders in socially vulnerable positions and to ensuring that “no one will be left behind.”

➤ Implement initiatives related to employment support for elderly persons (such as thorough enforcement of equal pay for equal work, prevention of workplace accidents,¹³¹ and promotion of measures to secure employment and ensure job opportunities).¹³² [Ministry of Health, Labour and Welfare] (1, 3, 8)

➤ Implement initiatives to support elderly persons without family or relatives. [Cabinet Secretariat, Cabinet Office, Financial Services Agency, Consumer Affairs Agency, Ministry of Internal Affairs and Communications, Ministry of Justice, Ministry of Health, Labour and Welfare, Ministry of Economy, Trade and Industry, Ministry of Land, Infrastructure, Transport and Tourism] (1, 3, 8)

➤ Implement initiatives to protect general consumers including elderly persons from frauds. [Cabinet Secretariat, Cabinet Office, Financial Services Agency, Consumer Affairs Agency, National Police Agency, Digital Agency, Personal Information Protection Commission, Ministry of Internal Affairs and Communications, Ministry of Justice, Ministry of Health, Labour and Welfare, Ministry of Economy, Trade and Industry, Ministry of Land, Infrastructure, Transport and Tourism] (1, 3, 8)

(ii) Provide information and good practices obtained through initiatives for elderly persons to help companies identify human rights risks and promote efforts to respect human rights.

➤ Provide case examples on the employment of elderly persons in companies.¹³³ [Ministry of Health, Labour and Welfare] (3)

¹³⁰ Ministerial Meeting Concerning Measures against Crime, “Comprehensive Measures to Protect People from Frauds” 2.0. (<https://www.npa.go.jp/bureau/safetylife/sos47/assets/img/new-topics/detail/250609/01/01.pdf>) (in Japanese)

¹³¹ Ministry of Health, Labour and Welfare, “Occupational Safety and Health Measures for Elderly Workers.” (https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/koyou_roudou/roudoukijun/enzen/newpage_00007.html) (in Japanese)

¹³² Ministry of Health, Labour and Welfare, “Employment and Work Measures for Elderly Persons.” (https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/koyou_roudou/koyou/koureisha/index.html) (in Japanese)

¹³³ Japan Organization for Employment of the Elderly, Persons with Disabilities and Job Seekers, “Case Study Website on Companies Promoting the Active Engagement of Elderly Persons.” (<https://www.elder.jeed.go.jp/>) (in Japanese)

3 Thematic Human Rights Issues

(1) AI, Technology, and Human Rights

A. Recognition of Issues and Measures Taken

The advancement of AI and technology, including generative AI, has been remarkable. These fields continue to evolve toward further technological development. However, their rapid progress and widespread adoption present major challenges to the international community as a whole. Recognizing the need for international rules on generative AI in order to realize advanced AI systems that are safe, secure, and trustworthy, the Government launched the [Hiroshima AI Process](#) while serving as the G7 presidency. Japan led the development of the “[Hiroshima AI Process Comprehensive Policy Framework](#),”¹³⁴ which includes international guidelines and codes of conduct. Similarly, recognizing the need for international rules, the Government signed the “[Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law](#),”¹³⁵ which covers AI systems in general, in February 2025. In the design, development, and implementation of advanced AI systems, businesses should respect the rule of law, human rights, due process, diversity, fairness, non-discrimination, democracy, and human-centricity.¹³⁶ Current concerns include: (i) acts that threaten human rights and peace of mind, such as privacy infringement and the use of privacy for criminal purposes; (ii) security risks, such as leaks of confidential information and increasingly sophisticated cyberattacks; (iii) the problem of spreading misinformation, false information, and biased information; (iv) risks of infringement of intellectual property rights; (v) the need to ensure transparency; (vi) the responsibilities of AI users; and (vii) harmonization with international regulations and standards.^{137 138} These issues must be carefully considered and addressed by strengthening domestic governance.

Science & technology and innovation are driving forces behind Japan’s economic growth, and they are becoming increasingly important in addressing social challenges.¹³⁹ On the other hand, companies that develop and use these technologies face a wide range of human rights issues, as noted above, and must be increasingly aware of their responsibilities. From this perspective, in order to promote the development and use of AI technology while respecting human rights and enhancing international competitiveness, it is important to implement initiatives that address human rights risks alongside technological development.

B. Directions of Measures and Examples of Specific Initiatives

- (i) Promote innovation of AI while mitigating risks.
 - Promote research on safe human-AI cooperation based on principles such as human-centricity, respect for human rights, and compliance with laws, and realize governance through the AI Act and related legislation.¹⁴⁰ [Cabinet Office, Relevant Ministries and Agencies] (1, 3)
 - Raise awareness and promote the adoption of the [AI Guidelines for Business](#). [Ministry of Internal Affairs and Communications, Ministry of Economy, Trade and Industry] (8, 10)
- (ii) Promote international cooperation in the field of AI.
 - Promote the Hiroshima AI Process. [Ministry of Internal Affairs and Communications] (8, 10)

¹³⁴ Hiroshima AI Process G7 Digital & Tech Ministers’ Statement (December 1, 2023) (https://www.soumu.go.jp/main_content/000915261.pdf)

¹³⁵ Ministry of Foreign Affairs, Press Releases, “Signing of the Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law.” (https://www.mofa.go.jp/press/release/pressite_000001_00983.html)

¹³⁶ Hiroshima Process International Code of Conduct for Organizations Developing Advanced AI Systems. (https://www.soumu.go.jp/hiroshimaaiprocess/pdf/document05_en.pdf)

¹³⁷ Cabinet Office, “Key Issues Concerning AI” (Material 2 from the AI Strategy Council, May 11, 2023), p. 4 “Issue 2: Concerns and Risks of AI” (https://www8.cao.go.jp/cstp/ai/ai_senryaku/1kai/shiryu2.pdf) (in Japanese).

¹³⁸ Furthermore, one of the current concerns associated with AI is its potential impact on employment. See: G20 “Artificial intelligence adoption and its impact on jobs.” (<https://www.ilo.org/publications/artificial-intelligence-adoption-and-its-impact-jobs>)

¹³⁹ Integrated Innovation Strategy 2025 (Cabinet Decision, June 6, 2025). (https://www8.cao.go.jp/cstp/tougosenryaku/togo2025_honbun_en.pdf)

¹⁴⁰ “Integrated Innovation Strategy 2025” pp. 1-2.

(2) Environment and Human Rights

A. Recognition of Issues and Measures Taken

Since the UNGPs began requiring the implementation of Human Rights DD to identify and prevent risks of human rights violations, there has been a movement, particularly in Europe, to establish legal regulations not only for Human Rights DD but also for environmental due diligence (Environmental DD). As seen with the EU's CSDDD and the EU Deforestation Regulation (EUDR), there is also a trend toward imposing Human Rights DD and Environmental DD obligations on entities throughout the entire international supply chain, including non-domestic companies. Consequently, Japanese companies are also required to address Human Rights DD and Environmental DD. Additionally, there have been calls to address the intersection of human rights and environmental issues,¹⁴¹ and many argue that environmental destruction has direct and indirect adverse impacts on human rights. In light of this, it is important to advance measures that take both human rights and environmental issues into account.

To date, the Government has acknowledged the connection between adverse environmental impacts and adverse impacts on human rights in the "[Handbook on Environmental Due Diligence](#)."¹⁴² Additionally, the "[Compilations of Case Studies on Environmental Due Diligence](#)"¹⁴³ has introduced examples that consider this connection. Moreover, at the [Consultative Meeting on Promoting Environmental Due Diligence by Japanese Companies](#)¹⁴⁴, discussions have been held on approaches to address adverse impacts on both the environment and human rights. Furthermore, the "[Guidance for the Development of Private-Sector JCM Projects](#),"¹⁴⁵ relating to the Joint Crediting Mechanism (JCM) for reducing carbon dioxide (CO₂) emissions internationally, also refers to the necessity of considering human rights when implementing JCM projects. In addition, the basic screening criteria for JCM equipment subsidy programs include items related to human rights compliance. Moreover, the Government is advancing efforts to legislate Environmental DD. For example, regarding wood and wood products, the "[Act on Promoting the Distribution and Use of Legally Harvested Wood and Wood Products](#)" (Act No. 48 of 2016) (the Clean Wood Act)¹⁴⁶, as amended, obligates business entities that first acquire wood and wood products on the domestic market to verify their legality, among other requirements. Based on these existing measures, it is important to continue promoting Japanese companies' efforts to address both environmental and human rights issues.

B. Directions of Measures and Examples of Specific Initiatives

- (i) Promote Environmental DD that takes both human rights and environmental issues into account.¹⁴⁷
 - Support the implementation of Environmental DD in light of international regulatory trends and promote the sharing of good practices. [Ministry of the Environment] (3, 8, 10)
 - Incorporate criteria related to corporate efforts to respect human rights into the screening standards for subsidy programs and similar projects.¹⁴⁸ [Ministry of the Environment] (1, 3, 6)

¹⁴¹ Stakeholder Report, p. 35.

¹⁴² Ministry of the Environment's "Publication of Handbook on Environmental Due Diligence" (May 8, 2023) introduces the connection between environmental and human-rights issues on p. 17. (https://www.env.go.jp/press/press_01571.html) (in Japanese)

¹⁴³ Ministry of the Environment, "Update of Compilations of Case Studies on Environmental Due Diligence" (April 11, 2024). (https://www.env.go.jp/press/press_03065.html) (in Japanese)

¹⁴⁴ Ministry of the Environment, "Consultative Meeting on Promoting Environmental Due Diligence by Japanese Companies." (https://www.env.go.jp/policy/policy/j-hiroba/post_173_00003.html) (in Japanese)

¹⁴⁵ Ministry of the Environment, Ministry of Economy, Trade and Industry, Ministry of Foreign Affairs, and Ministry of Agriculture, Forestry and Fisheries, "Guidance for the Development of Private-Sector JCM Projects (Revised)" (March 25, 2024). (<https://www.env.go.jp/content/000123179.pdf>) (in Japanese)

¹⁴⁶ Act on Promoting the Distribution and Use of Legally Harvested Wood and Wood Products (Act No. 48 of 2016) (Clean Wood Act). (<https://www.japaneselawtranslation.go.jp/en/laws/view/4677>)

¹⁴⁷ Ministry of the Environment, "Introduction to Environmental Due Diligence in the Value Chain -With Reference to OECD Guidance-" (February 2020). (<https://www.env.go.jp/content/900497033.pdf>) (in Japanese); and "Introduction to Environmental Due Diligence in the Value Chain -Implementing Environmental Due Diligence through the Use of Environmental Management Systems (EMS)-" (May 2023), pp. 15 and 17. (<https://www.env.go.jp/content/000131115.pdf>) (in Japanese).

¹⁴⁸ Ministry of the Environment, Ministry of Economy, Trade and Industry, Ministry of Foreign Affairs, and Ministry of Agriculture, Forestry and Fisheries, "Guidelines for Public Applications for FY2024 to FY2026 Subsidies for Measures to Control Carbon Dioxide Emissions (Equipment Subsidy Program under the Joint Crediting Mechanism Financial Support Project)" (April 5, 2024). (https://gic.jp/newtech/R6/newtech24_yoryo.pdf) (in Japanese)

- (ii) Consider human rights in climate change adaptation and mitigation policies.
 - Promote workforce development efforts, such as reskilling, and the facilitation of smooth labor mobility into growth sectors, including the green transformation (GX) field. [Ministry of Economy, Trade and Industry] (8)

4

Capacity Building for the Promotion of the Implementation of the UNGPs

(1) Recognition of Issues and Measures Taken

The capacity building systems required in line with the UNGPs to ensure respect for human rights by companies include information dissemination, seminars, and the provision of guidance by the government and other organizations to raise corporate awareness of business and human rights issues. In addition, responding to consultations and providing necessary support according to corporate needs are also important.¹⁴⁹ These efforts form the foundation for companies to steadily implement the requirements related to business and human rights.

In addition to holding seminars and formulating guidelines, the Government has also established and operates a [portal site](#)¹⁵⁰ that centralizes business and human rights information. Furthermore, the Government has made efforts to develop and disseminate certain practical reference materials to provide more specific and practical guidance on respecting human rights as outlined in the Guidelines. These materials include the “[Practical Reference Materials](#)” (April 2023), “[Handbook on Environmental Due Diligence](#)” (May 2023), “[Guidebook for Respecting Human Rights in Food Enterprises](#)” (December 2023), and the “[Business and Human Rights at Work Checklist](#)” (October 2024).¹⁵¹

Additionally, as part of its provision of information to companies and other stakeholders, the Government compiled and published “[A Compilation of Case Studies on Business and Human Rights](#)” in September 2021; [a collection of good practices](#) on Human Rights DD by Japanese companies operating in Asia, in cooperation with relevant organizations, in March 2024; and “[A Collection of Initiatives for SMEs](#)” in March 2025. Furthermore, in January 2024, JETRO prepared and released a “[Quick Guide to Business and Human Rights](#)” introducing key points for business and human rights measures, and launched a dedicated website on business and human rights, titled “[Supply Chains and Human Rights](#)”¹⁵² as a reference for Japanese companies. The website provides Japanese translations of national and regional laws related to supply chains and human rights, provisional translations of guidance alongside the original texts, and information on the initiatives undertaken by Japanese companies. Furthermore, the Government operates the “[Green Value Chain Platform](#),”¹⁵³ which compiles methods, case studies, and guides to support companies’ decarbonization efforts. Regarding corporate

¹⁴⁹ “Building capacity for the implementation of the Guiding Principles on Business and Human Rights.” (A/HRC/53/24) (<https://docs.un.org/en/A/HRC/53/24>)

¹⁵⁰ Ministry of Foreign Affairs, “Business and Human Rights.” (<https://www.mofa.go.jp/mofaj/gaiko/bhr/index.html>) (in Japanese)

¹⁵¹ In addition, regarding human rights education and awareness-raising in general, human rights education (including school education and social education) and awareness-raising activities are being carried out based on The Basic Plan on Human Rights Education and Human Rights Awareness Raising (Ministry of Justice, “The Basic Plan on Human Rights Education and Human Rights Awareness Raising (The Second Edition)” (<https://www.moj.go.jp/JINKEN/JINKEN83/jinken83.html>) (in Japanese)). The Government also raises awareness of business and human rights and conducts training on these topics for government officials, as well as runs various human rights training programs for judicial officials that cover human rights treaties and international human rights law. With regard to companies, under the Support for Human Resources Development in SMEs (Small and Medium Enterprise Agency, “Support for Human Resources Development in SMEs” (https://www.chusho.meti.go.jp/soudan/jinken_pamf/index.html) (in Japanese)), the Government conducts human rights education and awareness-raising seminars mainly for SMEs. In addition, it disseminates the Guidelines and related materials to member businesses through corporations and industry associations under the jurisdiction of the relevant ministries and agencies (Ministry of Foreign Affairs, “List of Dissemination and Awareness-Raising Activities for the Guidelines for Respecting Human Rights in Responsible Supply Chains” (as at the end of March 2025) (<https://www.mofa.go.jp/mofaj/files/100859890.pdf>) (in Japanese)). Furthermore, it publicizes the NAP and raises awareness of human rights due diligence to Japanese business enterprises operating overseas via Japanese embassies, consulates, and overseas offices of government-related entities.

¹⁵² JETRO, “Special Feature: Supply Chains and Human Rights.” (https://www.jetro.go.jp/world/scm_hrm/) (in Japanese)

¹⁵³ Ministry of the Environment, “Green Value Chain Platform, “Supply-chain Emissions” Information Platform.”” (https://www.env.go.jp/earth/ondanka/supply_chain/gvc/en/)

information disclosure, the “[Cabinet Office Order on Disclosure of Corporate Affairs](#)” was revised in January 2023 to introduce a new sections for Sustainability-Related Policies and Initiatives in annual securities reports and similar documents. In response, a [reference casebook of good practices](#) was published as disclosure examples for sustainability in annual securities reports, including examples of human rights disclosures.

As a dedicated consultation service for companies, JETRO has been accepting inquiries regarding the Guidelines and consultations on respecting human rights in supply chains for overseas business.¹⁵⁴ Furthermore, schemes such as the “Health and Productivity Management,” the “Award for Leading Companies Where Women Shine,” and the “My Declaration of Human Rights” have been established to evaluate business enterprises who are tackling social issues.

Regarding the development of personnel specialized in business and human rights, nationwide training programs were conducted through contributions to the ILO and in collaboration with the Japan Federation of Labor and Social Security Attorney’s Associations. These programs aimed to develop Business and Human Rights (BHR)-promoting labor and social security attorneys who support human rights-respecting practices among SMEs. By the end of November 2025, a total of 646 such attorneys had completed the training. In addition, contributions to the ILO provided opportunities to learn from case studies on identifying and addressing human rights and labor issues faced by companies. This contributed to the development of business-and-human-rights specialists within companies.

While capacity-building for companies is being advanced by numerous institutions, including the Government, companies advancing efforts to respect human rights report practical difficulties, such as “it is difficult to determine the extent of risks that should be addressed” and “we cannot secure sufficient personnel or budget.”¹⁵⁵ Even companies that are undertaking such efforts express concerns about effectiveness, stating that “the structure of supply chains is complex and vast, making it difficult to identify issues” (73%) and “there are complex problems that cannot be solved by a single company alone” (72%). In addition, there are also calls to expand tools that promote companies’ voluntary efforts, as well as to enhance and expand consultation services that support these efforts.¹⁵⁶ Furthermore, the need to empower rights holders has also been noted.¹⁵⁷

In response to this, measures such as building networks between Japanese companies operating overseas and local firms, as well as establishing cooperative frameworks for respecting human rights can be considered.¹⁵⁸ It is also necessary to continue providing support, such as raising awareness among local governments, promoting consumer-oriented management, educating consumers,¹⁵⁹ and providing assistance that includes school education and development cooperation, to underpin corporate human-rights efforts. Companies have also called for continuous and systematic support; with this perspective in mind, specific capacity-building measures are required to address the above existing issues and to meet companies’ needs.

(2) Directions of Measures and Examples of Specific Initiatives

- (i) Provide information, advice, and support to businesses, including SMEs.
 - Disseminate and raise awareness of the New Action Plan and the Guidelines to companies in cooperation with industry groups and other relevant bodies. [All Ministries] (2, 3)

¹⁵⁴ JETRO: Trade and Investment Consultation Desk for Economic Security and Business and Human Rights. (<https://www.jetro.go.jp/services/advice/>) (in Japanese)

¹⁵⁵ According to the Third Keidanren Survey (p. 33), among companies that are advancing efforts, 69% responded for the former and 46% for the latter; among companies that have not yet started, the former was highest at 72%, followed by the latter at 57%.

¹⁵⁶ In the Third Keidanren Survey (p. 34), the most frequent request to the government and public institutions was for “expanding tools that promote companies’ voluntary efforts” (67%), followed by “promoting the provision of information on human-rights risks overseas” (65%) and “establishing consultation services that support companies’ specific efforts” (56%).

¹⁵⁷ Stakeholder Report, p. 51.

¹⁵⁸ As an example, the Platform for Sustainable Cocoa in Developing Countries, established in January 2020 by JICA together with a diverse range of stakeholders including private companies, NPOs, and lawyers facilitates the sharing of knowledge and experiences and promotes collaborative initiatives to address issues such as child labor, farmer poverty, and deforestation in cocoa-producing countries.

¹⁵⁹ Consumer behavior has a significant impact on the economy and society. Therefore, consumer education initiatives should not only develop individuals who can take independent and informed action to support and promote their own interests, but also, with the awareness that consumption itself is an investment in the future, promote ethical consumption, which is consumer behavior that is considerate of people, society, and the environment. It is also important to foster in individuals a sense of responsibility as participants in a fair and sound market, as well as to promote ways for them to express opinions that encourage businesses to improve their goods and services.

- Develop and promote the sharing of guidance and good practices that take into account the characteristics of industries and SMEs. [All Ministries] (2, 3)
 - Support for SMEs, including assistance with piloting human rights initiatives, conducting workshops, and enabling access to expert advice. [Ministry of Economy, Trade and Industry] (2, 3)
 - Receive and respond to consultations from companies on business and human rights, provide information, and disseminate these measures. [Ministry of Economy, Trade and Industry, Ministry of Defense] (3)
 - Follow up on companies' progress in respecting human rights and consider revising capacity-building policies, guidelines, and guidance based on the follow-up results. [Cabinet Secretariat, Ministry of Foreign Affairs of Japan, Ministry of Health, Labour and Welfare, Ministry of Agriculture, Forestry and Fisheries, Ministry of Economy, Trade and Industry, Ministry of Land, Infrastructure, Transport and Tourism, Ministry of the Environment, Relevant Ministries and Agencies] (2, 3)
 - Implement various initiatives for overseas supply chains, such as capacity-building support in regions where Japanese companies expand abroad, as well as contributions to international organizations.¹⁶⁰ [Ministry of Foreign Affairs of Japan, Ministry of Health, Labour and Welfare, Ministry of Economy, Trade and Industry] (1, 2, 10)
 - Provide information on business and human rights to Japanese companies at Japanese embassies and consulates, and respond to inquiries regarding local conditions. [Ministry of Foreign Affairs of Japan] (1, 2, 3, 8)
- (ii) Promote awareness-raising through the provision of education and training
- Continuously develop and utilize experts, conduct training sessions, and share the latest international trends through government and relevant agencies. [Ministry of Foreign Affairs of Japan, Ministry of Land, Infrastructure, Transport and Tourism, Ministry of Health, Labour and Welfare, Ministry of Agriculture, Forestry and Fisheries, Ministry of Economy, Trade and Industry, Ministry of Land, Infrastructure, Transport and Tourism] (3)
 - Strengthen capacity-building for government officials and local government employees through human rights education and training that incorporate perspectives of the UNGPs' framework of protection, respect, and remedy. [Ministry of Justice, All Ministries] (3, 8)
 - Develop and implement human rights education and awareness-raising activities based on human rights education in schools, incorporating the UNGPs' framework of protection, respect, and remedy. These activities particularly aim to enable rights holders to access mechanisms for raising concerns about adverse human rights impacts. This includes promoting consumer and worker education, disseminating the New Action Plan at the local level, and other related efforts. [Consumer Affairs Agency, Ministry of Justice, Ministry of Foreign Affairs of Japan, Ministry of Education, Culture, Sports, Science and Technology] (3, 8)

¹⁶⁰ Ministry of Foreign Affairs conducts overseas seminars and training through international organizations to promote the dissemination of human rights due diligence to Japanese companies and their business partners (e.g., UNDP, "B+HR Project" (<https://www.undp.org/rolhr/projects/bhr-jsb>)). Ministry of Economy, Trade and Industry provides, primarily in Asian countries, advice and support to local companies, including business partners of Japanese companies, to improve human rights and labor conditions, and implements measures such as developing expert personnel knowledgeable in international labor standards and supporting skills development (e.g., ILO, "Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations (Phase II)" (April 1, 2024 to March 31, 2026) (<https://www.ilo.org/projects-and-partnerships/projects/building-responsible-value-chains-asia-through-promotion-decent-work-0>)). Ministry of Health, Labour and Welfare is promoting initiatives to build the capacity of workers and labor unions across globally expanding supply chains. These initiatives leverage the government's policy experience and expertise accumulated through domestic practice (Study Group on Addressing International Challenges Using Domestic Labor Policy Measures (Business and Human Rights Study Group), "Report: Toward Respect for Human Rights in Global Supply Chains" (December 13, 2023) (<https://www.mhlw.go.jp/content/10501000/001181137.pdf>) (in Japanese)).

(1) Recognition of Issues and Measures Taken

Regarding developments surrounding corporate information disclosure, related initiatives are being implemented domestically, taking international trends into account. The 2021 revision of Japan's Corporate Governance Code recognized that companies' initiatives on sustainability constitute important management issues from the perspective of increasing mid- to long-term corporate value and strengthening international competitiveness. Moreover, the Code urged companies to further consider addressing positively and proactively sustainability issues, such as respect for human rights, caring for working environments, and fair and reasonable transactions with suppliers, alongside taking care of climate change and other global environmental issues.¹⁶¹

In addition, as outlined in Chapter 1 Section 1, efforts have been made to enhance the disclosure of sustainability-related information in annual securities reports and similar documents,¹⁶² and reference casebook of good practices on the disclosure of narrative information includes [examples of human rights disclosures](#) as reference examples of Sustainability-Related Policies and Initiatives in annual securities reports. Furthermore, Japanese companies have been proactive in disclosing information through the [Task Force on Climate-related Financial Disclosures](#) (TCFD)¹⁶³ and the [Taskforce on Nature-related Financial Disclosures](#) (TNFD)¹⁶⁴. At present, listed companies and others are required to disclose sustainability information envisioned to be reported under a TCFD-based framework.

In Europe, while regulatory developments such as the CSRD and CSDDD, which include the disclosure of information on human rights, are underway, there have also been signs of a swing-back following the Omnibus package. At the same time, the [Taskforce on Inequality and Social-related Financial Disclosures](#) (TISFD)¹⁶⁵ is advancing efforts to develop a voluntary disclosure framework that includes human rights.

Disclosure by companies of matters related to human rights is part of the Human Rights DD cycle.¹⁶⁶ Companies must be able to explain to stakeholders, including shareholders, employees (job applicants included), customers (consumers), investors, and local communities, that they are fulfilling their responsibility to respect human rights. If a company faces allegations of human rights abuses, it is essential, particularly when concerned stakeholders who may be adversely impacted raise issues, that the company explain the measures it has taken to respect human rights. Dialogue with stakeholders enables an understanding of the scope and root causes of adverse impacts, facilitates improvements in how those impacts are addressed, and helps build trust with stakeholders. Such information can be an important factor in investors' assessment of a company's long-term sustainability, competitiveness, and corporate value. The increasing demand for such disclosures is driven by the diversification of investment and financing policies and approaches, as well as the growing importance of nonfinancial information for investors and financial institutions. This information, including that related to human rights, has become a basis for investment decisions. In addition, it should be noted that there is a growing international trend of companies considering their social and environmental impacts as part of their accountability for medium- to long-term risks and opportunities.¹⁶⁷

Furthermore, in the private sector, initiatives such as the Corporate Human Rights Benchmark (CHRB) evaluate a company's responsibility to respect human rights based primarily on publicly

¹⁶¹ Tokyo Stock Exchange, Inc., "Publication of Revised Japan's Corporate Governance Code" (June 2021). (<https://www.jpx.co.jp/english/news/1020/20210611-01.html>) (The Code's General Principles 2, Supplementary Principles 2.3.1).

¹⁶² Financial Services Agency, "Special Feature Page on Disclosure of Sustainability Information." (<https://www.fsa.go.jp/policy/kaiji/sustainability-kaiji.html>) (in Japanese)

¹⁶³ Task Force on Climate-related Financial Disclosures (TCFD). (<https://www.fsb-tcf.org/>)

¹⁶⁴ Taskforce on Nature-related Financial Disclosures (TNFD). (<https://tnfd.global/>)

¹⁶⁵ Taskforce on Inequality and Social-related Financial Disclosures (TISFD). (<https://www.tisfd.org/>)

¹⁶⁶ UNGPs 17.

¹⁶⁷ Stakeholder Report, p. 61; Financial System Council, "Disclosure Working Group Report: Toward Building Capital Markets That Contribute to the Enhancement of Medium- to Long-Term Corporate Value." (https://www.fsa.go.jp/singi/singi_kinyu/tosin/20220613/01.pdf) (in Japanese); Keidanren, "Chapter 3: Fair disclosure of information and constructive dialogue with stakeholders" in "Implementation Guidance on Charter of Corporate Behavior" (9th Edition), p. 33. (<https://www.keidanren.or.jp/policy/cgcb/tebiki9.html>) (in Japanese), p. 33.

available information. Consequently, even if companies have implemented adequate measures to respect human rights, those efforts will not be reflected in the evaluation if they are not disclosed¹⁶⁸ and insufficient disclosure could result in lower scores for Japanese companies.

For Japanese companies to maintain international competitiveness and achieve sustainable development going forward, they are expected to strategically disclose information, enhance management transparency, and deepen mutual understanding with stakeholders. This will contribute to resolving shared social challenges.¹⁶⁹ To this end, it is important to discuss measures that promote information disclosure and consider harmonization with international standards.

(2) Directions of Measures and Examples of Specific Initiatives

- (i) Conduct discussions on corporate human rights disclosure as necessary, taking into account developments in international standards. [Financial Services Agency, Ministry of Economy, Trade and Industry] (1, 3, 8)
- (ii) Promote enhanced corporate disclosure through dissemination of the reference casebook of good practices on the disclosure. [Financial Services Agency, Ministry of Economy, Trade and Industry] (1, 3)

6

Public Contracts Including Public Procurement and Subsidized Projects, etc.

(1) Recognition of Issues and Measures Taken

Under the UNGPs, the government supervision of counterparties in public contracts, mainly public procurement, is a state duty.¹⁷⁰ To date, Japan has also used public procurement to promote corporate efforts to respect human rights. For example, Japan has promoted the procurement of goods from disability employment facilities based on the Act on Priority Procurement for Persons with Disabilities,¹⁷¹ incorporated a positive point evaluation system for business enterprises that promote work-life balance, etc. in the comprehensive evaluation bidding system based on Article 24 of the Act on the Promotion of Women's Active Engagement in Professional Life,¹⁷² and implemented initiatives to exclude organized crime groups from public procurement projects.¹⁷³ In particular, as described in Chapter 1 Section 1, the Government decided on a policy on human rights considerations in public procurement in April 2023, and all relevant ministries and agencies have indicated in their bidding explanations and contracts, etc. that the business enterprises are expected to make efforts to respect human rights. In addition, at international mega-events such as the Tokyo Olympic and Paralympic Games and the Expo 2025 Osaka, Kansai, Japan, the Government has established a "Code of Sustainable Procurement,"¹⁷⁴ which includes approaches to supply chains, and has set up a contact point for receiving reports to present specific compliance items to business enterprises and provide an exclusive grievance mechanism.

On the other hand, as the sufficiency of corporate efforts to respect human rights is not

¹⁶⁸ Keidanren, "Hearing on the Corporate Human Rights Benchmark: Planning Subcommittee of the Committee on Corporate Behavior and SDGs, Task Force on the Charter of Corporate Behavior" (December 2, 2021). (https://www.keidanren.or.jp/journal/times/2021/1202_05.html) (in Japanese)

¹⁶⁹ Keidanren, "Chapter 3: Fair disclosure of information and constructive dialogue with stakeholders" in "Implementation Guidance on Charter of Corporate Behavior" (9th Edition), p. 36; ILO and PRI, "A Guide to 'Business and Human Rights' for Institutional Investors: What, Why and How to Address Human Rights through Investment Practices," p. 28 (<https://www.ilo.org/publications/guide-business-and-human-rights-institutional-investors>).

¹⁷⁰ UNGPs 5 and 6.

¹⁷¹ Ministry of Health, Labour and Welfare, "Act on Priority Procurement for Persons with Disabilities was enforced." (<https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/0000052423.html>) (in Japanese)

¹⁷² Gender Equality Bureau of the Cabinet Office, "Guidelines for Utilization of Public Procurement and Subsidies Towards the Promotion of Women's Advancement (decided by the Headquarters for Creating a Society in which All Women Shine on March 22, 2016)." (https://www.gender.go.jp/policy/positive_act/wlb_torikumi.html) (in Japanese)

¹⁷³ Working Team on Comprehensive Measures against Organized Crime Group Funding Sources, "Measures to Eliminate Organized Crime Groups from Public Projects, etc." (<https://www.kantei.go.jp/jp/singi/hanzai/kettei/091222/haijo1.pdf>) (in Japanese)

¹⁷⁴ Bureau of Tokyo 2020 Olympic and Paralympic Games Preparation, "Sustainable Procurement Code" (<https://www.2020games.metro.tokyo.lg.jp/special/watching/tokyo2020/games/sustainability/sus-code/>) (in Japanese); Japan Association for the 2025 World Exposition, "Code of Sustainable Procurement(Third Edition)" (https://www.expo2025.or.jp/wp/wp-content/themes/expo2025orjp_2022/assets/pdf/sustainability/202307_sus_code_en.pdf).

suitable for quantitative judgment, there are practical difficulties as to how the Government can objectively evaluate them. Furthermore, as described in Chapter 1 Section 2, there are concerns that SMEs may be excluded from public procurement if business and human rights efforts are included in the requirements for participation in public procurement in cases where business and human rights efforts are preceded by large enterprises.¹⁷⁵ While taking these issues into consideration, it is necessary to consider concrete measures to enhance the effectiveness.

(2) Directions and Examples of Specific Initiatives

- (i) Promote respect for human rights in public procurement by business enterprises, etc.
 - Continue efforts on human rights considerations in public procurement based on the government policy decided in April 2023 [All Ministries] (1, 3, 6)
 - Consider examining the status of corporate efforts to respect human rights [All Ministries] (3, 6)
 - Conduct training for public procurement officers. [All Ministries] (3, 6, 8)
- (ii) Consider incorporating corporate human rights initiatives into the assessment criteria for publicly subsidized projects,, consistent with international agreements and current laws and regulations. [All Ministries] (1, 3, 6, 8)

7

Access to Remedy

(1) Recognition of Issues and Measures Taken

Access to remedy constitutes one of the three pillars of the UNGPs. In Japan, IT is increasingly used not only for judicial proceedings but also for alternative dispute resolution (ADR), and efforts are being made to improve access and convenience to dispute resolution procedures.¹⁷⁶ In addition, Ministry of Justice and other competent ministries and agencies have established counseling contacts accessible to workers including foreign nationals, persons with disabilities, and victims of human rights violations, etc. in accordance with the specific content of each dispute.¹⁷⁷ In terms of the Japanese NCP, it engages in activities to raise awareness of the OECD Guidelines for Multinational Enterprises, reviews case-handling, and discloses the results of its response to specific instances.¹⁷⁸ Furthermore, the Japanese NCP is working to strengthen its functions through exchanging opinions at the Japanese NCP Committee, which is composed of the Japanese NCP, Keidanren and the Japanese Trade Union Confederation. The Japanese NCP conducts peer learning/reviews based on the OECD Guidelines for Multinational Enterprises and shares experiences with other countries' NCPs to satisfy the core effectiveness criteria prescribed in the OECD Guidelines for Multinational Enterprises such as ensuring visibility, accessibility, and transparency. It could be observed from the above that the Japanese NCP is reinforcing its function and is pursuing deeper dialogue and enhanced engagement with stakeholders. Under the Whistleblower Protection Act, business operators with more than 300 employees are required to establish a system to respond appropriately to whistleblowing.¹⁷⁹ In the field of development cooperation and development finance, JICA, JBIC, and NEXI have established objection systems to ensure compliance with their respective guidelines for environmental and social considerations.¹⁸⁰

In addition, an increasing number of organizations are responding to requests for consultation on specific business enterprises from various stakeholders, both internal and external. These

¹⁷⁵ Stakeholder Report p. 67

¹⁷⁶ Ministry of Justice "Concerning the promotion of ODR (Online ADR)." (https://www.moj.go.jp/housei/adr/housei10_00187.html) (in Japanese)

¹⁷⁷ See Appendix III.

¹⁷⁸ Ministry of Foreign Affairs, "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, 5. Specific instances handled and closed by the Japanese NCP." (https://www.mofa.go.jp/ecm/oecd/page22e_000946.html)

¹⁷⁹ Business operators with more than regular employees are required to establish a system to respond appropriately to internal whistleblowing. (Obligation to make efforts for business operators with 300 or fewer regular employees) (Article 11 of the Whistleblower Protection Act (Act No. 122 of 2004)).

¹⁸⁰ See Appendix III for each entity's objection procedures.

consultation contact points are primarily established by private enterprises, civil society, and non-profit organizations. Therefore, further efforts are expected from business enterprises to establish their own grievance mechanisms.

As can be understood from the above, although various systems have already been developed and efforts are being made in Japan, there remains a challenge to deepen understanding of the grievance mechanism required by the UNGPs and to raise awareness and increase utilization rates and effectiveness of these various systems. For example, only 20.9% of the individuals who were surveyed responded that they are aware of the name or procedures of ADR, and online dispute resolution (ODR) is less well known (15.5%).¹⁸¹ The Stakeholder Report also indicates the proactive use of NCP.¹⁸² Furthermore, less than 45% of Japanese companies accept reports and consultations from employees of overseas business partners.¹⁸³ In addition, it is necessary for various remedial systems to be linked to the actual remedy of human rights violations. From this perspective, it is conceivable to continue to examine the nature of human rights remedy systems while taking into account the circumstances of human rights remedy under individual laws.

In view of the above challenges and the current situation, Japan's multi-layered establishment of remedy mechanisms is expected not only to lead to the actual remedy of human rights violations, but also to raise awareness of human rights among Japanese companies which would enhance international trust and reputation towards them.

(2) Directions of Measures and Examples of Specific Initiatives

- (i) Establish opportunities for dialogue and engagement with stakeholders to strengthen the NCP function. [Ministry of Foreign Affairs, Ministry of Health, Labour and Welfare, and Ministry of Economy, Trade and Industry] (1, 3, 8, 10, 25, 27, 31)
- (ii) Continue to review a framework for human rights remedy system while taking into account the circumstances of human rights remedies based on individual laws. [Ministry of Justice] (1, 3, 8, 25, 26, 27, 31)
- (iii) Promote corporate activities conducted from human rights perspectives including the establishment and operation of a grievance mechanism that complies with the UNGPs through lectures based on educational materials to promote awareness of human rights.¹⁸⁴ [Ministry of Justice] (3, 8, 31)
- (iv) Continue and strengthen measures based on individual laws and regulations
 - Promote the establishment of internal whistleblowing systems in business operators. [Consumer Affairs Agency] (1, 3, 8, 25, 27, 28, 31)
- (v) Appropriately operate and review as necessary the grievance mechanisms operated by independent administrative agencies and other entities.
 - In the field of development cooperation and development finance, effectively administer, and review as necessary, objection procedures to ensure compliance with the guidelines for environmental and social considerations set by JICA, JBIC, and NEXI. [Ministry of Foreign Affairs, Ministry of Finance, and Ministry of Economy, Trade and Industry] (4, 8, 28, 31)

¹⁸¹ Ministry of Justice, "Results of Survey on Recognition of Alternative Dispute Resolution Procedures" (FY 2023). (<https://www.moj.go.jp/content/001415310.pdf>)(in Japanese)

¹⁸² Stakeholder Report, p. 75.

¹⁸³ The Third Keidanren Survey, p. 32.

¹⁸⁴ Ministry of Justice, "Human rights awareness education - To corporate personnels in charge of raising awareness of human rights" (https://www.moj.go.jp/JINKEN/jinken04_00188.html) (in Japanese) gives actual examples of grievance mechanisms introduced by business enterprises.

(1) Recognition of Issues and Measures Taken

Under the Former Action Plan, each ministry and agency implemented relevant measures. They have also annually been reviewing the status of implementing the NAP at the Committee level, discussing pending issues and fostering inter-ministerial cooperation. The Roundtable and the Working Group meetings have also been regularly held, allowing for opportunities for dialogue with various stakeholders.

For monitoring, each ministry and agency has conducted administrative program reviews for each initiative in relation to its respective measures under the Former Action Plan. In these reviews, the progress and effects of the measures have been checked against indicators of outputs (i.e., indicators measuring the quantity of goods and services provided by the measures and the results of their use) and indicators of outcomes (i.e., indicators concerning changes in the target audience of the project (behavioral changes) that have been actually brought about as a result of the measures). In addition, under the Former Action Plan, evaluation indicators concerning the implementation status of the NAP have been examined,¹⁸⁵ “[Indicators in Five Priority Areas](#)”¹⁸⁶ have been set, and important measures have been intensively monitored based on objective indicators.

As explained in the overview in Chapter 1, 1, the “future measures planned” in each area as defined by the Former Action Plan have progressed as shown in the “List of Implementation Status of Action Plan Measures” in the [annual review](#), and steady progress has been made toward the achievement of the goals under the Former Action Plan. According to the Third Keidanren Survey conducted in 2023, 76% of the business enterprises responded that they were promoting initiatives based on the UNGPs, which is a significant leap from 36% in the Second Keidanren Survey conducted in 2020. This can be evaluated as a change brought about to society by initiatives under the Former Action Plan.

On the other hand, some point out that new evaluation methods should be established for the objective and quantitative indicators and performance indicators (Key Performance Indicators, KPIs) to measure the degree of achievement of the NAP itself, and impact evaluation to evaluate the changes that the business has brought to society. It is very important that the various measures are implemented effectively and efficiently, and that they are accompanied by modification of targets as necessary, in order to achieve the desired results. Under the existing monitoring system, while each ministry and agency conduct administrative program reviews and works to set objective and quantitative indicators and KPIs, they will each continue to examine what kind of indicators are feasible and useful as a new evaluation method to measure the overall progress of the NAP, and also examine how to implement them through discussions with stakeholders.

(2) Directions of Measures and Examples of Specific Initiatives

- (i) Regularly identify priority areas to be addressed by Japan, and consider implementing a system to evaluate the relevant measures from the perspectives of the “output,” “outcome,” and “impact,” etc. [All Ministries] (3)
- (ii) Consider establishing an effective review system to conduct periodical assessments. [All Ministries] (3)
- (iii) Consider implementing a system to make clearer disclosures to stakeholders regarding the progress of measures and achievement of targets. [All Ministries] (3)

¹⁸⁵ The Former Action Plan, Chapter 4, 4(1) and Inter-Ministerial Committee “Method of Evaluating the National Action Plan on ‘Business and Human Rights’” (June 2022). (<https://www.mofa.go.jp/mofaj/files/100363447.pdf>) (in Japanese)

¹⁸⁶ Inter-Ministerial Committee “Indicators in Five Priority Areas (Reference)” (March 2023). (<https://www.mofa.go.jp/mofaj/files/100520260.pdf>) (in Japanese)

1 Under the Former Action Plan, the Government expressed its expectations to business enterprises regarding their business and human rights initiatives.¹⁸⁷ As described in Chapter 1, during this period, the concept of business and human rights has become well recognized, especially by large enterprises, and many companies have made progress in their initiatives, mainly through the formulation of human rights policies. At the same time, various issues also surfaced, such as challenges in implementing practical Human Rights DD for building responsible supply chains and realizing respect for human rights, issues related to access to remedy, and the need to extend these efforts to SMEs and rural areas.

Outside Japan, international trends in business and human rights continue to change. In light of such international trends, Japanese companies are recommended to take measures to ensure respect for human rights in supply chains that extend not only within Japan but also overseas, from both perspectives of “protecting and promoting human rights in society as a whole, including the international community,” and “securing and enhancing the international competitiveness and sustainability of Japanese companies.”

All business enterprises have a responsibility to respect human rights as entities that engage in business activities, and their efforts aim to prevent, mitigate, and remedy adverse human rights impacts from business activities. In recent years, the impact of corporate activities on human rights has been attracting more attention, and in some cases, the response of enterprises could have resulted in boycott and loss of reputation as business partners. Therefore, on the premise that every enterprise is exposed to human rights risks, its actual implementation of efforts to respect human rights may mitigate these managerial risks. The enterprise’s actual implementation of initiatives to respect human rights and to implement appropriate disclosure of such initiatives will enhance its corporate image, enhance its reputation as an investable entity, enhance relationships with its business partners, enable it to acquire and retain talented human resources and, consequently, enhance its corporate value.

2 Based on the above, the New Action Plan expects all Japanese companies, regardless of their size or industry, etc., to continue to respect internationally recognized human rights,¹⁸⁸ and to make utmost efforts to respect human rights, by taking into account the gap between international standards and domestic laws and regulations established by the countries in which Japanese companies operate (i.e., governance gap), on the premises that human rights risks exist everywhere.

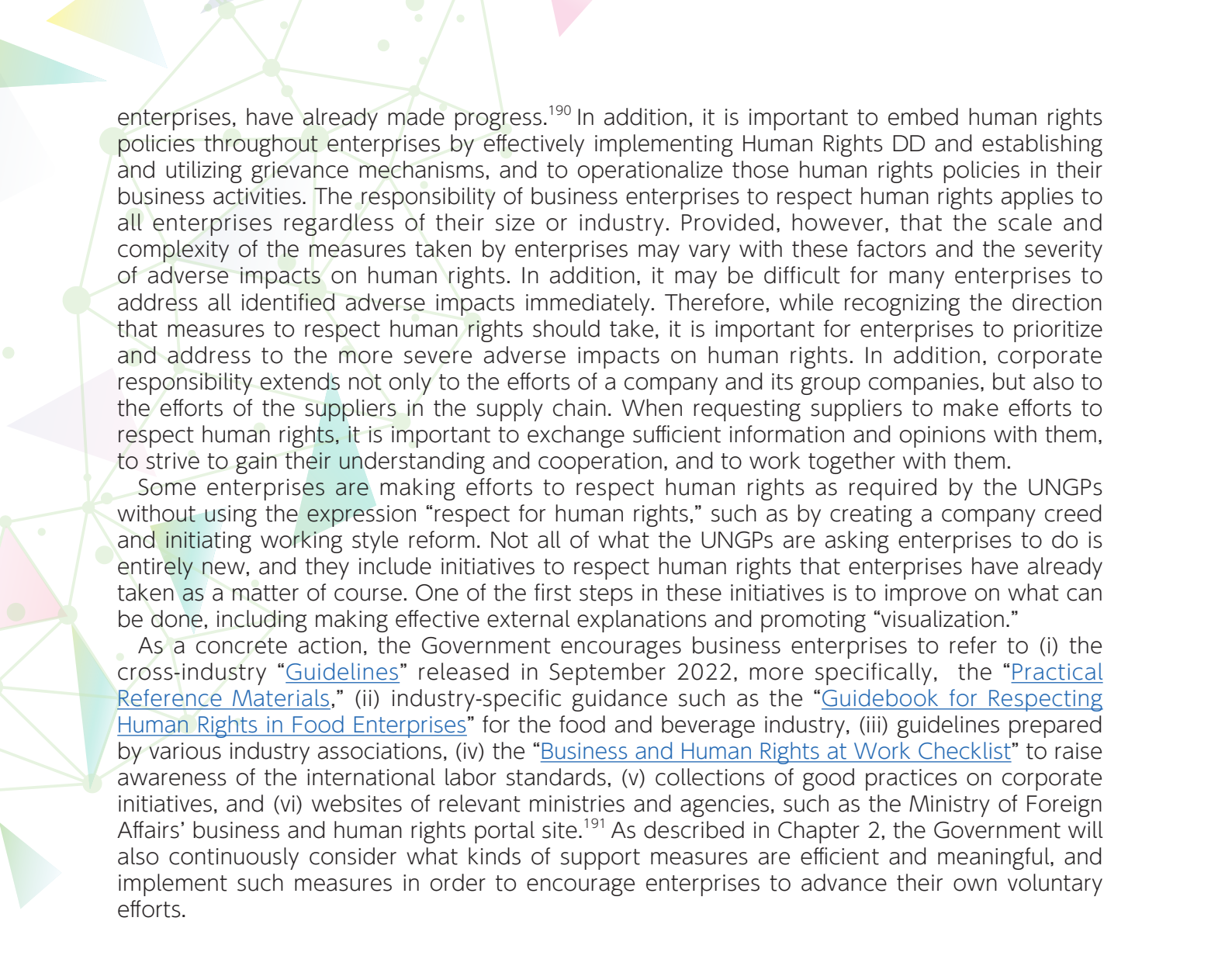
Specifically, in order to fulfill their responsibility to respect human rights in line with UNGPs, business enterprises are required to: (1) formulate and publish their human rights policies; (2) carry on Human Rights DD; and (3) implement measures to prevent and mitigate, and provide remedy in cases where they cause or contribute to adverse human rights impacts. When the business enterprise’s operations are directly linked to adverse human rights impacts, they should strive to prevent or mitigate the adverse impacts by using its leverage over the concerned entities or strengthening leverage or providing support.¹⁸⁹

In regard to introduction of human rights policies, many business enterprises, mainly large

¹⁸⁷ Under the Former Action Plan, the Government expected business enterprises to: (i) respect internationally recognized human rights and fundamental rights principles set out in the ILO Declaration; (ii) introduce the process of human rights due diligence; (iii) engage in dialogue with stakeholders; and (iv) resolve issues through effective grievance mechanisms.

¹⁸⁸ “Internationally recognized human rights” for which enterprises are responsible to respect at least include the International Bill of Human Rights (as enunciated in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles relating to fundamental rights set out in the ILO Declaration (freedom of association and the effective recognition of the right to collective bargaining; elimination of all forms of forced and compulsory labor; effective abolition of child labor; elimination of discrimination in respect of employment and occupation; and creation of a safe and healthy working environment) (UNGPs 12 Commentary, Guidelines 2.1.2.1).
· Universal Declaration of Human Rights (https://www.mofa.go.jp/policy/human/univers_dec.html) ;
· International Covenant on Civil and Political Rights (https://www.mofa.go.jp/policy/human/cove_civil/cove_civil.html); and
· International Covenant on Economic, Social and Cultural Rights (https://www.mofa.go.jp/policy/human/cove_econo/cove_econo.html).

¹⁸⁹ UNGPs 11-24.



enterprises, have already made progress.¹⁹⁰ In addition, it is important to embed human rights policies throughout enterprises by effectively implementing Human Rights DD and establishing and utilizing grievance mechanisms, and to operationalize those human rights policies in their business activities. The responsibility of business enterprises to respect human rights applies to all enterprises regardless of their size or industry. Provided, however, that the scale and complexity of the measures taken by enterprises may vary with these factors and the severity of adverse impacts on human rights. In addition, it may be difficult for many enterprises to address all identified adverse impacts immediately. Therefore, while recognizing the direction that measures to respect human rights should take, it is important for enterprises to prioritize and address to the more severe adverse impacts on human rights. In addition, corporate responsibility extends not only to the efforts of a company and its group companies, but also to the efforts of the suppliers in the supply chain. When requesting suppliers to make efforts to respect human rights, it is important to exchange sufficient information and opinions with them, to strive to gain their understanding and cooperation, and to work together with them.

Some enterprises are making efforts to respect human rights as required by the UNGPs without using the expression “respect for human rights,” such as by creating a company creed and initiating working style reform. Not all of what the UNGPs are asking enterprises to do is entirely new, and they include initiatives to respect human rights that enterprises have already taken as a matter of course. One of the first steps in these initiatives is to improve on what can be done, including making effective external explanations and promoting “visualization.”

As a concrete action, the Government encourages business enterprises to refer to (i) the cross-industry “[Guidelines](#)” released in September 2022, more specifically, the “[Practical Reference Materials](#),” (ii) industry-specific guidance such as the “[Guidebook for Respecting Human Rights in Food Enterprises](#)” for the food and beverage industry, (iii) guidelines prepared by various industry associations, (iv) the “[Business and Human Rights at Work Checklist](#)” to raise awareness of the international labor standards, (v) collections of good practices on corporate initiatives, and (vi) websites of relevant ministries and agencies, such as the Ministry of Foreign Affairs’ business and human rights portal site.¹⁹¹ As described in Chapter 2, the Government will also continuously consider what kinds of support measures are efficient and meaningful, and implement such measures in order to encourage enterprises to advance their own voluntary efforts.

¹⁹⁰ According to the Third Keidanren Survey (p.24), enterprises that have formulated a human rights policy (including those that have formulated a policy independently and those that have adopted a common policy for the entire group) comprised 91% of the total number of companies operating in Japan, which is an improvement from the previous survey (2020, 65%).

¹⁹¹ See Appendix II.

Three Steps to Respect Human Rights [UNGPs 15]

1. Formulation and Publication of Human Rights Policy [UNGPs 16]

- Enterprises should express their commitment to fulfilling their human rights responsibilities both internally and externally through a human rights policy that meets the following five requirements:
 - (i) it is approved at the most senior level of the business enterprises;
 - (ii) it is informed by relevant internal and/or external expertise;
 - (iii) it stipulates the business enterprises' human rights expectations of personnel, business partners and others partners directly linked to its operations, products or services;
 - (iv) it is publicly available and communicated internally and externally to all personnel, business partners and other relevant parties; and
 - (v) it is reflected in the operational policies and procedures necessary to embed it throughout the business enterprise.

2. Human Rights DD [UNGPs 17~21, 23, 24]

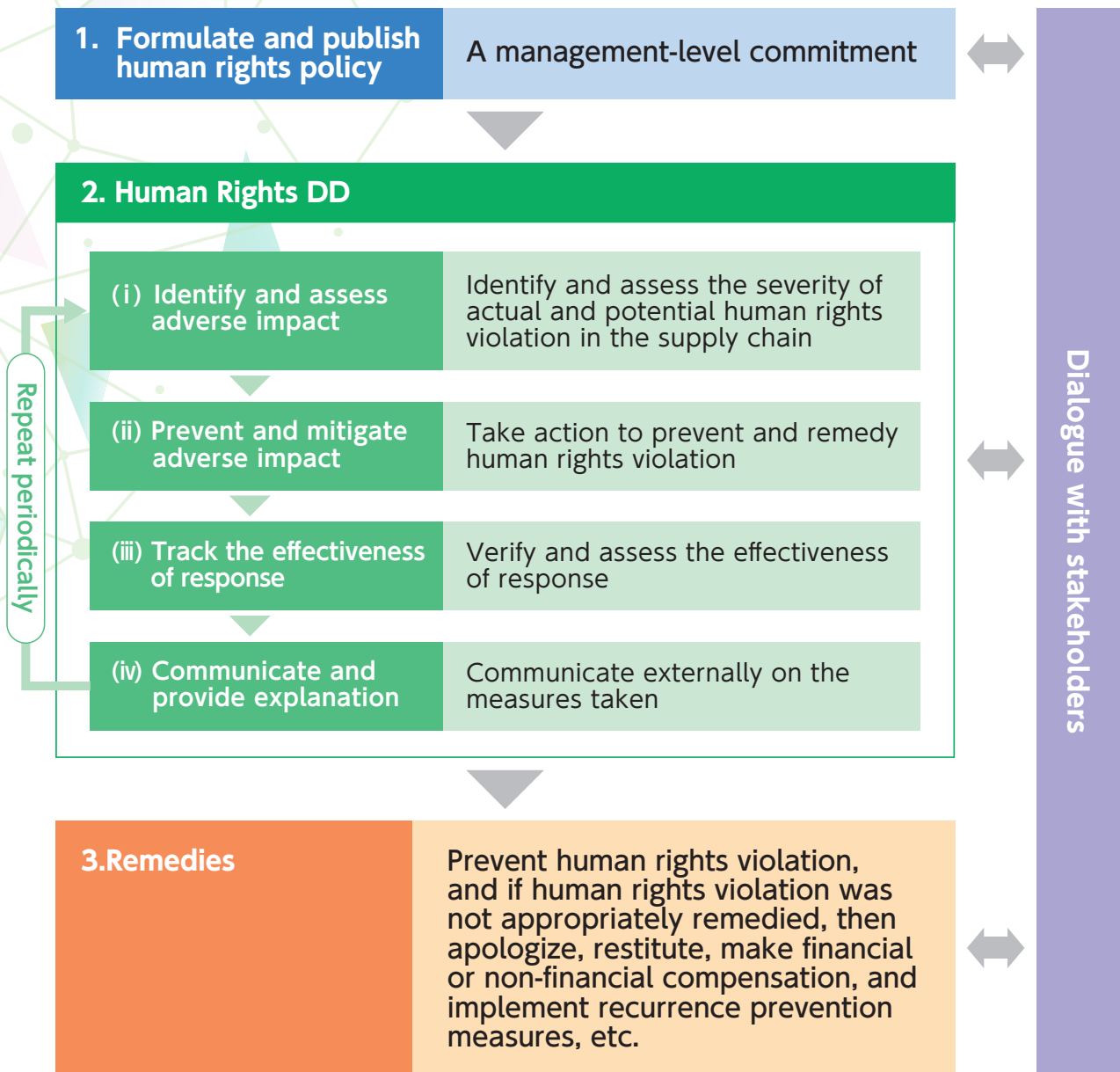
- Human Rights DD is a series of acts undertaken by a business enterprise to (i) identify, assess, prevent, and mitigate adverse human rights impacts in its business enterprise, group companies, and suppliers, etc., (ii) track the effectiveness of its responses, and (iii) account for and disclose information on how it addresses the adverse impacts.
- This is an ongoing process to prevent and mitigate adverse human rights impacts through continuous dialogue with stakeholders.

3. Remedies [UNGPs 22, 29~31]

- When it has become clear that a business enterprise caused or contributed to adverse human rights impacts, the business enterprise should implement a remedy or cooperate in the implementation of a remedy. (Specific examples of remedies: apologies, restitution, financial or non-financial compensation, and recurrence prevention measures, etc.)
- When a business enterprise's operations, etc. are directly linked to adverse human rights impacts, it should strive to prevent or mitigate the adverse impacts by using its leverage on the entities that cause or contribute to the adverse impacts or strengthening leverage or providing support.
- A business enterprise should be able to provide remedy either by establishing a grievance mechanism or by participating in a grievance mechanism established by an industry association and others.
- To ensure the effectiveness of a grievance mechanism, this mechanism must be: legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue with stakeholders.



Overall picture of respect for human rights in a responsible supply chain



*1 The Guidelines require that **all business enterprises conducting business in Japan** to 1. formulate and publish its human rights policy, 2. perform Human Rights DD, and 3. implement remedies.

*2 **Dialogue with stakeholders** is important in all of these efforts.

1

Framework for Implementing the NAP

Under the leadership of the Committee, relevant policies will be implemented in coordination among ministries and agencies as appropriate. In addition, the Roundtable and the Working Group will be continued as a place for dialogue based on trust between relevant ministries and agencies and stakeholders.

2

Process for Implementing the NAP

The implementation status of the New Action Plan will be confirmed every year by the Committee. In confirming the implementation status, efforts will be made to use objective indicators as much as possible, including the use of existing evaluation indicators at relevant ministries and agencies. In addition to the measures described in the New Action Plan, any new measures conceived will also be included. In confirming the implementation status, opinions will be collected from stakeholders.

3

Launch and Revision of the NAP

The New Action Plan will commence from FY 2026. The Committee will appropriately assess the necessity of revisions to the New Plan approximately five years after its publication, taking into account changes in domestic and international situations surrounding business and human rights, and hearing opinions from stakeholders.



1

Members of the “Inter-Ministerial Committee on Policy Promotion for the Implementation of the NAP”

(Director-Generals)

Cabinet Secretariat	Assistant Chief Cabinet Secretary
Cabinet Office	Councilor, Minister’s Secretariat, Policy Planning
National Police Agency	Director General for International Affairs
Financial Services Agency	Director-General, Strategy Development and Management Bureau
Consumer Affairs Agency	Deputy Director General
Children and Families Agency	Commissioner-General’s Secretariat, Deputy Director
Digital Agency	Director-General for Policy Coordination
Reconstruction Agency	Deputy Director-General
Ministry of Internal Affairs and Communications	Director General
Ministry of Justice	Assistant Vice-Minister
Ministry of Foreign Affairs	Director-General, Foreign Policy Bureau
Ministry of Finance	Deputy-Director, Minister’s Secretariat
Ministry of Education, Culture, Sports, Science and Technology	Director-General for International Affairs
Ministry of Health, Labour and Welfare	Senior Assistant Minister for International Affairs, Minister’s, Secretariat
Ministry of Agriculture, Forestry and Fisheries	Director-General for New Business and Food Industry, Minister’s Secretariat
Ministry of Economy, Trade and Industry	Director, Trade Policy Bureau, and Director-General for Business and Human Rights Policy
Ministry of Land, Infrastructure, Transport and Tourism	Director, International Affairs
Ministry of Environment	Director, Global Environment Bureau
Ministry of Defense	Deputy Commissioner, Secretariat, Acquisition, Technology & Logistics Agency

(Section Chiefs)

Cabinet Secretariat	Assistant Chief Cabinet Secretary, Counsellor, Cabinet Secretariat
Cabinet Office	Director, Policy Coordination Division, Ministers’ Secretariat
National Police Agency	Director for International Affairs
Financial Services Agency	Director, Planning and Management Division, Strategy Development and Management Bureau
Consumer Affairs Agency	Counselor, Office of the Counselor for Consumer Research and International Affairs
Children and Families Agency	Commissioner’s Secretariat, Director (Policy Research)
Digital Agency	Director (Strategy and Organization Group)
Reconstruction Agency	Director
Ministry of Internal Affairs and Communications	Counselor, General Affairs Division, Minister’s Secretariat
Ministry of Justice	Director, International Affairs Division, Minister’s Secretariat

Ministry of Foreign Affairs	Director, Human Rights and Humanitarian Affairs Division, Foreign Policy Bureau
Ministry of Finance	Director, Policy Promotion Office, Policy Planning and Research Division, Minister's Secretariat
Ministry of Education, Culture, Sports, Science and Technology	Director, International Affairs Division, Minister's Secretariat
Ministry of Health, Labour and Welfare	Deputy Assistant Minister for International Policy Planning, International Affairs Division, Minister's Secretariat
Ministry of Agriculture, Forestry and Fisheries	Director (Counsellor), International Strategy Division, Export and International Affairs Bureau
Ministry of Economy, Trade and Industry	Director, Business and Human Rights Policy Office, Trade Policy Bureau
Ministry of Land, Infrastructure, Transport and Tourism	Counsellor for Global Strategy, Policy Bureau
Ministry of Environment	Director, International Strategy Division, Global Environment Bureau
Ministry of Defense	Director, Procurement Planning Division, Department of Procurement Management, Acquisition, Technology & Logistics Agency

2

Members of the “Roundtable for Promoting the NAP”

(Stakeholders) *Japanese-alphabetical order

ARIMA Toshio	Board Member, Global Compact Network Japan
IWATSUKI Yuka	Chair, Business and Human Rights Civil Society Platform; President, Action against Child Exploitation (ACE)
OZEKI Hiroshi	Chair, Japan Sustainable Investment Forum (JSIF); President & CEO, Nissay Asset Management Corporation
OMURA Emi	Former Chair, Committee on International Human Rights, Japan Federation of Bar Associations
KONO Yasuko	Director, Japan Consumer's Association
SUGAWARA Emi	Professor, Osaka University of Economics and Law
TOMITA Nozomi	Director, International Labour Organization (ILO) Office for Japan
NISHIZAWA Keiji	Vice Chair of the Board of Councillors, Japan Business Federation (Keidanren); Chair, Committee on Responsible Business Conduct & SDGs Promotion, Keidanren; Executive Advisor, Sompo Japan Insurance Inc.
HIROHAMA Yasuhisa	Chairperson, The National Conference of Association of Small Business Entrepreneurs
YASUKOCHI Katahiro	Vice President, Japanese Trade Union Confederation, RENGO

(Relevant Ministries and Agencies)

Cabinet Office	Director, Policy Coordination Division, Minister's Secretariat
National Police Agency	Director for International Affairs
Financial Services Agency	Director, Planning and Management Division, Strategy Development and Management Bureau
Consumer Affairs Agency	Counselor, Office of the Counselor for Consumer Research and International Affairs
Children and Families Agency	Commissioner-General's Deputy Director, (Policy Planning)

Digital Agency
 Reconstruction Agency
 Ministry of Internal Affairs and Communications
 Ministry of Justice
 Ministry of Foreign Affairs
 Ministry of Foreign Affairs
 Ministry of Finance
 Ministry of Education, Culture, Sports, Science and Technology
 Ministry of Health, Labour and Welfare
 Ministry of Agriculture, Forestry and Fisheries
 Ministry of Economy, Trade and Industry
 Ministry of Land, Infrastructure, Transport and Tourism
 Ministry of Environment
 Ministry of Defense

Director
 Director
 Counselor, General Affairs Division, Minister's Secretariat
 Director, International Affairs Division, Minister's Secretariat
 Deputy Director-General, Foreign Policy Bureau
 Director, Human Rights and Humanitarian Affairs Division, Foreign Policy Bureau
 Director, Policy Promotion Office, Policy Planning and Research Division, Minister's Secretariat
 Director, International Affairs Division, Minister's Secretariat
 Deputy Assistant Minister for International Policy Planning, International Affairs Division, Minister's Secretariat
 Director (Counsellor), International Strategy Division, Export and International Affairs Bureau
 Director, Business and Human Rights Policy Office, Trade Policy Bureau
 Counsellor for Global Strategy, Policy Bureau
 Director, International Strategy Division, Global Environment Bureau
 Director, Procurement Planning Division, Department of Procurement Management, Acquisition, Technology & Logistics Agency

3

Members of the "Working Group for Promoting the NAP"

(Stakeholders) *Japanese-alphabetical order

UJIE Keiichi	BHR Specialist, Global Compact Network Japan
KIMURA Hitomi	Associate Professor, Otsuma Women's University Faculty of Social Information Studies
SAITO Kazutaka	Director of Policy, National Conference of Association of Small Business Entrepreneurs
SAITO Toshikazu	Director, International Policy Division, Japanese Trade Union Confederation, RENGO
ZENIYA Miyuki	National Partner Board Member, GSG Impact Japan; Executive board member, JSIF
TAKAHASHI Daisuke	Chair, Project Team on Corporate Social Responsibility and Internal Control, Committee on Legal Practice Reform, Japan Federation of Bar Associations
TANAKA Ryusuke	Project Coordinator, ILO Office for Japan
DOI Yoko	Vice Chair, Business and Human Rights Civil Society Platform; Co-Founder, Social Connection for Human Rights (SCHR)
HASEGAWA Tomoko	Managing Director, Keidanren
FURUYA Yukiko	Advisor, CSO Network Japan, President, Consumer Conference for Sustainability

(Relevant Ministries and Agencies) The relevant ministries and agencies participating in the Roundtable (depending on the content of the discussion).

1

International Instruments

- “Guiding Principles on Business and Human Rights for implementing the UN ‘Protect, Respect and Remedy’ Framework” (2011)
<https://www.mofa.go.jp/files/000055037.pdf>
- “OECD Guidelines for Multinational Enterprises on Responsible Business Conduct”
<https://www.mofa.go.jp/mofaj/files/100514804.pdf>
- “OECD Due Diligence Guidance for Responsible Business Conduct” (2018)
https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-business-conduct_15f5f4b3-en.html
- “The ILO Declaration on Fundamental Principles and Rights at Work” (1998)
<https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work/about-declaration/text-declaration-and-its-follow>
- “Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (6th edition)” (2022)
https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_emp/%40emp_ent/%40multi/documents/publication/wcms_094386.pdf
- “The 2030 Agenda for Sustainable Development” (2015)
<https://www.mofa.go.jp/mofaj/gaiko/oda/sdgs/pdf/000101401.pdf>
- “United Nations Global Compact” (2000)
<https://unglobalcompact.org/what-is-gc/mission/principles>
- “Children’s Rights and Business Principles” (2012)
<https://www.unicef.org/media/96136/file/Childrens-Rights-Business-Principles-2012.pdf>

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National Policy Documents and Others

(Guidelines and Handbook, etc.)

- “Guidelines on Respecting Human Rights in Responsible Supply Chains” (2022)
<https://www.meti.go.jp/policy/economy/business-jinken/guidelines/provisionalenglishtranslation.pdf>
- “Reference Material on Practical Approaches for Business Enterprises to Respect Human Rights in Responsible Supply Chains” (2023)
https://www.meti.go.jp/english/press/2023/pdf/0404_002a.pdf
- “On Human Rights Consideration in Public Procurement” (2023)
https://www.cas.go.jp/jp/seisaku/business_jinken/dai7/siryoku4.pdf (in Japanese)
- “Guidebook for Respecting Human Rights in Food Enterprises” (2023)
<https://www.maff.go.jp/j/shokusan/kokusaihan/attach/pdf/jinkentebiki-13.pdf>
- “Business and Human Rights at Work Checklist” (2024)
<https://www.mhlw.go.jp/content/10500000/001511269.pdf>
- “Quick Guide to ‘Business and Human Rights’: How to Respect Human Rights in Domestic and Foreign Businesses and Supply Chains” (2024)
https://www.jetro.go.jp/ext_images/world/scm_hrm/pdf/202401.pdf (in Japanese)
- “‘Business and Human Rights’ Initiatives Required of Companies now: A report on the ‘Survey on Business and Human Rights’ (full version)” (published in March 2021, revised in March 2024)
<https://www.moj.go.jp/content/001417137.pdf> (in Japanese)

(Collections of Good Practices)

- “A Compilation of Case Studies on ‘Business and Human Rights’” (2021)
<https://www.mofa.go.jp/files/100348374.pdf>
- “Responsible Business Conduct and Human Rights Due Diligence: Good Practices of Japa-

nese Companies” (2024)

https://www.jetro.go.jp/ext_images/world/scm_hrm/JETRO_RBC_HRDD2024en.pdf

- “Business and Human Rights”: First Steps - A Compilation of Initiatives for Small and Medium-sized Enterprises” (2025)

<https://www.moj.go.jp/content/001437123.pdf> (in Japanese)

- “FY 2024 Reference Casebook of Good Practices on the Disclosure of Narrative Information”

<https://www.fsa.go.jp/news/r6/singi/20250324-2.html> (in Japanese)

(Relevant websites of relevant ministries and agencies and others)

- Ministry of Foreign Affairs: Business and human rights information portal site (Access to the NAP, etc.)

https://www.mofa.go.jp/fp/hr_ha/page23e_000551.html

- Ministry of Justice: Business and Human Rights

https://www.moj.go.jp/JINKEN/jinken04_00090.html (in Japanese)

- Ministry of Justice: Human Rights Training at Companies, For Corporate Human Rights Training Personnel (Access to educational materials, etc.)

https://www.moj.go.jp/JINKEN/jinken04_00188.html (in Japanese)

- Ministry of Health, Labour and Welfare: Business and Human Rights: Toward a Responsible Global Supply Chain

https://www.mhlw.go.jp/stf/newpage_37874.html (in Japanese)

- Ministry of Agriculture, Forestry and Fisheries: Business and Human Rights

https://www.maff.go.jp/j/kokusai/kokusei/kanren_sesaku/business_and_human_rights.html (in Japanese)

- Ministry of Economy, Trade and Industry: “Business and Human Rights”: Towards a Responsible Value Chain

https://www.meti.go.jp/english/policy/economy/biz_human_rights/index.html

- Ministry of Environment: Environment Due Diligence

https://www.env.go.jp/policy/j-hiroba/post_38.html (in Japanese)

- Japan External Trade Organization (JETRO): “Special Feature: Supply Chain and Human Rights”

https://www.jetro.go.jp/world/scm_hrm/ (in Japanese)

- Institute of Developing Economies, Japan External Trade Organization (IDE-JETRO): Business and Human Rights: The Roles of Governments, Companies, and Citizens

<https://www.ide.go.jp/Japanese/New/Special/BHR.html> (in Japanese)

(Note) For the latest information, please refer to “Access to Remedies” on the Business and Human Rights Portal (Ministry of Foreign Affairs).

https://www.mofa.go.jp/mofaj/gaiko/bhr/salvation_access.html (in Japanese)

■ Japanese NCP (Japan Contact Point under the “OECD Guidelines for Multinational Enterprises”) (Ministry of Foreign Affairs)

A contact point has been established in each country in order to promote awareness of the “OECD Guidelines for Multinational Enterprises,” to respond to inquiries about these guidelines, and to support the resolution of specific instances. In Japan, this contact point is composed of Ministry of Foreign Affairs, Ministry of Health, Labour and Welfare, and Ministry of Economy, Trade and Industry.

https://www.mofa.go.jp/ecm/oezd/page22e_000946.html

■ Japan Legal Support Center (The JLSC)

A “General Information Center” established by the Government to provide guidance for solving various legal problems.

<https://www.houterasu.or.jp/site/english/>

■ Human Rights Counseling (Ministry of Justice)

Legal Affairs Bureaus and District Legal Affairs Bureaus across Japan provide human rights counseling by face-to-face contact, letters (Children’s Rights SOS Mini-Letters), exclusive telephone counseling (Children’s Human Rights Hotline, Human Rights Hotline), the internet, and chat. These contacts also provide human rights counseling to foreigners (face -to-face in 80 languages, telephone counseling in 10 languages). In addition, at the request of the person seeking counseling, human rights counseling is provided to persons with disabilities via written communication or arranging for a sign-language interpreter.

https://www.moj.go.jp/JINKEN/index_soudan.html

■ Comprehensive Contact Point for Goods and Services (Ministry of Defense)

This contact point has been established to enable anyone to raise their concerns on human rights violations and Human Rights DD by business enterprises in relation to the Ministry of Defense’s public procurement. This contact point also provides counseling on human rights issues in the supply chains of SMEs.

https://www.mod.go.jp/j/form/procurement/chotatsu_20200819.html (in Japanese)

■ Workplace Troubles

- Individual Labor Dispute Resolution System (labor counseling, advice/guidance, and mediation) (Ministry of Health, Labour and Welfare)

A system that responds to requests for consultations on all labor issues from workers and employers, and promotes voluntary dispute resolution through consultations between relevant parties through the provision of advice and guidance from the Director of the Prefectural Labour Bureaus and mediation by the Dispute Coordinating Committee, depending on the requestor’s preferences.

<https://www.mhlw.go.jp/general/seido/chihou/kaiketu/index.html> (in Japanese)

- Comprehensive Labour Consultation Corner (Ministry of Health, Labour and Welfare)

Specialized counselors provide advice to workers, job seekers, and employers on all labor issues, including dismissal and termination.

<https://www.mhlw.go.jp/general/seido/chihou/kaiketu/soudan.html>

- Equal Employment Office, Prefectural Labour Bureaus

The Prefectural Labour Bureau provides counseling to employees and employers on matters related to the Act on Equal Opportunity and Treatment between Men and Women in Employment, including measures against sexual harassment in the workplace.

<https://www.mhlw.go.jp/content/001438299.pdf> (in Japanese)

- Freelancer Troubles Consultation Hotline (Ministry of Health, Labour and Welfare, Japan Fair Trade Commission, The Small and Medium Enterprise Agency)

A contact point for freelancers to access lawyers to consult on difficulties encountered in the conducting of business between freelancers and their clients.

<https://freelance110.mhlw.go.jp/> (in Japanese)

■ Whistleblower Protection System Consultation Hotline (Consumer Affairs Agency)

This hotline answers questions on the interpretation of the Whistleblower Protection Act and the Whistleblowing System (reporting method, requirements for whistleblower protection, and various guidelines, etc.), and accepts consultation concerning inquiries from administrative agencies that are anticipated when making a report or inappropriate responses to the report.

https://www.caa.go.jp/en/policy/consumer_partnerships/

■ Persons with disabilities

- Disability Consultation Desk (Cabinet Office)

This site provides information on various consultation services tailored to the nature of your inquiry and the type of disability.

https://www8.cao.go.jp/shougai/whitepaper/r06hakusho/zenbun/furoku_12.html (in Japanese)

- Consultation Desk for Disability Discrimination (Cabinet Office)

Consultation point project “Intermediary Desk” that performs the role of explaining laws and connecting inquirers to appropriate consultation points in order to address consultations about discrimination against persons with disabilities from persons with disabilities, companies, and prefectural and municipal governments, etc.

https://www8.cao.go.jp/shougai/suishin/sabekai_tsunagu.html (in Japanese)

- Measures for employment of persons with disabilities (Ministry of Health, Labour and Welfare)

Introduction of consultation desks and support institutions for employment of persons with disabilities.

https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/koyou_roudou/koyou/shougaishakoyou/shisaku/shougaisha/index.html (in Japanese)

■ Foreign Workers

- Consultation Desk and Information Reception (Immigration Services Agency)

Consultation services are provided mainly at the “Foreign Residents General Information Center,” which provides consultation services for immigration procedures, and at the “Foreign Residents Support Center,” which provides consultation services by four ministries and eight organizations relating to support to foreigners regarding their residence status.

<https://www.moj.go.jp/isa/support/consultation/index.html> (in Japanese)

- Consultation Service for Foreign Workers, Telephone Consultation Service for Foreign Workers, and Working Conditions Consultation Hotline (Ministry of Health, Labour and Welfare)

This consultation service for foreign workers is available in 14 languages (including Japanese), including the “Guide to Labour Bureaus with Foreign Workers Consultation Service” set up at Prefectural Labour Bureaus and Labour Standards Inspection Offices, the “Telephone Consultation Service for Foreign Workers” for those who cannot visit the consultation service, and the “Labour Standards Advice Hotline” for those who cannot visit the service when the Labour Standards Inspection Office is open.

https://www.check-roudou.mhlw.go.jp/soudan/foreigner_eng.html

- Provision of information and consultation services to foreign technical intern trainees in their native languages (Organization for Technical Intern Training)

This organization has consultants who can respond to requests for consultations from technical intern trainees in their native languages. In addition to consultations, a system is in place to respond to reports and declarations from technical intern trainees in the event of violations of laws and regulations by the implementing organizations or supervising organizations.

<https://www.support.otit.go.jp/soudan/en/>

- JP-MIRAI Assist (Japan Platform for Foreign Workers towards Responsible and Inclusive Society (JP-MIRAI))

Daily life and labor consultations are available in 23 languages from foreigners and supporters via phone, app chat, and email. Complex consultations are supported through accompaniment support, specialist consultations, and ADR (Alternative Dispute Resolution).

<https://portal.jp-mirai.org/en/consult>

■ Consumer Relations

- Consumer Hotline (Consumer Affairs Agency)

This three-digit telephone number, which is common nationwide, provides the contact details of local consumer affairs consultation centers to consumers who do not know the

existence or contact information of such centers.

https://www.caa.go.jp/policies/policy/local_cooperation/local_consumer_administration/hotline/ (in Japanese)

- Consultation, Dispute Resolution and Information Reception (National Consumer Affairs Center of Japan, an incorporated administrative agency)

This agency collects information from consumer affairs centers nationwide regarding consumer affair matters on which people have sought consultation, to help prevent the occurrence and spread of damage to consumers. In addition, this agency supports consumer affairs centers by providing consultation services for consumer disputes and conducts alternative dispute resolution (ADR) procedures.

<https://www.kokusen.go.jp/category/consult.html> (in Japanese)

■ **Minister of Justice’s Certification System for Alternative Dispute Resolution, “Kaiketsu Support” (Ministry of Justice)**

“Kaiketsu Support” is a service certified by Minister of Justice in which a private business operator enters into a dispute as a fair and neutral third party to endeavor to resolve the dispute flexibly through discussion.

<https://www.adr.go.jp/> (in Japanese)

■ **Consultation Desk for Development Cooperation and Development Finance**

- Objection Procedures based on JICA’s “Guidelines for Environmental and Social Considerations” (Japan International Cooperation Agency (JICA)):

Residents of the country who have suffered or are likely to suffer damage due to JICA’s non-compliance with JICA Guidelines for Environmental and Social Considerations may request a third-party Examiner to review JICA’s compliance and facilitate dialogue between the parties to resolve the dispute.

<https://www.jica.go.jp/english/about/policy/environment/objection/index.html>

- Objection Procedures Based on JBIC’s “Guidelines for Confirmation of Environmental and Social Considerations” and its “Guidelines for Confirmation of Information Disclosure Considerations for Nuclear Sector Projects” (Japan Bank for International Cooperation (JBIC)):

JBIC has introduced objection procedures to ensure its compliance with its “JBIC Guidelines for Confirmation of Environmental and Social Considerations.”

<https://www.jbic.go.jp/en/business-areas/environment/disagree/procedure.html>

- Objection Procedures based on “Guidelines on Environmental and Social Considerations in Trade Insurance” and “Guidelines for Information Disclosure Considerations for Nuclear Energy Projects in Trade Insurance” (Nippon Export and Investment Insurance (NEXI)):

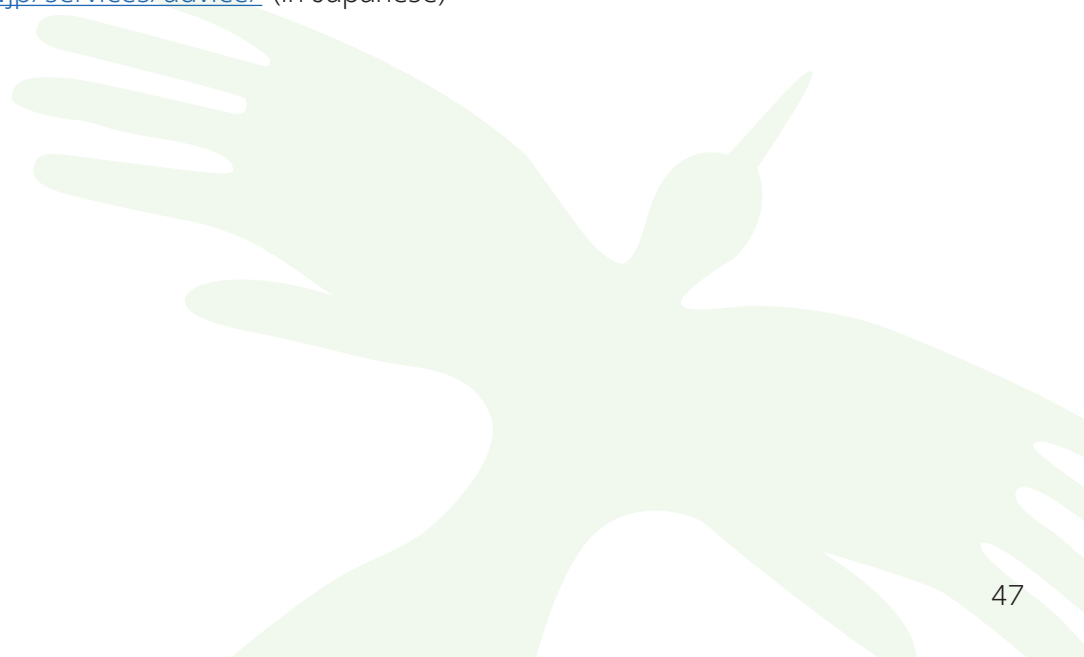
NEXI has established objection procedures to ensure compliance with these guidelines.

<https://www.nexi.go.jp/en/environment/objection.html>

- Trade and Investment Consultation on Business and Human Rights (Japan External Trade Organization (JETRO)):

JETRO provides advice on supply chain and human rights in addition to advice on overseas businesses. JETRO also provides advice on the Government’s “Guidelines for Respecting Human Rights in the Responsible Supply Chain” and related practical reference materials.

<https://www.jetro.go.jp/services/advice/> (in Japanese)





Notes

