

Compliance Training

Training,
education

Toppan organizes group training for Conduct Guidelines Promotion Leaders (“Leaders”) every year. The Group devises ways to enhance the effectiveness of training sessions through activities such as group discussions using case methods describing actual incidents. Thirty-six training sessions were held for 528 Leaders from Toppan Inc. and Group companies across Japan in fiscal 2020.

Toppan also gives every Group employee in Japan a *Conduct Guidelines Casebook*, a Q&A style casebook describing situations that can arise in daily work. The casebook is used in various guideline promotion activities. The Leaders, for example, use it to disseminate the guidelines at their workplaces. The Compliance Department in the Legal Affairs

& Intellectual Property Division, meanwhile, posts monthly *Conduct Guideline Notifications* on topics relevant to the guidelines at the workplace to ensure strict compliance under the Leaders. Toppan has also been holding seminars, producing posters, and implementing other compliance promotion activities to ensure full observance of the guidelines among Group employees.

In fiscal 2020 Toppan held two online training sessions for 51 employees at Group affiliates in Shanghai, China to disseminate the guidelines and ensure strict compliance at overseas subsidiaries. Toppan will continue to organize education on the Conduct Guidelines for employees working at Group affiliates in other countries and regions.

■ Compliance in fiscal 2020

Toppan was not involved in any serious incidents or violations of laws or regulations in the course of business in fiscal 2020.

Anti-Corruption Initiatives

Policy

Activity results,
performance data

Toppan has been undertaking various anti-corruption initiatives in conformance with the anti-corruption principle set out by the United Nations Global Compact. The Toppan Group Conduct Guidelines affirm wide-ranging principles on corruption prevention, such as the “prohibition of bribery and inappropriate entertainment practices,” “prohibition of receipt or provision for personal gain or rebate,” “prohibition of illegal political contributions or donations,” and “prohibition of collusion and cartels.”

To better combat corruption, Toppan established a set of anti-bribery rules and guidelines in March 2017 and formulated an anti-corruption framework led by the Director in charge of Legal Affairs & Intellectual Property as the chief anti-bribery manager. For more intensive anti-bribery control, Toppan also launched a system requiring pre-authorization for the offering of any entertainment or gifts to a public official or the like.

In April 2018 the Group issued an FAQ describing specific

cases of bribery to further heighten employee awareness and call strict attention to compliance-related issues. No cases of inappropriate entertainment or gifts to public officials or the like were identified across the Group in fiscal 2020.

In training sessions organized each year for candidates for overseas assignments, trainees learn reinforced strategies to combat bribery in the commercial and public sectors and become familiar with the Group’s system for pre-authorization. Twenty employees attended five sessions in Japan in fiscal 2020.

The Toppan Group continues to win more contracts with national and local governments, primarily for business process outsourcing (BPO) projects in Japan. To ensure proper conduct, Toppan organizes regular training sessions on the prevention of collusion and bribery. The target trainees are mainly Group employees who are often assigned to sales and planning operations for public sector projects.