

## Internal Reporting System

System

Activity results,  
performance data

When a person at Toppan discovers a legal violation or improper conduct somewhere in the Group, they are to report it to their superior for deliberation as a basic rule. If their superior fails to resolve the problem, the person is encouraged to call the Toppan Group Helpline, the Group's internal reporting system. The helpline is open for use by all officers and employees (including dispatched staff and part-time workers) at Group companies (excluding listed corporations). This system allows the Group to ensure strict compliance with the Toppan Group Conduct Guidelines by promptly identifying and properly dealing with legal violations and misconduct.

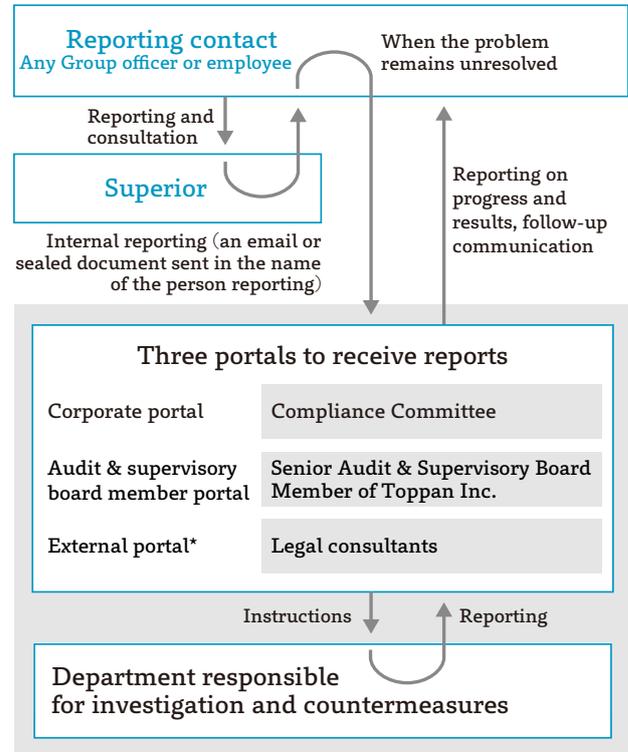
The Group revised the rules on reporting in November 2019 to encourage Group personnel to call the helpline by lowering the threshold for use. The revised rules stipulate the establishment of three portals to receive reports: a "corporate portal" and "audit & supervisory board member portal" operated in-house, and an "external portal" operated by legal consultants. The receiver has thus been changed from the President & Representative Director or Senior Audit & Supervisory Board Member of Toppan Inc. to the three portals that have been in operation since April 1, 2020. The President & Representative Director currently serves as the chief manager of the helpline.

An intranet portal site of the Group, meanwhile, posts topics on the intent of the reporting system, system outlines, and precautions regarding calls placed to the helpline, along with other helpline information. Toppan also holds rank-based training, training for new employees, and other types of training to inform Group personnel about the system.

### ■ Number of Internal Reports

The Toppan Group Helpline was used in seven cases in fiscal 2020. No serious legal violations or cases of misconduct were reported. Six of the helpline reports were on harassment. In the seventh, the reporting contact called for improvements in a Group internal management system. Every case was properly handled and followed up with necessary countermeasures to prevent recurrence.

## Toppan Group Helpline



(as of April 1, 2020)

\*The Compliance Committee investigates issues reported to the external portal and considers and formulates measures, etc. to handle them.