

(Translation)

## **ROHTO GROUP HUMAN RIGHTS POLICY**

With the aim of realizing a society with well-being, the ROHTO Group<sup>1</sup> has been expanding business activities not only in Japan but throughout the world. In this light, respect for human rights is the foundation of all our business activities. Acknowledging that we may directly or indirectly affect human rights in the process of conducting our business, we observe and respect international norms for human rights, including the United Nations' International Bill of Human Rights<sup>2</sup>, the ILO Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), conventions related to workers' rights, such as wages and working hours, and the OECD Guidelines for Multinational Enterprises. Through the process of research and development for pharmaceutical products, we also value and protect the human rights of patients and research participants according to the Ethical Principles for Medical Research Involving Human Participants (The Declaration of Helsinki)<sup>3</sup>.

Further, we will implement our initiatives based on the Ten Principles of the UN Global Compact, which we uphold as a signatory company, and the Guiding Principles on Business and Human Rights. We will also comply with the laws and regulations applicable in each country or region where we conduct our business activities. In the event of an inconsistency between internationally recognized human rights and the laws and regulations of any country or region, we will seek a way to respect international human rights principles.

### **1. Scope of Application**

This human rights policy ("Policy") applies to all officers and employees<sup>4</sup> of the ROHTO Group.

Understanding that our Group's business activities may have some impacts on local residents, to pursue the co-existence with regional society, we will also request that all business partners, including suppliers, related to our products and services, as well as other persons concerned, endorse this Policy and respect human rights.

### **2. Material Human Rights Issues**

The ROHTO Group acknowledges that addressing the following human rights issues relating to our business activities is essential in fulfilling our social responsibility to respect human rights.

#### **Prohibition of discrimination and harassment**

- To respect the dignity and basic human rights of all our stakeholders
- Not to allow any discrimination and harassment based on personal attributes and factors (including race, ethnicity, age, religion, belief, gender, nationality, social status, disability, sexual orientation, gender identity, physical features, and disease)

- To respect diversity and strive to ensure equal opportunity

#### **Assurance of workers' rights**

- To prohibit child labor, forced labor (including trade in humans, such as enslaved people)
- To guarantee freedom of association and the right to collective bargaining
- Not to allow low-wage labor (with pay below the minimum wage or living wage) and prevent long working hours
- To assure occupational safety and health (including workers' health, physically and mentally)

#### **Respect for privacy**

- To respect the privacy of our customers, employees, and other persons concerned, including the protection of their personal information

#### **Utilization of technology with high ethical standards**

- To utilize various technologies, including AI, big data, robotics, and IoT, based on high ethical standards, under the recognition that technological advancement entails a risk of abusing human rights, while it brings considerable benefits to society, and to fulfill a responsibility to respect human rights

### **3. Human Rights Due Diligence**

To identify, prevent, or mitigate negative impacts caused by human rights violations and take appropriate and effective remedial measures, we will strive to build a structure to conduct human rights due diligence and continuously implement the program.

### **4. Dialogue and Consultation**

If any case is revealed to have caused or is likely to cause negative impacts on human rights during our business activities, we will have dialogue and consultation with relevant stakeholders continuously and facilitate our efforts to respect human rights.

### **5. Contact for Complaints and Reports**

The ROHTO Group has the "ROHTO Group Hotline" desk to receive complaints and whistle-blowing reports relating to human rights. In addition, we have set up the "Business Partner Hotline" separately for outside

stakeholders to report any action or behavior that violates or is likely to violate this Policy.

## **6. Remedial Measures**

If any case is revealed to have caused or contributed to negative impacts on human rights, we will take appropriate and effective remedial measures sincerely and appropriately through dialogue and proper procedures.

## **7. Education and Training**

We will offer appropriate human rights education, awareness-raising, and training to all our officers and employees so that this Policy is embodied in all our business activities and effectively materialized.

## **8. Information Disclosure**

We will disclose information relating to human rights, such as the progress and results of our efforts to respect human rights, in various reports and on our websites.

Established on September 26, 2022

Revised on March 28, 2025

Approved by the Board of Directors of ROHTO Pharmaceutical Co., Ltd.

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1 “ROHTO Group” means ROHTO Pharmaceutical Co., Ltd. and its domestic and overseas subsidiary companies.

2 The “International Bill of Human Rights” is the collective name for the following three documents: the “Universal Declaration of Human Rights” and its treaties, namely the “International Covenant on Civil and Political Rights” and the “International Covenant on Economic, Social, and Cultural Rights.”

3 “Ethical Principles for Medical Research Involving Human Participants (the Declaration of Helsinki)” is a statement of ethical principles in conducting medical research involving human subjects adopted by the World Medical Association (WMA).

4 “Employees” includes all persons with employment relationships and temporary workers under the worker dispatch contract with any company of the ROHTO Group.