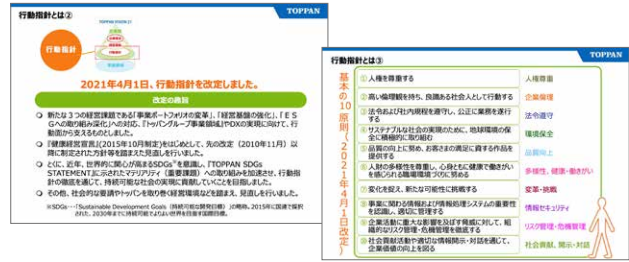


Disseminating the Revised Conduct Guidelines

Toppan gives every Group employee in Japan a booklet presenting the revised Conduct Guidelines and arranges an e-learning program to heighten awareness of the revisions. Toppan also organizes group training for Conduct Guidelines Promotion Leaders (“Leaders”) to brief them on the details and intent of the latest revisions. The Leaders disseminate the revised guidelines at their workplaces throughout the Group.



E-learning program on the revised guidelines

Compliance Promotion Structure

Toppan believes that the strict observance of the Conduct Guidelines directly links to legal compliance. The Conduct Guidelines Promotion Leader system is a core mechanism to ensure full observance of the guidelines. Upon their election every year, the Leaders initiate guideline compliance in daily operations at their workplaces under the Director in charge of Conduct Guidelines Promotion.

Seven hundred and twelve Leaders were deployed across the Group in fiscal 2020, including 98 women (13.8% of the Leaders). A cumulative total of 11,132 employees have worked as Leaders since the system was launched in fiscal 2004.

| | Number of Newly Deployed Leaders | Number of Female Leaders Deployed (Percentage) | Cumulative Total Number of Leaders |
|-------------|----------------------------------|--|------------------------------------|
| Fiscal 2017 | 733 | 95 (13.0%) | 9,055 |
| Fiscal 2018 | 677 | 86 (12.7%) | 9,732 |
| Fiscal 2019 | 688 | 87 (12.6%) | 10,420 |
| Fiscal 2020 | 712 | 98 (13.8%) | 11,132 |

Structure to Promote the Conduct Guidelines

