

Meiji Group Modern Slavery Act Transparency Statement (Consolidated Fiscal Year 2023)

This Statement sets out:

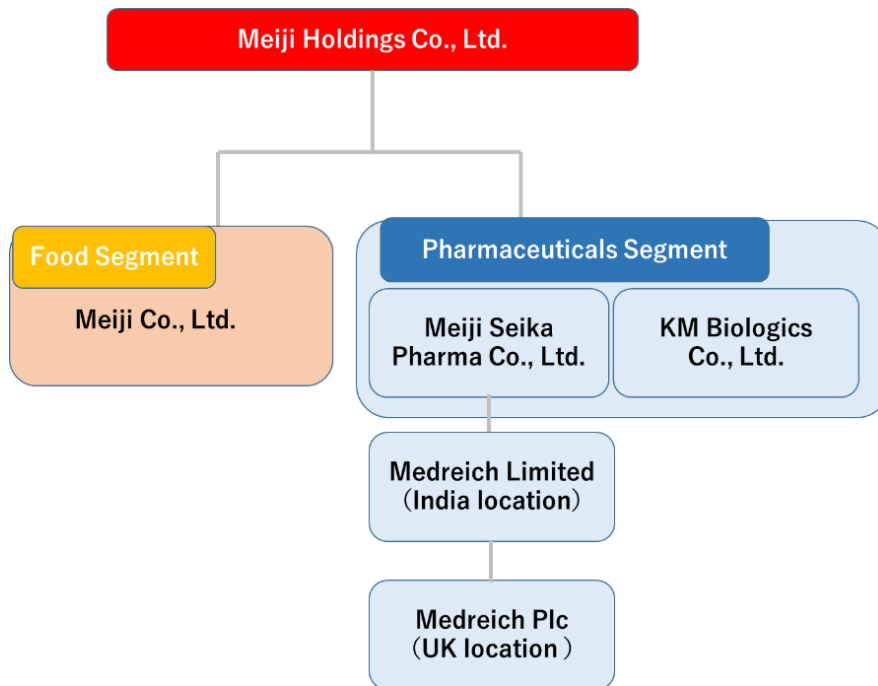
- (i) The steps Meiji Holdings Co., Ltd. (“Meiji HD”) has taken during the consolidated fiscal year 2023 (April 1, 2023 to March 31, 2024) to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any part of its own business. This statement constitutes its voluntary modern slavery act transparency statement for the fiscal year relating to section 54(1) of the UK Modern Slavery Act 2015 (the “Act”);
- (ii) The steps Medreich Limited has taken during the fiscal year 2023 (April 1, 2023 to March 31, 2024) to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any part of its own business. This statement constitutes its modern slavery act transparency statement for the fiscal year made pursuant to section 54(1) of the Act: and
- (iii) The steps Medreich Plc has taken during the fiscal year 2023 (April 1, 2023 to March 31, 2024) to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any part of its own business. This statement constitutes its modern slavery act transparency statement for the fiscal year made pursuant to section 54(1) of the Act.

1. Business Structure

We, at the Meiji Group, eager to be a corporate group that widens the world of *Tastiness and Enjoyment*, meets consumers’ expectations regarding *Health and Reassurance* and makes a positive contribution to the lives of people around the world by offering products and services in a wide range of fields to every generation from infants to seniors. Based in Japan, the Meiji Group also conducts its business in the U.S., Europe, Asia and Oceania, and employs more than 17,000 persons around the world. One of the Group companies, Medreich Plc runs our pharmaceuticals sales business in the United Kingdom.

The Meiji Group Profile : <https://www.meiji.com/global/about-us/corporate-profile/>

The Meiji Group conducts its business mainly in the fields of food and pharmaceuticals in approximately 200 countries and regions around the world. In the food business, Meiji Co., Ltd. (“Meiji”), one of the subsidiaries of Meiji HD, manufactures and sells milk and dairy products, processed foods, confectioneries, nutritional products and more. In the pharmaceuticals business, Meiji HD’s two subsidiaries, Meiji Seika Pharma Co., Ltd. (“Meiji Seika Pharma”) and KM Biologics Co., Ltd. (“KM Bio”) lead the business. Meiji Seika Pharma manufactures and sells ethical pharmaceuticals, human vaccines. It has five Group companies and a production plant in Japan and in addition 15 Group companies overseas including in China, Indonesia, Thailand, India, and Spain.



Medreich Limited, based in Bengaluru, India, is a fully integrated pharmaceutical company with an established presence across the globe. Medreich Limited is involved in the Contract Manufacturing Organization (CMO) and Contract Development Manufacturing Organization (CDMO) business of pharmaceutical preparations in various dosage forms catering to diverse therapeutic categories. Medreich Limited manufactures such products for multinational companies (MNC) and various customers across approximately 60 countries in key markets of India, United Kingdom, Europe, Australia & New Zealand, Canada, Japan, Far East Asia, GCC, Africa, LATAM, and CIS. Medreich Limited has more than 2,600 employees (direct and indirect) distributed across five manufacturing sites in India and its corporate head office.

Medreich Limited Website : <https://www.medreich.com/>

Medreich Plc, our wholly-owned subsidiary, is a pharmaceutical company engaged in the distribution and sale in the United Kingdom and the European Union of Pharmaceutical products. Medreich Plc currently has 32 employees based in the United Kingdom, and reports to Medreich Limited.

Medreich Group employs more than 3,600 people (direct and indirect) at its entities in the United Kingdom, India, Australia, Hong Kong, and New Zealand. Medreich Group pays wages higher than minimum wage and its employment is in accordance with regulations of the nations and municipalities in which it operates to ensure employees are able to work in a safe environment.

2. Person Responsible for Enacting Measures

In the Meiji Group, the Chief Sustainability Officer (“CSO”) at Meiji HD is responsible, under instructions by the President & the Chief Executive Officer (“CEO”) at Meiji HD, for enacting Meiji Group measures against slave labor and human trafficking.

3. Supplier Overview

The Meiji Group has procurement or contract manufacturing agreements with approximately 3,100 suppliers globally, to procure raw materials, packaging materials, and semi-finished and finished food and pharmaceutical products.

In the fiscal year 2020, the Meiji Group established the Meiji Group Supplier Code of Conduct to ensure that we work together with suppliers, to fulfill our social responsibility, including the prohibition of slave labor and human trafficking pursuant to the Meiji Group Procurement Policy. However, in light of the diversification of social issues since that time, as well as the need for a more multifaceted response, we revised the Supplier Code of Conduct in April 2023.

4. Relevant Charters, Regulations, and Policies

The Meiji Holdings' Board of Directors or Executive Committee deliberates and decides on the following charters, regulations, and policies to ensure that the Meiji Group prevents slave labor and human trafficking in its operations and along its supply chain.

(i) Corporate Behavior Charter

This Charter, in which we recognize the gravity of our responsibilities, prescribes the conduct that each person working at the Meiji Group, as someone concerned with the business of food and health, is to practice for ensuring the continual fulfillment of our obligations to society.

(ii) Meiji Group Code of Conduct

This Code concretely outlines the values, approach, and behavior standards applied to the implementation of the Meiji Group Corporate Behavior Charter, and clarifies the conduct expected of each officer and employee associated with the Meiji Group.

(iii) Meiji Group Policy on Human Rights

This Policy, based on the concept of respect for human rights as outlined in the Meiji Group Corporate Behavior Charter, prescribes that we constantly recognize that all persons are free by nature and equal in terms of dignity and rights and that we conduct our business activities fairly and sincerely.

(iv) Meiji Group Procurement Policy

This Policy prescribes that we will support the NDPE commitment (No Deforestation, No Peat and No Exploitation), and that we constantly remain alert to comply with the law, practice fair trade and transparency, and prevent corruption. Together with our Suppliers, we engage in procurement activities that are mindful of our social responsibilities, including protecting human rights and the environment, and being conscious of animal welfare.

(v) Meiji Group Supplier Code of Conduct

This Code of Conduct provides for initiatives expected of suppliers, including conduct related to human rights and labor, safe and healthy work environments, and the establishment of a grievance system and prohibition of retaliation.

Corporate Behavior Charter, Meiji Group Code of Conduct :

<https://www.meiji.com/global/about-meiji/philosophy.html>

The Meiji Group Policies :

<https://www.meiji.com/global/sustainability/policies/>

5. Operating System and Permeation of Relevant Policies

Meiji HD has established Group Sustainability Committee, which answers to the Executive Committee at Meiji HD, as the committee supervising the Meiji Group's sustainability actions as a whole including the protection of human rights.

The Meiji Group has established the Group Human Rights Conference to enable the Meiji Group to respond concretely to the wide range of human rights issues. Participants include Meiji HD Sustainability Management Department (the department supervising the sustainability activities), other related departments and external experts. At this conference, we identify salient human rights issues, formulate policies for addressing important issues, and examine and confirm the progress of specific measures, to ensure that we address various human rights issues in Japan and abroad in an appropriate manner.

The Meiji Group publicly discloses the Meiji Group Policy on Human Rights on our website. We continually train our executive officers and employees on the subject of human rights to ensure that our policies, etc., become firmly embedded in our business activities and are implemented effectively. We also notify our Suppliers of requirements as appropriate.

The Meiji Group has established a whistle-blower system, accepting reports and consultations through a variety of methods, including telephones, postal mails and e-mails. Internal rules stipulate that the privacy of reporting or consulting persons must be protected and that they must not be punished due to use of the whistle-blower system. Medreich Limited and Medreich Plc have also established similar whistle-blower systems.

6. Human Rights Risk Assessments

The Meiji Group works to catch potential and manifested human rights issues in each value chain with reference to the advice of external experts and to survey reports and relevant guidelines from various national governments and Non-Governmental Organizations (NGOs). To identify human rights risks, we assess individual risks by the gravity of its impact on human rights and the possibility of each risk to occur.

To prevent or mitigate identified risks, we engage in relevant initiatives and, if a negative impact on human rights is discovered, we take appropriate measures towards corrective action, relief, and reoccurrence prevention.

7. Salient Human Rights Issues

In the consolidated fiscal year 2022, we reviewed and updated salient human rights issues as follows, based on the progress of our efforts to date and social trends.

- Discrimination and Harassment
- Gender equality
- Child labor
- Slave (forced) labor and human trafficking

- Violation of freedom of association and collective bargaining rights
- Unfair labor conditions and wages
- Occupational safety and health
- Working hours
- Violation of foreign workers' rights
- Negative impacts on healthy lifestyles and access to water for local people
- Negative impacts on children because of marketing
- Negative impacts on customers' health
- Access to information
- Privacy protection

8. Human Rights Due Diligence

In the consolidated fiscal year 2023, given the salient human rights issues as described in Section 7 above, we have taken actions as specified below. In addition, as a member of the Consumer Goods Forum ("CGF"), the Meiji Group works with reference to industry best practices, such as in the areas of human rights due diligence and sustainable palm oil procurement.

(1) Sustainable Procurement Questionnaire for Major Suppliers

We began asking suppliers to fill out a Meiji Group sustainable procurement questionnaire beginning in the fiscal year 2020. The questionnaire utilizes the EcoVadis evaluation system, as well as original questions by the Meiji Group. By conducting this questionnaire, we will become aware of any human rights or environment-related issues present in the supply chain. If any issues are discovered, the Meiji Group strives to remedy the issue(s) in question in collaboration with the suppliers. During the consolidated fiscal year 2023, we conducted sustainable procurement questionnaires with 82 domestic and overseas suppliers and initiated engagement (dialogue) with 20 suppliers in Japan.

(2) Sustainable Procurement Questionnaire for Meiji Group Companies in Japan and Overseas

In the fiscal year 2021, domestic and overseas Meiji Group companies began conducting sustainability evaluations using EcoVadis and our Meiji Group original questionnaire. Based on these evaluation results, we confirmed each company's initiatives related to human rights and labor management. In the fiscal year 2023, 13 domestic and overseas Meiji Group companies conducted sustainability evaluations using EcoVadis.

(3) Initiatives in Procuring Major Raw Materials

We seek to identify and resolve social issues, including human rights issues, in the procurement of the following five raw materials.

A) Raw Milk

The Meiji Group conducts our own unique dairy farmer management support activities that we call Meiji Dairy Advisory (MDA). This program supports sustainable dairy farm management and creates environments in which every person works fairly and derives satisfaction from their work.

Also, in the consolidated fiscal year 2023, the Group examined employment conditions for foreign workers by surveying 37 dairy farmers receiving support via the MDA to ascertain the status of labor environments for foreign workers at dairy farms. The results of these surveys showed that roughly 80% of dairy farmers employed foreign laborers, and that initiatives were being implemented, including providing guidance related to labor management and occupational safety and health. The Meiji Group collaborates with

domestic industry associations and other dairy industry manufacturers to promote industry-wide initiatives related to contributing to the SDGs and human rights accountability, including holding conferences based on themes related to human rights issues in the dairy industry.

B) Cocoa

In 2006, the Meiji Group began Meiji Cocoa Support, a unique support program for cocoa farmers. We aim to achieve 100% procurement of Meiji Sustainable Cocoa Beans by the fiscal year 2026. Meiji Sustainable Cocoa Beans are cocoa beans produced in regions where we provide farmer support through this program, and in the consolidated fiscal year 2023, we procured 62% of our beans through this program. In Ghana, the risk of child labor is high. Here, we introduced the Child Labor Monitoring and Remediation System (CLMRS), which is a child labor monitoring and remediation system developed by the International Cocoa Initiative, a non-profit organization that aims to eliminate child labor and forced labor in cocoa-producing regions. Surveys for October 2022 through September 2023 indicated that the Republic of Ghana had a CLMRS adoption rate of 48%, with 5,460 farmers having adopted the system. The number of children identified as child laborers was 650, of which corrective action had been taken for all the children.

C) Palm Oil

The Meiji Group supports the No Deforestation, No Peat, and No Exploitation (NDPE) Policy to address social issues such as deforestation, peatland destruction, and forced labor in palm production areas. In 2016, we joined the Roundtable for Sustainable Palm Oil (RSPO). By October 2022, all Meiji Group plants involved in palm oil procurement (18 domestic and five overseas plants) obtained RSPO supply chain certification. As a result, of these efforts, the Meiji Group reached a 100% rate of certified palm oil procurement, which includes requirements related to human rights accountability, in the consolidated fiscal year 2023.

D) Paper

The Meiji Group is expanding its use of environmentally friendly paper for materials used in product containers and packaging as well as various printed matter. This includes the use of forest-certified paper (FSC, PEFC), which have requirements for human rights accountability, and recycled paper. By the end of the consolidated fiscal year 2023, we completed the switch to environmentally friendly paper for all containers and packaging for the entire Group. We will continue to promote the switch to environmentally friendly paper for printed matter as well.

E) Soybeans

Through research of soybean procurement volumes and supplier procurement areas, the Meiji Group identified social issues that include deforestation and forced labor in soybean production areas.

(4) Initiatives for Improving Labor Environments for Foreign Workers

In the fiscal year 2022, the Meiji Group established the Meiji Group Guidelines for Employment of Foreign Workers to promote initiatives aimed at improving labor environments for foreign workers at domestic production sites. In the consolidated fiscal year 2023, we confirmed whether or not operations were being conducted in accordance with these Guidelines by visiting five Group business sites to check on-site conditions and

exchange opinions with site supervisors. For matters requiring further correction, we requested that the sites implement responses towards making future improvements. In June 2023, we established a multilingual complaint processing desk for foreign workers as part of efforts to create an environment in which foreign employees can work with peace of mind.

9. Human Rights Training System

The Meiji Group is endeavoring, based on the Meiji Group Policy on Human Rights, to raise awareness about respecting basic human rights; prohibiting discrimination, harassment, forced labor, and child labor; considering safety and health; respecting the basic rights of employees; and the like.

<Human Rights Education Targets and Results>

Targets	Consolidated fiscal year 2023 results
Human rights education (including e-learning) is provided to all Group employees in Japan at least once a year	Implemented one time (Enrolled participants: approximately 13,000, participation rate: 93%)
Human rights education (including e-learning) is provided to all overseas Group employees at least once by the fiscal year 2023	Implemented in four overseas group companies (Enrolled participants: approximately 1,200, participation rate: 99%)

This Statement was approved by the Board of Directors of Meiji HD on August 9, 2024 and by the Board of Directors of Medreich Limited on August 8, 2024 and by the Board of Directors of Medreich Plc on August 8, 2024. This Statement is signed by duly authorized Representative of each company.

August 9, 2024

Kazuo Kawamura
CEO, President and Representative Director
Meiji Holdings Co., Ltd.

Pankaj Garg
Managing Director
Medreich Limited

Pankaj Garg
Director
Medreich Plc