

Whistleblowing and Compliance in Japan

A Data-Driven Snapshot

2026



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Introduction

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Having an effective system in place for incident reporting and case management is a crucial factor in every compliance program. But that's just a part of the process. Actually looking at, analyzing and benchmarking your data against your peers helps organizations answer crucial questions about their risk and compliance program. This broader perspective on how internal data performs relative to your market and industry is an invaluable source of knowledge and helps to inform stakeholders, the C-suite and board members, as well as decisions about your program.

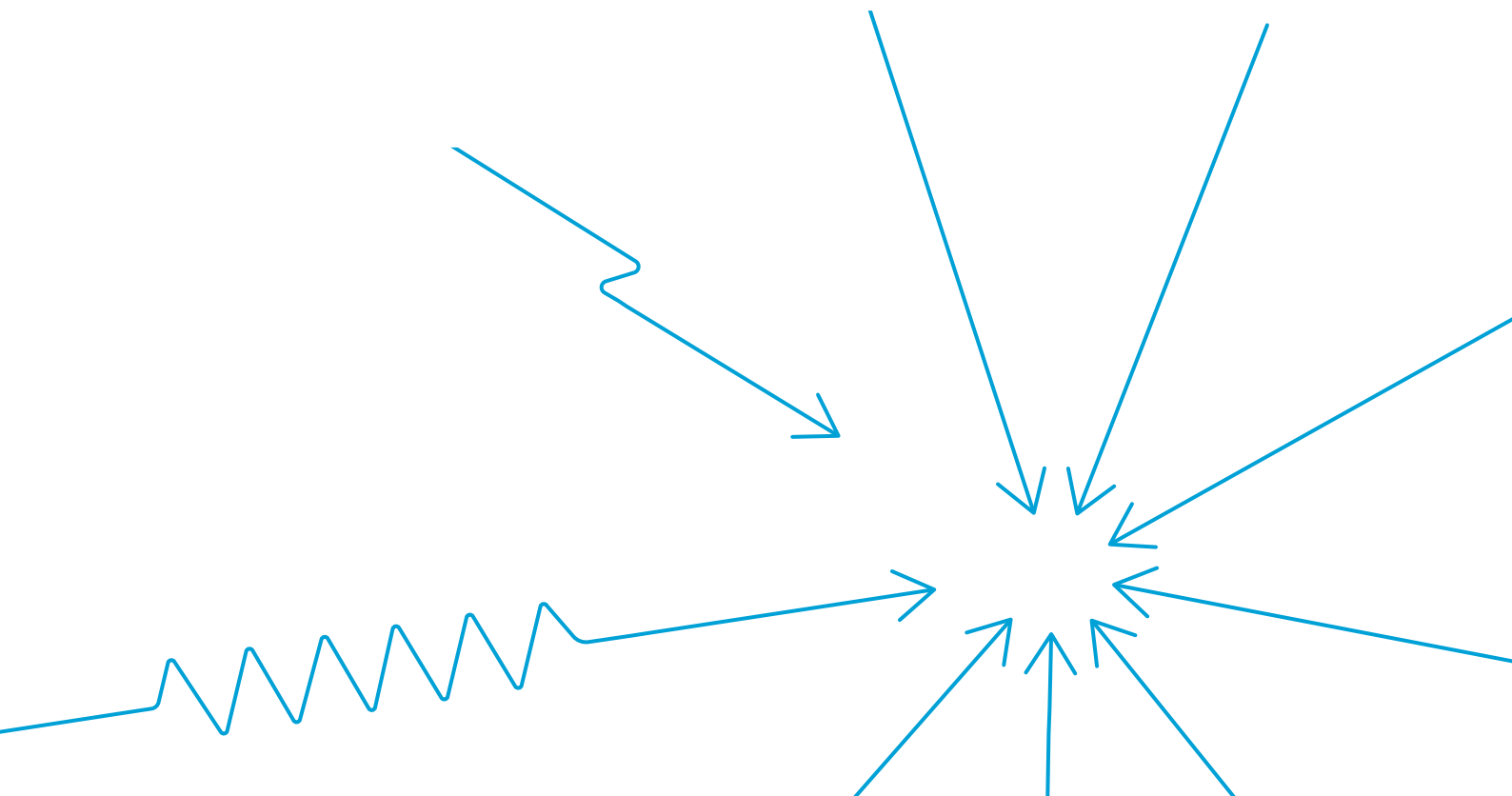
With this report, we want to give Japanese organizations the ability to easily benchmark themselves directly against their local and regional peers. To facilitate this, NAVEX anonymizes data collected through our reporting and case management systems every year - this 2026 report presents data collected from reports received in 2025.

It is important to highlight that there are no "correct" outcomes in benchmarking data. Each organization faces a unique operating environment and culture. Our hope is that these metrics provide context for Japanese organizations seeking to improve how they view and speak about their internal reporting performance.

Understanding Japan's reporting culture

When looking at Japanese reporting benchmarks, a clear correlation with cultural norms and expectations is evident. Japanese organizations are built on a loyalty-based hierarchy, with harmony, conformity, discretion and avoidance of confrontational behavior at its core. Internal resolutions to conflicts are preferred before formal escalation.

As a result, reporting volumes tend to be lower than the global average, and anonymous reporting rates tend to be higher. These insights suggest that while formal reporting methods are in place, confidentiality when raising concerns is preferred and cultural norms influence if, how and when employees decide to report misconduct.



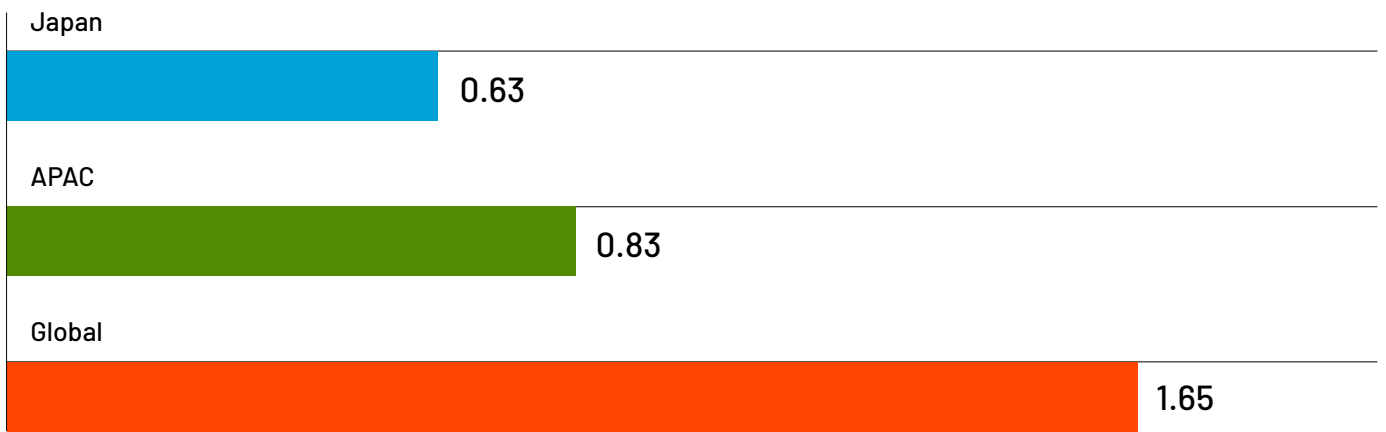


01

Hotline benchmark data for Japan compared to APAC and global data

Concerns are reported less

REPORTS PER 100 EMPLOYEES

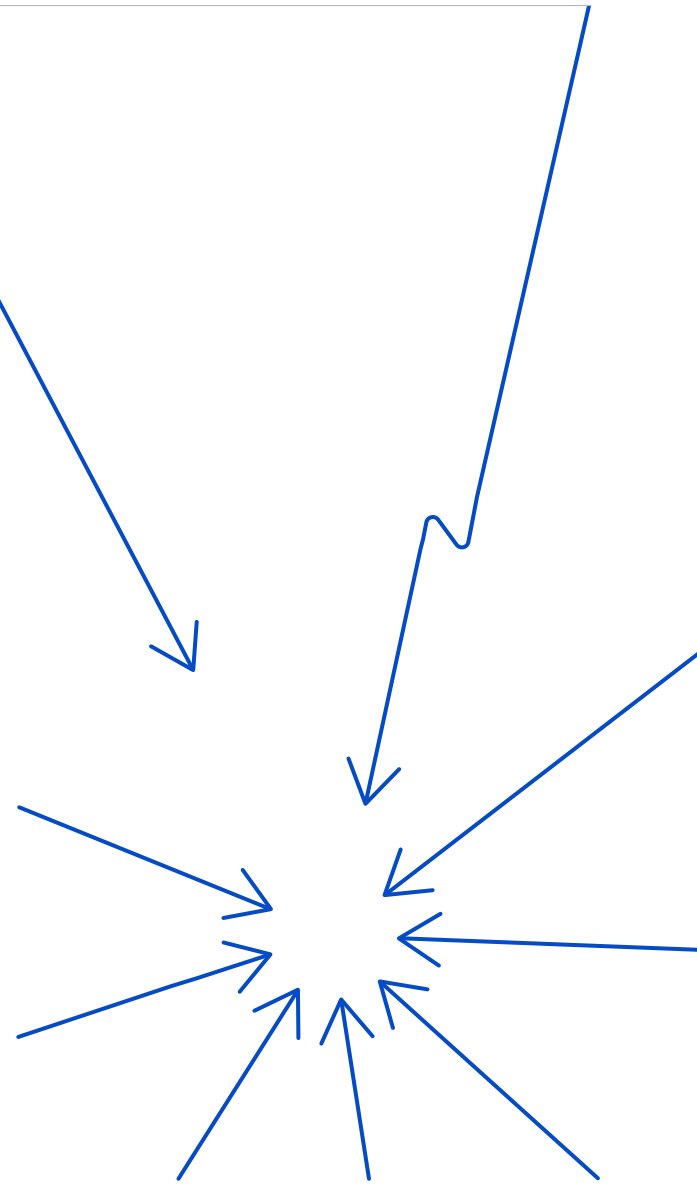


Reporting volumes in Japan are lower than in the APAC region and significantly lower than global volumes, with 0.63 Reports per 100 Employees in Japan compared to 0.83 in APAC and 1.65 globally. That strongly reflects the observations from the beginning of this report - reporting volumes in Japan are highly influenced by cultural and corporate norms. Loyalty, harmony, and the avoidance of conflicts lead to lower reporting volumes.

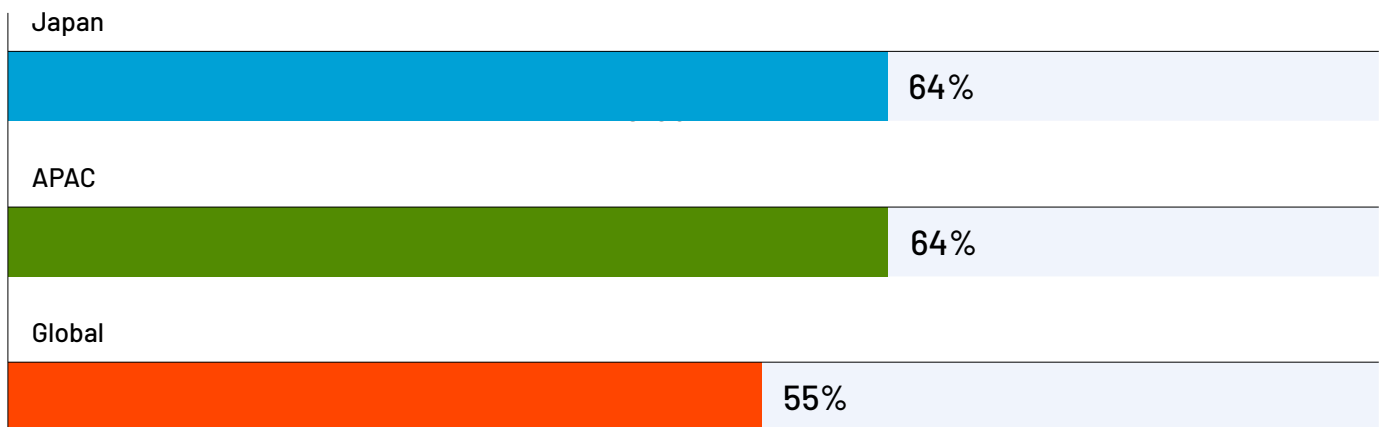


Anonymous reports are the norm

Anonymous reporting in Japan aligns with the broader APAC benchmark, while both are notably higher than the global average by nine (9) percentage points. This data suggests that, even though misconduct is being reported in Japan, due to the cultural factors mentioned earlier, employees may not yet feel comfortable enough to disclose their identities.



ANONYMOUS REPORTS

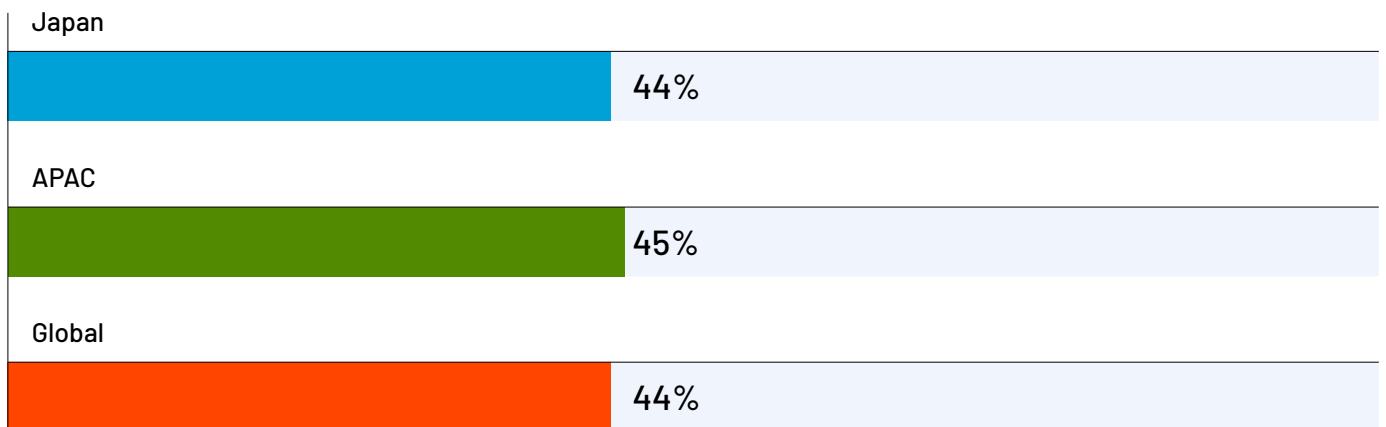


Reported misconduct is substantiated similarly across regions

Substantiation rates in Japan align with both APAC and global benchmarks, indicating that the outcomes of investigations across all regions are similar. Even though there are visible differences in reporting volumes or preferences regarding anonymous reporting, organizations across the globe are confirming reported misconduct at a similar rate.

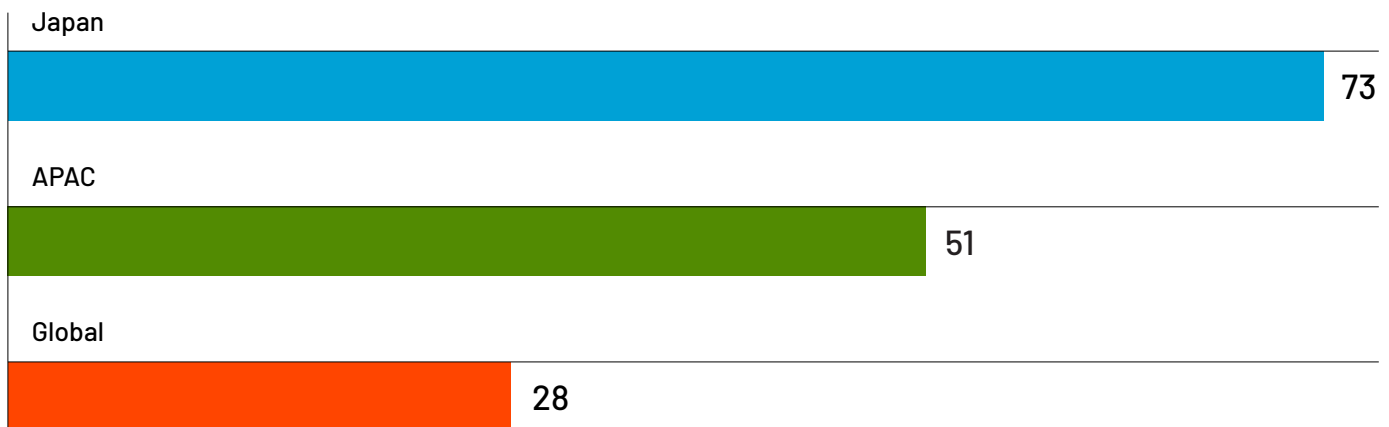


SUBSTANTIATION RATE

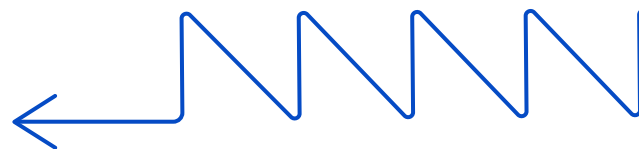


Concerns are investigated thoroughly, but the response is slowed

CASE CLOSURE TIME (DAYS)



Organizations in Japan take significantly longer to close cases compared to both APAC and the global average. With a median of 73 days, Case Closure Time in Japan is more than 2.5 times longer than the global median of 28 days. This may indicate a more thorough approach to received concerns, considering the cultural norms that govern corporate behavior in Japan. At the same time, a long case closure time means the organization may be perceived as responding more slowly to reported concerns.



Workplace conduct is the most reported risk category

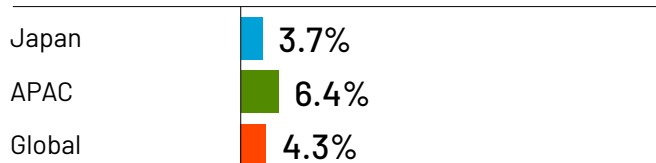
The most reported risk category in Japan is **Workplace Conduct** – with 50% of reports addressing this issue – which is consistent across all regions.

Business Integrity is the second most prevalent risk category in Japan and APAC – with 24.5% of reports addressing this issue – exceeding the global average by more than four (4) percentage points. This again reflects the importance of expected behavior in Japan’s corporate environments.

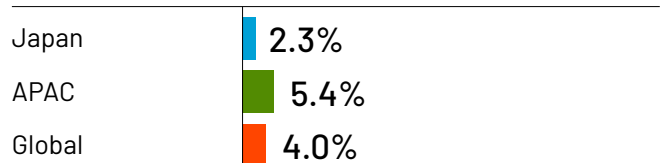
Another notable benchmark within the risk categories is **Accounting, Auditing, and Financial Reporting**. While the overall share of reports in this category is relatively low, the percentage in APAC is nearly double that of Japan. This is particularly interesting given that Japan is part of the APAC region, suggesting that other countries in this region are driving higher reporting levels in this area.

RISK CATEGORY REPORTING

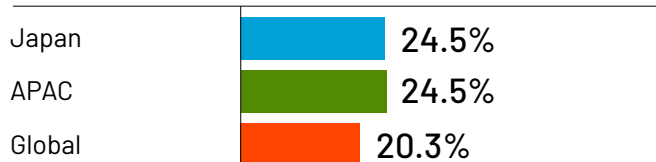
Accounting, Auditing & Financial Reporting



Misuse or misappropriation of assets



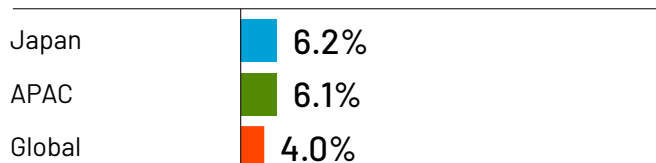
Business Integrity



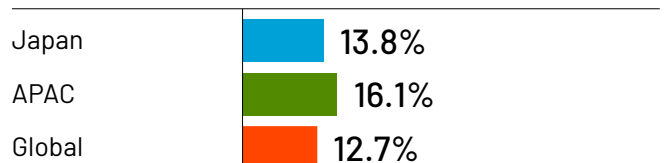
Workplace Conduct



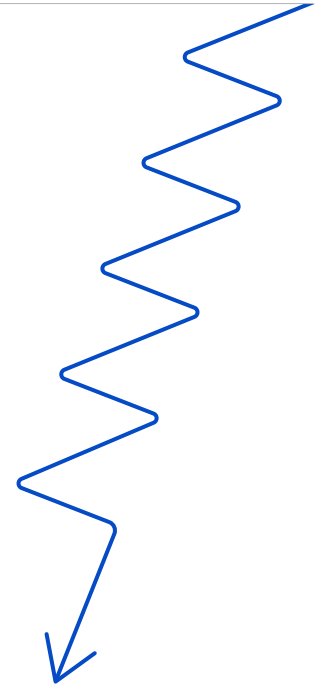
Environment, Health & Safety



Other



Web reporting is the primary intake method



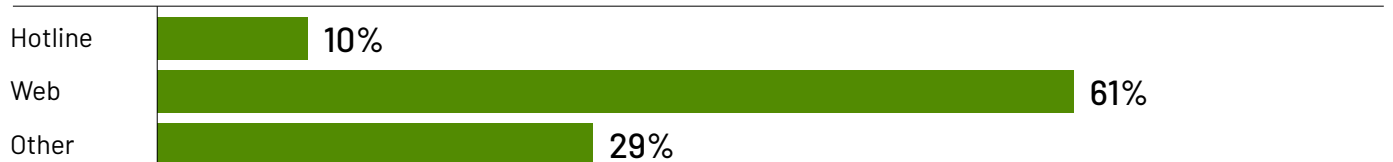
Japan shows a strong preference for web-based reporting, with 76% of reports submitted online. This is significantly higher than APAC at 61% and well above the global average of 34%. This trend likely reflects the previously noted preference for anonymous reporting in Japanese organizations, as digital intake channels make it easier to report concerns without disclosing one's identity.

REPORT INTAKE METHODS (FREQUENCY)

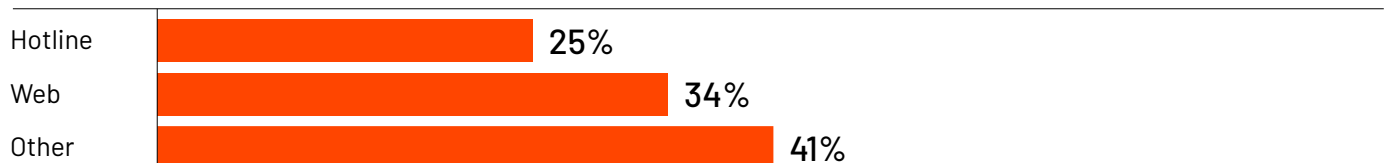
Japan



APAC



Global



02

State of Risk & Compliance survey benchmark insights in Japan

A decorative graphic consisting of several light blue arrows of varying lengths and directions, all pointing towards a central point in the lower right quadrant of the page. The arrows originate from various points around the page, creating a sense of convergence.

Established risk and compliance programs are strongly developed

Key findings:

Program maturity levels in Japan closely reflect the global average, with **58%** of organizations reporting **Managing** and **Optimizing** levels for their programs, both in Japan and globally. At the same time, just 2% of Japanese organizations classify their programs as **Underdeveloped**, compared to 5% globally.

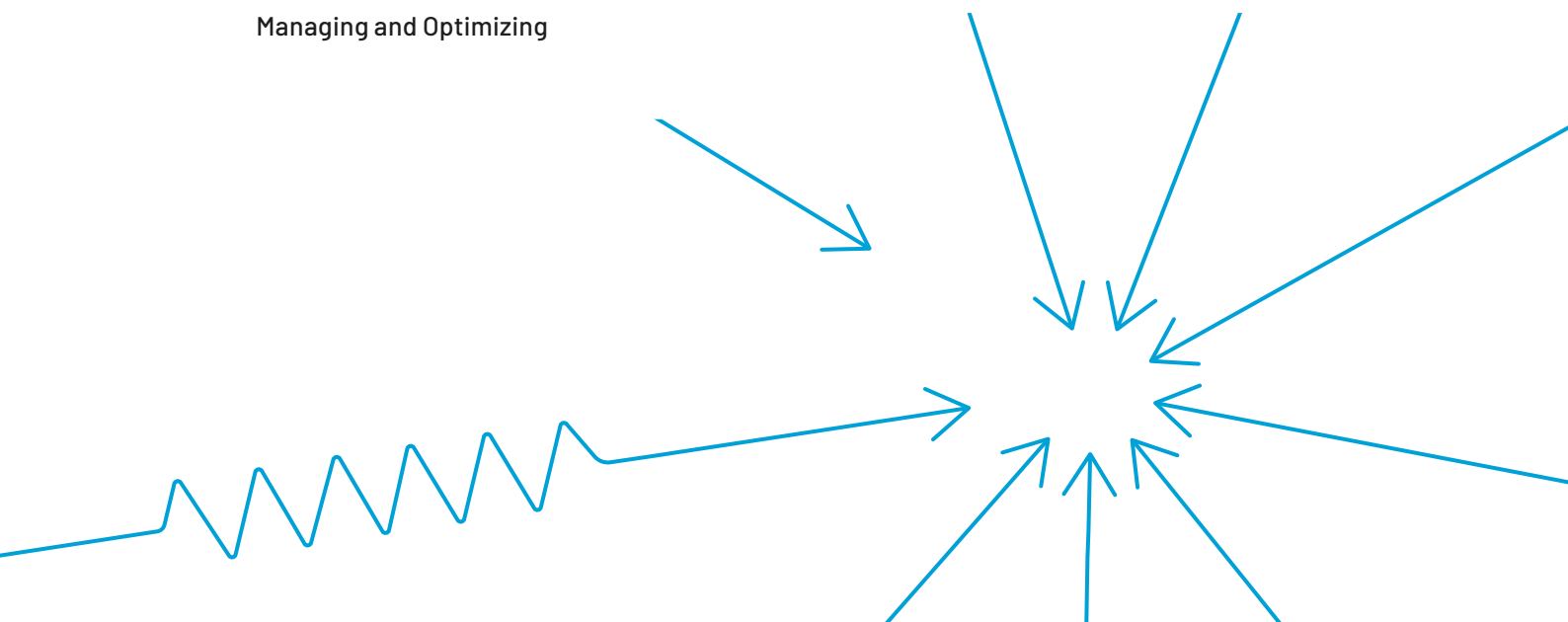
Insight:

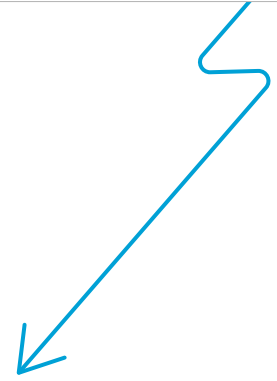
Japanese organizations with dedicated risk and compliance programs demonstrate a strong commitment to these efforts and approach them in a structured, responsible manner. While there is still room for improvement, overall program maturity in Japan is relatively high.

58%



Program maturity level:
Managing and Optimizing





Mixed signals from leadership towards ethics and compliance

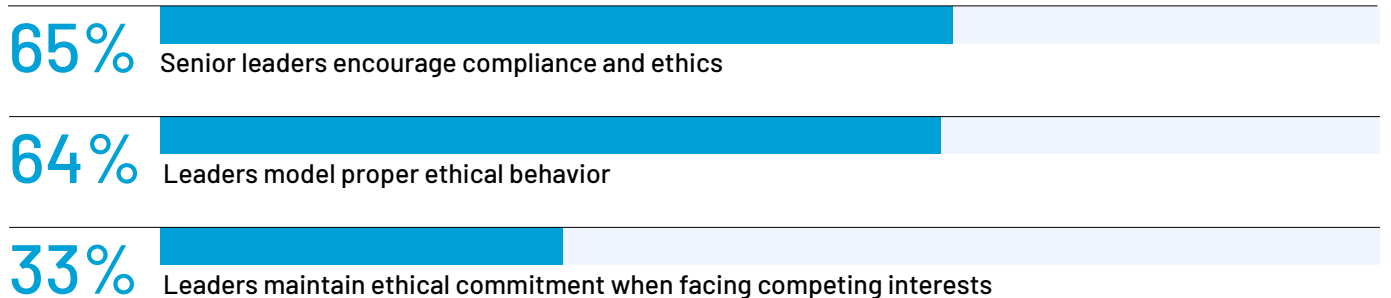
Key findings:

Sixty-five percent of respondents say senior leaders encourage compliance and ethics within their organization, and 64% report that leaders model proper ethical behavior. This strongly contrasts with the fact that only 33% say leaders maintain ethical commitments when facing competing interests and business objectives, which is significantly below the global average of 50%.

Insight:

These benchmarks indicate that senior leadership in Japan broadly supports and models ethical and compliance practices. However, this commitment drops significantly when it is tested against competing business priorities.

PERCEPTIONS OF ORGANIZATIONS' SENIOR LEADERS



The speak-up culture is still in development

Key findings:

Responses indicate there is still much work to be done in Japan regarding speak-up mechanisms. **Forty-one percent say anonymous reporting channels are in place, 44% report having regular leadership messaging to reinforce the importance of speaking up, and 40% offer third parties a way to report misconduct.**

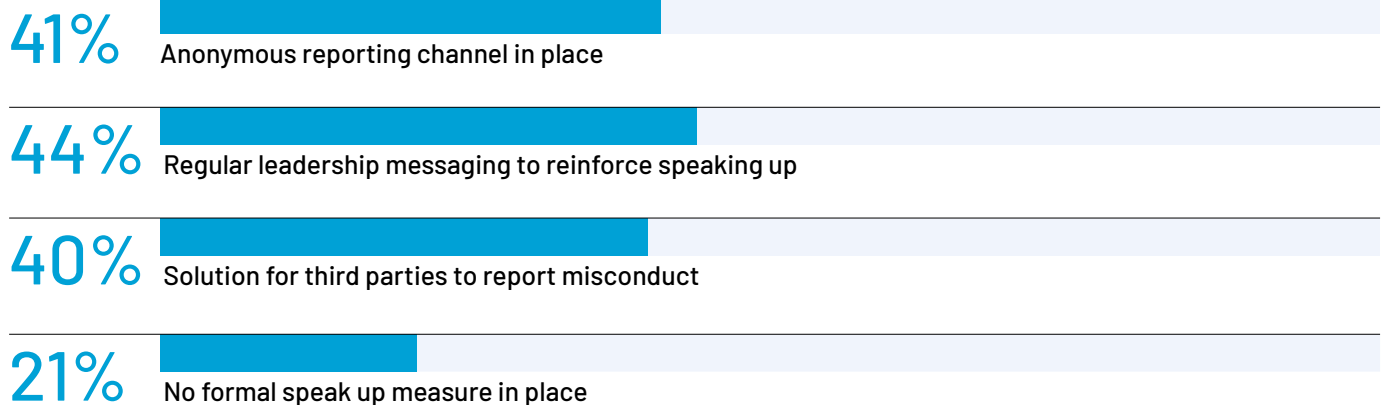
In addition, **21% of respondents report not having formal speak-up measures in place,** which is significantly higher than the **global average of 8%.**

Insight:

These results show that while formal speak-up measures exist in Japan, there is still considerable room for improvement – particularly in closing the gap among organizations that do not offer any formal speak-up mechanisms.



MEASURES ORGANIZATIONS' HAVE IN PLACE TO PROMOTE A STRONG SPEAK-UP CULTURE





How did the amended Whistleblower Protection Act affect organizations in Japan?

Key findings:

Thirty-three percent of respondents say the amendment had **no major impact on their speak-up program**, because they were already compliant with the necessary requirements. Additionally, **23%** report that due to the amendment, **investigation or escalation processes have been formalized**. And **21%** say that **communication about retaliation protection has improved**.

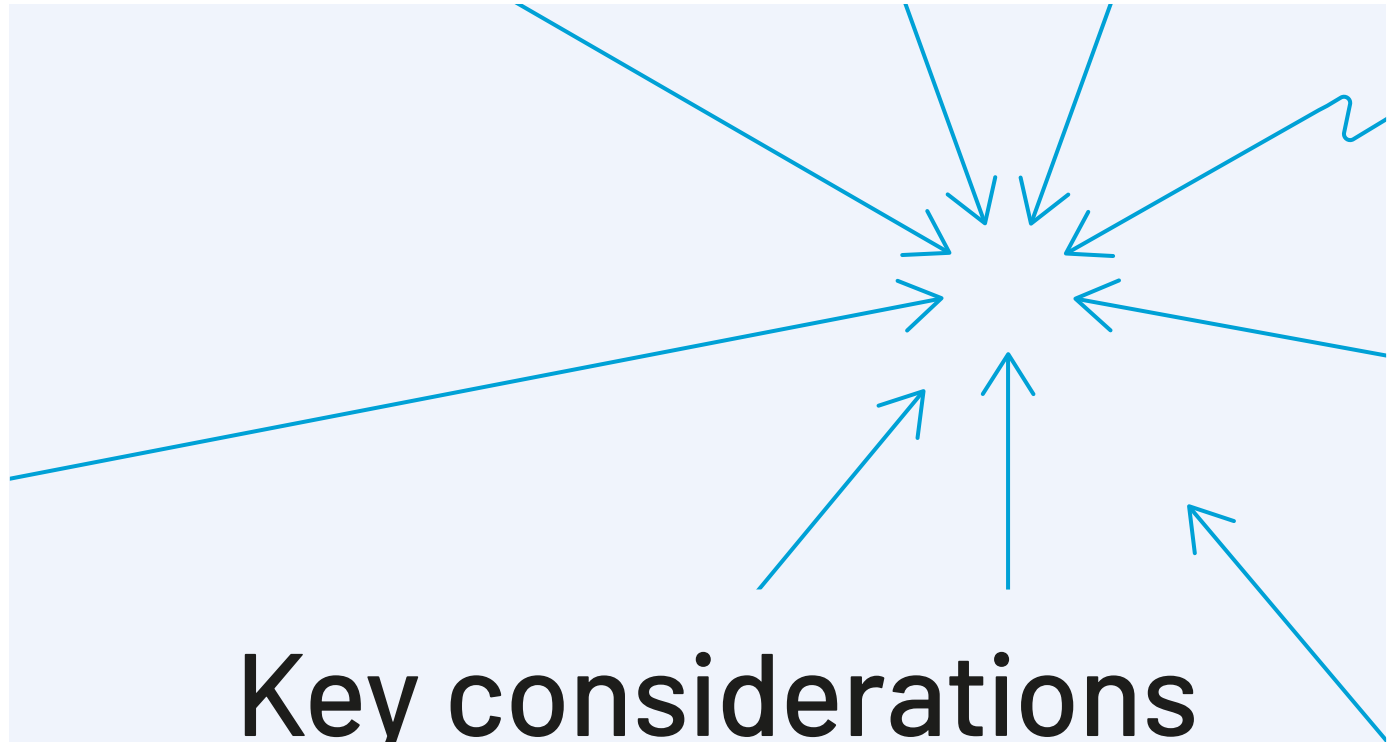
Insight:

Responses indicate that only a minority of organizations are fully compliant with the Japanese Whistleblower Protection Act. At the same time, the amendment appears to be driving progress by formalizing investigation and escalation processes and improving communication around retaliation protection.

33%



Amendment had no major impact on their speak-up program



Key considerations for compliance leaders in Japan

Fewer reports. More anonymity. Longer case closure times. And many organizations without formal speak-up measures.

In Japan, where workplace harmony and hierarchical structures can make raising concerns more difficult, these trends signal more than operational challenges – they point to underlying barriers to speaking up.

Strengthening speak-up frameworks in ways that build trust, ensure anonymous reporting is available, and align with evolving regulatory expectations can help organizations surface concerns earlier, respond more effectively, and foster a culture where speaking up is both safe and supported.

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