

Statement on the UK Modern Slavery Act for Fiscal Year 2024

1. Introduction

Santen ("Company") is committed to respecting internationally recognized human rights, including the prevention of slavery and human trafficking, across our business operations and supply chain. This statement is made in accordance with Section 54 of the United Kingdom Modern Slavery Act 2015 covering the period of April 1, 2024, to March 31, 2025.

2. Supply Chain

The Company is headquartered in Japan and operates in more than 60 countries and regions, employing 3,849 people as of March 2025. Overseas sales account for 44.4% of total sales.

We have built a three- base manufacturing system, consisting of Noto, Shiga (Japan) and Suzhou (China).

Our geographical distribution of primary suppliers crosses four regions: Japan (52.5%), China (14.4%), EMEA (16.5%) and North America (16.5%).

3. Policies on Preventing Modern Slavery and Human Trafficking

[Santen Code of Practice](#)

The Company established the Santen Corporate Code of Practice as a code of conduct built on Santen's Core Principle of "*Tenki ni sanyo suru.*" The Code of Conduct requires all corporate executives and employees, including contract and temporary staff, to understand the spirit behind Santen's Core Principle and to act with the highest ethical standards as befitting a Santen employee.

[Santen Group Human Rights Policy](#)

The Company is committed to respecting and protecting human rights through our business activities, performing these activities in a stable manner. Santen established the Santen Group Human Rights Policy to promote and develop respect for human rights globally.

We engage in continuous and effective activities supporting international norms, including the Universal Declaration of Human Rights; International Covenant on Civil and Political Rights; International Covenant on Economic, Social and Cultural Rights; International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work; United Nations Global Compact; United Nations Guiding Principles on Business and Human Rights; and the Declaration of Helsinki, which is a set of ethical principles for medical research involving human subjects.

[Sustainable Procurement Policy and Guidelines](#)

The Company established the Sustainable Procurement Policy in our pursuit of sustainable procurement. Sustainable procurement allows us to contribute to the development of a sustainable society by fulfilling our social responsibilities in cooperation with our business partners.

4. Steps to Prevent Modern Slavery and Human Trafficking

Supplier Assessments

We conduct supplier assessments to identify potential human rights risks and other risks in our supply chain. During assessments, we show suppliers the Santen Group Sustainable Procurement Policy and Guidelines. We request that suppliers complete the Guidelines Compliance Questionnaire to confirm their efforts to follow the guidelines. This ESG survey is an official process that all suppliers must perform at the beginning of their contracts with Santen and in a three-year cycle thereafter.

Speak-Up Program

We established an independent reporting hotline and web portal called *Speak Up*. This hotline allows employees or third-parties to raise good-faith concerns about human rights or other issues online or by phone globally, twenty-four hours a day, seven days a week. The service, available in multiple local languages, allows for anonymous reports where permissible by local laws and regulations.

During fiscal year 2024, we received 54 consultations and reports, including 32 reports of discrimination or harassment. We received zero reports of human trafficking or forced labor. Of those cases reported, any found to be in violation of compliance were handled appropriately through disciplinary action.

5. Training and Education

With the globalization of our business, the Santen family of employees has become much more diverse. We believe all employees must respect human rights and act in accordance with a highest ethical standard. We provide enhanced training programs and other measures to raise employee awareness of the need to respect human rights.

We conducted human rights training on harassment-related topics in Japan with a participation of 95.7%.

This statement was approved by our board of directors on May 20th, 2025.

20 May, 2025

Takeshi Ito

President & CEO

Santen Pharmaceutical Co., Ltd.