SHIONOGI GROUP MODERN SLAVERY STATEMENT

(Year ended March 2026)

1. Introduction

This statement has been published in response to Section 54 of the UK Modern Slavery Act 2015. It sets out the steps taken by SHIONOGI & CO., LTD. (hereinafter referred to as "the Company") and the SHIONOGI Group to prevent modern slavery and human trafficking in their business and supply chains during the fiscal year from April 1, 2025, to March 31, 2026 (FY2025).

2. Business and supply chains

Since its foundation in 1878, SHIONOGI Group has been committed to continuously creating innovative healthcare products and services to provide more comprehensive solutions to patients and society worldwide. SHIONOGI Group consists of the Company, 39 consolidated subsidiaries, 6 associated companies, and 2 joint ventures (as of March 31, 2026). SHIONOGI Group has a single business segment related to prescription drugs and operates in the research and development, procurement, manufacturing, and distribution of prescription drugs and related businesses. With a consolidated workforce of 6,223 employees (as of March 31, 2026), of which the majority is based in Japan, we are engaged in research, development, manufacturing, and distribution of pharmaceuticals, diagnostic reagents, and diagnostic instruments, centered on the ethical pharmaceuticals business.

More information on the Company and SHIONOGI Group is available on our website at:
https://www.shionogi.com/global/en/company.html

The Dutch subsidiary of Shionogi & Co., Ltd., Shionogi B.V., is responsible for the commercial operations for the U.K. and Europe. Shionogi B.V. has its registered office in the Netherlands (Herengracht 464, 1017CA, Amsterdam, the Netherlands), and a U.K. branch office in London, United Kingdom. It also has four subsidiary entities in other European countries: Shionogi SAS (France), Shionogi SrL (Italy), Shionogi GmbH (Germany), and Shionogi SLU (Spain).

With our core business in pharmaceuticals, SHIONOGI Group procures active pharmaceutical ingredients, intermediates, raw materials, packaging, and services globally, mainly through a network comprising the Company, its manufacturing group companies, and its overseas group companies. We also cooperate with a number of outsourcing partners in order to provide the best possible medicines needed to protect people's health at all times.

In FY2025, the Company acquired the pharmaceutical business of Japan Tobacco Inc., Torii Pharmaceutical Co., Ltd., and Akros Pharma Inc., and announced the acquisition of the edaravone

business from Tanabe Pharma Corporation. Through these business acquisitions, the scope of SHIONOGI Group's business activities and value chain has expanded. We are sequentially informing newly added organizations and business partners of the SHIONOGI Group Human Rights Policy and Codes of Conduct, obtaining their agreement, and taking steps to implement and embed human rights due diligence promptly and appropriately across the Group at a consistent standard.

SHIONOGI Group requires business partners across the supply chain, as well as the globally expanded value chain, to address human rights issues appropriately in accordance with the policies described below.

3. Policies on the Prevention of Modern Slavery and Human Trafficking

- **SHIONOGI Group Human Rights Policy**

Recognizing our responsibility to respect the human rights of all those affected by our business activities, we established the SHIONOGI Group Human Rights Policy in March 2021 based on the UN Guiding Principles on Business and Human Rights, and we are promoting respect for human rights.

The policy is available at:

https://www.shionogi.com/global/en/company/policies/shionogi-group-human-rights-policy.html

The policy covers all individuals and groups that may be affected by our business activities and business relationships. This commitment applies to all board members and employees of SHIONOGI Group, and we encourage all business partners involved in SHIONOGI Group's products and services to comply with this policy. The policy expresses our commitment to adhere to the principles set forth in the International Bill of Human Rights (specifically the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights), the ILO Declaration on Fundamental Principles and Rights at Work, international conventions concerning workers' rights, including wages and working hours and the United Nations Declaration on the Rights of Indigenous Peoples, and to respect the Ten Principles set forth in the United Nations Global Compact and the Ethical Principles for Medical Research Involving Human Subjects (Declaration of Helsinki). The Company has been a signatory to the United Nations Global Compact since August 2019.

The policy has received the approval of our Board of Directors and the signature of our Representative Director, President and CEO.

- **SHIONOGI Group Procurement Policy**

We conduct procurement activities based on the principles of honesty, accuracy, fairness, and transparency in order to maintain and promote people's health and comfortable lifestyles, and to realize a sustainable and healthy society. We support and respect international standards such as the Ten Principles of the United Nations Global Compact, PSCI (Pharmaceutical Supply Chain Initiative) Principles, ISO 26000 (Guidance on Social Responsibility), and ISO 20400 (Guidance on Sustainable Procurement) as our basic approach to procurement. We promote procurement that respects the human rights of all people in accordance with various international standards related to human rights, and takes into consideration working conditions and occupational safety and health.
https://www.shionogi.com/global/en/company/policies/shionogi-group-procurement-policy.html

- **SHIONOGI Group Anti-Corruption/Anti-Bribery Policy**

There is an established link between modern slavery and corruption activities. We have strict policies both at the SHIONOGI Group level and at the regional level to prevent corruption and bribery. This is a link to the Group's anti-corruption and anti-bribery policy:
https://www.shionogi.com/global/en/company/policies/shionogi-group-anti-corruption-anti-bribery-policy.html

Codes of Conduct

- **SHIONOGI Group Code of Conduct**

We have established the SHIONOGI Group Code of Conduct as a guide to act ethically and responsibly in the business activities of the SHIONOGI Group. Under this Code of Conduct, we oppose all forms of unlawful working conditions and inhumane labor practices, require all business partners to adopt the same stance, and do not tolerate forced labor, slavery, or human trafficking in our operations and supply chain.
Management leads by example in embodying the spirit of this Code of Conduct through concrete actions and ensures that all members of the SHIONOGI Group are fully informed of it. Additionally, the SHIONOGI Group also asks all business partners to endorse this Code of Conduct.
https://www.shionogi.com/global/en/company/business.html

- **SHIONOGI Group Business Partner Code of Conduct**

We have established the SHIONOGI Group Business Partner Code of Conduct and ask all business partners to comply with this Code of Conduct in order to contribute to the realization of a sustainable and healthier society across the entire value chain. This Code of Conduct has been formulated based on the UN Global Compact and the PSCI principles. It stipulates the elimination of modern slavery and child labor, non-discrimination, fair treatment, observance of fair wages and reasonable

working hours, and freedom of association under "2. Human Rights and Labor". If it emerges that any activity violating this Code of Conduct may have occurred, we will take prompt corrective action.

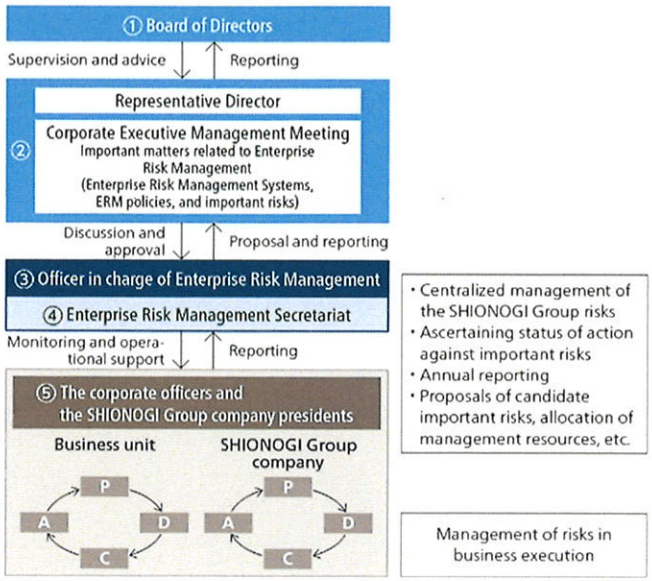
https://www.shionogi.com/global/en/company/policies/shionogi-group-business-partner-code-of-conduct.html

4. Governance structure for ensuring respect for human rights

At the Company, important management matters concerning sustainability (including human rights) are deliberated and decided by the Corporate Executive Management Meeting and the Board of Directors. Regarding human rights, under the responsibility of the Executive Officer, the Corporate Governance Department collaborates with each part of the organization to promote company-wide activities aimed at advancing initiatives and strengthening structures to respect human rights. Furthermore, after setting indicators for each materiality item, the progress of initiatives measured against each indicator is reported to the Corporate Executive Management Meeting and the Board of Directors, where feedback and advice are received and reflected in our activities.

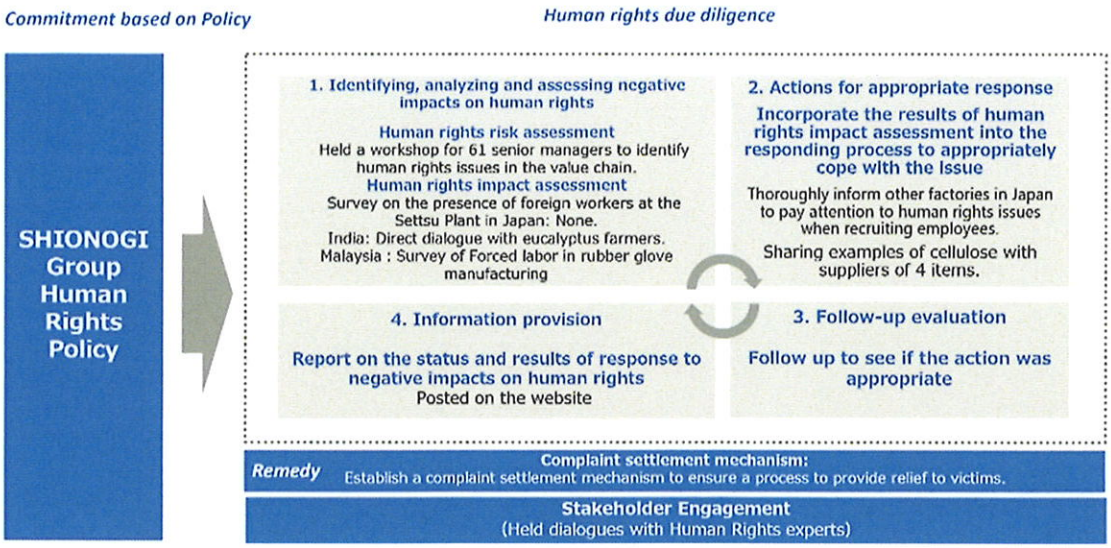
In addition, in accordance with the SHIONOGI Group Risk Management Policy, we conduct appropriate management, including the pursuit of business opportunities and the avoidance or mitigation of risks. We also position Enterprise Risk Management (ERM)—which oversees business risks for the entire group, including human rights risks and crisis management such as pandemics, natural disasters, terrorism, and cyberattacks—as an important mechanism for management strategy and management infrastructure.

SHIONOGI Group Risk Management Structure



5. Due diligence process

In accordance with processes detailed in the UN Guiding Principles on Business and Human Rights, we have established the following mechanism for human rights due diligence.



SHIONOGI Group Due Diligence Process

6. Human Rights Impact Assessment

In FY2020, we conducted a human rights risk assessment across all businesses of SHIONOGI Group, identifying areas in which human rights risks required more detailed assessment.

(1) Human Rights Risk Assessment

In FY2020, with the support of a third-party organization that specializes in ethical business practices, Caux Round Table Japan (CRT Japan), we identified potential human rights risks that SHIONOGI Group's business activities might have.

After researching human rights issues and industry-specific risks through desktop research and engagement with experts, we held a workshop on November 4, 2020. 61 senior managers discussed potential human rights risks and the status of measures taken to address those risks in our value chain, and the identified risks were categorized by rights-holder group and stage of the value chain. We also held workshops and interviews on November 26 and December 21, 2020, on specific human rights risks with personnel from relevant departments and shared examples of initiatives and opinions on potential human rights risks. Based on the results of these risk assessments, we identified areas requiring a more detailed understanding of human rights risks.

(2) Human rights themes for more precise risk identification

We have an important responsibility to ensure a stable supply of products and services, maintain their safety and quality, and respect and give due consideration to the human rights of patients, healthcare professionals, and Group employees. We have already established a dedicated organization within the Group to address these issues, and we are responding to risks based on an appropriate management cycle. We will continue to focus our efforts on these issues, and we recognize the following two areas of supply chain activity as especially important areas of potential concern for any pharmaceutical company:

(i) Working conditions for foreign workers

(ii) Working conditions in regions where raw materials and other materials are produced

(i) Working conditions of foreign workers

The SHIONOGI Group confirmed through questionnaire surveys of contractors and service providers operating within the SHIONOGI Group and at the Company's factories, as well as major suppliers of COVID-19 treatments and preventive vaccines, that no technical intern trainees had been employed through FY2023. From FY2024 onward, we have not conducted questionnaire surveys because ongoing communication with the surveyed suppliers indicated no significant changes in their business circumstances and revealed no information suggesting human rights risks. In FY2025, after confirming that foreign workers were working for contractors operating at the Company's business sites, we conducted reviews with these contractors regarding employment types, communication support systems, and the status of management training. As a result, no significant human rights concerns were identified at this time. We will continue to maintain ongoing communication with contractors and promote efforts to respect the human rights of all workers, including foreign workers, utilizing insights from external experts as necessary.

Investigation into foreign technical intern trainee acceptance among our factory's on-site and external contractors.

Company	FY2021	FY2022	FY2023
Cleaning company A	None	None	None
Cleaning company B	None	None	None
Cleaning company C	None	None	None
Security company D	None	None	None
Cafeteria E	None	None	None
Greenery company F	None	None	None
Laundry company G	None	None	None
Laundry company H	None	None	None
Laundry company I	None	None	None
Logistics company J	None	None	None

Survey of the acceptance of foreign technical intern trainees by companies involved in COVID-19-related businesses.

Company	FY2021	FY2022	FY2023
Company involved in COVID-19 treatment	None	None	None
Vaccine company	None	None	None

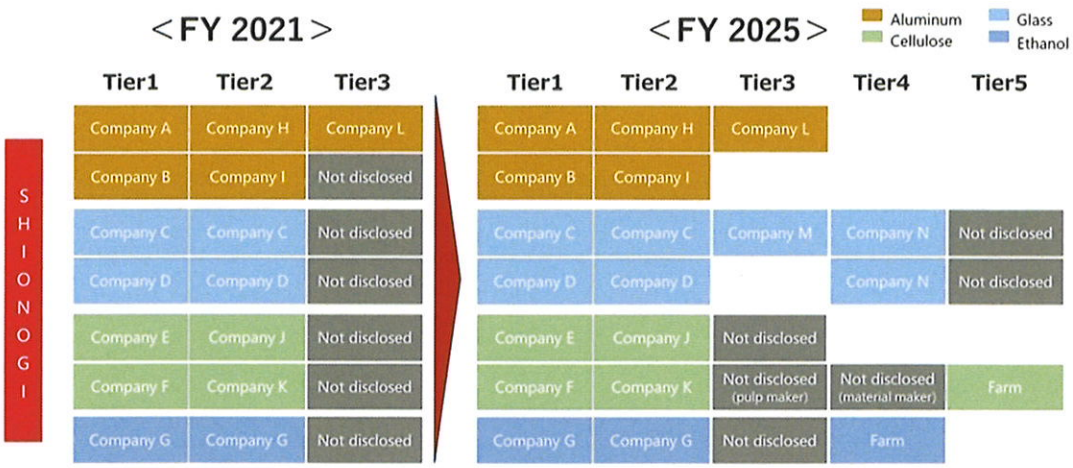
We will continue to monitor supplier trends through communication with our business partners, and if human rights issues are identified, we will consult with CRT Japan and take appropriate action in cooperation with suppliers based on the insights gained.

(ii) Working conditions in regions where raw materials and other materials are produced

Based on the PSCI assessment report, *Material-specific Human Rights & Environmental Impact Assessment*, and research conducted by CRT Japan, we designated aluminum, glass, cellulose, and ethanol as SHIONOGI Group Priority Materials based on the significance of their impact on the Group's business and the level of potential risk recognized by society. We continue to conduct human rights impact assessments of these materials.

In FY2025, we continued discussions with suppliers regarding these four Priority Materials and confirmed the situation, including the occurrence of human rights issues in the manufacturing regions of raw materials. As a result, all suppliers responded that they were not aware of any human

rights issues. Additionally, some suppliers have begun to actively engage in communication with our company. Such ongoing efforts not only deepen suppliers' understanding but also contribute to further strengthening cooperative relationships and improving visibility into upstream suppliers that had previously been difficult to identify. Going forward, we will continue to work closely with suppliers through detailed communication to secure their cooperation in our human rights initiatives.



With regard to cellulose, one of the four Priority Materials, we began our assessment in FY2021, focusing on eucalyptus, which is one of the raw materials used to produce cellulose. We conducted an online dialogue with eucalyptus producers in India as rights holders and confirmed that there were no salient human rights risks, such as forced labor or child labor. The dialogue also identified several issues, including the relatively strong bargaining position of brokers purchasing timber, which leaves producers with limited scope to negotiate prices; the significant environmental impact on local communities and the production of other crops arising from the decline in groundwater levels caused by eucalyptus trees' high water consumption; and the possibility of a future decline in eucalyptus production due to its environmental impact and low profitability.

We will continue to assess human rights risks in the supply chains of products required for our business, including SHIONOGI Group Priority Materials, and maintain a management system that allows us to take prompt corrective action when issues arise.
More information on our human rights due diligence initiatives is available on our website at:
https://www.shionogi.com/global/en/sustainability/society/respect-human-rights.html

7. Procurement initiatives

We continue to obtain suppliers' agreement to comply with the SHIONOGI Group Business Partner Code of Conduct from all suppliers involved in our business.

In addition, we regularly conduct written and on-site audits of suppliers of critical pharmaceutical raw materials and other key materials using the Self-Assessment Questionnaire (SAQ) provided by the PSCI to assess risks in each category, including modern slavery and human trafficking.

In FY2025, we completed on-site audits of 7 companies and desk-based audits of 54 companies. As a result of the audits, there were no major human rights-related findings; however, should any findings arise in the future, we will promptly implement improvement activities.

Supplier management levels and auditing items are available on our website at:
https://www.shionogi.com/global/en/sustainability/society/supply-chain-management.html

In addition, since FY2019, we have used EcoVadis, a rating platform that objectively and fairly evaluates corporate social responsibility and sustainable procurement, to progressively assess our business partners in order of priority. In FY2025, we completed evaluations of 14 companies, bringing the cumulative total since the introduction of EcoVadis to 164 companies. As a result of the EcoVadis assessments, 11 suppliers fell below the benchmark in the "Labor and Human Rights" category. We engaged with each company, and three of them improved their "Labor and Human Rights" scores. For suppliers that had not undergone an EcoVadis assessment for various reasons, we actively provided opportunities to explain the benefits of undergoing an EcoVadis assessment and encouraged them to do so. For suppliers that did not agree to undergo an EcoVadis assessment even after these discussions, we continued to explore the development of our own SAQ in order to assess risks, including human rights risks, across as many suppliers as possible.

Following the acquisition of the pharmaceutical business of Japan Tobacco Inc., Torii Pharmaceutical Co., Ltd., and Akros Pharma Inc., as well as the announcement of the acquisition of the edaravone business, if we enter into business relationships with new suppliers, the SHIONOGI Group will seek their agreement to comply with the aforementioned Code of Conduct and assess human rights risks, including those related to modern slavery and human trafficking.

Through the above measures, we manage important suppliers.

8. Engagement with external stakeholders

The Company participates in the Stakeholder Engagement Program organized by Nippon CSR Consortium[1], with CRT Japan serving as the secretariat, to discuss human rights issues in the

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[1] The Nippon CSR Consortium is a prominent multi-stakeholder platform in Japan established to help corporations understand, assess, and integrate human rights due diligence into their business activities.

pharmaceutical industry. In FY2025, we participated in the program from June to July. This initiative brings together participants from different backgrounds, including companies, NGOs/NPOs, and academic experts, to exchange views on promoting human rights due diligence initiatives. Following input from NGOs/NPOs and experts on relevant human rights issues, participating companies held discussions to identify key human rights issues in the pharmaceutical industry, referring to the Human Rights Guidance Tool developed by the United Nations Environment Programme Finance Initiative (UNEP FI). We use the outcomes of these discussions to inform and advance our human rights initiatives.

By continuing to participate in the Stakeholder Engagement Program, we will promote systematic human rights initiatives in accordance with the UN Guiding Principles on Business and Human Rights while utilizing views from stakeholders.

9. Assessing Effectiveness

To ensure that slavery and human trafficking are not taking place in the SHIONOGI Group's business or supply chains, we continue to: (i) conduct periodic human rights due diligence assessments; (ii) review the results of supplier assessments; and (iii) monitor the number and content of reports concerning modern slavery or human trafficking received from employees, business partners, or other parties through our reporting procedures. We evaluate the effectiveness of these initiatives while also incorporating an independent third-party perspective.

In addition, CRT Japan, an expert in business and human rights, positively assessed our human rights risk assessment, including the workshops involving management and employees and the collection of reliable first-hand information through direct communication with eucalyptus producers. Furthermore, we received advice on points to consider when developing future human rights activities. Incorporating these recommendations into our Plan-Do-Check-Act (PDCA) cycle, we will continue to promote our initiatives for FY2026 and strengthen their effectiveness.

10. Grievance mechanism

SHIONOGI Group has established an online contact point for all workers engaged in work for the SHIONOGI Group, including workers employed by business partners, to report compliance concerns in Japanese or English. We protect the privacy of reporting parties and other persons concerned and ensure that they are not subjected to retaliation or other disadvantageous treatment.

In addition, we maintain a system to promptly investigate the facts and circumstances of any reported concern and implement appropriate corrective and remedial measures if human rights violations are recognized. In FY2025, no human rights-related reports or consultations were submitted through this contact point.

Details of this contact point are available on our website at:

https://fofa.jp/song/a.p/115/

In Europe and the U.K., we also operate a "Speak Up" process run through an independent company, ensuring accessibility for reporting parties by enabling anonymous reporting and multi-language support. In FY2025, no reports concerning modern slavery or human rights issues were received.

11. Education and Training on Modern Slavery and Human Trafficking

We regularly provide training to raise awareness of human rights risks, including modern slavery and human trafficking, so that every SHIONOGI Group employee considers and respects human rights in their day-to-day work.

In May 2025, we conducted lectures and workshops for senior management (department heads and above) aimed at further improving their understanding of the UN Guiding Principles on Business and Human Rights, which form the basis of the SHIONOGI Group's commitment to respecting human rights, and the human rights due diligence required of companies. Active discussions took place regarding potential human rights issues across the SHIONOGI Group's business. These discussions provided a solid foundation for senior management to re-examine and discuss the relationship between their own organization's operations and human rights in preparation for the second human rights risk assessment planned for FY2026.

Additionally, following the acquisition of the pharmaceutical business of Japan Tobacco Inc., Torii Pharmaceutical Co., Ltd., and Akros Pharma Inc., as well as the announcement of the acquisition of the edaravone business, we conducted an e-learning program in March 2026 for employees in Japan who had newly joined the SHIONOGI Group, focusing on "SHIONOGI Group's Human Rights Initiatives." The participation rate was 97.2% (1,501 out of 1,544 employees). In the post-program survey, positive responses exceeded 80% for nearly all items.

Through such education, employees are deepening their understanding of how human rights relate to their own work, their organization's operations, and the supply chain.

12. Future Initiatives

In accordance with the UN Guiding Principles on Business and Human Rights, we are committed to ensuring that our operations and supply chains do not cause or contribute to human rights violations. Specifically, we will focus on the following:

(1) Conducting the Second Human Rights Risk Assessment

Since the initial human rights risk assessment conducted in FY2020, our business environment has changed significantly, including the development of human rights due diligence legislation in the EU, rapid advancements in AI and digital technology, and rising geopolitical risks. Furthermore, following the acquisition of the pharmaceutical business of Japan Tobacco Inc., Torii

Pharmaceutical Co., Ltd., and Akros Pharma Inc., as well as the acquisition of the edaravone business, the scope of the SHIONOGI Group's business activities and value chain has expanded. To re-evaluate human rights risks based on these changes, we will conduct our second human rights risk assessment in FY2026. In this assessment, we will identify human rights issues across the entire value chain through workshops with relevant departments, conduct a human rights impact assessment based on the results, and consider response measures. Additionally, we will disclose the assessment results in an appropriate manner and use the findings to continuously improve our human rights due diligence process.

(2) Implementation of human rights education for board members

Based on the results of the human rights risk assessment described in item (1) above, we will provide training to members of the Board of Directors, in their oversight role, to deepen their understanding of the latest human rights risks identified by the executive team. By ensuring that both the executive team and the Board of Directors share a common understanding of human rights risks, we will further strengthen our structure to appropriately address human rights risks in our business activities.

This statement is made on behalf of SHIONOGI & CO., LTD. and the SHIONOGI Group companies, including Shionogi B.V. It was approved by the Board of Directors of SHIONOGI & CO., LTD. on September 28, 2026, and signed by the Representative Director, President and CEO.

September 30, 2026

SHIONOGI & CO., LTD.
Representative Director, President and CEO