



International
Labour
Organization

► Responsible business conduct in small and medium-sized enterprises

Examples of collaborative practice with BHR promotion labour and social security attorneys



Responsible business conduct in small and medium-sized enterprises:

Examples of collaborative practice with BHR
promotion labour and social security attorneys

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► Introduction

This compilation of case studies was prepared as part of the “Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations (Phase II) project,” implemented by the International Labour Organization (ILO) with support from the Government of Japan (Ministry of Economy, Trade and Industry). The programme aims to foster an enabling environment for the realization of decent work by systematically supporting enterprises’ compliance with national laws and respect for the principles of international labour standards and by promoting cooperation between government, workers and employers to address structural challenges.

In March 2020, the ILO Enterprises Department concluded a memorandum of cooperation with the Japan Federation of Labour and Social Security Attorney’s Associations (Japan *Sharoushi* Federation) to foster collaboration in efforts to realize decent work and contribute to the Sustainable Development Goals (SDGs). Based on this memorandum of cooperation, the federation began an initiative in 2021 with the support of the ILO Office in Japan to train experts in providing advice on human rights due diligence and promoting responsible business conduct. Since 2022, the federation has offered training for business and human rights promotion labour and social security attorneys (“BHR *Sharoushi*”), for which the ILO provided technical cooperation based on its expertise and the knowledge gained through the Better Work programme.¹ By March 2025, a total of 646 individuals nationwide had completed this training. Those who completed the training are active BHR *Sharoushi*, primarily supporting SMEs in each prefecture by creating opportunities to promote responsible business conduct and human rights initiatives, as well as by providing guidance and

¹ Better Work is a joint programme of the ILO and the International Finance Corporation (IFC) of the World Bank Group, aiming to improve working conditions and enhance productivity in the apparel supply chain.

hands-on support as enterprises take their first steps.

This collection of case studies introduces practical examples from SMEs supported by BHR *Sharoushi*. It also summarizes the activities of BHR *Sharoushi* and highlights the common challenges and opportunities for SMEs identified through interviews. We hope that the broad sharing of insights on responsible business conduct will help advance such practices regardless of industry, size or region. SMEs, which account for 90 per cent of all enterprises in Japan, play a vital role in the economy and local communities and are key actors in realizing decent work. While efforts on business and human rights (BHR) within SMEs are still in the early stages, international frameworks such as the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) indicate that respecting workers' rights and improving working conditions contribute to stronger corporate competitiveness and long-term sustainability. We also hope that this collection will contribute to greater understanding of international human rights and labour standards – including the fundamental principles and rights at work and the MNE Declaration – and help strengthen cooperation among stakeholders.

Nozomi Tomita

Director

ILO Office for Japan

► Acknowledgements

We would like to express our deepest gratitude to the enterprises and BHR *Sharoushi* who generously agreed to participate in interviews for this case study collection. We also extend our sincere appreciation to the secretariat of the Japan *Sharoushi* Federation and to all affiliated organizations for their valuable advice and tireless efforts. This case study collection was made possible because of the support of everyone involved.

Contributing *Sharoushi* (in alphabetical order):

Azusa Nishimoto; Emi Nakashima; Hiroshi Hirao; Naotoshi Karasuwaki;
Rie Araya.

► Messages

Japanese enterprises have been actively expanding their international operations, reflecting the increasingly cross-border nature of their supply chains. As initiatives related to business and human rights gain global importance, such efforts are now essential for Japanese enterprises to play a role within global supply chains.

In response to these international trends, the Government of Japan released the “Guidelines on Respecting Human Rights in Responsible Supply Chains²” in 2022 and has been supporting enterprises in their voluntary initiatives. Ensuring sustainability throughout supply chains requires engagement not only from large enterprises but also stronger engagement from small and medium-sized enterprises (SMEs), which often face challenges such as shortages of human resources and expertise.

The Ministry of Economy, Trade and Industry, in cooperation with the Japan Federation of Labour and Social Security Attorney’s Associations and through contributions to the ILO’s project, has supported the implementation of a training programme for business and human rights promotion labour and social security attorneys (BHR *Sharoushi*), who support SMEs in promoting respect for human rights. After completing the programme, these professionals provide tailored, ongoing support to enterprises, including assistance with the formulation of human rights policies and the implementation of human rights due diligence.

This publication presents concrete case studies from these initiatives and shares practical insights that may serve as useful references for other enterprises. We hope these examples will further encourage corporate efforts, particularly among SMEs, and help promote the wider adoption of responsible business conduct.

Hideaki Fujisawa

*Director-General, International Economic Affairs Department
Deputy Director-General for Business and Human Rights Policy
Ministry of Economy, Trade and Industry, Japan*

2 The Inter-Ministerial Committee on Policy Promotion for the Implementation of Japan’s National Action Plan on Business and Human Rights, *Guidelines on Respecting Human Rights in Responsible Supply Chains*, September 2022, <https://www.meti.go.jp/policy/economy/business-jinken/guidelines/provisionalenglishtranslation.pdf>

We would like to extend our sincere appreciation to the ILO Office for Japan and all our partner organizations for their invaluable support in preparing this collection of case studies featuring the initiatives of BHR *Sharoushi*, who were trained with technical support from the ILO Office for Japan.

The values of the ILO and the mission set forth in Article 1 of the *Sharoushi* Act³ have much in common. We have concluded a Memorandum of Cooperation and received a wide range of technical assistance since then.

Sharoushi are specialists in labour management and Japan's labour and social-security-related laws – an essential element of business and human rights. Today, approximately 46,000 *Sharoushi* are active across Japan. By working closely with many enterprises, particularly SMEs, they have contributed to expanding the application of Japan's labour and social security systems, supporting the realization of decent work and improving the working environment for workers and other stakeholders. In this way, they have played a catalytic role in promoting greater social inclusion and fostering a positive socio-economic cycle.

As demonstrated by the cases in this collection, I am confident that if each *Sharoushi* continuously strives to deepen their commitment to human rights and applies their expertise in practice, they can offer even greater support for positive change. It would be a great pleasure to be able to contribute to a better future.

Masakiyo Wakabayashi

President

*Japan Federation of Labour and Social Security Attorney's Associations
(Japan Sharoushi Federation)*

³ The mission of labour and social security attorneys (*Sharoushi*) will help towards the realization of people's prosperity and a vibrant economic society by contributing to the welfare of employees, improving and promoting social security, and to the sound growth of industries, with the establishment of effective human resource management and decent working conditions, where individual dignity is maintained through the smooth implementation of labour and social-security-related laws and regulations.

1

What is a Business and Human Rights (BHR) Promotion *Sharoushi*?



► What is a Business and Human Rights (BHR) Promotion *Sharoushi*?

The Japan Federation of Labour and Social Security Attorney's Associations offers business and human rights (BHR) training to develop the skills and knowledge of experts so they are equipped to provide practical support in areas including fostering management respect for human rights, and understanding of the BHR framework and conducting human rights due diligence. Labour and social security attorneys (*Sharoushi*) who complete this training are certified as "BHR Promotion *Sharoushi*" (BHR *Sharoushi*) and are then placed on the BHR *Sharoushi* List posted on the federation's website.

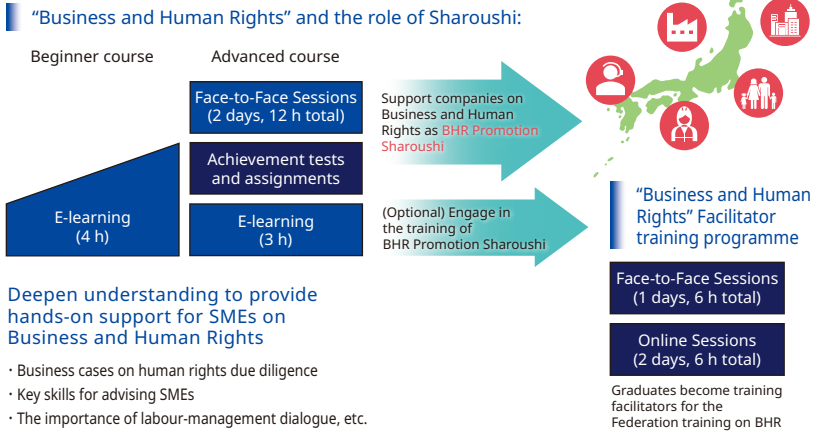
The training programme enables participants to learn practical methods for providing hands-on support to SMEs and emphasizes the importance of social dialogue between employers and workers. The training programme includes e-learning, providing information on the [Guidelines on Respecting Human Rights in Responsible Supply Chains](#)⁴ developed by the Japanese Government; practical implementation in client companies using the [Guideline for Responsible Business Conduct for the Textile and Clothing Industry of Japan](#)⁵ (Japan Textile Federation Guidelines), developed by the Japan Textile Federation with technical support from the ILO Office in Japan; and the use of case studies and role-play exercises during in-person training sessions.

4 The Inter-Ministerial Committee on Policy Promotion for the Implementation of Japan's National Action Plan on Business and Human Rights, *Guidelines on Respecting Human Rights in Responsible Supply Chains*, September 2022, <https://www.meti.go.jp/policy/economy/business-jinken/guidelines/provisionalenglishtranslation.pdf>

5 Japan Textile Federation, *Guideline for Responsible Business Conduct for the Textile and Clothing Industry of Japan*, July 2022, <https://jtf-net.com/index.htm>

Federation training on “Business and Human Rights (BHR)”

“Business and Human Rights (BHR)”



Support and Approaches for SMEs

The interviews with enterprises revealed many instances where the approach by a BHR *Sharoushi* became the catalyst for an SME to begin working on business and human rights. As mentioned above, the BHR *Sharoushi* training programme includes practical implementation using the checklist from the Japan Textile Federation Guidelines. This enables *Sharoushi* to explain and implement BHR practices in their client companies, leading to continued support even after the training is complete.

BHR *Sharoushi* actively support and promote the labour dimension of BHR initiatives within enterprises, leveraging the knowledge and skills acquired during their training and role plays. In particular, BHR *Sharoushi* explain in clear and accessible terms the expectations under international standards and government guidelines, adapting them to the realities of Japanese SMEs and helping enterprises to understand responsible business conduct at the operational level. As part of these efforts, by the end of February

2025, BHR *Sharoushi* had held seminars for a total of 2,681 participants, primarily for SMEs, contributing to the dissemination and promotion of responsible business conduct. Furthermore, they provided BHR-related advice 403 times to 341 enterprises, resulting in 17 enterprises developing a human rights policy.

To ensure an effective first step is taken, each BHR *Sharoushi* adopts approaches tailored to the unique circumstances of each enterprise and depending on their relationship with the SME. For example, they may include a BHR angle in harassment training to raise awareness, encourage the development of a human rights policy by identifying common ground between the enterprise's purpose and BHR, or support a review of internal rules to accommodate the stakeholders' perspective. In this manner, each BHR *Sharoushi* uses their existing relationships with each enterprise as a starting point to expand BHR initiatives.

Common Challenges and Opportunities for SMEs

A common finding among the enterprises interviewed was management recognition that "respect for human rights is fundamental and promotes corporate growth". These enterprises are therefore not driven by compliance requests from business partners but rather are voluntarily advancing human rights initiatives. At the same time, they recognize the advantages of adopting responsible and sustainable business practices, including an expansion of sales, talent attraction and improved productivity. Furthermore, the participation of management in the team promoting BHR, where they act as champions leading the effort, has also been a major driving force. This reflects the importance of the commitment of management, as emphasized in the UN Guiding Principles on Business and Human Rights (Guiding Principle 16).

Resources are often limited in SMEs, and human rights initiatives tend to be considered a burden. In reality, however, there are many enterprises that have listened to their employees and put in place systems and

structures that better meet their needs. In doing so, they are effectively implementing elements of BHR, even if they do not explicitly recognize these efforts as part of the BHR framework. Therefore, refining existing systems and initiatives by connecting them with international frameworks can also lead to effective action.

On the other hand, a common challenge identified is the grievance mechanism. In small enterprises, ensuring anonymity and neutrality in consultation is more difficult compared to large enterprises, while the proximity to employees and easy coordination between departments can be advantageous. Therefore, some enterprises are working to create an environment where employees can consult and/or report with confidence by involving specialists such as BHR *Sharoushi* and public health nurses, or even a major buyer's hotline, as external contact points.

Additionally, ensuring that these initiatives take root internally within enterprises remains a challenge. It is crucial to understand that adopting responsible business practices requires continuous effort and that there should be ongoing collaboration between workers and management. As a precondition, especially in the context of SMEs, it is important that the management's intentions and understandings are clearly communicated to employees and relevant stakeholders. To achieve this, BHR should be embedded in the corporate culture through internal awareness campaigns and continuous training. Enterprises are encouraged to advance human rights due diligence as an ongoing effort with business partners and throughout the supply chain.

Future Outlook

Each of the SMEs interviewed for this report has its own initial entry point for engaging on BHR and plans to expand the scope of their initiatives in the future. This includes engaging in dialogue with business partners based on the human rights policy developed and communicating expectations regarding respect for human rights throughout the supply chain;

expanding the scope of stakeholders to be engaged in efforts to reduce human rights risks; conducting human rights due diligence within the supply chain; and strengthening grievance mechanisms.

As demonstrated by the interviewed SMEs, which actively listen to workers' voices and establish systems and arrangements that reflect employees' needs, it is effective for experts with a strong understanding of each company's specific context to conduct detailed reviews of company-level policies and practices, organize them in line with international frameworks on responsible business conduct and business and human rights, and translate them into concrete, tailored actions for each enterprise through dialogue and explanation. While the interviewed companies have already made significant progress in this area, it remains essential to continue awareness-raising and information-sharing efforts to support other SMEs that are still at an early stage and encourage them to take their first steps toward building such systems.

The UN Guiding Principles on Business and Human Rights also point to the importance of drawing on the expertise of external specialists (Guiding Principles 16 and 18). Particularly for SMEs, the role of specialists who can provide specific advice and close support tailored to actual circumstances, such as enterprise size, business content and internal systems, is significant. This highlights the importance of further expansion of such support and improving the substance of the assistance provided.

2

Responsible Business Practices by the SMEs



► HBA Corporation

Building a fulfilling workplace by collecting employee voices through multiple channels

Main Services: Systems integration, cloud services, software development, outsourcing

Location: Sapporo, Hokkaido

Number of employees: 826

Initiative background

In response to growing social concern regarding power harassment and sexual harassment in the workplace, the enterprise began conducting an employee satisfaction survey in 2007 and has continued to do so every two years. Based on the results of this survey, the enterprise concluded a consulting contract with a *Sharoushi* in 2013, requesting training on harassment and external consultation services for harassment issues.

In light of the recent increase in public attention to responsible business conduct and business and human rights, and prompted by the *Sharoushi*, the enterprise decided to incorporate the BHR perspective, linking it to its existing harassment-related initiatives.

Examples of responsible business conduct

Under its management philosophy, “we, HBA, contribute to the happiness of our customers and society through the fusion of IT and humanity”, the enterprise had already been building mechanisms to actively listen to and utilize employee voices even before recognizing the connection to responsible business conduct and business and human rights agendas. For instance, the results of the employee satisfaction survey are disclosed to

all employees, and the aggregated feedback is prioritized and addressed cross-departmentally. Furthermore, by regularly visiting work sites and actively communicating with employees, the president established a foundation for trust and communication, which led to more active and open discussions during the annual town hall meetings, where all employees speak directly with the president. Dialogue between management and worker representatives is also facilitated through the health and safety committee, where topics such as working hours, personnel systems and flexible work adjustment for employees with family responsibilities are discussed. As a result of these consultations, company policies have been amended and implemented to include measures to prevent excessive overtime and the introduction of flexible work arrangements beyond legal requirements. The enterprise has established multiple channels through which employees can seek advice or raise concerns on a broad range of issues, from harassment and other labour-related issues to mental health concerns and day-to-day difficulties that may not yet constitute human rights violations, including access to an occupational health nurse, contact points within the human resources department via official email or informal chat and an external channel provided by the *Sharoushi*. These channels are shared widely through the internal company website's home page and by distributing information cards. Both the internal human resources department via email and the external *Sharoushi* channels function as formal channels for handling harassment and other labour issues, with established procedures.

Through these multiple channels, the enterprise encourages employees to safely communicate their voices and concerns. By encouraging active dialogue and the exchange of views, the enterprise is seeking to address human rights violation risks, such as harassment, at an early stage and to ensure that appropriate remedies are provided where a potential human-rights violation may arise. Through these efforts, the enterprise aims to create a more fulfilling working environment.

Additionally, based on the human rights issues identified through the various channels, the enterprise revised its compliance guidelines and code

of conduct, adding respect for human rights.

Positive changes and future outlook

The enterprise has consistently prioritized listening to employee voices and has continually engaged in dialogue through employee satisfaction surveys and town hall meetings. As a result, the feedback that was initially centred on urgent issues and pressing concerns, such as harassment and wages, gradually shifted towards more positive opinions, such as a desire to create a more supportive workplace. Currently, the enterprise receives many requests for system improvements focused on issues like balancing work with family or caregiving responsibilities and improving the workplace environment. One example of how employee and worker representative input has been taken into account is the “Mums and Dads Community”, an initiative that supports employees who are parents through internal communication. The “Mums and Dads Community” serves as a space where younger employees who are parents can seek advice from older colleagues with parenting experience about childcare and work modalities, and where they can exchange information on child-care-related systems both inside and outside the enterprise.

Going forward, the enterprise plans to include human rights due diligence across its supply chain. It has already been conducting regular consultations with business partners to ensure that no human rights-related issues arise in transactions with the enterprise’s development division. Furthermore, the enterprise’s human resources and purchasing department has been publicized as a quasi-third-party contact point available to all business partners, establishing a mechanism where they can submit complaints and seek consultation at any time. The enterprise plans to make it explicit that complaints and consultations from a human rights perspective are also welcome through this channel.

The BHR *Sharoushi* approach and collaboration

The BHR *Sharoushi*, who also serve as its consulting *Sharoushi*, is responsible for the enterprise's training on harassment and external consultation services. Several years ago, the incorporation of business and human rights into the training by the BHR *Sharoushi* became a catalyst for the enterprise to begin its own BHR initiatives. Currently, the *Sharoushi* continues to provide hands-on support in revising and aligning the enterprise's existing systems with the BHR framework, raising employee awareness and supporting the enterprise in planning the deployment of BHR practices across its supply chain.



**Kazuo Shirahata, Representative
Director and Executive President**

Since our company's capital is our people, I believe it is critical to create a workplace where employees feel safe and fulfilled. To ensure this, we should adopt responsible business practices. I believe that dialogue between the management and its employees is essential: listening to their voices and clearly communicating the company's intentions towards them. Through this process, I believe we can become a truly good and strong company.



**Hiroko Morino, Chief, Human Resources
Group, Human Resources and Purchasing
Department, Management Planning Division**

The town hall meetings, which began in 2022, have been a valuable opportunity for direct dialogue between the president and employees, and I think this is a very good initiative, with a formal but lively question-and-answer session. I also empathize with the company's stance of seeking to understand employee satisfaction and issues through the town hall meetings and employee satisfaction surveys.

**BHR Sharoushi**

HBA's initiatives were focused on "people" (employees and business partners) even before incorporating a business and human rights perspective. I believe that reframing these existing efforts from a business and human rights standpoint can further accelerate the company's initiatives on responsible business conduct and respect for human rights. Human rights are the "invisible infrastructure" supporting corporate activities and, without them, the very business foundation would be shaken. I believe that achieving decent work – where every employee can fully demonstrate their capabilities, as the company aims to ensure – will lead to the sustainable growth of the enterprise.



UNGPs:
18, 29, 31



OECD Guidance:
6.2



ILO MNE Declaration:
10(e), 63, 66

▶ Motomura Confectionery Co.,Ltd.

Decent work as a driver for productivity

Main Products/Services: Manufacturing and sales of baked confectionery and *marubōro* (traditional round biscuits)

Location: Saga City, Saga Prefecture

Number of employees: Under 40

Initiative background

The enterprise operates in a business environment where most competitors, suppliers and clients are large enterprises. These major companies had already begun taking advanced measures on business and human rights and the company felt that, even as a small local enterprise, it would need to put in place initiatives that meet global standards to be chosen as a business partner. Around that time, the BHR *Sharoushi*, who had been advising the enterprise on management matters, encouraged the enterprise to work on business and human rights. This proposal aligned with the enterprise's own belief that its *raison d'être* is to create an environment where employees can grow as individuals and generate stable, living wages so that they can be happy both materially and spiritually. In light of this alignment, the enterprise decided to embark on its business and human rights efforts.

Examples of responsible business conduct

The enterprise formed a four-person business and human rights team made up of the president, vice-president, production manager and an employee from the administration section. The timing coincided with supplier audits conducted by a major buyer. This acted as a lever for the enterprise

to hold interviews with six suppliers on human rights risks associated with their sourcing locations, including raw material suppliers, wholesalers and industrial waste contractors. Within the enterprise, a series of initiatives were launched quickly, including the development of internal policies on working conditions, such as measures to prevent and address harassment, and notifying employees of their entitlement to report to the major client's hotline, as the buyer's hotline functions as a grievance mechanism available to its supply chain.

It also developed its own policies prohibiting harassment and discrimination, as well as a code of conduct, drawing on the major buyer's materials as a reference. These were posted in six locations within the workplace, and the president explained their content at morning meetings. Although a suggestion box already existed, it was rarely used. To address this, the enterprise improved the consultation and reporting routes to supervisors and enabled employees to contact the president and vice-president directly via LINE (popular social networking services – SNS in Japan) hotline to seek a consultation or report a grievance. As a result, the enterprise has begun to receive a steady number of consultations and grievances.

Positive changes and future outlook

Since the initial supplier audit at the start of the business relationship, the enterprise has continued to report on its business and human rights initiatives to the major buyer. The enterprise's commitment to responsible business conduct has strengthened its position as a supplier, as such practices are still not widely adopted in the industry. These initiatives have also contributed to the development of new business with other clients and to stronger relationships with financial institutions. Moreover, the enterprise has received feedback that it is encouraging to see these initiatives on human rights and increased sales can go hand in hand. The enterprise has introduced its human rights initiatives to various stakeholders, including the temporary staffing agencies with which it works, and is actively increasing dialogue with them about its approach to business and

human rights and how it is applied within the enterprise's own operations. As a result, its efforts have had positive effects, including progress in the development of human rights policies within those agencies.

Meanwhile, some employees were not directly involved in the process of developing initiatives on business and human rights, and the enterprise is seeking to address this, including by strengthening communication between management and employees and among employees themselves, increasing employee motivation by sharing positive reactions from outside the enterprise, including recognition of the enterprise as one striving to respect human rights, introducing training on preventing and addressing harassment and holding workshops, and establishing an external consultation and reporting channel.

The BHR *Sharoushi* approach and collaboration

For several years, through the Saga Yorozu Support Centre (a free management consultation service established by the Small and Medium Enterprise Agency), the BHR *Sharoushi* had been assisting the enterprise in organizing its personnel evaluation system, wage system and organization chart. The BHR *Sharoushi* explained recent international trends and social expectations and proposed that the enterprise begin working on business and human rights. They started by using the checklist from the [Japan Textile Federation Guidelines](#)⁶ to identify human rights risks together. Since this checklist is broadly applicable not only to the textile industry but also to many Japanese SMEs, it is included as part of the training curriculum for BHR *Sharoushi*. Taking this opportunity, the BHR *Sharoushi* did not simply apply the checklist just as a formality but rather supported interpreting the checklist with the enterprise's specific business context in mind. The BHR *Sharoushi* is currently advising the enterprise on how to accelerate internal

6 Japan Textile Federation, *Guideline for Responsible Business Conduct for the Textile and Clothing Industry* of Japan, August 2022, <https://jtf-net.com/index.htm>

uptake and foster dialogue with employees.



**Makoto Sakaguchi, Executive
Vice-President and Director**

I hope the company can become a model case demonstrating that respect for human rights and economic benefit can coexist even for small regional enterprises. At first glance, “business” and “human rights” may seem difficult to reconcile in SMEs. However, by continuing to pursue both simultaneously, we can create an environment where people feel excited to work, their efforts are fairly rewarded, productivity rises, profits are generated and where those profits are returned to employees. We want to build this kind of positive cycle. To foster a corporate culture that respects human rights, we place strong emphasis on preventing harassment, maintaining open channels for employee consultations and reporting, and using dialogue to create a comfortable workplace.



Manabu Hyakutake, Administration Section

When I first heard from management that the company would be engaging in business and human rights initiatives, I wondered whether such efforts could really be achieved by a small regional enterprise. As I worked together with management as a member of the business and human rights team, I realized that they were genuinely and proactively committed to these initiatives. As an ordinary employee, I hope to serve as a bridge so that management and employees can move forward together, and I try to convey employees' voices as much as possible. I hope that this initiative will become an opportunity to create an atmosphere in which even one more person feels comfortable speaking up.

**BHR Sharoushi**

Many enterprises find it difficult to translate ideas into action. At Motomura, however, the company is characterized by its readiness to immediately take on board advice from experts and information from outside. Implementing measures then leads to the identification of new issues, which prompts the company to take further steps to address them. I feel that this has set in motion a positive cycle that continues to move the company forward. Looking ahead to further internal uptake among employees, management and employees may appear to be in different positions, but both are aiming at the same goal: to create a meaningful and rewarding work environment. I would like to get across the idea that business and human rights are something that can only be advanced together.



UNGPs:
18, 29, 31



OECD Guidance:
2.2, 6.2



ILO MNE Declaration:
30, 43, 63, 66

► Yugen Kaisha Will Work

Building pride in work and creating opportunities for dialogue through a human rights policy

Main products/services: Fee-based employment placement and self-reliance consultation support

Location: Asahikawa City, Hokkaido

Number of employees: 20

Initiative background

The enterprise provides employment support and self-reliance support⁷ (a service commissioned by local governments) for people in vulnerable situations in Japanese society, including recipients of public assistance and people experiencing economic hardship. Recognizing that simply handing out food or job placement is not enough, the enterprise has always been conscious of respecting each client's wishes and dignity, conducting careful interviews and proposing responses tailored to individual circumstances, which in turn has helped support more autonomous and sustainable employment and self-reliance among people in vulnerable situations. These practices were taken for granted within the enterprise. However, a BHR *Sharoushi* who knew the enterprise's work well advised that re-examining these everyday practices through a BHR lens would be valuable for the enterprise and society. Therefore, the enterprise decided to launch a BHR initiative.

7 Self-reliance support is a local-government service in Japan offering consultations and assistance, providing tailored support for individuals facing economic hardship or social difficulties. The enterprise operates self-reliance support centres commissioned by the local government.

Examples of responsible business conduct

In June 2025, the enterprise developed and posted its human rights policy on its website. The drafting team was composed of the president, two directors heading self-reliance support centres and the personnel manager. The gender ratio among the members was 2:2. When the enterprise proposed taking up business and human rights initiatives, some team members initially responded that respect for human rights was already a fundamental part of their work and questioned the need for a formal declaration. Through internal discussion, they reached a shared understanding that articulating it would strengthen the enterprise's credibility and employees' confidence. With support from the BHR *Sharoushi*, the policy was developed and published.

The enterprise informed not only its employees but also a wide range of business partners about the policy, including local governments, other relevant public bodies, client companies that submit job postings, the office management company and fuel suppliers. Furthermore, it presented its work in study sessions attended by relevant public bodies and partner organizations and encouraged them to develop human rights policies of their own. Beyond its direct stakeholders, the company engages with local enterprises to provide information and foster dialogue.

Positive changes and future outlook

When the policy was communicated – which includes providing support free from discrimination and exclusion, preventing violence, abuse and harassment, ensuring self-determination and respect for dignity, promoting decent and safe working conditions, and considering the needs of people in vulnerable situations as salient human rights issues –, many employees noted that it reflected what the president and the office heads had long been speaking about. They also realized the practices they had taken for granted were not necessarily universal. Others expressed their feeling of pride at being part of the enterprise. There has also been a growing

recognition that, alongside the human rights of the people in vulnerable social positions who they support, attention must also be paid to employees' workplace environment, psychological burdens and well-being. As a result, employees have created regular opportunities themselves for employees from offices across Hokkaido to meet and solicit views on workplace conditions.

Local governments informed of the human rights policy have commented that they feel greater reassurance in working with the enterprise, which provides employment opportunities to people in vulnerable social positions.

The enterprise intends to continue encouraging stakeholders involved in supporting people in vulnerable situations, including relevant public bodies and business partners, to develop human rights policies and engage in business and human rights initiatives, with the aim of building cooperative relationships grounded in mutual respect for human rights.

The BHR *Sharoushi* approach and collaboration

As mentioned above, the enterprise's engagement with BHR began at the suggestion of the BHR *Sharoushi*. As the BHR *Sharoushi* also serves as an interview counsellor in a local government livelihood support division and has a deep understanding of the enterprise's work, their support has centred on explaining BHR concepts in clear, practical terms while remaining mindful of the enterprise's long-standing commitment to helping people live with dignity as human beings, and in ways true to who they truly are. Through this approach, the BHR *Sharoushi* is helping business and human rights concepts take firm root within the enterprise.

**Kazuhiko Sawada, Representative Director**

From the perspectives of business and human rights and the SDGs, creating a community where no one is left behind is an essential theme for sustainable regional development. Our company has supported the employment of people in socially vulnerable situations for 22 years, but through this initiative, we renewed our understanding that we have already been engaging in business and human rights and decent work. I hope that our client companies and local governments will further incorporate business and human rights and decent work, and that by developing employment environments where all individuals' wishes and aptitudes are respected, and by supporting career pathways that reflect these, we can work together to build a vibrant community where no one is left behind.

**Akiko Nakajima, Section Manager**

We had always conducted consultation services while listening carefully and respecting the views of the clients (including people in vulnerable situations), but we had not connected this to the idea of human rights. Through this initiative, we realized anew that our daily work contributes to the respect of human rights. Because our work sometimes involves facing situations which can be emotionally challenging, this initiative also prompted us to focus more closely on psychological support and ensuring that employees can work with ease.



Masato Kaneko, General Manager

At first, I personally felt that the content of a human rights policy was so obvious that I wondered why we needed to undertake it. However, once we actually developed and published the policy, we saw benefits. Employees voiced that they felt a renewed sense of meaning in their work, and it created an opportunity to re-examine our own workplace environment. I also hope that, by sharing the human rights policy with related institutions, including local governments, we can clarify our respective roles and strengthen collaborative efforts.



BHR Sharoushi

In the course of providing hands-on support to the company on business and human rights, I realized that unfamiliar terminology itself can become a barrier to embedding these concepts within the company. Sharoushi, as accessible advisers to companies, can play an important role in supporting business and human rights initiatives in SMEs. In particular, when supporting regional SMEs, I strongly feel the importance of explaining business and human rights concepts in clear and accessible terms that are understandable in the Japanese context and language.



UNGPs:
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OECD Guidance:
1.1



ILO MNE Declaration:
30

▶ Withceed Hospitality Management Inc.

Promoting human rights initiatives for diverse rights-holders, centred on non-discrimination

Main products/services: Hotel operations management; hotel investment and development management

Location: Chuo-ku, Tokyo

Number of Employees: 373

Initiative background

The hotel industry has seen a remarkable increase in in-bound guests (foreign visitors to Japan), including many families with LGBT members. The enterprise heard from peers in the industry that establishing a discrimination-free environment and fostering diversity not only had a positive effect on attracting customers but also helped recruit and retain talented employees. Recognizing that these efforts were consistent with its corporate philosophy of “Withceed (Moving Forward Together)”, the enterprise requested on-site expert support through the Tokyo Metropolitan Government’s programme for businesses, aiming to become more LGBT-friendly. Through this support, they met a BHR *Sharoushi*, who would go on to provide hands-on support for the enterprise’s subsequent business and human rights initiatives.

Examples of responsible business conduct

Recognizing that both customers and employees would benefit from inclusive practices, the enterprise formed a cross-functional, six-member team that included management, the business division and human resources/general affairs. Aiming to obtain PRIDE Index certification (a

recognized benchmark for LGBT inclusion in Japan), the team developed the company's human rights policy, code of conduct, hiring policy and corporate social responsibility procurement policy; revised internal regulations (eliminating gender-based assumptions in the language of internal policies and adding sexual orientation and gender identity to the existing harassment clause); raised awareness by conducting training sessions led by the BHR *Sharoushi*; and participated in Pride parades. In addition to awareness-raising through an internal newsletter, they reviewed services in line with their human rights policy, such as updating how staff interacted with guests, replacing gendered signage with gender-free signage, and providing guest loungewear that does not differentiate by gender.

When developing these policies, the team and the BHR *Sharoushi* gathered case studies from enterprises inside and outside of the hospitality sector and leading international examples, drawing on materials from the Japanese Ministry of Economy, Trade and Industry and the ILO to deepen their understanding of responsible business conduct and human rights due diligence. To align with the enterprise's philosophy and current practices, drafts were prepared that clearly prohibited discrimination and harassment based on race, nationality, gender, place of origin, sexual orientation, gender identity, age, religion, beliefs and disability status.

These efforts prompted the enterprise to expand its focus to other rights-holders, leading to improvements in the working environment for foreign employees as well. Specific measures included the development of operations manuals designed to address unequal treatment in working conditions, prohibit discrimination and respect religious and cultural differences.

Positive changes and future outlook

Through training and awareness-raising, employees have deepened their understanding of discrimination, learning about topics such as

unconscious bias, sexual orientation and gender identity, and “allyship”.⁸ These activities have elicited comments from employees such as “I realized that the human rights challenges faced by LGBT individuals are relevant to us” and “I now feel more confident in addressing these issues”.

The enterprise recognizes that full internalization of respect for human rights cannot be achieved overnight and intends to embed these principles in its corporate culture through ongoing training and related efforts. Additionally, the enterprise plans to revisit and improve its working environment for other rights-holders, including persons with disabilities.

The BHR *Sharoushi* approach and collaboration

As noted above, the BHR *Sharoushi* provided training for the enterprise through the Tokyo Metropolitan Government’s programme and has since continued to work alongside the enterprise on its business and human rights initiatives. The support includes revising company regulations, offering expertise in human rights through training, and supporting the expansion of efforts to address the human rights issues of other vulnerable rights-holders. The BHR *Sharoushi* promotes understanding by engaging with employee feedback from post-training surveys.

The BHR *Sharoushi* is also raising awareness through accessible methods that help employees feel a closer connection to rights-holders. Examples include recommending books on various rights-holders and business and human rights that can be borrowed from the enterprise’s library, as well as introducing television programmes that feature the voices of vulnerable rights-holders.

⁸ An “ally” is a person who understands and supports sexual minorities (Reference: Ministry of Health, Labour and Welfare <https://www.mhlw.go.jp/content/000808159.pdf>).



**Kenji Tanaka, COO, Managing Director,
Head of Operations**

I believe the time has passed when human rights were considered a concern only for large enterprises. It is important to build knowledge through training and to begin taking action at a scale suited to a small or medium-sized enterprise. It is also crucial to seek expert assistance, as enterprises may struggle if they try to navigate these issues alone. As management deepens its understanding and takes concrete action, the steps that need to be taken will naturally come into focus. I am convinced that these initiatives will lead not only to increased customer trust but also to improvements in employee well-being and the enhancement of corporate value. Although our company only began these initiatives about a year ago, I have heard of enterprises where employee retention has improved, and I am optimistic about our future results.



**Kyoko Murase, Manager,
operations headquarters**

I serve as the project leader for our human rights initiatives. Even if the system is not perfect, I feel that what matters is having the willingness to face human rights issues. Our efforts remain a work in progress, but I hope everyone will have the determination to start with what they can do, believing there is always something that each person can contribute to every moment. Rather than thinking that “this has nothing to do with me or my company”, I believe it is important to always look for potential issues and consider the actions we can take.



Hidenori Nayuki, Director of Sales Planning, operations headquarters

I learned about our company's LGBT human rights initiatives through internal newsletters, participation in Pride parades, and in-house training sessions. I am proud that our company not only complies with laws and regulations but also explicitly upholds respect for human rights and sustainability. At the same time, I sense that understanding of these issues still varies among employees, and I personally intend to continue raising awareness both within the company and at our managed hotels. In addition to awareness-raising among the owners and customers of the hotel we manage, I believe it is necessary to consider ways to strengthen internal uptake, for example, by making performance indicators for these initiatives more visible and establishing a feedback system with our managed hotels.



BHR Sharoushi

Withceed Hospitality Management's initial focus was on LGBT issues, but this served as a starting point to broaden efforts towards diversity, including addressing the pressing issue of foreign workers. Each enterprise's starting point may differ – with some enterprises perhaps focusing on other rights-holders' issues – but by taking action with an understanding of the importance of respecting human rights, they can catalyse efforts to address other human rights challenges as well.



UNGPs:
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OECD Guidance:
1.1



ILO MNE Declaration:
30

Who are rights-holders?

A rights-holder is any individual or group whose human rights may be affected, or are already affected, by an enterprise's operations. This includes not only the enterprise's own employees but also workers in the supply chain, local communities, consumers and other affected parties. Rights-holders are identified based on the **potential or actual adverse impact on their human rights**, not on whether they have a direct business interest. Enterprises are expected to assess, prevent, mitigate and address the human rights risks from the perspective of rights-holders, and to provide access to remedy.

In human rights due diligence, special attention should be paid to **vulnerable or marginalized groups**, such as indigenous peoples, women, minorities, children, persons with disabilities, migrant workers and their families.

Stakeholders, in contrast, are a broader category, encompassing any party with an interest in, or the ability to influence, an enterprise's operations – such as shareholders, investors, business partners, regulators, industry associations and local communities.

For further reference, see the [UN Guiding Principles on Business and Human Rights](#)⁹, the [ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy](#)¹⁰, the

9 OHCHR, *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework*, January 2012, <https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights>

10 ILO, *Tripartite declaration of principles concerning multinational enterprises and social policy (MNE Declaration)*, March 2023, <https://www.ilo.org/publications/tripartite-declaration-principles-concerning-multinational-enterprises-and-3>

OECD Guidelines for Multinational Enterprises on Responsible Business Conduct¹¹, and the OECD Due Diligence Guidance for Responsible Business Conduct¹².

11 OECD, *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, June 2023, https://www.oecd.org/en/publications/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_a0b49990.html

12 OECD, *OECD Due Diligence Guidance for Responsible Business Conduct*, February 2018, https://www.oecd.org/en/publications/2018/02/oecd-due-diligence-guidance-for-responsible-business-conduct_c669bd57.html

What is violence and harassment in the world of work?

The [ILO Violence and Harassment Convention](#)¹³, 2019 (No. 190¹⁴) is the first international treaty to recognize the right of everyone to a world of work free from violence and harassment, including gender-based violence and harassment. Together with its accompanying Violence and Harassment Recommendation, 2019 (No. 206¹⁵), it provides a common framework to prevent, remedy and eliminate such behaviours in the world of work.

Convention No. 190 provides the first international definition of violence and harassment in the world of work (Art. 1(1)(a)), which refers to a “range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment”. The Convention also defines gender-based violence and harassment (Art. 1(1)(b)) as: “violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment”.

The Convention requires Member States to adopt an inclusive, integrated and gender-responsive approach to prevent and address such behaviours and practices in the world of work. It sets out a common framework for preventing, addressing and eliminating violence and harassment, which envisages action on prevention, protection, enforcement, remedies, guidance, training and awareness-raising, including by requiring employers to take specific measures and take into account third parties as both victims and perpetrators.

13 ILO, *Violence and harassment in the world of work*, <https://www.ilo.org/topics-and-sectors/violence-and-harassment-world-work#convention>

14 ILO, *C190 - Violence and Harassment Convention*, 2019 (No. 190), https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190

15 ILO, *R206 - Violence and Harassment Recommendation*, 2019 (No. 206), https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R206

Employers are responsible for providing a safe and healthy working environment, by preventing as far as reasonably practicable, any work-related risk to the safety and health of workers. Convention No. 190 and Recommendation No. 206 call on ratifying countries to adopt laws and regulations requiring employers to take appropriate steps commensurate with their degree of control to prevent violence and harassment in the world of work, including gender-based violence and harassment.



全国社会保険労務士会連合会
JAPAN FEDERATION OF LABOR AND SOCIAL SECURITY ATTORNEYS ASSOCIATIONS



From
the People of Japan

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