Sumitomo Forestry Group Sustainability Report 2023

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Top     Top     Sustainability     Commitment     Management     Sustainability     Business and ESG	Environment	Social	Governance	Related Information
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External Recognition - Initiatives in Response to the Spread of the Coronavirus Disease (COVID-19) - SASB Content Index - GRI Content Index (GRI Standards) - Editorial Policy /Independent Assurance Report

# SASB Content Index

## **SASB** Content Index

#### **SASB Content Index**

It shows places where Sumitomo Forestry Group's initiatives are posted on the topic of standard of the forestry management of SASB.

### SUSTAINABILITY DISCLOSURE TOPICS & ACCOUNTING METRICS

TOPIC	ACCOUNTING METRIC	CODE	LOCTION
	Area of forestland certified to a third- party forest management standard,	RR-FM-160a.1	Area of Forest Managed and Owned by the Sumitomo Forestry Group
	percentage certified to each standard		> Overseas Managed Afforestation Area
Ecosystem Services &	Area of forestland with protected conservation status	RR-FM-160a.2	> Commitment to Protected Areas
Impacts			> Commitment to Protected Areas
	A ca of forestiand in chuangered	RR-FM-160a.3	> Biodiversity Conservation in Company-Owned Forests in Japan and Planted Forests Overseas
	Description of approach to optimizing opportunities from ecosystem services provided by forestlands	RR-FM-160a.4	> Utilization of Sustainable Forest Resources
	Area of forestland in indigenous land	RR-FM-201a.1	-
Rights of Indigenous Peoples	Description of engagement processes and due diligence practices with respect to human rights, indigenous rights, and the local community	RR-FM-201a.2	<ul> <li>Identifying and Managing Human Rights Risks</li> <li>Consideration for Biodiversity Conservation,</li> <li>Labor Practices and Human Rights, and Local Communities</li> </ul>
Climate Change Adaptation	Description of strategy to manage opportunities for and risks to forest management and timber production presented by climate change	RR-FM-450a.1	> Responding to TCFD

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### **Activity Metrics**

ACTIVITY METRIC	CODE	LOCTION
Area of forestland owned, leased, and/or managed by the entity	RR-FM-000.A	Area of Forest Managed and Owned by the Sumitomo Forestry Group
Aggregate standing timber inventory	RR-FM-000.B	-
Timber harvest volume	RR-FM-000.C	> Overseas Managed Afforestation Area
		> Balance of Input & Output

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## **GRI Content Index (GRI Standards)**

## **GRI Content Index (GRI Standards)**

#### **GRI Content Index (GRI Standards)**

Sumitomo Forestry Group references the GRI Standards, and reports the information listed in the content index for the period from January 2022, to December 2022.

Below Content Index includes related information available on Sustainability Report.

	Disclosures	ISO26000 Disclosure	Location		
GRI Con	GRI Content Index (GRI Standards)				
1. The or	ganization and its reporting practices				
2-1	Organizational details		<ul> <li>Corporate Profile</li> <li>List of Sumitomo Forestry Group Companies</li> </ul>		
2-2	Entities included in the organization's sustainability reporting		<ul> <li>&gt; Editorial Policy</li> <li>&gt; Securities Reports (in Japanese)</li> </ul>		
2-3	Reporting period, frequency and contact point		<ul> <li>&gt; Editorial Policy</li> <li>&gt; Questionnaire</li> </ul>		
2-4	Restatements of information		> Greenhouse Gas Emissions from Business Activities		
2-5	External assurance		> Independent Assurance Report 迄		
2. Activi	ties and workers				
2-6	Activities, value chain, and other business relationships		<ul> <li>Corporate Profile</li> <li>Home</li> <li>Our Business</li> <li>Overall Picture of Our Business</li> <li>Global Housing, Construction and Real Estate Business</li> </ul>		
2-7	Employees		> Social Data		
2-8	Workers who are not employees		-		
3. Gover	3. Governance				
2-9	Governance structure and composition		<ul> <li>&gt; Securities Reports (in Japanese)</li> <li>&gt; Corporate Governance report </li> <li>&gt; Environmental Management Structure</li> </ul>		

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	Disclosures	ISO26000 Disclosure	Location
2-10	Nomination and selection of the highest governance body		> Corporate Governance
2-11	Chair of the highest governance body		> Corporate Governance
2-12	Role of the highest governance body in overseeing the management of impacts		<ul> <li>Mid-Term Sustainability Targets and Material Issues</li> <li>Environmental Management Structure</li> <li>Risk Management</li> </ul>
2-13	Delegation of responsibility for managing impacts		<ul> <li>Corporate Governance</li> <li>Risk Management</li> <li>Environmental Management Structure</li> <li>Communication with Employees</li> </ul>
2-14	Role of the highest governance body in sustainability reporting		<ul> <li>Corporate Governance</li> <li>Mid-Term Sustainability Targets and Material Issues</li> </ul>
2-15	Conflicts of interest		> Basic Philosophy on Corporate Governance 見
2-16	Communication of critical concerns		> Compliance
2-17	Collective knowledge of the highest governance body		> Basic Philosophy on Corporate Governance 💈
2-18	Evaluation of the performance of the highest governance body		> Corporate Governance
2-19	Remuneration policies		> Corporate Governance
2-20	Process to determine remuneration		> Corporate Governance
2-21	Annual total compensation ratio		> Social Data
4. Strate	egy, policies and practices		
2-22	Statement on sustainable development strategy		> Top Commitment
2-23	Policy commitments		<ul> <li>Human Rights Initiatives</li> <li>Corporate Philosophy and Sustainability Management</li> </ul>
2-24	Embedding policy commitments		> Corporate Philosophy and Sustainability Management
2-25	Processes to remediate negative impacts		<ul> <li>Stakeholder Engagement</li> <li>Compliance</li> <li>Risk Management</li> <li>Human Rights Initiatives</li> </ul>
2-26	Mechanisms for seeking advice and raising concerns		<ul> <li>&gt; Intellectual Property Management</li> <li>&gt; Compliance</li> </ul>

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	Disclosures	ISO26000 Disclosure	Location		
2-27	Compliance with laws and regulations		<ul> <li>Environmental Risk Management</li> <li>Information Security/DX</li> <li>Compliance</li> </ul>		
2-28	Membership associations		<ul> <li>Promotion of Social Contribution Activities</li> <li>Contributions to Public Policy</li> </ul>		
5. Stakeh	5. Stakeholder engagement				
2-29	Approach to stakeholder engagement		> Stakeholder Engagement		
2-30	Collective bargaining agreements		-		

	Disclosures	ISO26000 Disclosure	Location
GRI 3: M	aterial Topics 2021		
3-1	Process to determine material topics		> Mid-Term Sustainability Targets and Material Issues
3-2	List of material topics		> Mid-Term Sustainability Targets and Material Issues
3-3	Management of material topics		<ul> <li>&gt; Top Commitment</li> <li>&gt; Sustainability-related Policies and Philosophy</li> <li>&gt; Mid-Term Sustainability Targets and Material Issues</li> <li>&gt; Material Issue 1</li> <li>&gt; Material Issue 2</li> <li>&gt; Material Issue 3</li> <li>&gt; Material Issue 4</li> <li>&gt; Material Issue 5</li> <li>&gt; Material Issue 6</li> <li>&gt; Material Issue 7</li> <li>&gt; Material Issue 8</li> <li>&gt; Material Issue 9</li> </ul>

	Disclosures	ISO26000 Disclosure	Location
Economi	c Performance 2016		
201-1	Direct economic value generated and distributed	6.8.1 6.8.2 6.8.3 6.8.7 6.8.9	<ul> <li>Return to Shareholders and IR Activities</li> <li>Corporate Profile</li> <li>Securities Reports (in Japanese)</li> <li>Financial Results/Other Financial Information</li> </ul>

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	Disclosures	ISO26000 Disclosure	Location
201-2	Financial implications and other risks and opportunities due to climate change	6.5.5	<ul> <li>Responding to TCFD</li> <li>Mitigation of Climate Change</li> <li>Adaption to Climate Change</li> <li>Greenhouse Gas Emissions from Business Activities</li> </ul>
201-3	Defined benefit plan obligations and other retirement plans	6.8.7	> Securities Reports (in Japanese)
201-4	Financial assistance received from government		
Market I	Presence 2016		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	6.3.7 6.3.10 6.4.3 6.4.4 6.8.1 6.8.2	_
202-2	Proportion of senior management hired from the local community	6.4.3 6.8.1 6.8.2 6.8.5 6.8.7	_
Indirect	Economic Impacts 2016		
203-1	Infrastructure investments and services supported	6.3.9 6.8.1 6.8.2 6.8.7 6.8.9	<ul> <li>&gt; Sustainable Forest Management</li> <li>&gt; Promotion of Social Contribution Activities</li> </ul>
203-2	Significant indirect economic impacts	6.3.9 6.6.6 6.6.7 6.7.8 6.8.1 6.8.2 6.8.5 6.8.5 6.8.6 6.8.7 6.8.9	<ul> <li>&gt; Risk Management</li> <li>&gt; Environmental Risk Management</li> <li>&gt; Responding to TCFD</li> </ul>

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	Disclosures	ISO26000 Disclosure	Location
Procure	ment Practices 2016		
		6.4.3	
		6.6.6	
204-1	Proportion of spending on local suppliers	6.8.1	-
		6.8.2	
		6.8.7	
Anti-cor	ruption 2016		
	Operations assessed for risks related to	6.6.1	
205-1	corruption	6.6.2	-
		6.6.3	
		6.6.1	
205-2	Communication and training about anti-	6.6.2	> Compliance
205 2	corruption policies and procedures	6.6.3	
		6.6.6	
	Confirmed incidents of corruption and actions	6.6.1	
205-3	taken	6.6.2	> Compliance
		6.6.3	
Anti-con	npetitive Behavior 2016		
		6.6.1	
206-1	Legal actions for anti-competitive behavior, anti-	6.6.2	> Compliance
200 1	trust,and monopoly practices	6.6.5	
		6.6.7	
Tax 2019	9		
207-1	Approach to tax	6.2	> Tax
207-2	Tax governance, control, and risk management	6.2	> Tax
207-3	"Stakeholder engagement and management of concerns related to tax"		> Тах
207-4	Country-by-country reporting		-
Materia	ls 2016		·
		6.5.1	
301-1	Materials used by weight or volume	6.5.2	> Balance of Input & Output
		6.5.4	> Environmental Related Data

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	Disclosures	ISO26000 Disclosure	Location
301-2	Recycled input materials used	6.5.1 6.5.2	<ul> <li>Waste Reduction and Recycling</li> <li>Manufacturing Business Initiatives</li> </ul>
		6.5.4	> Power Generation Business Initiatives
301-3	Reclaimed products and their packaging materials	6.5.1 6.5.2 6.5.4	<ul> <li>Waste Reduction and Recycling</li> <li>Housing Business Initiatives</li> </ul>
Energy 2	2016		1
302-1	Energy consumption within the organization	6.5.1 6.5.2 6.5.4	<ul> <li>Balance of Input &amp; Output</li> <li>Environmental Related Data</li> <li>Energy Used in Business Activities and the Adoption of Renewable Energy</li> </ul>
302-2	Energy consumption outside of the organization	6.5.1 6.5.2 6.5.4	<ul> <li>&gt; Balance of Input &amp; Output</li> <li>&gt; Environmental Related Data</li> <li>&gt; Greenhouse Gas Emissions from Business Activities</li> </ul>
302-3	Energy intensity	6.5.1 6.5.2 6.5.4	_
302-4	Reduction of energy consumption	6.5.1 6.5.2 6.5.4 6.5.5	Energy Used in Business Activities and the Adoption of Renewable Energy
302-5	Reductions in energy requirements of products and services	6.5.1 6.5.2 6.5.4 6.5.5	> Mitigation of Climate Change
Water 2	018		
303-1	Interactions with water as a shared resource		> Efficient Use of Water Resources
303-2	Management of water discharge-related impacts		> Pollution Prevention
303-3	Water withdrawal		<ul> <li>&gt; Balance of Input &amp; Output</li> <li>&gt; Environmental Related Data</li> </ul>
303-4	Water discharge		<ul> <li>Balance of Input &amp; Output</li> <li>Environmental Related Data</li> </ul>
303-5	Water consumption		> Environmental Related Data

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	Disclosures	ISO26000 Disclosure	Location
Biodive	rsity 2016		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	6.5.1 6.5.2 6.5.6	<ul> <li>Policies and Targets for Biodiversity Conservation</li> <li>Biodiversity Conservation in Company-Owned Forests</li> <li>in Japan and Planted Forests Overseas</li> </ul>
304-2	Significant impacts of activities, products, and services on biodiversity	6.5.1 6.5.2 6.5.6	<ul> <li>Environmental Risk Management</li> <li>Policies and Targets for Biodiversity Conservation</li> <li>Biodiversity Conservation in Company-Owned Forests</li> <li>in Japan and Planted Forests Overseas</li> </ul>
304-3	Habitats protected or restored	6.5.1 6.5.2 6.5.6	<ul> <li>Contributions to Eco Cities Through Greening</li> <li>Examples of Social Contribution Activities in Japan</li> <li>Biodiversity Conservation in Company-Owned Forests</li> <li>in Japan and Planted Forests Overseas</li> </ul>
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	6.5.1 6.5.2 6.5.6	Biodiversity Conservation in Company-Owned Forests in Japan and Planted Forests Overseas
Emissio	ns 2016	•	
305-1	Direct (Scope1) GHG emissions	6.5.1 6.5.2 6.5.5	<ul> <li>&gt; Greenhouse Gas Emissions from Business Activities</li> <li>&gt; Boundaries and Methods of Greenhouse Gas Emissions</li> <li>&gt; Calculation</li> <li>&gt; Balance of Input &amp; Output</li> </ul>
305-2	Energy indirect (Scope 2) GHG emissions	6.5.1 6.5.2 6.5.5	<ul> <li>&gt; Greenhouse Gas Emissions from Business Activities</li> <li>&gt; Boundaries and Methods of Greenhouse Gas Emissions</li> <li>&gt; Calculation</li> <li>&gt; Balance of Input &amp; Output</li> </ul>
305-3	Other indirect (Scope3) GHG emissions	6.5.1 6.5.2 6.5.5	<ul> <li>&gt; Greenhouse Gas Emissions from Business Activities</li> <li>&gt; Boundaries and Methods of Greenhouse Gas Emissions</li> <li>&gt; Calculation</li> <li>&gt; Balance of Input &amp; Output</li> </ul>
305-4	GHG emissions intensity	6.5.1 6.5.2 6.5.5	> Greenhouse Gas Emissions from Business Activities
305-5	Reduction of GHG emissions	6.5.1 6.5.2 6.5.5	<ul> <li>Mitigation of Climate Change</li> <li>Greenhouse Gas Emissions from Business Activities</li> </ul>

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	Disclosures	ISO26000 Disclosure	Location
305-6	Emissions of ozone-depleting substances (ODS)	6.5.1 6.5.2 6.5.3 6.5.5	> Environmental Risk Management
WASTE	2020		1
306-1	Waste generation and significant waste-related impacts		> Waste Reduction and Recycling
306-2	Management of significant waste-related impacts		> Waste Reduction and Recycling
306-3	Waste generated		<ul> <li>&gt; Balance of Input &amp; Output</li> <li>&gt; Waste Reduction and Recycling</li> </ul>
306-4	Waste diverted from disposal		> Waste Reduction and Recycling
306-5	Waste directed to disposal		> Balance of Input & Output
Environ	mental Compliance 2016		
307-1	Non-compliance with environmental laws and regulations	6.5.1 6.5.2 4.6	> Environmental Risk Management
Supplier	Environmental Assessment 2016		
308-1	New suppliers that were screened using environmental criteria	6.3.5 6.5.1 6.5.2 6.6.6 7.3.1	> Distribution Business Initiatives
308-2	Negative environmental impacts in the supply chain and actions taken	6.3.5 6.5.1 6.5.2 6.6.6 7.3.1	<ul> <li>Distribution Business Initiatives</li> <li>Manufacturing Business Initiatives</li> <li>Housing Business Initiatives</li> </ul>
Employr	nent 2016		
401-1	New employee hires and employee turnover	6.4.1 6.4.2 6.4.3	> Social Data

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	Disclosures	ISO26000 Disclosure	Location
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	6.4.1 6.4.2 6.4.4 6.8.7	> Work-Life Balance
401-3	Parental leave	6.4.1 6.4.2 6.4.4	> Social Data
Labor/M	anagement Relations 2016		
402-1	Minimum notice periods regarding operational changes	6.4.1 6.4.2 6.4.3 6.4.5	_
Occupat	ional Health and Safety 2018		
403-1	Occupational health and safety management system		> Occupational Health and Safety Management
403-2	Hazard identification, risk assessment, and incident investigation		<ul> <li>Occupational Health and Safety</li> <li>Occupational Health and Safety in the Environmental Energy Business</li> <li>Occupational Health and Safety in the Manufacturing Business</li> </ul>
403-3	Occupational health services		<ul> <li>Promotion of Health Management</li> <li>Occupational Health and Safety in the Forestry Business</li> <li>Occupational Health and Safety on Construction Sites</li> </ul>
403-4	Worker participation, consultation, and communication on occupational health and safety		<ul> <li>Communication with Employees</li> <li>Occupational Health and Safety</li> <li>Promotion of Health Management</li> </ul>
403-5	Worker training on occupational health and safety		<ul> <li>Occupational Health and Safety</li> <li>Promotion of Health Management</li> </ul>
403-6	Promotion of worker health		<ul> <li>Promotion of Health Management</li> <li>Occupational Health and Safety in the Forestry Business</li> </ul>

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	Disclosures	ISO26000 Disclosure	Location
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		<ul> <li>Occupational Health and Safety</li> <li>Occupational Health and Safety in the Forestry Business</li> <li>Occupational Health and Safety in the Environmental Energy Business</li> <li>Occupational Health and Safety on Construction Sites</li> <li>Occupational Health and Safety in the Lifestyle Services Business</li> <li>Promotion of Health Management</li> </ul>
403-8	Workers covered by an occupational health and safety management system		> Occupational Health and Safety
403-9	Work-related injuries		<ul> <li>Material Issue 6</li> <li>Occupational Health and Safety Management</li> <li>Social Data</li> </ul>
403-10	Work-related ill health		<ul> <li>Material Issue 6</li> <li>Occupational Health and Safety Management</li> <li>Social Data</li> </ul>
Training	and Education 2016		
404-1	Average hours of training per year per employee	6.4.1 6.4.2 6.4.7	<ul> <li>&gt; Human Resources Development</li> <li>&gt; Social Data</li> </ul>
404-2	Programs for upgrading employee skills and transition assistance programs	6.4.1 6.4.2 6.4.7 6.8.5	<ul> <li>Diversity and Inclusion</li> <li>Human Resources Development</li> </ul>
404-3	Percentage of employees receiving regular performance and career development reviews	6.4.1 6.4.2 6.4.7	<ul> <li>Human Resources Development</li> <li>Communication with Employees</li> </ul>
Diversity	and Equal Opportunity 2016		
405-1	Diversity of governance bodies and employees	6.2.3 6.3.7 6.3.10 6.4.1	<ul> <li>Corporate Governance</li> <li>Social Data</li> </ul>

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	Disclosures	ISO26000 Disclosure	Location
405-2 Non-disc	Ratio of basic salary and remuneration of women to men crimination 2016	6.3.7 6.3.10 6.4.1 6.4.2 6.4.3 6.4.4	> Social Data
406-1	Incidents of discrimination and corrective actions taken	4.8 6.3.1 6.3.2 6.3.6 6.3.7 6.3.10 6.4.3	> Human Rights Initiatives
Freedom	of Association and Collective Bargaining 2016		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	6.3.1 6.3.2 6.3.3 6.3.4 6.3.5 6.3.8 6.3.10 6.4.5 6.6.6	> Human Rights Initiatives
Child Lal	bor 2016		
408-1	Operations and suppliers at significant risk for incidents of child labor	4.8 6.3.1 6.3.2 6.3.3 6.3.4 6.3.5 6.3.7 6.3.10 6.6.6 6.8.4	<ul> <li>Distribution Business Initiatives</li> <li>Manufacturing Business Initiatives</li> <li>Housing Business Initiatives</li> <li>Human Rights Initiatives</li> </ul>

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	Disclosures	ISO26000 Disclosure	Location
Forced o	r Compulsory Labor 2016		
		4.8	
		6.3.1	
		6.3.2	> Distribution Business Initiatives
409-1	Operations and suppliers at significant risk for	6.3.3	> Manufacturing Business Initiatives
	incidents of forced or compulsory labor	6.3.4	> Housing Business Initiatives
		6.3.5	> Human Rights Initiatives
		6.3.10	
		6.6.6	
Security	Practices 2016		
		4.8	
		6.3.1	
410-1	Security personnel trained in human rights policies	6.3.2	
410-1	or procedures	6.3.4	
		6.3.5	
		6.6.6	
Rights of	Indigenous Peoples 2016		
		4.8	
		6.3.1	
		6.3.2	
		6.3.4	
411-1	Incidents of violations involving rights of	6.3.6	> Human Rights Initiatives
	indigenous peoples	6.3.7	
		6.3.8	
		6.6.7	
		6.8.3	
Human F	Rights Assessment 2016		
		4.8	
		6.3.1	
	Operations that have been subject to human rights	6.3.2	
412-1	reviews or impact assessments	6.3.3	> Human Rights Initiatives
		6.3.4	
		6.3.5	

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	Disclosures	ISO26000 Disclosure	Location
412-2	Employee training on human rights policies or procedures	4.8 6.3.1 6.3.2 6.3.5	> Human Rights Initiatives
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	4.8 6.3.1 6.3.2 6.3.3 6.3.5 6.6.6	<ul> <li>Distribution Business Initiatives</li> <li>Human Rights Initiatives</li> </ul>
Local Co	ommunities 2016		
413-1	Operations with local community engagement, impact assessments, and development programs	6.3.9 6.5.1 6.5.2 6.5.3 6.8	<ul> <li>&gt; Protecting Domestic Forest Resources</li> <li>&gt; Afforestation Consultancy</li> <li>&gt; Reforestation Activities Contributing to the Society</li> <li>&gt; Examples of Social Contribution Activities in Japan</li> <li>&gt; Examples of Regional Contribution Activities Overseas</li> <li>&gt; Human Rights Initiatives</li> </ul>
413-2	Operations with significant actual and potential negative impacts on local communities	6.3.9 6.5.3 6.8	-
Supplier	Social Assessment 2016		
414-1	New suppliers that were screened using social criteria	6.3.5 6.6.1 6.6.2 6.6.6 6.8.1 6.8.2 7.3.1	> Distribution Business Initiatives
414-2	Negative social impacts in the supply chain and actions taken	6.3.5 6.6.1 6.6.2 6.6.6 6.8.1 6.8.2 7.3.1	<ul> <li>Distribution Business Initiatives</li> <li>Manufacturing Business Initiatives</li> <li>Housing Business Initiatives</li> <li>Human Rights Initiatives</li> </ul>

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	Disclosures	ISO26000 Disclosure	Location
Public P	olicy 2016		
415-1	Political contributions	6.6.1 6.6.2 6.6.4	<ul> <li>&gt; Promotion of Social Contribution Activities</li> <li>&gt; Compliance</li> </ul>
Custome	er Health and Safety 2016		
416-1	Assessment of the health and safety impacts of product and service categories	6.7.1 6.7.2 6.7.4 6.7.5 6.8.8	<ul> <li>Product Safety and Quality Management in the Manufacturing Business</li> <li>Product Safety and Quality Management in the Housing Business</li> </ul>
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	4.6 6.7.1 6.7.2 6.7.4 6.7.5 6.8.8	_
Marketi	ng and Labeling 2016		
417-1	Requirements for product and service information and labeling	6.7.1 6.7.2 6.7.3 6.7.4 6.7.5 6.7.9	> Distribution Business Initiatives
417-2	Incidents of non-compliance concerning product and service information and labeling	4.6 6.7.1 6.7.2 6.7.3 6.7.4 6.7.5 6.7.9	_
417-3	Incidents of non-compliance concerning marketing communications	4.6 6.7.1 6.7.2 6.7.3	> Responsible Advertising/Promotional Efforts

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	Disclosures	ISO26000 Disclosure	Location
Custome	er Privacy 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	6.7.1 6.7.2 6.7.7	> Information Security/DX