

Sawai Group Human Rights Policy

The Sawai Group will fulfil its corporate responsibility to respect human rights in line with its corporate philosophy: “Always putting healthier lives first.” To achieve this, the Group hereby establishes the Sawai Group Human Rights Policy (hereinafter, the “Policy”) as its policy for human rights initiatives, based on the Guiding Principles on Business and Human Rights adopted by the UN Human Rights Council.

1. Basic Approach to Human Rights

This Policy declares the Sawai Group's commitment to respecting human rights in order to fulfil its responsibilities to all stakeholders in accordance with the Sawai Group Code of Conduct. To this end, we support and respect the following international norms and strive to ensure that we are not complicit in human rights abuses.

- The International Bill of Human Rights (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights)
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Guiding Principles on Business and Human Rights
- The Ten Principles of the UN Global Compact
- Ethical Principles for Medical Research Involving Human Subjects (Declaration of Helsinki), and
- Other internationally recognized human rights norms.

2. Policy Scope

This Policy applies to all executives and employees of the Sawai Group. In addition, the Sawai Group continues to encourage all business partners involved in its products and services to respect this Policy.

3. Responsibility to Respect Human Rights

The Sawai Group understands that its business activities may directly or indirectly affect human rights. We will fulfil our responsibility to respect human rights and build a responsible supply chain by ensuring that we do not infringe the human rights of those under the influence of our business activities and by taking appropriate action to remedy any negative impacts on human rights that we have caused or contributed to.

4. Governance for Respect for Human Rights

The Sawai Group will establish a system for close cooperation between management and frontline workers in fulfilling their responsibility to respect human rights. Led by the President and GCOO, the Group's human rights initiatives will be promoted under the responsibility of the Group Chief Human Resources Officer, the Group Chief Compliance Officer, and the Group Chief Sustainability Officer, and they will be implemented under the supervision of the Board of Directors.

5. Human Rights Due Diligence

The Sawai Group will establish a human rights due diligence mechanism to ensure that every significant business decision or change is made after the continuous process of identifying and assessing any negative impact that its business activities can have on human rights and of avoiding, mitigating or remedying the causes thereof. We will also encourage our business partners to respect this Policy concerning impacts on the human rights of people who are linked to their operations, products, and/or services through their business relationships with the Sawai Group. Furthermore, we will ensure the effectiveness of our efforts to respect human rights by regularly monitoring or auditing these efforts.

6. Stakeholder Engagement

In the course of its business activities under this Policy, the Sawai Group will draw on independent external human rights expertise. It will also engage seriously in dialogue and consultation with its stakeholders to identify and understand the views of those under the influence of its business activities and to ensure that their human rights are fully respected.

7. Education and Training

The Sawai Group will educate and train all executives and employees to ensure that this Policy is embedded in all its business activities and effectively implemented, and it will also work to obtain its business partners' understanding of this Policy.

8. Remedy

If it becomes clear that the Sawai Group has caused a negative impact on human rights through its own business activities or the activities of its business partners or other parties, the Group will work to remedy that impact by implementing appropriate procedures.

9. Disclosure

The Sawai Group will disclose the progress and results of its own human rights initiatives as appropriate while giving due consideration to stakeholder and business confidentiality.

10. Applicable Laws and Regulations

The Sawai Group complies with the laws and regulations of each country or region in which it operates. If there is a conflict between internationally recognized human rights and the laws and regulations of the respective countries, we will seek a way to ensure maximum respect for international human rights principles.

This Policy has been approved by our Board of Directors and signed by the President. It is subject to constant, regular review to ensure that it guides the Sawai Group to respond to changing human rights issues in line with changes in the business environment.

Supplementary Provisions

This Policy shall be under the charge of the Group Chief Sustainability Officer of Sawai Group Holdings. Amendment or repeal of this Policy shall require a resolution approved by the Sawai Group Holdings Board of Directors.

Enacted on February 14, 2025, and put into effect on April 1, 2025