

Guidance on Efforts Related to Respect for Human Rights in the Photovoltaic Industry Supply Chain, etc.

～ Guidance on Practice ～

Ver 1.0

Japan Photovoltaic Energy Association (JPEA)

April 2023

In principle, businesses involved in solar power generation should conduct their activities in accordance with the Japanese "Guidelines on Respecting Human Rights in Responsible Supply Chains" and use this document as a reference for implementation. It is not a requirement to implement the described activities, nor is it a requirement to do only the items listed.

This document is a provisional English translation of the "Guidance on Efforts Related to Respect for Human Rights in the Photovoltaic Industry Supply Chain, etc.." The Japanese version is the original, and the English translation is only for informational purposes. If there is any discrepancy between the Japanese original and this English translation, the Japanese will prevail.

INTRODUCTION

Business enterprises in the photovoltaic industry provide sustainable products and services to their customers by producing energy with a low greenhouse gas impact, improving energy security, and creating jobs and economic development. However, these efforts are only a part of the business enterprise's role in achieving a sustainable society. Business enterprises have a responsibility to mitigate and manage all of their impacts on society and the environment, including respecting the rights of workers, local communities, and other stakeholders, and ensuring that their business operations are safe and environmentally responsible.

Recognizing the importance of respect for human rights, and in order to prevent and mitigate human rights issues in supply chains, etc., throughout the photovoltaic industry, in January 2022, the Japan Photovoltaic Energy Association (JPEA) released its "Action Guidelines for the Realization of a Sustainable Society," and in October 2022, together with other supporting business enterprises, announced the "Declaration of Commitment to Human Rights Issues in the Photovoltaic Industry."

Now, JPEA has developed this "Guidance on Respect for Human Rights in the Photovoltaic Industry Supply Chain" (the "Guidance") to reemphasize the importance of business activities based on the "Guidelines for Respecting Human Rights in Responsible Supply Chains, etc." formulated by the Japanese government, and to promote respect for human rights in the supply chain, etc. as required of business enterprises.

This Guidance consists of two parts. The first part explains the purpose of its development. The second part explains what every business enterprise should do to respect human rights, and includes discussion of human rights policies, human rights due diligence, and remedies, with examples. In addition, examples of the code of conduct required of suppliers, etc., and items to be confirmed at the time of contracting for the installation of solar power generation systems are attached for reference. Please refer to them as needed.

This guidance was prepared based on advice from business and human rights expert [Takeshi Nemoto](#), an attorney at Nishimura & Asahi. We hope that business enterprises in the photovoltaic industry will use this guidance to promote the spread and expansion of photovoltaic power generation to help realize a sustainable society and fulfill our social mission of making energy clean.

April 28, 2023
Japan Photovoltaic Power Association (JPEA)

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Part 1: Purpose of this Guidance

1. Purpose

(1) The Climate Crisis and the Role of Solar Power Generation

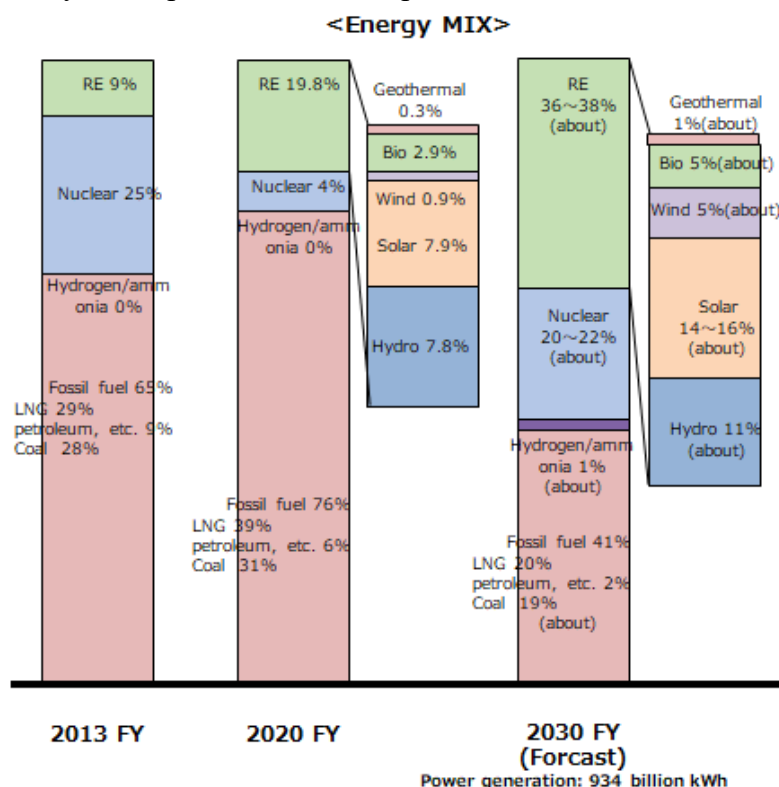
The Paris Agreement is the first treaty in history in which all countries, including Japan, which ascended to the United Nations Framework Convention on Climate Change (UNFCCC) in 2015, have committed to reduce greenhouse gases that cause global warming.

Common Global Long-Term Goals

- Keep the temperature increase from pre-industrial revolution level less than 2°C
- Pursue efforts to keep the temperature increase less than 1.5°C

In addition to its goal of being carbon neutral by 2050, Japan has declared its aim to have reduced greenhouse gas emissions by 46% in FY2030 compared to FY2013, and that it will continue to take on the challenge of achieving a further 50% reduction.* Within this scenario, one objective is to increase the ratio of renewable electricity in the power source composition to 36-38%.

*) Reference are introduced at the end of this document (same below).



Outlook for Energy Supply and Demand in FY2030 (Energy Mix)¹⁾

Source: Ministry of Economy, Trade and Industry Agency for Natural Resources and Energy, Advisory Committee for Natural Resources and Energy, Energy Conservation and New Energy Sub-committee / Electricity and Gas Business Subcommittee. (October 2022). Organizing Issues Requiring Institutional Consideration, Reference Material 制度的な検討を要する論点の整理 参考資料. Page 3 (Reference) The Road to the Realization of a New Energy Mix (参考) 新たな「エネルギーミックス」実現への道のり
https://www.meti.go.jp/shingikai/enecho/denryoku_gas/saisei_kano/pdf/20221007_1.pdf

Among them, diverse renewable energies, such as solar power, are promising, diverse and important domestic energy source that can contribute to energy security because they can be produced domestically.

Solar power, which shines down on all parts of the earth, is the trump card for renewable energy to support "The Five Ps" (1) People, 2) Planet, 3) Prosperity, 4) Peace, and 5) Partnership) that are the spirit of the SDGs.



The 5 Ps of SDGs ⁽²⁾

Source: United Nations Department of Economic and Social Affairs "Governance for the Sustainable Development Goals"
<https://unpan.un.org/sites/unpan.un.org/files/Module%201%20Course%20%20Introduction-compressed.pdf>

(2) Global situation surrounding solar power generation

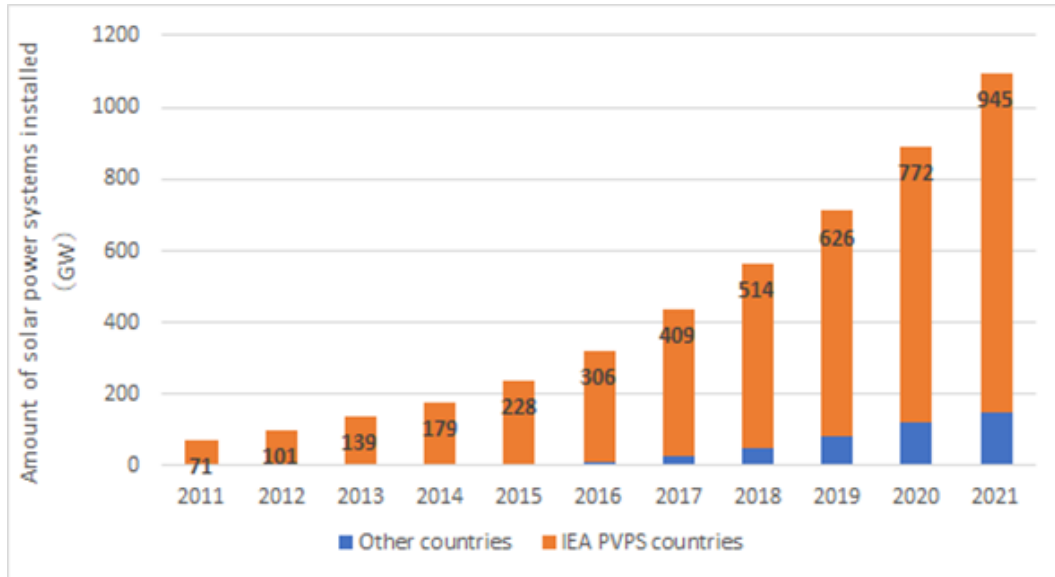
The number of solar power systems installed worldwide is increasing every year.

Japan has set a goal of installing solar power generation equipment in 60% of new detached houses by 2030, and the solar power generation industry needs to work resolutely toward achieving this goal.

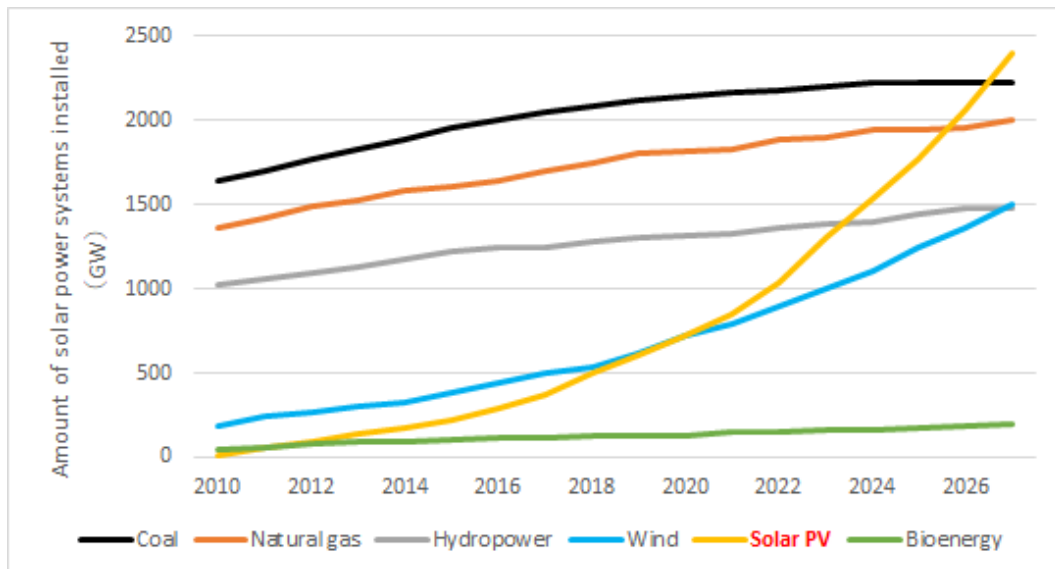
Local governments are also taking progressive steps, such as the Tokyo Metropolitan Government and Kawasaki City, which will begin requiring the installation of photovoltaic power generation systems in new small and medium-sized houses supplied by major housebuilders in FY2025.

Leveraged by such efforts, the green energy transition is expected to accelerate in Japan and abroad in the mid- to long-term due to the global trend toward decarbonization and cost reductions in renewable energy sources such as solar power generation.

As a result, corporate activities related to the photovoltaic industry are expected to attract more attention than ever around the world.



Global Photovoltaic Power Generation Installation Trends ⁽³⁾
 Source: Compiled by JPEA from PVPS. (2022). PVPS_Trend_Report_2022



Projected global PV installations for the future ⁽⁴⁾
 Source: Compiled by JPEA from IEA. IEA Renewables(December 2022).Cumulative power capacity, gigawatts (GW), by tech-nology, 2010-2027.

(3) Formation of international standards for respect for human rights

Many of the products that people use in their daily lives have become increasingly globalized in terms of procurement of raw materials and components. In this context, it has become clear that some business enterprises have neglected human rights in their supply chains and have had an adverse impact on people's lives. Since the 1990s, many cases of forced labor and child labor have been reported in developing countries where global business enterprises have expanded their business operations in developed countries. Accordingly, there has been a growing demand from stakeholders for business enterprises to seriously address the issue of respect for human rights.

Under these circumstances, international standards and guidelines on fundamental labor rights to be respected by business enterprises were established, including the International Labor Organization ("ILO") Declaration on Fundamental Principles and Rights at Work adopted in 1998 and the UN Global Compact launched in 2000. Subsequently, international frameworks related to business enterprises and human rights were developed, such as ISO 26000 (Guide on Social Responsibility) in 2010 and a new chapter on human rights in the OECD Guidelines for Multinational Enterprises in 2011, and one of the most important international frameworks, the Guiding Principles on Business and Human Rights (the "Guiding Principles"), was unanimously endorsed by the UN Human Rights Council. The Guiding Principles have three pillars: the state duty to protect human rights, the corporate responsibility to respect human rights, and access to remedy.

Three Pillars of the Guiding Principles on Business and Human Rights⁽⁵⁾

(1) State duty to protect human rights

- States must proactively protect against human rights abuses by third parties

(2) Corporate responsibility to respect human rights

- Business enterprises must respect human rights and formulate human rights policies
- Business enterprises must commit to their human rights policies
- Business enterprises must establish protocols for and engage in Human Rights DD
- Business enterprises must establish or participate in grievance mechanisms

(3) Access to remedy

- States must establish mechanisms to ensure that those who have suffered human rights violations have access to remedies
- Business enterprises must establish or participate in grievance mechanisms that are accessible to individuals and communities that may have been adversely impacted

Source: Compiled by JPEA from Nations. (March 2011). Guiding Principles on Business and Human Rights: For the Implementation of the United Nations Framework for Protection, Respect and Remedies (A/HRC/17/31)

In 2017, when the ILO revised the Tripartite Declaration of Principles on Multinational Enterprises and Social Policy to include the state duty to protect human rights and the corporate responsibility to respect human rights.

Against this background, Japan formulated and published the "Action Plan on 'Business and Human Rights' (2020-2025)" in October 2020, and further formulated and published the "Guidelines on Respecting Human Rights in Responsible Supply Chains" (hereinafter referred to as "Human Rights Guidelines") in September 2022. In April 2023, Japan published the "Practical Reference Materials for Respecting

Human Rights in Responsible Supply Chains" (hereinafter referred to as the "Practical Reference Materials") to introduce case studies that can be used as references in implementing the Human Rights Guidelines.

Table 1: Major trends in the world and Japan regarding corporate respect for human rights

1998	“ILO Declaration on Fundamental Principles and Rights at Work” adopted
2000	Inauguration of the United Nations Global Compact
2010	ISO 26000 (Guide on Social Responsibility) established
2011	“OECD Guidelines for Multinational Enterprises“ revised
	UN Human Rights Council unanimously endorses “Guiding Principles on Business and Human Rights”
2017	“ILO Tripartite Declaration of Principles for Multinational Enterprises and Social Policy” revised
2020	Japanese Government "The National Action Plan on Business and Human Rights (2020-2025)" established
2022	Japanese Government " Guidelines on Respecting Human Rights in Responsible Supply Chains" established
2023	Japanese Government " Reference Material on Practical Approaches for Business Enterprises to Respect Human Rights in Responsible Supply Chains " published

(4) Necessity of efforts based on international standards

In Japan, which has strong economic ties with the United States, Europe, and especially with Asian countries that make up its supply chains, business enterprises are expected to promote efforts in line with the international standards of respect for human rights mentioned above, while taking the sustainability of their suppliers and other stakeholders into consideration. Therefore, business enterprises operating in Japan must pay attention to the adverse impacts on human rights in their supply chains, etc., not only in Japan but also in their own business enterprises and group business enterprises around the world, based on the Guiding Principles.

Business enterprises in the photovoltaic industry are also engaged in business activities within international supply chains, and therefore, such business enterprises need to actively implement internationally required efforts to respect human rights.

2. Eligibility for Utilization of this Guidance

The Japan Photovoltaic Energy Association (hereinafter "JPEA") encourages its member business enterprises, as well as business enterprises involved in solar power generation, to make use of this Guidance, and will conduct training sessions and other activities to promote respect for human rights based on this Guidance to encourage business enterprises to make efforts to respect human rights.

3. Positioning of this Guidance

In principle, businesses involved in solar power generation projects should conduct their business activities in accordance with the Human Rights Guidelines and should also refer to this Guidance in their efforts to comply with the Guidelines.

4. Definition of terms

The definitions of terms used in this Guidance are as follows.

Human rights

Refers to internationally recognized human rights. The internationally recognized human rights include, at a minimum, those expressed in the International Bill of Human Rights and the principles concerning fundamental rights as stated in “ILO Declaration on Fundamental Principles and Rights at Work.”

Stakeholder

Refers to persons or groups who have interests that could be impacted by a business enterprise’s activities.

Supply chain

Refers to "upstream" in relation to the procurement and securing, etc. of raw materials and resources for a business enterprise’s products and services, facilities, and software, and the "downstream" in relation to the sale, consumption, and disposal etc. of its products and services.

Suppliers, etc.

Refers to business enterprises in supply chains and other business partners, which are not limited to direct business partners

Human Rights Due Diligence (hereinafter "Human Rights DD")

Refers to a series of acts undertaken by business enterprises to identify, prevent and mitigate adverse impacts on human rights in their business enterprise, group business enterprises, and suppliers, etc., to track the effectiveness of their efforts, and to account for and disclose information on how they address the adverse human rights impacts.

Remedy

Refers to mitigating and repairing adverse human rights impacts and the process for doing so.

Part 2: Corporate Efforts for Respecting Human Rights

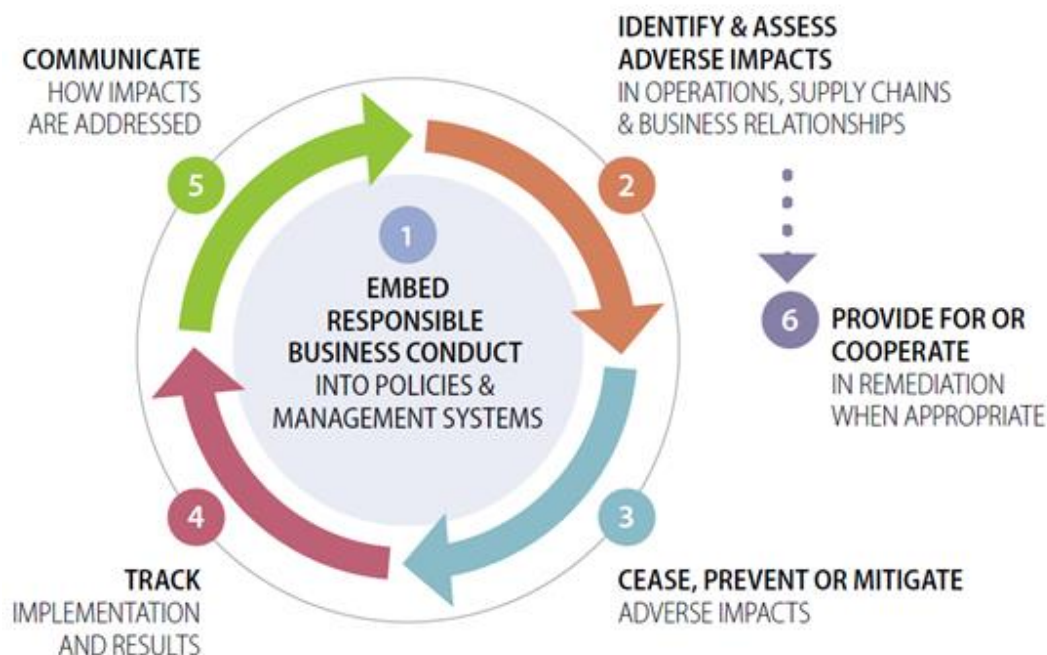
The second part of this Guidance mainly explains the matters related to respect for human rights that business enterprises in the photovoltaic industry should specifically address, considering the purpose of the Human Rights Guidelines and illustrating the actual supply chain situation in the photovoltaic industry. Business enterprises in the photovoltaic industry should consider how to address these issues based on the reality of their own business and the Human Rights Guidelines.

1. Overview of Efforts

In order to meet corporate responsibility to respect human rights, the Human Rights Guidelines require business enterprises to formulate their human rights policy, conduct Human Rights DD, and provide remedy when business enterprises cause or contribute to adverse human rights impacts. The following figure outlines the overall picture of these efforts to respect human rights; it is important to implement the PDCA¹ cycle through dialogue with stakeholders.

Human Rights GL (P7)

* The corresponding pages of the Human Rights Guidelines and Practical References are listed (the same applies hereinafter).



Source: OECD. OECD Due Diligence Guidance for Responsible Business Conduct, Figure 1, page 21⁽⁶⁾

* In (6) of the above figure, the reservation of "when appropriate" refers to multiple corrective measures (including judicial grievance mechanisms by the government). In some cases, it is appropriate for the business enterprise to take corrective measures on its own, and in other cases, it is appropriate to cooperate with corrective measures by a third party (see OECD Guidance Annex Q53).

The Human Rights Policy (Commitment on Responsibility to Respect Human Rights), Human Rights DD, and Remedies are described below, as well as the scope of "human rights" and the concept of "stakeholders."

¹ "Plan-Do-Check-Act" management method

Scope of "Human Rights"

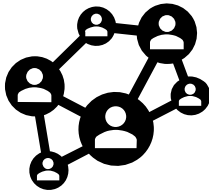


Human rights that business enterprises should respect are internationally recognized human rights. The internationally recognized human rights include, at a minimum, those expressed in the International Bill of Human Rights and the principles concerning fundamental rights as stated in “ILO Declaration on Fundamental Principles and Rights at Work”, including the freedom of association and the effective recog-

nition of the right to collective bargaining, the prohibition of all forms of forced and compulsory labor, the effective abolition of child labor, the elimination of discrimination in employment and occupation, and a safe and healthy working environment. Compliance with laws and regulations is a matter of course, but it is also important to note that human rights may not be adequately protected by law or enforcement.

Human Rights
GL (P9)

"Stakeholders"



Stakeholders refers to persons or groups who have interests that could be impacted by a business enterprise’s activities, including employees (including non-regular employees), labor unions and worker representatives, consumers, civil society and other NGOs, industry associations, human rights defenders, residents, indigenous peoples, investors and shareholders, national and local governments, and others. Through

dialogue with these stakeholders, business enterprises are expected to raise the level of their efforts to respect human rights.

Human Rights
GL (P11)

The table below shows the correspondence of each item in this Guidance to the Guiding Principles and Human Rights Guidelines. Please check the various guidelines, etc., as necessary to further deepen your understanding of our efforts.

Table 2. Correspondence between this Guidance and the UN Guiding Principles and Human Rights Guidelines

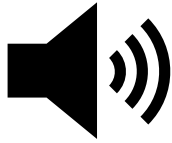
Items of this Guidance	Guiding Principles ^{*)}	Human Rights Guidelines
Part 2: Corporate Efforts to Respect Human Rights		
2-1 Overview of Efforts	II. A, P4~5	2, P6~12
2-2 Human Rights Policy		
(1) Commitment to Meet the Responsibility to Respect Human Rights	II. B, P5	3, P12~13
(2) Reflection in the Internal Business Policies and Procedures	II. B, P5	3, P13~14
2-3 Human Rights DD		
(1) Identification and Assessment of Adverse Impacts	II. B, P5~6	4.1, P14~20
(2) Prevention or Mitigation of Adverse Impacts	II. B, P6	4.2, P20~26
(3) Tracking Effectiveness of the Efforts	II. B, P6	4.3, P26~27
(4) Communication and Information Disclosure	II. B, P6~7	4.4, P27~28
2-4 Remedy		
(1) Necessity of Remedies and Efforts by Business enterprises	II. B, P7	5, P29~
(2) Grievance Mechanism	II. B, P8~9	5.1, P29~30
(3) State-Based Remedy Mechanism	II. B, P7~9	5.2, P30~31

^{*)} Ministry of Economy, Trade and Industry website: Page posted on the United Nations Guiding Principles on Business and Human Rights

In promoting respect for human rights, the following items should also be considered to make efforts more effective and clearer.

- (1) Scope of the efforts
- (2) Human rights items of particular importance
- (3) Human Rights DD implementation policy
- (4) Implementation and management system to promote efforts
- (5) Consistency and coordination with various labor-related action guidelines, etc., and clarification of relationships (free choice of employment, young workers, working hours, wages and benefits, humane treatment, exemption from discrimination, freedom of association, etc.)

2. Human Rights Policy



Since efforts to respect human rights should be implemented by all business enterprise activities, including recruitment, procurement, manufacturing, sales, and others, the entire business enterprise needs to be involved to fully meet the responsibility to respect human rights.

Human Rights
GL (P8,15)
Practical Materials(P3)
*Practical Materials is Japanese Version only((the same applies herein-after).

(1) Commitment to meet the responsibility to respect human rights

Business enterprises in the photovoltaic industry should express their commitment to respect human rights both internally and externally through a human rights policy that meets the five requirements in the table below. Corporate commitments that obtain the approval of management are very important since they provide a clear and comprehensive policy to determine corporate actions.

Human Rights
GL (P12)
Practical Materials(P3)

Table 3. Five Requirements for Commitment

①	It is approved at the most senior level of the business enterprise
②	It is informed by relevant internal and/or external expertise
③	It stipulates the business enterprise's human rights expectations of personnel, business partners and other parties directly linked to its operations, products, or services
④	It is publicly available and communicated internally and externally to all personnel, business partners and other relevant parties
⑤	It is reflected in the operational policies and procedures necessary to embed it throughout the business enterprise

Human Rights
GL (P15)
Practical Materials(P5)

(2) Reflection in the internal business policies and procedures

Business type, size and other factors vary among each business enterprise and the type of human rights on which adverse impacts may occur and the severity of the assumed adverse impacts also vary among each business enterprise. Therefore, when establishing a Human Rights Policy, it is necessary to start with identifying the human rights on which the business enterprise may have impacts.

It is expected that established human rights policies will reflect more actual conditions if, when considering the above, knowledge is collected from each internal department and dialogues and discussions are held with stakeholders.

The human rights policy expresses the basic idea of a business enterprise concerning overall efforts to respect human rights and is closely related to the corporate management philosophy. Each business enterprise establishes a unique Human Rights Policy based on its management policy, thereby ensuring consistency between the Human Rights Policy and management philosophy, which leads to institutionalizing the Human Rights Policy internally.

Establishing and publishing a Human Rights Policy is not the end of the process. Business enterprises should embed their Human Rights Policy throughout the business enterprise and implement the Human Rights Policy concretely in their efforts. For this reason, it is important to disseminate the Human Rights Policy internally and to reflect the details of the Human Rights Policy in a code of conduct

Human Rights
GL (P12)
Practical Materials(P4,5)

and procurement guidelines. In addition, it is useful to revise the Human Rights Policy as needed considering the results of Human Rights DD and other factors.

3. Human Rights DD



Due to its nature, Human Rights DD does not guarantee the result that there are no human rights abuses but is an ongoing process to prevent and mitigate adverse impacts on human rights while holding dialogue with stakeholders.

Human Rights GL (P8)

Even when an actual abuse of human rights is identified, the information disclosure on the efforts for human rights will not reduce the enterprise value. On the contrary, it can increase the business enterprise value because it shows its willingness to improve and its transparency, and it should receive recognition from its stakeholders. Business enterprises are expected to communicate and disclose information proactively.

Human Rights GL (P31)

(1) Identification and assessment of adverse impacts

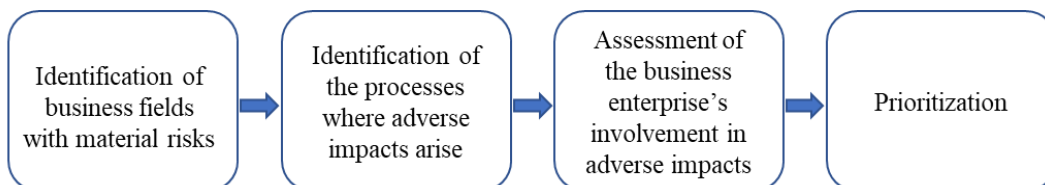


The first step of Human Rights DD is to identify and assess any actual or potential adverse human rights impacts in which business enterprises may be involved. For this purpose, it is helpful to hold dialogues with stakeholders, including employees, labour union/workers' representatives, civil society organizations, human rights defenders, and local residents.

Human Rights GL (P8)
Practical Materials (P7)

In order to identify and assess adverse impacts, business enterprises need to know their suppliers and others to ensure traceability of their products and services.

The identification and assessment of adverse impacts is done through the following process:



a. Identification of business fields with material risks

In identifying adverse impacts on human rights, the creation and management of supply chain maps has proven effective. The following is a representative example for the solar panel industry.

Practical Materials (P9)

Supply chain map of "upstream" and "downstream" supply chain centered on solar panels

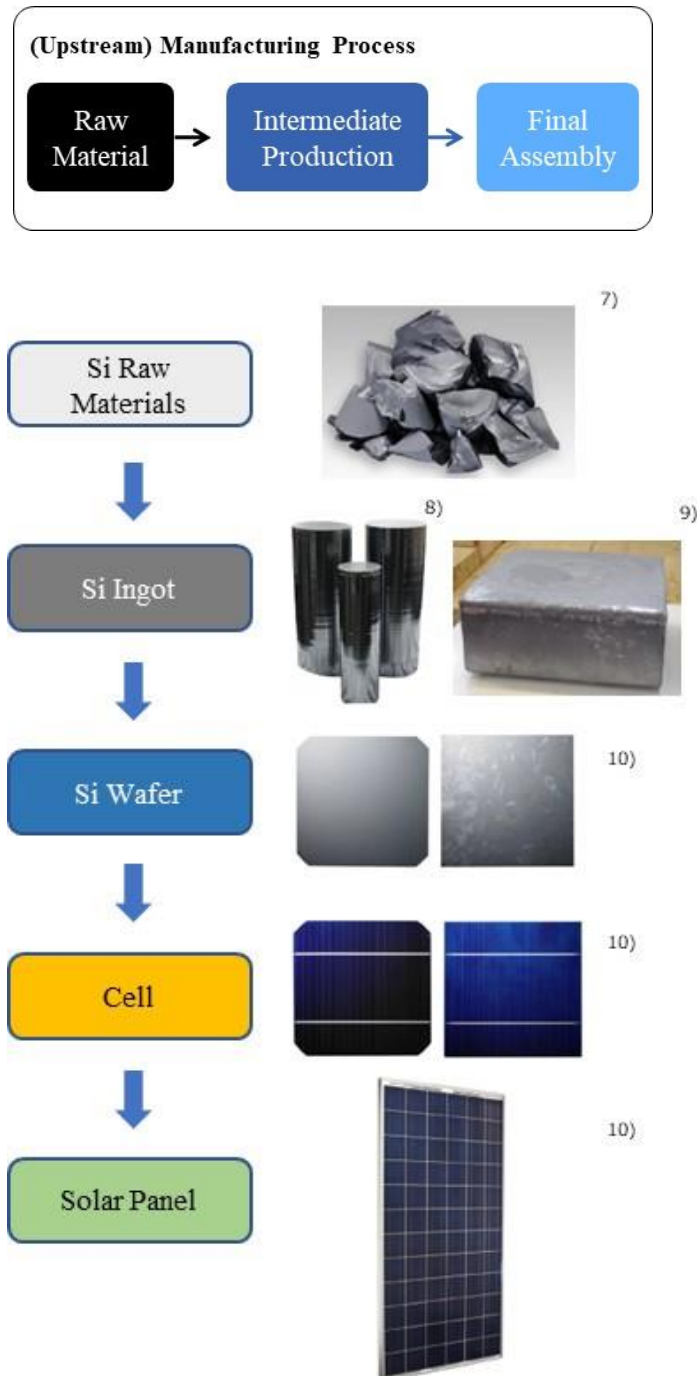
Business enterprises need to be able to present and explain the flow of related businesses and goods from procurement of raw materials, etc., to sales and disposal. This presentation includes creating and managing a supply chain map that illustrates the step-by-step flow from raw materials to disposal.

The first step in creating a supply chain map is to "map" the entire supply chain, including "upstream" suppliers of raw materials used in the production of goods or materials, as well as "downstream" in sales, disposal, or recycling. Mapping is the process by which a business enterprise or a third party collects information about suppliers and others throughout the supply chain. This allows a business enterprise

to identify who is doing the work at each step in the process and the conditions under which the work is being done. The more comprehensively a business enterprise can map its supply chain, the more accurately it can identify where the risks are highest.

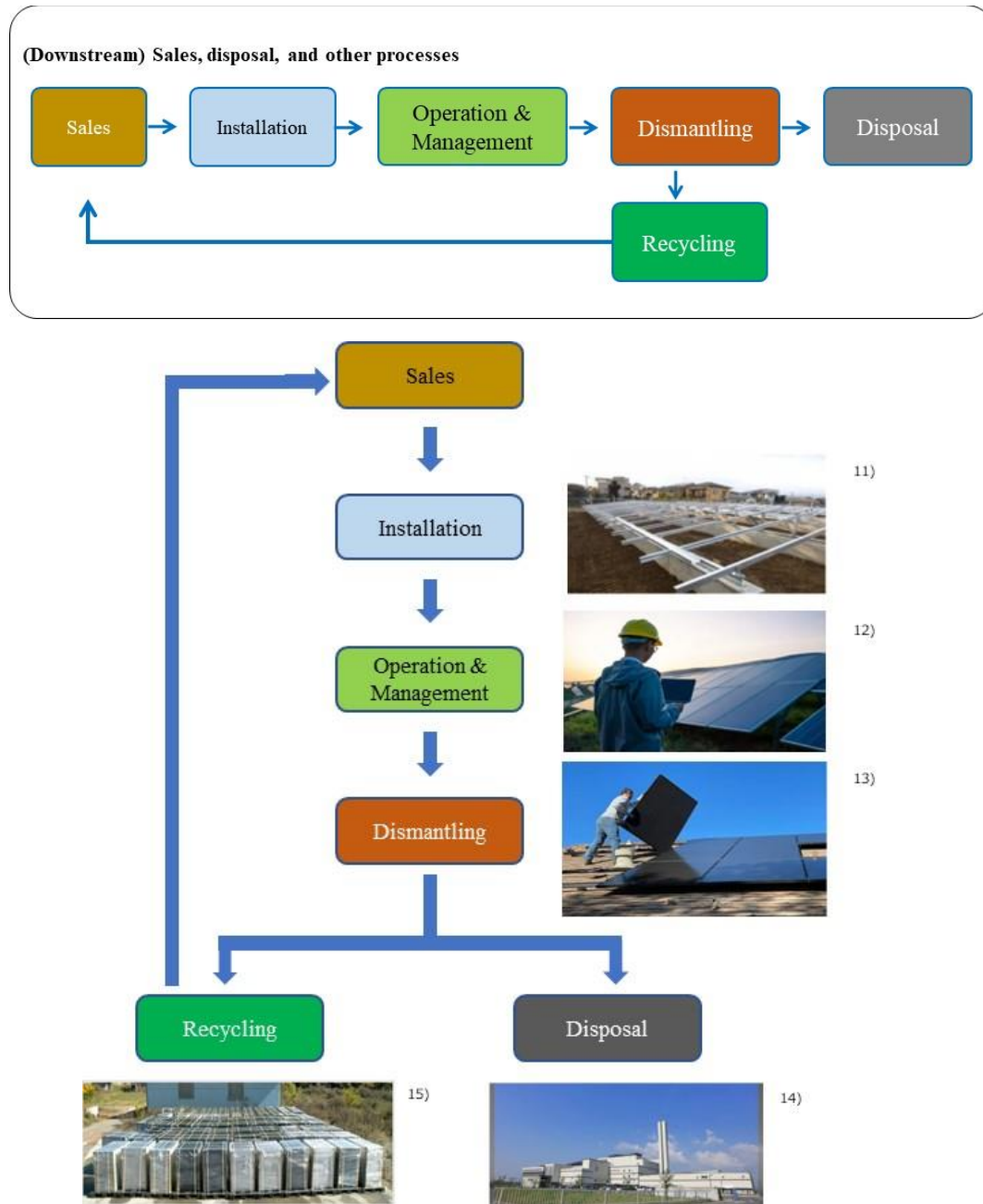
A supply chain map can take many forms, but the steps involved in creating one are as follows.

For example, the supply chain for a solar panel may include the silicon (Si) raw materials, silicon (Si) ingots, silicon (Si) substrates, and cell manufacturing processes. After these processes, a solar panel is completed as a final product.



Example: Process diagram related to solar panel products (preparation of supply chain map)

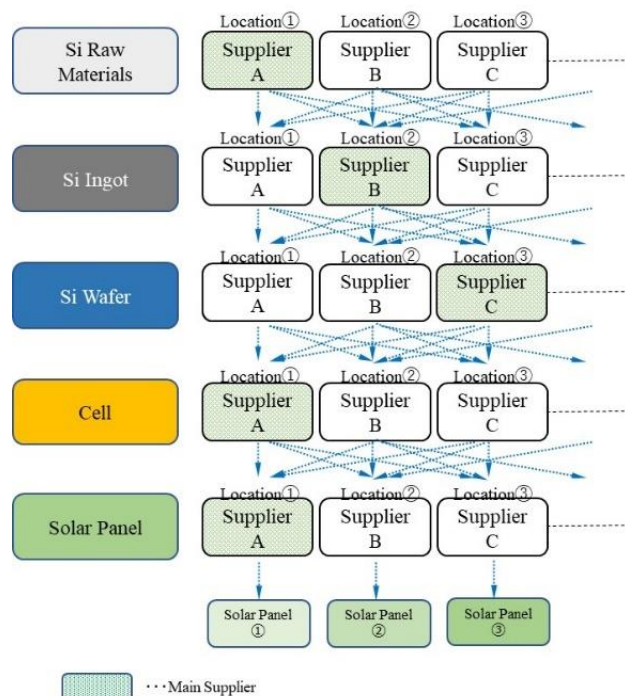
In the sale and disposal of products, the supply chain covers the series of processes of products, including sales, installation, operation, disposal and recycling.



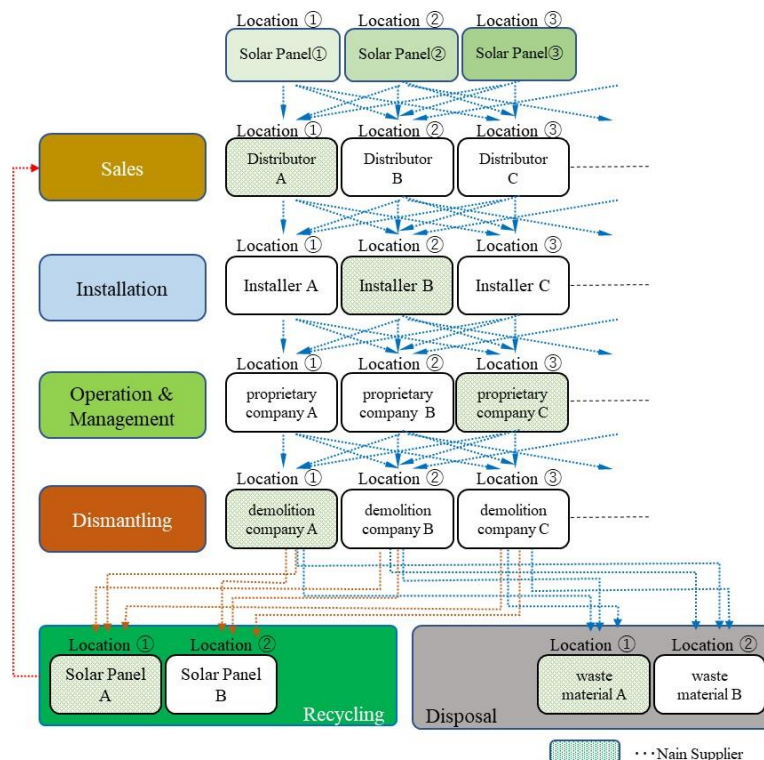
Example: Process diagram related to sales, disposal, etc. (Preparation of supply chain map)

The supply chain map should identify the individual steps in the manufacturing process. Each step should include information about the entity at that step, such as the item produced, a description of the overall manufacturing process employed, the name of the producer, and the location of production. If there are multiple suppliers for the item, multiple businesses will be shown in the supply chain map. If an entity has multiple production locations in the product supply chain, it is also important to identify the relevant locations.

Complex products or products with many parts and suppliers, etc., can lead to complex supply chain maps. In such cases, it is possible to simplify the creation and management of the supply chain map by considering the uniqueness and importance of location, cost, and time, and by taking out particularly important raw materials and intermediate production processes.



Identification of suppliers for solar panel products (creation of supply chain maps)



Identification of suppliers from sales to disposal, etc. (creation of supply chain maps)

When preparing a supply chain map, there may be cases where it is difficult to identify all suppliers. In such cases, it is even more important to try to understand the risk of human rights violations at suppliers with low traceability through dialogue with a wide range of stakeholders, as well as establishment and operation of appropriate grievance mechanisms, in cooperation with stakeholders and industry associations.

It is also desirable to be able to explain externally whether there are limitations in identifying suppliers, etc.

b. Identification processes where adverse impacts arise

Business enterprises need to specifically identify how adverse impacts on human rights occur (who suffers adverse impacts on what human rights) at each process of the business enterprise's operations..

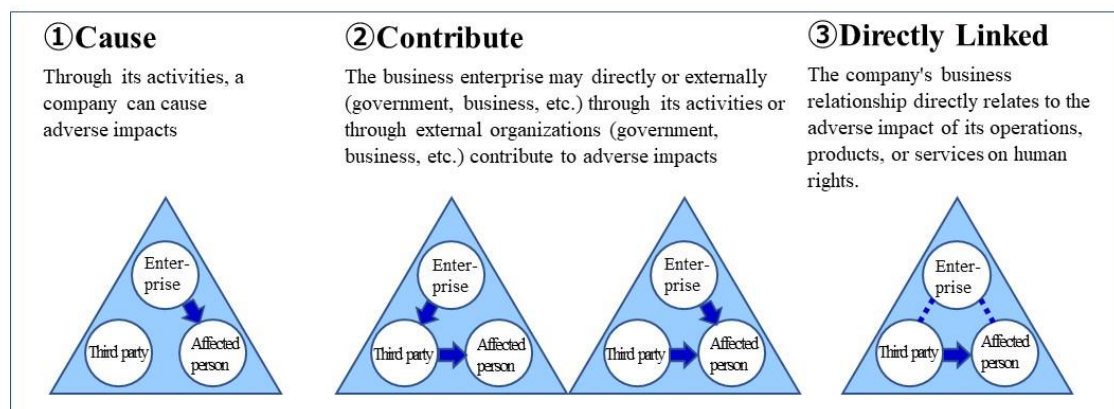
Practical Materials(P10)

If business fields with material risks have been identified in a above, start identification from these business fields.

c. Assessment of business enterprises' involvement in adverse impacts

To decide on an appropriate response, assess the business enterprise's involvement in adverse human rights impacts. In particular, assess whether or not the business enterprise has caused or contributed to (or may cause or contribute to) adverse impacts and whether or not adverse impacts are directly linked (or may be directly linked) to their operations, products, or services.

Human Rights GL (P18)
Practical Materials(P12)



Types of adverse effects ⁽¹⁶⁾

Source: United Nations. (December 2012). The Corporate Responsibility to Respect Human Rights: An Interpretive Guide prepared by JPEA

Table 4. Types of Adverse Impacts

Types of Adverse Impacts	(Upstream) Solar Panel Products Exam- ples	(Downstream) Examples related to sales to disposal, etc.
When a business enterprise causes a adverse impact through its activities (cause)	Discriminating against foreign workers in terms of treatment and forcing them to follow Japanese customs at their own factories	In its own sales, a business enterprise imposes excessive quotas on its employees, causing them to work chronically long hours.
A business enterprise contributes to adverse impacts directly through its activities or through external entities (government, business enterprise, etc.) (contribute)	In negotiations with suppliers on delivery dates and prices, etc., excessive demands are made to suppliers, etc., knowing that such demands are unfeasible in light of past business results, and workers at suppliers, etc., are forced to work long hours, etc.	The owner of the solar panels supplied by a business enterprise disposed of the solar panels according to the business enterprise's advice, which resulted in soil contamination due to inadequate advice
If business, product, or service is linked to an adverse human rights impact through a business relationship, even though a business enterprise does not cause or contribute to such impact. (directly linked)	The business enterprise's own contractor, in violation of its contractual obligations to the business enterprise, re-commissioned the work to a contractor where child labor was being used.	A seller installed solar panels in violation of the installation conditions set by the business enterprise, which caused health hazards to residents in the surrounding area.

d. Prioritization

If it is difficult to immediately address all adverse impacts identified, prioritization of responses is necessary.

Priority in response is decided based on the severity of the adverse human rights impacts. Business enterprises should address impacts with high severity first. If there are multiple potential adverse impacts with the same level of severity, it is reasonable to start from those with higher probability (degree of certainty).

Because priority may change as the situation changes, it is important to carry out ongoing impact assessment.

The severity of the adverse human rights impacts is judged by their scale, scope, and irremediable character (see the table below). In other words, severity is judged based on the level of the adverse impacts on human rights and not on the level of the adverse impacts on business management (management risk).

Practical Materials(P13)

Human Rights GL (P22)

Human Rights GL (P23)

Human Rights GL (P23)

Table 5. Criteria and Examples of Adverse Impact Considerations

Criterion	Description	Examples of Considerations
(1) Scale	Gravity of the adverse human rights impact	<ul style="list-style-type: none"> • Character and background of the abuse • Mode of the abuse • Situation of the victims
(2) Scope	Scope of Adverse Impact	<ul style="list-style-type: none"> • Number of people affected by the adverse impact • Size of the group or community affected by the adverse impact
(3) Irremediability	Difficulty of restoring to a situation equivalent to the situation before the impact	<ul style="list-style-type: none"> • Degree of potential possibility to remedy the adverse impact (for example, remedy by compensation or recovering from the damage) • Degree of promptness of actions required to restore a situation equivalent to the situation before the adverse impact occurred

e. Points to Consider for the process to identify and assess adverse impacts

Because human rights situations are constantly changing, assessment of human rights impacts should be iterative and increasingly in depth.

Practical Materials(P10)

When assessing adverse human rights impacts, business enterprises should pay special attention to potential adverse impacts on vulnerable individuals, namely, individuals from groups or populations that may be at heightened risk of becoming socially vulnerable or marginalized. This perspective is important not only in the identification and assessment of adverse impacts, but also throughout efforts to respect human rights.

Human Rights GL (P20)

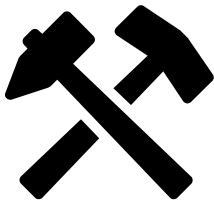
In areas of armed conflict and areas where widespread violence or serious harm by criminal groups affect the populace, Human Rights DD according to high risk (“heightened Human Rights DD”) should be conducted. Examples of such Human Rights DD include efforts by business enterprises to ensure that their business activities not only do not have an adverse impact on human rights but also do not contribute to violence in the region. This is best accomplished through understanding the conditions in the areas where they operate and identifying potential factors that may contribute to conflict, etc.

Human Rights GL (P21)

A worksheet for identifying and assessing adverse impacts (risk of human rights violations) is attached as Attachment 2 to Practical Reference Materials. It is recommended to utilize it.

Human Rights GL (P19)

(2) Prevention or mitigation of adverse impacts



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In order to meet their responsibility to respect human rights, business enterprises need to avoid “causing” or “contributing” to adverse human rights impacts through their business activities and to prevent or mitigate such adverse impacts. In addition, business enterprises should strive to prevent and mitigate adverse impacts on human rights that are directly related to their business, products, or services through business relationships, even if the business enterprise does not “cause” or “contribute” to such impacts. Business enterprises need to take appropriately work to prevent or mitigate adverse human rights impacts identified and assessed under the ultimate responsibility of the management, after clarifying the responsible departments and persons.

Business enterprises are encouraged to take measures to prevent or mitigate adverse impacts in a manner that takes into account the actual business situation, but in implementing such measures, particular attention should be paid to the following points.

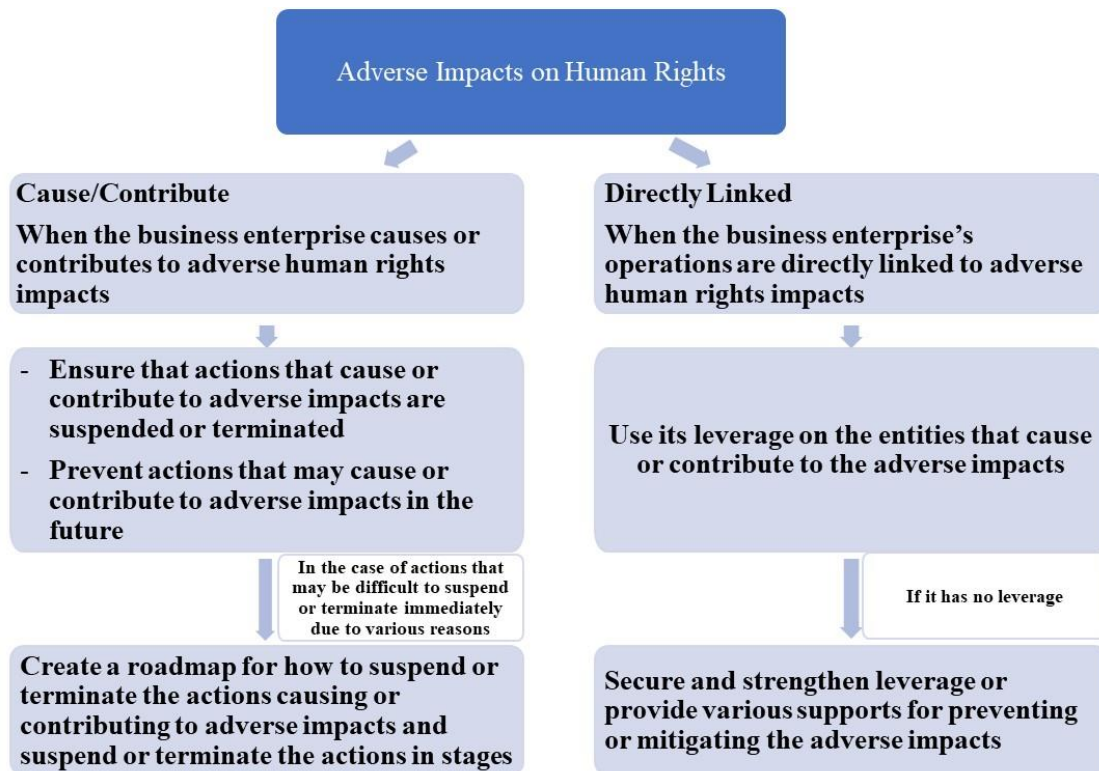
- Have a process to confirm with suppliers, etc., before entering into a contract, whether forced labor, etc., exists in their supply chains.
- Contracts with suppliers, etc., should include clauses obligating suppliers, etc., to take remedial measures if forced labor, etc., is identified in their supply chain, and allowing the business enterprise to terminate contracts if suppliers, etc., do not take remedial measures.

Considering these points, one effective way to facilitate efforts to prevent and mitigate adverse impacts is for business enterprises in the photovoltaic industry to obtain consent when concluding contracts with suppliers, etc.

Specifically, for "upstream" suppliers, a code of conduct for suppliers, etc., as shown in Appendix (1), may be presented.

For "downstream" suppliers, it should be noted that photovoltaic power generation equipment is not a product that can be sold over the counter, but requires individual visits, confirmation, and explanations, such as confirmation of the location and roof conditions where the equipment should be installed. For this reason, JPEA has prepared and published a confirmation document to be used at the time of contracting for the installation of solar power generation systems to ensure that the installation is done in consideration of respect for human rights, including the impact on the surrounding residential environment. Please consider using this document not only for sales activities in compliance with laws and regulations, but also to avoid unforeseen problems (see Appendix (2)).

In addition, please consider the following measures to prevent or mitigate adverse impacts, depending on the type of adverse impact.



a-1. Where the business enterprise causes or contributes to adverse human rights impacts

If the business enterprise “causes” or “contributes” to adverse human rights impacts, it should take measures to prevent or mitigate the adverse human rights impacts that it “caused” or “contributed” to in the following ways, for example:

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(i) Ensure that the actions that “cause” or “contribute” to adverse impacts are suspended or terminated (e.g., changing product design so as not to use harmful substances) and prevent actions that may “cause” or “contribute” to adverse impacts in the future.

(ii) In the case of actions that may be difficult to suspend or terminate immediately due to operational, contractual, or legal issues, create a roadmap for how to suspend or terminate the actions causing or contributing to adverse impacts and suspend or terminate the actions in stages.

Example 1: Where the business enterprise causes adverse human rights impacts

The business enterprise's sales department was imposing excessive quotas on its employees, causing them to work extremely long hours on a regular basis. Therefore, the business enterprise conducted interviews with industrial physicians for all employees in the department, took appropriate health management measures under the guidance of physicians, and conducted fact-finding investigations, etc., by outside experts. Based on the results of the fact-finding investigation, etc., the business enterprise took measures to prevent the recurrence of long working hours, such as establishing an appropriate personnel structure and reviewing the method of setting sales targets.

Example 2: Where the business enterprise contributes to adverse human rights impacts

When the client disposed of used solar panels by taking measures in accordance with the business enterprise's advice, soil contamination occurred because the advice was not appropriate. Therefore, the business enterprise immediately hired experts to investigate and confirm that no damage had been caused to the surrounding residents or the environment, and then carried out appropriate decontamination work. In addition, under the advice of the experts, the business enterprise revised its own guidelines for the disposal of solar panels in accordance with JPEA's "Guidelines for Providing Information that Contributes to the Proper Disposal of Used Solar Cell Modules," and ensured that all employees and suppliers were thoroughly informed of these guidelines. The business enterprise plans to continue to provide thorough internal education and inform its business partners, and to periodically interview its business partners to confirm that the management system has been maintained and is ongoing.

a-2. When the business enterprise's operations are directly linked to adverse human rights impacts

When the business enterprise does not "cause" or "contribute" to adverse impacts, but there are adverse human rights impacts "directly linked" to its operations, products or services, the business enterprise may not be able to address the adverse impacts directly. However, the business enterprise 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 if it has no leverage, securing and strengthening leverage or providing support, such as in the following ways depending on the situation.

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Example 3: When the business enterprise's operations are directly linked to adverse human rights impacts

A sales and installation business enterprise installed solar panels in violation of the installation conditions set by the business enterprise, a manufacturer of solar panels, causing health hazards to nearby residents. The business enterprise requested the management of the sales and installation business enterprise to comply with the installation conditions. If the installation conditions were not complied with and the health hazard to the surrounding residents remained uncorrected, the business enterprise advised the sales and installation business enterprise that it might cease doing business with them and advised them on how to establish a system to comply with the installation conditions. Subsequently, the business enterprise confirmed that the installation management system at the sales/construction business enterprise had been improved. In addition, when revising the business contract with the sales and installation business enterprise, the business enterprise added a clause on environmental protection. The business enterprise plans to continue to periodically interview the sales/construction business enterprise to confirm that the management system has been maintained and is ongoing.

Examples of Adverse Impact Prevention Measures Taken by JPEA

JPEA has published the following guidelines and other information after discussions by an expert committee consisting of academics for the purpose of providing photovoltaic power generation equipment with high structural safety.

- 1) Design guidelines and structural design examples for ground-mounted photovoltaic power generation systems⁽¹⁷⁾
- 2) Guidelines for Photovoltaic Power Generation System Maintenance and Inspection⁽¹⁸⁾
- 3) Engineer and human resource development (PV Master Installation Engineer and Maintenance and Inspection Engineer System, etc.)



Design Guidelines for Ground-Mounted Photovoltaic Systems



Photovoltaic power generation system Maintenance Guidelines



J-COT (PV Master Engineer System Operation Center)

We also conduct educational activities related to maintenance, inspection, safety management, etc.



Seminar on maintenance and inspection of photovoltaic power generation

b. Disengagement

Disengagement involves ending the relationship of the business enterprise with the adverse human rights impacts but does not remediate the adverse impacts themselves. In fact, it could further aggravate the adverse human rights impacts by making it more difficult to monitor the adverse impacts, or by worsening the financial status of the business partner, which may lead to unemployment of its employees.

For this reason, where adverse human rights impact exists or may exist, the business enterprise should first seek to prevent or mitigate the adverse impact while maintaining the relationship with the supplier, etc., rather than immediately disengaging from the business relationship. Disengagement should be considered as a last resort and implemented only when it is found appropriate.

On the other hand, there are cases where disengagement is not appropriate or, even when it is appropriate, impossible, or practically difficult to implement. Whether disengaging or continuing the relationship, the severity of the adverse human rights impacts must be considered, and businesses are expected to take a responsible approach to disengagement as explained in the table below.

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Table 6. Examples of actions to be taken when suspending or continuing transactions

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Disengaging / Not disengaging	Examples of responsible approaches
Disengaging from the business relationship	<ul style="list-style-type: none"> • Articulate phased measures for disengagement upfront with the business partner • Provide detailed information about adverse human rights impacts supporting the decision to disengage so that the business partner can respond appropriately • Where feasible, provide sufficient notice of the disengagement to the business partner
Continuing the business relationship	<ul style="list-style-type: none"> • Continue to monitor the situation of the business partners • Periodically review the appropriateness of continuing the business relationship • Explain how the decision to continue the business relationship is aligned with the human rights policy of the business enterprise, what measures are being taken to attempt to apply leverage for mitigating the adverse impacts, and how to continue to monitor the situation of the business partner.

When human rights abuses take place with the involvement of a State etc., there may be concerns that business activities based in the region may provide funds through tax contributions etc. to the human rights abuses conducted by a State, etc. However, it is difficult to determine the existence and extent of the relationship between tax contributions, etc. and the human rights abuses. Consequently, the sole fact that business activities are conducted in such a region does not necessarily mean that they are related to human rights abuses, and that immediate suspension or termination of the business activities in the region is required. Nevertheless, it is necessary to carefully examine the relationship, and depending on the results of

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such examination, the business enterprise may well reach a decision to suspend or terminate the business activities.

In addition, Suspicion may arise that human rights abuses are taking place in the production or supply process of the business enterprise's products or services with the involvement of a State, etc. If the business enterprise cannot confirm the actual situation of the human rights abuses because it cannot obtain cooperation from the relevant parties as a result of the involvement of a State, etc., or, even if the business enterprise can confirm the actual situation of the human rights abuses but cannot prevent or mitigate adverse human rights impacts by its own efforts due to the intervention of a State, etc., it is necessary to consider disengagement. When the business enterprise determines that it is necessary to disengage from the business relationship, but the disengagement incurs, for example, penalties for breach of contract, steps may be taken to terminate the contract.

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In any of the above cases, there are cases where disengagement is impossible or practically difficult despite the decision that disengagement is appropriate. In such cases, business enterprises should provide information and seek advice from the Japanese government and take appropriate measures.

c. “Responsible exit” from areas affected by conflicts and other situations

In general, there may be cases where business enterprises suddenly have to exit from areas affected by conflicts and other situations due to the rapid worsening of conditions and other factors. In such a case, alternative business enterprises may fail to appear through new entry or acquisition, making it impossible for consumers to obtain products or services necessary to live. It may become more difficult for employees laid-off by the exiting business enterprise to find a new job.

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For this reason, when considering suspension or termination of business activities in such areas affected by conflicts and other situations, the business enterprise should implement heightened Human Rights DD and make a more careful and responsible judgment than usual. Of course, to secure its employees' safety, the business enterprise may need to temporarily suspend its operation and evacuate employees or exit promptly from the area in some cases. However, it is necessary to give the maximum possible consideration to potential adverse human rights impacts on the stakeholders affected by the exit in making the decision whether to withdraw or not. It is also desirable that the decision can be appropriately explained to the stakeholders.

For this reason, it is important to consider an exit plan beforehand if conflicts and other situations may occur.

When considering a “responsible exit,” business enterprises should provide information and consult with the Japanese government and the Japan External Trade Organization (JETRO).

d. Addressing systemic issues

Systemic issues refer to problems that are prevalent within a context and are driven by root causes outside of the business enterprise's control, but that nonetheless increase the risk of adverse impacts within the business enterprise's operations or supply chain. Examples of systemic issues include poor access to schools and high rates of poverty, which can increase the risk of child labour and discrimination of

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foreigners, women, and minority groups.

Although business enterprises are not responsible for solving systemic issues, because efforts of business enterprises to address such issues can be effective for preventing or mitigating adverse human rights impacts in some cases, they are expected to make efforts to address such issues.

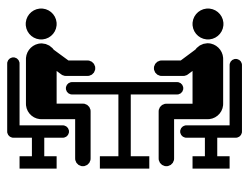
Business enterprises should be careful not to take advantage of or encourage situations where systemic issues exist, and should consider whether they can continue to operate responsibly in such contexts, in parallel with efforts by individual business enterprises, industry associations, and others.

(3) Tracking effectiveness of the efforts

Business enterprises need to track whether they have effectively identified, assessed, prevented, and mitigated adverse human rights impacts, and make continued improvement based on the results.

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a. Tracking methods



Based on the business environment and scale of the business enterprise, type, and severity of the target adverse impacts, etc., conduct interviews with employees, suppliers, etc., use of questionnaires, visit sites including factories, etc., and conduct audits and surveys by a third party.

b. Integration of effectiveness tracking in an internal process



Ensure that human rights perspectives are incorporated into internal process by conducting audits and site visits based on environmental, health and safety perspectives.

c. Use of the tracking results



Business enterprises are encouraged to use the tracking results to examine whether or not the countermeasures taken were effective in preventing or mitigating the adverse human rights impacts or whether there are more effective countermeasures.

If the assessment results show that the countermeasures are ineffective or insufficient, the enterprise can understand why the expected effect was not obtained by analyzing range of information obtained in the tracking process. This is useful for improvement of efforts for respect of human rights.

(4) Communication and information disclosure

Business enterprises should be able to explain that they meet their responsibility to respect human rights. When facing with an allegation of human rights abuse, especially expressed by stakeholders that could be adversely affected, it is essential for the business enterprise to be able to explain the measures it has taken. Even when an actual abuse of human rights is identified, the information disclosure on the efforts for human rights will not reduce the enterprise value. On the contrary, it can increase the business enterprise value because it shows its willingness to improve and its transparency, and it should receive recognition from its stakeholders. Business enterprises are expected to communicate and disclose information proactively. The following information should be disclosed and explained.

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a. Content of the information explained or disclosed.

(a) Basic Information

It is most important that business enterprises convey basic information on Human Rights DD such as measures taken to establish the human rights policy across the business enterprise; identified area of material risk; identified (or prioritized) severe adverse impacts or risks; criteria of prioritization; information on actions to prevent or mitigate risks, and; information on tracking effectiveness, when they address their adverse human rights impacts

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(b) Approach to addressing adverse impacts

If there is a risk of significant adverse human rights impacts, the business enterprise should explain how it will address the adverse impacts, and the explanation should provide sufficient information to evaluate the appropriateness of the action of the business enterprise to address the specific human rights impacts in which it is involved. When providing such information, however, the business enterprise needs to pay attention to the confidentiality of the personal information of the affected stakeholders and confidential information of its suppliers, etc.

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b. Approaches to communication and information disclosure

For disclosure to the general public, information may be posted on the website of the business enterprise, or disclosed in an integrated report, sustainability report, CSR report, or human rights report, etc. Consideration should be given to making the report accessible to stakeholders, for example by producing an English version of the report.

Disclosure can be made at any stage of the Human Rights DD process. Disclosing information as needed will help gain the trust of stakeholders.

Such disclosures can be periodic or non-periodic, but it is desirable to be at least once a year. Also, it is important for business enterprises to provide information to stakeholders who may be adversely affected or who are actually affected, either in an online format or in person.

Examples of Information Disclosure Methods (it is desirable to prepare an English version of the information for disclosure)

- Website
- Integrated report
- Sustainability Report
- Sustainability reports
- CSR reports
- Human rights report, etc.

4. Remedy

(1) Necessity of Remedies and Efforts by Business enterprises

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.

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If adverse human rights impacts are only directly linked to its operations, products or services, the business enterprise may take a role in implementing a remedy but is not required to provide for remediation. However, it needs attention that the business enterprise should strive to prevent or mitigate the adverse impacts by working on the business enterprise that causes or contributes to the adverse impacts.

Examples of Remedies

- Apologies
- Restitution
- Financial or non-financial compensation
- Establishment or statement of recurrence prevention process
- Request for recurrence prevention to the suppliers, etc.

(2) Grievance mechanisms

In order to make it possible for grievances to be addressed early and remediated directly, business enterprises should enable a remedy that is an important element of the responsibility to respect human rights by establishing a grievance mechanism that is a series of processes to address grievances and disputes pertaining to the business enterprises and their stakeholders.

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Through these grievance mechanisms, individuals and groups can raise concerns or bring complaints about adverse impacts caused by business enterprises, file a grievance, and seek a remedy. A grievance mechanism should meet the following requirements.

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Table 7. Requirements for Grievance Mechanisms

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Legitimate	Fair operation enabling trust from the stakeholder groups for whose use they are intended
Accessible	Being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access, which may include language, literacy, and fears of reprisal
Predictable	Providing a clear and known procedure with an indicative timeframe for each stage, and clarity on the types of processes and outcomes available and means of monitoring implementation
Equitable	Seeking to ensure that aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair, informed and respectful terms
Transparent	Keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake
Rights-compatible	Ensuring that both outcomes and remedies accord with internationally recognized human rights
A source of continuous learning	Drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and human rights abuse
Based on engagement and dialogue	Consulting the stakeholder groups for whose use they are intended on their design and performance, and focusing on dialogue as the means to address and resolve grievances

In June 2022, the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER) was established in compliance with the Guiding Principles. JaCER provides a non-judicial grievance platform to support and facilitate corporate engagement in dialogue and redress. The use of JaCER is considered one of the options to establish an early stage grievance mechanism.

Currently, JPEA provides referrals to related organizations, etc., when the secretariat office receives inquiries on various complaints, etc. In the future, the JPEA will strive to ensure transparency in the industry and ensure that remedies, an important element of its responsibility to respect human rights, are appropriately provided through activities such as introducing case studies of member business enterprises' efforts and posting information on the contact person in charge on its website, as well as horizontal deployment of best practices at human rights seminars and other events.

(3) State-based remedy mechanism

Business enterprises should establish their own grievance mechanisms or participate in a grievance mechanism, but the government also has established grievance mechanisms.

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Specifically, there are trials in courts as a judicial process, while non-judicial processes include: the individual labour dispute resolution systems of the Ministry of Health, Labour and Welfare (“MHLW”); the Japanese National Contact Point composed of the MOFA, MHLW and METI based on the OECD Guidelines for Multinational Enterprises; human rights counseling, investigation and remedy procedures provided by the Legal Affairs Bureaus of the MOJ; and the Native Languages Consultation at the Organization for Technical Intern Training.. If necessary, consider utilizing these remedy mechanisms.

Conclusion

This Guidance explains how business enterprises in the photovoltaic industry can deepen their understanding of human rights issues and specifically promote respect for human rights.

In the future, member business enterprises and their suppliers may have questions, and new issues and needs may arise, as they proceed with reference to this Guidance.

In addition, business enterprises in the photovoltaic industry must be aware of the adverse impacts on human rights in their own and their group business enterprises' supply chains, not only in Japan but also around the world. Furthermore, it is important to consider the international context, as suppliers are widely located both domestically and internationally.

This Guidance is a guide to help business enterprises implement the Human Rights Guidelines and will be reviewed as necessary in light of government policies and trends in the international photovoltaic industry.

In addition, we will play an active role in promoting respect for human rights in the solar industry by promoting more concrete changes in corporate behavior, including the following activities.

【Future Activity Policies】

- Introduce the status of disclosure of information on respect for human rights, including Human Rights DDs, by the JPEA member business enterprises on the JPEA website.
- Introduce information on the contact points of member business enterprises and examples of their efforts on the JPEA website.
- Training, public relations and dissemination activities for business enterprises in the photovoltaic industry centering on JPEA member business enterprises

Appendix (1) Code of Conduct for Suppliers, etc.

Code of Conduct for Suppliers, etc. (Example)

〇〇 (hereinafter referred to as "Our company") endorses the "SDGs" proposed by the United Nations and the "Guiding Principles on Business and Human Rights," one of the most important international frameworks on business and human rights, and places importance on respect for human rights and sustainability in its business activities. This Code of Conduct is intended to provide a framework for Our company supply chain, including not only parts and materials used in the manufacture of products, but also suppliers, etc., including the purchase of machinery, equipment, etc., and services necessary for business activities "upstream" (which relates to the procurement and securing of raw materials, resources, equipment and software for our company's products and services as well as business enterprises and other business partners in the supply chain, including but not limited to direct business partners; the same applies hereinafter) and "downstream" (which relates to the sale, consumption, and disposal of products and services; the same applies hereinafter). This Code of Conduct is to be applied throughout the supply chain.

Legal requirements

Suppliers, etc., shall comply with all applicable national and regional laws, legal requirements and treaties ("Laws and Regulations") in the countries in which they operate.

Child labor

Suppliers, etc., shall not engage in labor with persons under the age of 15 years or the age at which compulsory education is completed, whichever is higher.

Forced Labor

Suppliers, etc., shall not cause any labor, including bonded labor, indentured servitude, slave labor, labor by convicts, labor similar to slavery, or labor through human trafficking, which is forced upon a person under threat of punishment and which the person does not offer of his or her own free will.

Oppression and Harassment

Suppliers, etc., shall respect all workers. No harassment of any kind, including corporal punishment, other forms of oppression, abuse, or sexual harassment, shall be tolerated.

Discrimination

Suppliers, etc., shall not discriminate against workers based on race, gender, nationality, religion, age, social or ethnic origin, sexual preference, political opinion, or any other circumstance.

Corrective Actions

If a violation of this Code of Conduct is found, Our company and our suppliers shall develop and agree upon a corrective action plan to resolve the matter within a

reasonable time. If a violation of this Code of Conduct is found, Our company may take appropriate action, including cancellation of the order or suspension of business.

Recommissioning and Procurement

When suppliers, etc., sub-consign orders received from Our company to subcontractors, they must ensure that the sub-consignees' business activities are in line with this Code of Conduct. In addition, when procuring raw materials or sub-materials necessary for manufacturing products from third parties, suppliers, etc., shall not do business with suppliers whose business activities are in violation of this Code of Conduct. If Our company wish to confirm whether the business activities of a subcontractor or supplier are in accordance with this Code of Conduct, suppliers, etc., must respond to and cooperate with such confirmation in good faith.

Transparency and Integrity

Suppliers, etc., shall not falsify, alter, or conceal records, evidence, or testimony, or engage in other similar unethical practices in all their business activities. Information regarding business activities shall be properly disclosed in accordance with applicable regulations and general business practices.

As a representative of Our company, I have reviewed this Code of Conduct and fully understand its contents. I pledge to take prompt corrective action if any violations of this Code of Conduct are found.

I understand that this document will remain in effect for the duration of our business with your company after the date indicated below, and that it will be available in writing in a language understood by stakeholders (any individual or group of stakeholders who are or may be affected by the business enterprise's activities).

Date of Signature	_____
Company Name	_____
Company Address	_____
Phone	_____
Title	_____
Name	_____

Appendix (2) Confirmation at the time of contract

Confirmation letter at the time of purchase model contract

Thank you very much for your request for a solar power generation system.

Our company will use this checklist to determine whether the sales representative has provided appropriate explanations of various related matters at the time of contract.

We aim to be sincere to our customers, therefore, please only check the following items if actually provided.

○○ Corporation

(Please ensure you received the following items and check the corresponding ☐ in the right column)

	What to check	check
1	We received an explanation about the specifications of the photovoltaic power generation system.	<input type="checkbox"/>
2	We received an explanation on the construction method of the solar power generation system.	<input type="checkbox"/>
	• We received an explanation about the dangers of installing solar power generation systems in the surrounding area, such as falling snow and snow slipping, and countermeasures.	<input type="checkbox"/>
3	We received an explanation about the cost (estimated contents) of the solar power generation system and construction.	<input type="checkbox"/>
4	We received an explanation about the status of subsidies.	<input type="checkbox"/>
5	We received an explanation on the application and report of the power company (transmission and distribution company) and the feed-in tariff system (obligation to prepare, submit, and comply with the business plan) for the solar power generation system.	<input type="checkbox"/>
6	We received an explanation of the amount of power generated and economic feasibility using a document prepared with the basis for calculation.	<input type="checkbox"/>
	• We received an explanation that the amount of power generated is not the installed capacity power generation due to the influence of the installation direction and angle, weather and temperature, electrical resistance of wiring, junction boxes, etc., and loss of power controller. <input type="checkbox"/>	
	• We received an explanation that trees, shadows of buildings, future changes in the surrounding environment, snow accumulation, etc., affect power generation. <input type="checkbox"/>	
	• We received an explanation that the amount of power generated may decrease due to output suppression due to voltage rise and the occurrence of output control to balance power supply and demand. <input type="checkbox"/>	
	• We received an explanation that maintenance and inspection costs during operation, disposal costs at the time of removal, etc., are required separately. <input type="checkbox"/>	<input type="checkbox"/>
7	We received an explanation about the warranty system for solar power generation systems.	
8	We received an explanation about installment sales.	
9	We received an explanation about the contract.	
10	We received an explanation about cooling-off.	<input type="checkbox"/>

We have confirmed that we have received an explanation for each of the above contents.

Date: Year _____ Month _____ Day _____

Name: _____

Signature _____

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Citations

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