

# Third-Party Opinion

**Tamio Yamaguchi,**  
Representative  
Specified non-profit organization  
Junkan Workers Club



## Junkan Workers Club:

This is a civic group whose main purpose is to (1) discuss from a global point of view, the ideal figure of a circulation-based society, which is to have harmony with the natural ecosystem that should be handed down to our next generations, and (2) research, support, and implement any efforts to form a circulation-based society by local citizens, businesses, and public administrations.

**URL:**<http://www.nord-ise.com/junkan/>

Often, the concept of CSR is likened to an endless journey. This is probably because the essence of CSR lies in the fact that demands from society change over time and companies are expected to consistently respond to the changing demands."

For this reason, companies should make a constant effort to create a mechanism to promote the CSR concept and cultivate it profoundly.

After joining the Global Compact in 2007, the TOPCON Group has been actively making these efforts.

In addition to the "TOPCON WAY", this report covers the process of drawing up corporate principles such as principles for corporate governance, the anti-bribery regulations for Japanese and non-Japanese public service workers, the regulations for basic liaison management, and basic guidelines for the development of human resources in the TOPCON Group.

Drawing up these things requires deep in-house discussions. Mr. Miyawaki, chairman of the CSR Committee, was right when he made the following comment in his general overview: "The process itself is a shortcut to accelerating CSR management."

In future, it will be necessary to define the relationships among many items (such as the "TOPCON WAY", CSR basic guidelines, corporate governance principles, TOPCON Code of Business Conduct, Environmental Vision 2020) and the current TOPCON Vision and their roadmap to ensure that they are fully understood and widely accepted by the group's employees.

Along with creating this system, the current report also includes self-evaluation in each category.

I also agree with the general overview regarding this self-assessment item when it says, "There is still some margin for flexibility when it comes to ensuring the objectivity and validity of assessment."

However, I believe that making a self-assessment with some margin for flexibility will enhance the PDCA circle for CSR and that the descriptions

in the report will change from the present PD-only stance to the PDCA-circle stance, creating significant opportunities for cultivating CSR.

In the future, I would like you to set up quantitative targets well as Key Performance Indicators (KPIs) in each category.

In line with the implementation of the "TOPCON WAY", this report is constructed on seven pillars.

For this structure, I use the word "approach," by which I mean an approach to the ideal figure. I think that following the "approach" continuously in the future will help you to verify the extent to which the "TOPCON WAY" has been realized.

In this meaning as well, I believe that it is essential to set KPIs.

As can be seen, this report clearly identifies the departure to the "next journey." In the fiscal 2011 report, your stakeholders are watching the reports relating to great earthquakes in eastern Japan and the handling ISO 26000.

Writing about the earthquake begins with the message from your top official and is followed by articles such as the special topic, BCP and support for the reconstruction efforts.

Indeed, this information is essential. However, I would like to have found an article that emerged dealing with problems in the face of the earthquake. An example would be the supply chain, the location of production sites, measures related to energy, and the relationships with communities.

As the report was due out in May, you may have had insufficient time to verify the material. In this sense, I am looking forward to reading your contribution in the next issue of the report.

Regarding ISO 26000, you have signed a memorandum of understanding (MOU) for cooperation with the participating GC members. Reference is also made to the GRI and ISO. I have high hopes that by referencing this international standard, you will verify your own CSR and report the result of your verification.

## In Response to the Third-Party Opinion

I believe that squarely addressing the demands of a society that is continuously evolving and changing will be important in enabling the Topcon Group community to grow sustainably.

The CSR Report for fiscal 2011 is one achievement along the way.

Therefore, the opinion of Mr. Yamaguchi as a third party is a proposal on behalf of the needs of society. I understand this propos-

al expresses the viewpoint required in the future.

Although different degrees of interest in the issues to be addressed, we would like to deal with them face to face and arrive at solutions together with our stakeholders.

TOPCON CSR Committee  
Hiromasa Miyawaki, Chairman