

Human Rights Policy

Eisai Co., Ltd. and its subsidiaries and affiliates (“Eisai Network Companies” or “ENW”) endeavor to become *human health care (hhe)* companies in line with our Corporate Concept which is to give first thought to patients and the people in the daily living domain, and to increase the benefits that health care provides to them. Complementing our Charter of Business Conduct, which sets forth norms for business activities to fulfill our Corporate Concept, this Human Rights Policy (“Policy”) specifically outlines ENW’s approach to implement our responsibility to respect human rights.

This Policy applies to all the executives and employees of ENW. Furthermore, we expect all business partners, including suppliers, to respect human rights in line with this Policy. The Chief HR Officer of Eisai Co., Ltd. has responsibility for the implementation and management of this Policy.

1. Our Commitment to Respect Human Rights

We are committed to respecting human rights as set out in the International Bill of Human Rights^{*1} and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work^{*2}. In addition, we are a signatory to the United Nations Global Compact and support its ten principles. We also support the United Nations Guiding Principles on Business and Human Rights^{*3} and act in line with them.

We do not tolerate child labor, forced labor, human trafficking, slavery nor any other acts that undermine the dignity or respect of an individual.

We observe local laws, rules and regulations in all countries and regions where we carry out business activities. Where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will seek ways to respect internationally recognized human rights to the greatest extent possible.

2. Our approach to Human Rights Due Diligence

In line with the United Nations Guiding Principles on Business and Human Rights, we conduct human rights due diligence, namely to identify adverse impacts on human rights with which we are involved, and work to prevent and mitigate such identified impacts. If adverse impacts are directly linked to our operations, products, or services through our business relationships, we will urge our business partners and other relevant parties to avoid infringing on human rights.

3. Respect for Human Rights Initiatives

We strive to respect the human rights of stakeholders related to our business activities by utilizing a framework for conducting human rights due diligence.

<For Patients and the People in the Daily Living Domain>

We carry out our activities with an awareness that every product ENW manufactures is directly linked to patients' lives. Based on Eisai's Quality Policy, we consistently strive for high quality through the implementation of robust management that oversees all processes, from research and development to production and distribution. Continually collecting and evaluating product safety information worldwide, we work to ensure that our products are used properly in countries around the world by providing the latest product information to healthcare professionals, patients and the people in the daily living domain in a timely manner.

We conduct clinical trials in compliance with the various relevant laws, rules and regulations of each country, as well as international standards. In accordance with Patient Centricity, we make sure to obtain voluntary informed consent from patients before conducting any trials. Furthermore, when outsourcing various tasks related to clinical trials, we evaluate the entrusted companies in advance according to ENW's policies and standards, and continually monitor their compliance.

We strictly manage and protect the personal information and privacy of patients, the people in the daily living domain and participants in clinical trials.

We also recognize that contributing to the health of patients in developing and emerging countries is an essential part of respecting their human rights, hence we will strive to continue to improve access to medicines in these countries.

<For Business Partners >

We strive to deepen our understanding of our supply chains, including our suppliers, distributors and others working on their behalf. We request all business partners to respect human rights and not to infringe them based on our "Code of Conduct for Business Partners".

<For Employees>

Through rules, programs and policies related to employees, we seek to create a workplace environment in which employees will find it rewarding to strive toward realizing our Corporate Concept. We expressly prohibit any kind of harassment and any form of discrimination. At the same time, we actively promote talent development, realization of

a comfortable working environment, embrace of diversity, respect for freedom of association and the right to collective bargaining, responsible labor practices including appropriate working time management, securing minimum wage, and managing occupational health and safety.

4. Stakeholder Engagement

We engage in ongoing dialogues with relevant stakeholders in the implementation of this Policy. We commit ourselves to engaging with internal and external stakeholders so as to understand and address the impact linked to our business activities from the perspectives of those affected, and to respond appropriately.

5. Education and Training

We provide ongoing education and training to ensure that each and every executive and employee gain a deeper understanding of international human rights principles and respond appropriately to various issues related to human rights.

6. Remedy

In addition to not infringing on human rights ourselves, we endeavor not to contribute to their infringement in our supply chain. We also effectively identify adverse impacts on human rights associated with our business activities through the establishment of grievance mechanisms. Where we identify that we have caused or contributed to adverse impacts, we will work to remedy the situation and prevent its recurrence through appropriate procedures.

7. Disclosure

We continue to report on the progress of ENW's initiatives for respecting human rights through our websites various reports.

*1 The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenants on Economic, Social and Cultural Rights. It is widely regarded as the fundamental human rights framework by the international community.

*2 The Declaration on Fundamental Principles and Rights at Work adopted by the ILO sets out the following four categories as the minimum labor standard to be observed: freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in

respect of employment and occupation.

*3 The United Nations Guiding Principles on Business and Human Rights, endorsed by the United Nations Human Rights Council in 2011, is the authoritative global standard for states and businesses to prevent and address the risk of adverse impact on human rights linked to business activity, which requires corporate responsibility for efforts on respect to human rights and access to relief regarding the issues.

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Teruyuki Masaka

Chief HR Officer
Eisai Co., Ltd.

