Note: The English translation is provided for information. The original Japanese version remains the sole official version. If there is any discrepancy between the two versions, the Japanese original should take precedence.

Sophia School Corporation Guidelines for the Prevention of Job-Hunting Harassment

1. Purpose

Sophia School Corporation (hereinafter referred to as the "Corporation") establishes these Guidelines in order to respect the human rights and dignity of job applicants, etc. (as defined in Section 3 below; the same applies hereinafter) and to ensure fair and sincere recruitment activities and support for career selection.

The purposes of these Guidelines are as follows:

(1) To establish an environment in which job applicants, etc. can safely engage in job-hunting activities, recruitment screening, internships, and other activities that contribute to career selection.

(2) To fulfill our social responsibility as an educational institution and achieve fair and trusted recruitment activities by working to prevent job-hunting harassment (as defined in Section 3 below; the same applies hereinafter).

(3) Establish an environment for recruitment activities and career-choice support that is safe and respectful for both job applicants, etc. and faculty and staff members.

(4) Based on the Act on Comprehensive Promotion of Labor Policies, the Act on Equal Opportunity and Treatment between Men and Women in Employment, and guidelines established under these laws, take appropriate measures to prevent job-hunting harassment.

2. Scope of Application

(1) These guidelines apply to the following persons.

① All faculty and staff members involved in faculty recruitment, staff recruitment, and other recruitment activities of this Corporation

② Faculty and staff members involved in information sessions, interviews, meetings, workplace tours, work-experience workshops, internships, teaching practicums, and other activities that contribute to career choice

③ Faculty and staff members who come into contact with job applicants, etc., whether on

or off campus, in connection with the Corporation's recruitment activities or activities that contribute to career selection.

(2) These guidelines apply to the following situations.

① Situations in which faculty and staff members come into contact with job applicants ,etc., including information sessions, interviews, meetings, workplace tours, work-experience workshops, internships, teaching practicums, visits to alumni, individual consultations, informal discussions, networking events, and other situations regardless of their name.

② All methods of communication and contact, including in person, online, by telephone, email, social media, messaging applications, and any other means.

3. Definitions

(1) Job applicants, etc.

For the purposes of these guidelines, "job applicants, etc." means the following persons:

① Applicants for employment at the Corporation

② Participants in the Corporation's employment selection process

③ Individuals who participate in internships, information sessions, interviews, workplace tours, work-experience programs, teaching practicums, and similar activities conducted by the Corporation or in connection with the Corporation's recruitment activities or career-choice support

④ Individuals who have received a job offer from the Corporation

⑤ Other individuals who participate in activities that contribute to career choice, or who come into contact with faculty or staff members of the Corporation in connection with recruitment activities or activities that contribute to career choice

(2) Job-hunting harassment

"Job-hunting harassment" refers to inappropriate words or actions by faculty or staff members, in the course of the Corporation's recruitment activities or activities that support career selection, that, against the background of their position, authority, information, or influence, cause mental or physical distress, disadvantage, anxiety, or inhibition to job applicants, etc.; obstruct their job-search activities, recruitment screening, internships, information sessions, interviews, teaching practicums, or other activities that support career selection; or harm their dignity.

Job-hunting harassment includes sexual harassment directed at job applicants, etc., as

well as conduct equivalent to power harassment and harassment related to pregnancy, childbirth, child/family care leave, and similar matters directed at job applicants, etc..

4. Prohibited Conduct

The faculty and staff members of the Corporation must not engage in the following conduct in recruitment activities or activities that assist with career selection.

(1) Inappropriate questions that are not necessary or relevant to recruitment activities or activities that assist with career selection

① Inappropriate questions concerning family structure, family members' occupations, family circumstances, assets, and similar matters

② Inappropriate questions concerning registered domicile, place of birth, nationality, ethnicity, social status, and similar matters

③ Questions concerning beliefs, convictions, religion, political party affiliation, labor unions, social movements, and similar matters

④ Other inappropriate questions concerning private matters that are not necessary or relevant to making hiring decisions or assisting with career selection

(2) Intimidating or coercive conduct

① Intimidating or coercive behavior that causes job applicants, etc. to feel intimidated

② Excessively intimidating interviews

③ Remarks that deny or insult a person's character, abilities, appearance, attributes, or the like

④ Words or conduct that cause anxiety by suggesting hiring or rejection, evaluation, recommendation, or the like

⑤ Words or conduct that unjustly dismisses or ridicules statements, questions, or consultations by job applicants, etc.

(3) Sexual conduct

① Asking about sexual matters, romantic relationships, dating status, sexual experience, or the like

② Inappropriate questions regarding plans to marry, pregnancy, childbirth, child-rearing, or the like

③ Inappropriate sexual jokes or teasing, or remarks concerning appearance or physical characteristics

④ Unnecessary physical contact

⑤ Requesting a personal or sexual relationship
⑥ Persistently inviting someone to meals, drinking occasions, private meetings, or similar activities
⑦ Requesting private contact using social media, personal email, messaging apps, or similar means
⑧ Sending, displaying, or sharing obscene images, videos, texts, or similar materials
⑨ Requesting or implying a personal or sexual relationship in exchange for recruitment, evaluation, recommendation, or other preferential treatment

(4) Other inappropriate conduct
① Making contact that is not necessary for business or recruitment activities, against the wishes of job applicants, etc.
② Collecting personal information that is not necessary for recruitment activities.
③ Making private requests to job applicants, etc. that are not necessary for business or recruitment activities.
④ Unreasonably obstructing consultations, reports, or the raising of concerns by job applicants, etc..
⑤ Searching for or pressuring persons who consult about, report, or cooperate with investigations into job-hunting harassment.

5. Code of Conduct
Faculty and staff members of the Corporation shall comply with the following code of conduct in recruitment activities and activities that contribute to career choice.
(1) Ensuring fairness and transparency
① In recruitment selection, we make fair judgments based on applicants' aptitude, abilities, experience, expertise, and other matters related to the duties or activities of an educational institution.
② In accordance with the matters requiring consideration during recruitment selection set forth in "Toward Fair Recruitment Selection," issued by the Ministry of Health, Labor and Welfare, we do not ask inappropriate questions or engage in discriminatory treatment.
③ We ensure transparency, to the greatest extent possible, regarding the purpose, procedures, and evaluation methods of recruitment selection.

(2) Respect for Personality and Dignity

① We respect job applicants, etc. as individuals and do not engage in words or conduct that impair their personality or dignity.
② We take into consideration the anxiety and psychological burden that job applicants, etc. may experience because they are students, young people, applicants, or in similar positions.
③ As an educational institution, we respect opportunities for the growth of job applicants, etc..

(3) Measures that are necessary and appropriate
① Questions and matters to be confirmed in interviews, meetings, briefing sessions, and similar settings shall be limited to those necessary and appropriate for making hiring decisions or supporting career choices.
② We will not ask about private matters unrelated to the work or recruitment activities.
③ Information obtained from job applicants, etc. will be used only to the extent necessary for recruitment activities or career-choice support. However, if the information is to be used for placement after hiring or other matters necessary for employment management, we will clearly indicate the purpose of its use in advance, obtain the individual's consent to the extent required by law, and handle the information only within the necessary and appropriate scope.

6. Rules for Meetings and Contact

When faculty and staff members of the Corporation conduct interviews, consultations, informal discussions, or otherwise have contact with job applicants, etc., they shall comply with the following rules.

① In principle, interviews, consultations, informal discussions, and similar meetings will be conducted within the Corporation’s facilities, using the official online meeting system, or at or by another location or method deemed appropriate by the Corporation.
② We will not engage in contact at night, in places with a high degree of privacy, private residences, lodging facilities, vehicles, or other inappropriate locations.
③ In principle, we will not conduct one-on-one interviews. If it is unavoidable to conduct a one-on-one interview, we will share the date and time, location, and purpose of the interview in advance with the head of the relevant department or the department responsible for recruitment.
④ In connection with recruitment activities or career-choice support, we will not engage in private communication using individuals’ personal social media accounts, private

email, private messaging apps, or similar means.

⑤ We will not ask job applicants, etc. to engage in meals, drinking, private meetings, personal relationships, or other contact unnecessary for recruitment activities or career-choice support.

⑥ When conducting online interviews, as in face-to-face interviews, we will not engage in conduct or make remarks that undermine the dignity of job applicants, etc., and will retain records or implementation histories as necessary.

7. Education and Training

The Corporation will regularly provide information and education on the following matters to faculty and staff members involved in recruitment activities or activities that support career selection.

① The contents of these guidelines

② The definition and specific examples of job-hunting harassment

③ Points to note regarding fair hiring selection

④ Interview and contact rules

⑤ How to respond when a consultation is received

⑥ Privacy protection and prohibition of unfavorable treatment

⑦ Response in the event of a violation

8. Consultation and Reporting System

(1) Establishment of a Consultation Service

The Corporation will establish a consultation service regarding job- hunting harassment so that job applicants, etc. can seek advice with peace of mind. Job applicants, etc. may consult the consultation service not only when job- hunting harassment has actually occurred, but also when there is a risk that it may occur or when it is unclear whether the conduct constitutes job- hunting harassment.

① Consultation Contact

a) Consultations concerning recruitment activities and other matters conducted by Office of Personnel Affairs, Bureau of Personnel Affairs: Office of General Affairs, Bureau of General Affairs

b) Consultations other than those described in a) above: Office of Personnel Affairs, Bureau of Personnel Affairs

② Consultations are accepted not only from the person concerned but also from third parties who have learned of the facts.

③ When the Corporation receives a consultation, it will take the necessary measures while giving due consideration to the wishes, feelings, and privacy of the person seeking consultation.

(2) Handling of Consultations, Investigations, and Measures

The Corporation, upon receiving a consultation or report, will promptly confirm the facts and take measures for the protection and consideration of the victim, measures against the perpetrator, measures to prevent recurrence, interim measures in cases of high urgency, and any other necessary measures, in accordance with the Corporation's relevant regulations, including the "Regulations Concerning Prevention of Harassment" and the "Detailed Rules on Harassment Consulting and Investigation Procedures."

(3) Privacy Protection

The Corporation will strictly protect the personal information of those seeking consultation, whistleblowers, job applicants, investigation collaborators, and other relevant parties, and will share information concerning consultations, reports, investigations, and responses only to the minimum extent necessary.

(4) Prohibition of Adverse Treatment

The Corporation shall not subject job applicants, etc. , complainants, whistleblowers, persons cooperating with investigations, or any other relevant parties to adverse treatment on the grounds that they have sought advice, made a report, cooperated in fact-finding, or raised a legitimate concern.

Faculty and staff members must not seek to identify complainants, whistleblowers, or persons cooperating with investigations, obstruct consultations or reports, or engage in conduct that exerts pressure on such persons.

(5) Records and Management

The Corporation shall prepare records, to the extent necessary, concerning the content of consultations and reports, the course of actions taken, the results of fact-finding, and the measures implemented, and shall appropriately manage and retain them in accordance with the Corporation's relevant regulations.

9. Response to Violations

If faculty or staff members violate these guidelines, the Corporation may take necessary

and appropriate measures based on its regulations of employment and other internal regulations, including issuing warnings, providing guidance, ordering attendance at training, excluding them from recruitment activities or career-selection support activities, imposing disciplinary action, and taking other measures as necessary.

10. Review

The Corporation will review these guidelines as necessary in light of laws and regulations, guidelines, social circumstances, consultation cases both inside and outside the Corporation, and the status of their implementation.

Supplementary Provisions

These guidelines will take effect on October 1, 2026 (Reiwa 8).