

GRI Standards Content Index

**GRI 2: General Disclosures 2021**

Disclosure		Integrated Report 2025	ESG Data Book 2025	Others
<b>1. The organization and its reporting practices</b>				
2-1	Organizational details	P115-116 Corporate Profile and Stock Information	–	–
2-2	Entities included in the organization’s sustainability reporting	P14 Editorial Policy Kobelco Group Integrated Report 2025	P1 Editorial Policy	–
2-3	Reporting period, frequency and contact point	P14 Editorial Policy Kobelco Group Integrated Report 2025	P1 Editorial Policy	–
2-4	Restatements of information	Not applicable	Not applicable	–
2-5	External assurance	–	P108 Independent Assurance Report	–
<b>2. Activities and workers</b>				
2-6	Activities, value chain and other business relationships	P19-20 Overview of the Kobelco Group P25-26 Business Model and Value Provided P27-28 Our Value Creation P101-110 Operating Results by Segment	–	–
2-7	Employees	P112 10-Year Financial and Non-Financial Data	P74 Social and Labor Data	–
2-8	Workers who are not employees	–	–	–
<b>3. Governance</b>				
2-9	Governance structure and composition	P83 Directors	P77-81 Corporate Governance Policy on the Management Structure (Management Structure and the Scope of Delegation in Management) Our Corporate Governance System Knowledge, Experience, and Skills that Are Particularly Expected to Be Demonstrated for the Improvement of the Functions of the Board of Directors (Skills Matrix)	–

Disclosure		Integrated Report 2025	ESG Data Book 2025	Others
		<p>Corporate Governance</p> <p>Policy on the Management Structure (Management Structure and the Scope of Delegation in Management)</p> <p>Our Corporate Governance System</p> <p>Knowledge, Experience, and Skills That Are Particularly Expected to Be Demonstrated for the Improvement of the Functions of the Board of Directors (Skills Matrix)</p> <p>Views on Knowledge, Experience, and Skills That Are Particularly Expected to Be Demonstrated for the Improvement of the Functions of the Board of Directors</p>		
2-10	Nomination and selection of the highest governance body	<p>P86 Corporate Governance</p> <p>Our Corporate Governance System Nomination &amp; Compensation Committee</p>	<p>P79 Corporate Governance</p> <p>Our Corporate Governance System Nomination &amp; Compensation Committee</p>	–
2-11	Chair of the highest governance body	<p>P80-82 Message from the Chair of the Board of Directors</p> <p>P83 Directors</p> <p>P86 Corporate Governance</p> <p>Our Corporate Governance System Board of Directors</p>	<p>P79 Corporate Governance</p> <p>Our Corporate Governance System Board of Directors</p>	–
2-12	Role of the highest governance body in overseeing the management of impacts	<p>P39 Climate-Related Disclosures Based on TCFD Recommendations</p> <p>Governance and Risk Management</p> <p>P54 Framework for Promoting Sustainability Management</p>	<p>P6 Framework for Promoting Sustainability Management</p> <p>P12 Basic Environmental Management Policy and Structure</p> <p>Environmental Management Structure</p> <p>P14 Response to Climate Change</p> <p>Climate-Related Governance</p> <p>P57 Disaster Prevention</p> <p>Management Structure</p> <p>Human Resources</p> <p>P60 Enhancing Organizational Diversity Diversity and Inclusion (D&amp;I) Organizational Structure for D&amp;I Development</p> <p>P100 Information Security (Cybersecurity)</p> <p>Information Security Promotion System</p>	–
2-13	Delegation of responsibility for managing impacts	<p>P39 Climate-Related Disclosures Based on TCFD Recommendations</p> <p>Governance and Risk Management</p> <p>P54 Framework for Promoting Sustainability Management</p>	<p>P5 Message from the Chair of the Sustainability Management Committee</p> <p>P6 Framework for Promoting Sustainability Management</p> <p>P12 Basic Environmental Management Policy and Structure</p> <p>Environmental Management Structure</p>	–

Disclosure		Integrated Report 2025		ESG Data Book 2025		Others
				P14 P57 P60 P100	Response to Climate Change Climate-Related Governance Disaster Prevention Management Structure Human Resources Enhancing Organizational Diversity Diversity and Inclusion (D&I) Organizational Structure for D&I Development Information Security (Cybersecurity) Information Security Promotion System	
2-14	Role of the highest governance body in sustainability reporting	P54	Framework for Promoting Sustainability Management	P6	Framework for Promoting Sustainability Management	–
2-15	Conflicts of interest	P92	Corporate Governance Strategic Holdings of Shares	P87-88	Corporate Governance Strategic Holdings of Shares	–
2-16	Communication of critical concerns	P87	Corporate Governance Our Corporate Governance System Compliance Committee	P80  P93	Corporate Governance Our Corporate Governance System Compliance Committee  Compliance Compliance Activities Based on the Compliance Program Monitoring and Response to Reports	Website Basic Policy and Initiatives on the Corporate Governance of Kobe Steel, Ltd. To Guarantee the Sensibility of the Company by the Internal Reporting System <a href="https://www.kobelco.co.jp/english/sustainability/pdf/Basic_Policy_and_Initiatives.pdf">https://www.kobelco.co.jp/english/sustainability/pdf/Basic_Policy_and_Initiatives.pdf</a>
2-17	Collective knowledge of the highest governance body	P54  P90	Framework for Promoting Sustainability Management  Corporate Governance Training and Succession Plan for Directors and Executive Officers	P6  P83	Framework for Promoting Sustainability Management  Corporate Governance Training and Succession Plan for Directors and Executive Officers	–
2-18	Evaluation of the performance of the highest governance body	P89	Corporate Governance Initiatives to Ensure the Effectiveness of the Board of Directors	P82-83	Corporate Governance Initiatives to Ensure the Effectiveness of the Board of Directors	–
2-19	Remuneration policies	P90-91	Corporate Governance Remuneration for Directors, Executive Officers, and the Accounting Auditor	P84-86	Corporate Governance Remuneration for Directors, Executive Officers, and the Accounting Auditor	–
2-20	Process to determine remuneration	P90-91	Corporate Governance Remuneration for Directors, Executive Officers, and the Accounting Auditor	P84-86	Corporate Governance Remuneration for Directors, Executive Officers, and the Accounting Auditor	–
2-21	Annual total compensation ratio	–	–	–	–	–
<b>4. Strategy, policies and practices</b>						
2-22	Statement on sustainable development strategy	P5-10	Message from the President and CEO	–	–	–

Disclosure		Integrated Report 2025		ESG Data Book 2025		Others	
2-23	Policy commitments	P61 Environmental Management Basic Environmental Management Policy		P4 Framework for Sustainability Management		Website KOBELCO Group Basic Policy on Human Rights <a href="https://www.kobelco.co.jp/english/sustainability/pdf/policy.pdf">https://www.kobelco.co.jp/english/sustainability/pdf/policy.pdf</a>	
		P73 Human Rights Revision of Basic Policy on Human Rights		P11 Basic Environmental Management Policy and Structure		Website Basic CSR Procurement Policy <a href="https://www.kobelco.co.jp/english/sustainability/pdf/csr-procurement-basic-policy_e.pdf">https://www.kobelco.co.jp/english/sustainability/pdf/csr-procurement-basic-policy_e.pdf</a>	
		P74 Building Responsible Supply Chains Basic CSR Procurement Policy		P50 Human Rights and Labor Basic Concept Building Responsible Supply Chains Basic Concept			
				P71 Basic CSR Procurement Policy Basic Procurement Policy, Requests to Our Business Partners			
2-24	Embedding policy commitments	P54 Framework for Promoting Sustainability Management		P6 Framework for Promoting Sustainability Management		–	
		P73 Human Rights Human Rights Due Diligence		P12-13 Basic Environmental Management Policy and Structure Environmental Management Structure, Medium- to Long-Term Environmental Targets and Initiatives			
		P74 Building Responsible Supply Chains Main Initiatives in Fiscal 2024, Initiatives for Fiscal 2025 and Beyond		P50-51 Human Rights and Labor Management Structure, Kobelco Group Initiatives			
				P72-73 Building Responsible Supply Chains Basic CSR Procurement Policy Steering System, Response Policies Requests to Our Business Partners, Surveys of Major Tier 1 Suppliers, Upstream Supply Chain Survey on Conflict Minerals, Initiatives Scheduled for Fiscal 2025 and Beyond			
2-25	Processes to remediate negative impacts	P73 Human Rights Human Rights Due Diligence		P50 Human Rights and Labor Management Structure		Website Supply Chain Grievance Desk <a href="https://www.kobelco.co.jp/english/sustainability/procurement.html">https://www.kobelco.co.jp/english/sustainability/procurement.html</a>	
				P51 Human Rights and Labor Kobelco Group Initiatives Initiatives to Prevent Harassment, and Specific Measures for Dealing with Problems in Which Allegations Have Been Made			
				P73 Building Responsible Supply Chains Support for Our Business Partners		–	
				P93 Compliance Compliance Activities Based on the Compliance Program Monitoring and Response to Reports			
2-26	Mechanisms for seeking advice and raising concerns	P97 Compliance Compliance Structure and Activities Kobelco Group Compliance Program Whistleblowing System		P51 Human Rights and Labor Kobelco Group Initiatives Initiatives to Prevent Harassment, and Specific Measures for Dealing with Problems in Which Allegations Have Been Made		Website Supply Chain Grievance Desk <a href="https://www.kobelco.co.jp/english/sustainability/procurement.html">https://www.kobelco.co.jp/english/sustainability/procurement.html</a>	
				P73 Building Responsible Supply Chains Support for Our Business Partners			

Disclosure		Integrated Report 2025	ESG Data Book 2025	Others
			P93 Compliance Compliance Activities Based on the Compliance Program Monitoring and Response to Reports	
2-27	Compliance with laws and regulations	–	P27 Environmental Management Thorough Risk Management Status of Compliance (Fiscal 2024) P34 Appropriate Management of Water Resources Compliance with Laws and Regulations P94 Compliance Initiatives Related to Individual Laws and Regulations Prevention of Bribery, Compliance with Competition Laws	–
2-28	Membership associations	P100 Participation in Sustainability Initiatives and External Evaluations Participation in Sustainability Initiatives	P24 Response to Climate Change Climate-Related Organizations to Which We Belong P41 Biodiversity Alliances and Participation in Initiatives P107 Participation in Sustainability Initiatives and External Evaluations Participation in Sustainability Initiatives	–
<b>5. Stakeholder engagement</b>				
2-29	Approach to stakeholder engagement	P99 Communication with Stakeholders	P102-106 Communities (Communication with Stakeholders)	–
2-30	Collective bargaining agreements	–	–	–

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**GRI 3: Material Topics 2021**

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3-2	List of material topics	P55-56	Materiality-Related Non-Financial KPIs	P8-9	Materiality-Related Non-Financial KPIs	–
3-3	Management of material topics	P54	Framework for Promoting Sustainability Management	P6	Framework for Promoting Sustainability Management	–
		P55-56	Materiality-Related Non-Financial KPIs	P8-9	Materiality-Related Non-Financial KPIs	

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TOPIC STANDARD

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201-1	Direct economic value generated and distributed	P16 Value Creation Process P111 10-Year Financial and Non-Financial Data		-	-
201-2	Financial implications and other risks and opportunities due to climate change	P39-43 Climate-Related Disclosures Based on TCFD Recommendations	P14-26 Response to Climate Change		-
201-3	Defined benefit plan obligations and other retirement plans	-		-	-
201-4	Financial assistance received from government	-		-	-
<b>GRI202 : Market Presence 2016</b>					
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	-		-	-
202-2	Proportion of senior management hired from the local community	-		-	-
<b>GRI 203: Indirect Economic Impacts 2016</b>					
203-1	Infrastructure investments and services supported	P25 Business Model and Value Provided		-	-
203-2	Significant indirect economic impacts	-		-	-
<b>GRI 204: Procurement Practices 2016</b>					
204-1	Proportion of spending on local suppliers	-		-	-
<b>GRI 205: Anti-corruption 2016</b>					
205-1	Operations assessed for risks related to corruption	-	P91 Compliance Activities Based on the Compliance Program Commitment and Risk Assessment P94 Compliance Initiatives Related to Individual Laws and Regulations Prevention of Bribery		-
205-2	Communication and training about anti-corruption policies and procedures	-	P94 Compliance Initiatives Related to Individual Laws and Regulations Prevention of Bribery		-

Disclosure		Integrated Report 2025	ESG Data Book 2025	Others
205-3	Confirmed incidents of corruption and actions taken	–	P94 Compliance Initiatives Related to Individual Laws and Regulations Prevention of Bribery	–
<b>GRI 206: Anti-competitive Behavior 2016</b>				
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	–	P94 Compliance Initiatives Related to Individual Laws and Regulations Compliance with Competition Laws	–
<b>GRI 207: Tax 2019</b>				
207-1	Approach to tax	–	P99 Tax Risk Tax Policy	–
207-2	Tax governance, control, and risk management	–	P99 Tax Risk Tax Governance	–
207-3	Stakeholder engagement and management of concerns related to tax	–	P99 Tax Risk Tax Policy	–
207-4	Country-by-country reporting	–	P99 Tax Risk Taxes Paid by Region	–
<b>GRI 301: Materials 2016</b>				
301-1	Materials used by weight or volume	–	P47-48 Material Balance	–
301-2	Recycled input materials used	–	P35-37 Resource Recycling Promotion of Resource Recycling (Waste Reduction)	–
301-3	Reclaimed products and their packaging materials	–	P36-37 Resource Recycling Promotion of Resource Recycling (Waste Reduction) Major Initiatives	–
<b>GRI 302: Energy 2016</b>				
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302-2	Energy consumption outside of the organization	–	–	–
302-3	Energy intensity	–	P20 Response to Climate Change Climate-Related Metrics and Targets Energy Consumption	–
302-4	Reduction of energy consumption	–	P25 Response to Climate Change Initiatives to Save Energy and Reduce CO <sub>2</sub> Emissions	–
302-5	Reductions in energy requirements of products and services	P42-43 Climate-Related Disclosures Based on TCFD Recommendations Metric A: Reduction of CO <sub>2</sub> Emissions in Production Processes Metric B: Contribution to Reduction of CO <sub>2</sub> Emissions through Technologies, Products, and Services	P22-23 Response to Climate Change Climate-Related Metrics and Targets Targets and Results on Risk and Opportunity	–

Disclosure		Integrated Report 2025		ESG Data Book 2025		Others	
<b>GRI 303: Water and Effluents 2018</b>							
303-1	Interactions with water as a shared resource	P61	Environmental Management Response to Resource Recycling (Appropriate Management of Water Resources)	P32	Appropriate Management of Water Resources Basic Concept	-	
303-2	Management of water discharge-related impacts	P61	Environmental Management Response to Resource Recycling (Appropriate Management of Water Resources)	P12	Basic Environmental Management Policy and Structure Environmental Management Structure	-	
				P32	Appropriate Management of Water Resources Management Structure, Targets		
303-3	Water withdrawal	-		P32-33	Appropriate Management of Water Resources Results	-	
303-4	Water discharge	-		P32-33	Appropriate Management of Water Resources Results	-	
303-5	Water consumption	-		P32-33	Appropriate Management of Water Resources Results	-	
<b>GRI 304: Biodiversity 2016</b>							
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	P62	Biodiversity Strategy	P42	Biodiversity Strategy High-Level Analysis of the Natural Impacts of Our Operations and Key Supply Chain Locations	-	
304-2	Significant impacts of activities, products and services on biodiversity	P62	Biodiversity Management of Risks and Impacts	P43	Biodiversity Management of Risks and Impacts	-	
304-3	Habitats protected or restored	-		P46	Biodiversity Nature-Related Contributions Creating a Biotope in Nadahama Science Square	-	
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	P62	Biodiversity Strategy	P42	Biodiversity Strategy High-Level Analysis of the Natural Impacts of Our Operations and Key Supply Chain Locations	-	
<b>GRI 305: Emissions 2016</b>							
305-1	Direct (Scope 1) GHG emissions	P42	Climate-Related Disclosures Based on TCFD Recommendations Metric A: Reduction of CO <sub>2</sub> Emissions in Production Processes	P20-21	Response to Climate Change Climate-Related Metrics and Targets Greenhouse Gas Emissions (Scope 1, 2, and 3)	-	
305-2	Energy indirect (Scope 2) GHG emissions	P42	Climate-Related Disclosures Based on TCFD Recommendations Metric A: Reduction of CO <sub>2</sub> Emissions in Production Processes	P20-21	Response to Climate Change Climate-Related Metrics and Targets Greenhouse Gas Emissions (Scope 1, 2, and 3)	-	
305-3	Other indirect (Scope 3) GHG emissions	-		P20-21	Response to Climate Change Climate-Related Metrics and Targets Greenhouse Gas Emissions (Scope 1, 2, and 3)	-	
305-4	GHG emissions intensity	-		P20-21	Response to Climate Change Climate-Related Metrics and Targets Greenhouse Gas Emissions (Scope 1, 2, and 3)	-	

Disclosure		Integrated Report 2025	ESG Data Book 2025	Others
305-5	Reduction of GHG emissions	P42-43 Climate-Related Disclosures Based on TCFD Recommendations Metric A: Reduction of CO <sub>2</sub> Emissions in Production Processes Metric B: Contribution to Reduction of CO <sub>2</sub> Emissions through Technologies, Products, and Services	P20-21 Response to Climate Change Climate-Related Metrics and Targets Greenhouse Gas Emissions (Scope 1, 2, and 3)	-
305-6	Emissions of ozone-depleting substances (ODS)	-	-	-
305-7	Disclosure 305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	-	P38 Reduction of Environmental Impacts Air Pollution Measures  P39-40 Reduction of Environmental Impacts Appropriate Management of Chemical Substances	-
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306-2	Management of significant waste-related impacts	-	P12 Basic Environmental Management Policy and Structure Environmental Management Structure  P35 Resource Recycling Promotion of Resource Recycling (Waste Reduction) Management Structure, Targets	-
306-3	Waste generated	-	P35-36 Resource Recycling Promotion of Resource Recycling (Waste Reduction) Results	-
306-4	Waste diverted from disposal	-	P35-36 Resource Recycling Promotion of Resource Recycling (Waste Reduction) Results	-
306-5	Waste directed to disposal	-	P35-36 Resource Recycling Promotion of Resource Recycling (Waste Reduction) Results	-
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308-2	Negative environmental impacts in the supply chain and actions taken	P74 Building Responsible Supply Chains Main Initiatives in Fiscal 2024	P72-73 Building Responsible Supply Chains Surveys of Major Tier 1 Suppliers, Upstream Supply Chain Survey on Conflict Minerals	-
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401-1	New employee hires and employee turnover	P112 10-Year Financial and Non-Financial Data	P61 Human Resources Enhancing Organizational Diversity Supporting the Participation of a Diverse Array of Employees in the Workplace  P74 Social and Labor Data	-

Disclosure		Integrated Report 2025		ESG Data Book 2025		Others	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	-		-		-	
401-3	Parental leave	P112	10-Year Financial and Non-Financial Data	P69	Work-Life Balance Support for Work-Life Balance Usage of Main Childcare Support Systems	-	
				P74	Social and Labor Data		
<b>GRI 402: Labor/Management Relations 2016</b>							
402-1	Minimum notice periods regarding operational changes	-		-		-	
<b>GRI 403: Occupational Health and Safety 2018</b>							
403-1	Occupational health and safety management system	-		P52	Safety and Health Safety Initiatives	-	
403-2	Hazard identification, risk assessment, and incident investigation	-		P53	Safety and Health Accidents and Occupational Safety Risk Countermeasures	-	
403-3	Occupational health services	-		P55	Health and Productivity Management Health and Productivity Management Strategy Map	-	
403-4	Worker participation, consultation, and communication on occupational health and safety	-		P53	Safety and Health Participation of Workers in Discussions	-	
403-5	Worker training on occupational health and safety	-		P54	Safety and Health Education and Training	-	
403-6	Promotion of worker health	P78	Safety and Health Health and Productivity Management	P56	Health and Productivity Management Main Health and Productivity Management Initiatives	-	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	-		P53	Safety and Health Accidents and Occupational Safety Risk Countermeasures	-	
403-8	Workers covered by an occupational health and safety management system	-		P52	Safety and Health Safety Initiatives	-	
403-9	Work-related injuries	P77	Safety and Health Lost Time Injury Frequency Rate	P53	Safety and Health Targets for Accident Reduction and Results	-	
		P112	10-Year Financial and Non-Financial Data				
403-10	Work-related ill health	-		P56	Health and Productivity Management Health-Related Data	-	
<b>GRI 404: Training and Education 2016</b>							
404-1	Average hours of training per year per employee	P56	Materiality-Related Non-Financial KPIs	P9	Materiality-Related Non-Financial KPIs	-	
		P112	10-Year Financial and Non-Financial Data	P67	Human Resources Encourage the Growth and Initiative of Every Employee Results of Skills Development Training over the Past Three Years		

Disclosure		Integrated Report 2025		ESG Data Book 2025		Others	
404-2	Programs for upgrading employee skills and transition assistance programs	P71	Human Resources Strategy and Employee Experience Improvement Encouraging the Growth and Initiative of Every Employee	P65-67	Human Resources Encourage the Growth and Initiative of Every Employee	-	
404-3	Percentage of employees receiving regular performance and career development reviews	-		-		-	
<b>GRI 405: Diversity and Equal Opportunity 2016</b>							
405-1	Diversity of governance bodies and employees	P85	Corporate Governance Our Corporate Governance System	P61-62	Human Resources Enhancing Organizational Diversity Supporting the Participation of a Diverse Array of Employees in the Workplace	-	
		P112	10-Year Financial and Non-Financial Data	P74	Social and Labor Data		
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405-2	Ratio of basic salary and remuneration of women to men	-		-		-	
<b>GRI 406: Non-discrimination 2016</b>							
406-1	Incidents of discrimination and corrective actions taken	-		-		-	
<b>GRI 407: Freedom of Association and Collective Bargaining 2016</b>							
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	-		-		-	
<b>GRI 408: Child Labor 2016</b>							
408-1	Operations and suppliers at significant risk for incidents of child labor	-		-		-	
<b>GRI 409: Forced or Compulsory Labor 2016</b>							
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	-		-		-	
<b>GRI 410: Security Practices 2016</b>							
410-1	Security personnel trained in human rights policies or procedures	-		-		-	
<b>GRI 411: Rights of Indigenous Peoples 2016</b>							
411-1	Incidents of violations involving rights of indigenous peoples	-		-		-	

Disclosure		Integrated Report 2025		ESG Data Book 2025	Others
<b>GRI 413: Local Communities 2016</b>					
413-1	Operations with local community engagement, impact assessments, and development programs	P99	Communication with Stakeholders	P102-106 Communities (Communication with Stakeholders)	-
413-2	Operations with significant actual and potential negative impacts on local communities	-	-	-	-
<b>GRI 414: Supplier Social Assessment 2016</b>					
414-1	New suppliers that were screened using social criteria	-	-	-	-
414-2	Negative social impacts in the supply chain and actions taken	P74	Building Responsible Supply Chains Main Initiatives in Fiscal 2024	P72-73 Building Responsible Supply Chains Surveys of Major Tier 1 Suppliers, Upstream Supply Chain Survey on Conflict Minerals	-
<b>GRI 415: Public Policy 2016</b>					
415-1	Political contributions	-	-	-	-
<b>GRI 416: Customer Health and Safety 2016</b>					
416-1	Assessment of the health and safety impacts of product and service categories	P76	Quality Implementation Structure	P98 Quality Working Groups Quality Assurance Strengthening Working Group	-
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	-	-	-	-
<b>GRI 417: Marketing and Labeling 2016</b>					
417-1	Requirements for product and service information and labeling	-	-	-	-
417-2	Incidents of non-compliance concerning product and service information and labeling	-	-	-	-
417-3	Incidents of non-compliance concerning marketing communications	-	-	-	-
<b>GRI 418: Customer Privacy 2016</b>					
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	-	-	-	-