

(Translation)

## **ROHTO GROUP MODERN SLAVERY STATEMENT**

The Rohto Group is committed to respecting human rights across its global operations and supply chains. Guided by the Rohto Group Human Rights Policy, we strictly prohibit all forms of modern slavery, including forced labour, child labour, slavery, debt bondage and human trafficking.

This Statement sets out the Rohto Group's approach and actions to prevent modern slavery. It also reflects the intent of disclosures required under the UK Modern Slavery Act 2015 and other relevant legislation, and serves as a Group-wide policy framework that is aligned with the Modern Slavery Statements issued by our subsidiaries.

To support this Statement, the Rohto Group conducts human rights due diligence, including supplier assessments, the incorporation of human rights clauses into contracts, regular monitoring, corrective actions, employee awareness-raising and training, and the maintenance of reporting and grievance mechanisms. Through these efforts, we seek to contribute to the realization of a sustainable Well-being society by promoting respect for human rights throughout the Group.

### **1. Scope**

This Statement applies to Rohto Pharmaceutical Co., Ltd. and its Group companies in Japan and overseas. It does not replace the Modern Slavery Statements issued by Group subsidiaries in accordance with local laws. Rather, it functions as a Group-wide policy framework that is aligned with those Statements. (For country-specific information, please refer to the Appendix.)

### **2. Our Business and Supply Chain**

The Rohto Group operates globally in a range of businesses, including pharmaceuticals, cosmetics and health-related products, and provides products through manufacturing at our own production sites, as well as through contract manufacturing.

The supply chain supporting our business includes a wide range of business partners, such as suppliers of raw materials, packaging material suppliers, contract manufacturers, logistics and distribution partners, and domestic and overseas distributors and business partners.

Given the nature of our businesses, we recognize that there may be potential risks related to working conditions in certain areas, such as specific raw materials, manufacturing processes and logistics operations.

### **3. Governance**

The management of modern slavery risks is overseen by the Rohto Group Sustainability Committee, which functions as an advisory body to the Board of Directors.

The Committee is responsible for establishing policies related to human rights and sustainability, approving

implementation plans and monitoring progress.

Day-to-day implementation is carried out by Group companies and relevant departments, including:

- departments responsible for procurement
- departments responsible for quality assurance
- departments responsible for legal affairs and compliance
- departments responsible for human resources
- departments responsible for ESG-related activities
- sales and other relevant business departments

In the event of a serious human rights risk, a change in applicable laws and regulations, or significant requests from customers, the relevant departments and Group companies report promptly to the Sustainability Committee, which, where necessary, refers matters to the Board of Directors for discussion and decision.

#### **4. Identification of Modern Slavery Risks**

Taking into account international guidelines and the characteristics of our industries, the Rohto Group recognizes that potential modern slavery risks may arise in the Group's business activities and the supply chain supporting our business. In particular, risks related to working conditions may occur in connection with the procurement and supply of raw materials and packaging materials, manufacturing and processing operations (including at our own production sites and those of contract manufacturers), logistics and transportation processes, and the use of temporary and migrant workers.

The Rohto Group will continuously review its risk identification based on assessments conducted by Group companies in each country and on requests and expectations from customers.

#### **5. Human Rights Due Diligence**

The Rohto Group conducts human rights due diligence (HRDD), which includes, but is not limited to, the following:

- conducting pre-assessments of suppliers and using self-assessment questionnaires (Supplier CSR Assessment)
- including clear modern slavery and human rights-related clauses in contracts, agreements and codes of conduct
- monitoring risks and implementing improvement measures that are proportionate to the level of risk
- implementing corrective and preventive actions (CAPA: Corrective and Preventive Action)
- reviewing and updating procedures and documentation in response to legal changes, customer requirements and changes in business operations

The execution of CAPA is undertaken by relevant departments such as procurement, quality assurance and legal/compliance. These departments review progress, confirm the effectiveness of remedial measures and conduct re-assessments where appropriate.

## **6. Supplier Management**

Through its CSR Procurement Guidelines, the Rohto Group promotes initiatives by suppliers to respect human rights, uphold appropriate labour practices, protect the environment and conduct business ethically.

In addition, in order to address modern slavery risks, the Rohto Group continues to advance the following measures:

- assessments at the start of a business relationship and the obtaining of necessary agreements or confirmations
- confirmation of suppliers' adherence to requirements related to modern slavery
- enhanced management of high-risk areas and suppliers
- appropriate responses to enquiries and requests from business partners concerning modern slavery in the supply chain

## **7. Training and Awareness**

The Rohto Group is progressively developing training materials and training structures that cover, among other topics:

- fundamentals of modern slavery and human rights risks
- understanding of supply chains
- internal and external procedures (such as due diligence, contracts and SAQs)
- information on reporting mechanisms and consultation channels
- case studies and practical examples

For suppliers, the Rohto Group is also working to develop and provide materials such as:

- explanatory materials on codes of conduct
- self-assessment checklists
- introductory materials on human rights awareness
- information on reporting and consultation channels

## **8. Reporting and Grievance Mechanisms**

The Rohto Group maintains the following reporting channels, which allow for anonymous consultations and reports:

- Rohto Group Hotline / Business Partner Hotline (for use in Japan)
- Ethics Hotline (for international use)

Reports received through these channels are investigated promptly, and appropriate corrective and remedial actions are taken. Follow-up measures are implemented as necessary to prevent recurrence and to support those affected.

## **9. Continuous Improvement and Monitoring**

The Rohto Group regularly reviews this Statement and related procedures, taking into account changes in laws and regulations, industry trends, customer expectations and the structure of our supply chains.

Through these reviews and the implementation of improvement measures, we strive to continuously strengthen our approach to preventing modern slavery and protecting human rights.

#### **10. Relationship with National Modern Slavery Statements**

This Statement does not replace the Modern Slavery Statements issued by Group subsidiaries in accordance with local laws. Each Group company that is subject to modern slavery reporting requirements issues and updates its own Modern Slavery Statement in line with the applicable legal framework.

#### **11. Approval**

This Statement is issued by Rohto Pharmaceutical Co., Ltd. and has been approved by the Board of Directors.

Approved on December 10, 2025

Rohto Pharmaceutical Co., Ltd.

## **Appendix: Country-Specific Modern Slavery Measures**

(Information current as of December 2025)

### **A. United Kingdom (UK)**

- An annual Modern Slavery Statement is issued in accordance with the UK Modern Slavery Act 2015 and is approved by the Board of Directors, with the signature of a director (or an equivalent authorised individual).
- The annual Statement discloses all seven statutory areas required under the Act, including audits, SAQs, corrective actions, and training.

### **B. Australia (AUS)**

- As of the date of this Statement, none of Rohto Pharmaceutical Co., Ltd. or its Group companies falls within the reporting threshold under the Modern Slavery Act 2018 (Cth).
- In preparation for potential amendments to the Australian legislation, the Rohto Group continues working with local legal and procurement functions to ensure readiness should any Group company become subject to the reporting requirement.
- The Group also voluntarily responds to requests from retail customers related to modern slavery by providing information on human rights risks in the supply chain and, where appropriate, sharing relevant audit findings.

This Appendix is based on information available at the time of preparation.