

## Meiji Group Modern Slavery Act Transparency Statement (Consolidated Fiscal Year 2024)

This Statement sets out:

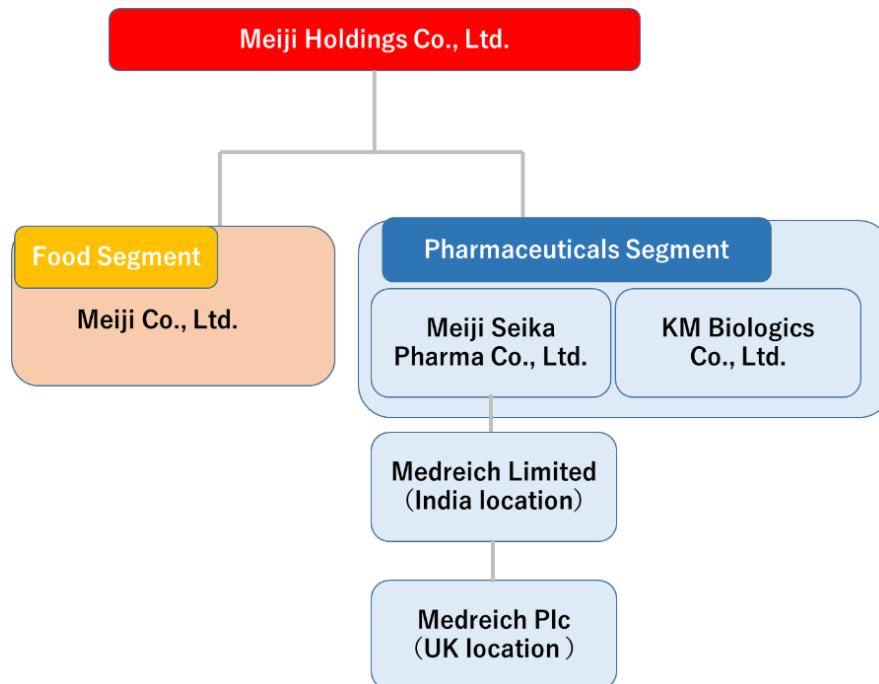
- (i) The steps Meiji Holdings Co., Ltd. (“Meiji HD”) has taken during the consolidated fiscal year 2024 (April 1,2024 to March 31,2025) to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any part of its own business. This statement constitutes its voluntary 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 2024 (April 1,2024 to March 31,2025) 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 2024 (April 1,2024 to March 31,2025) 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 16 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 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 3200 employees (direct and indirect) distributed across six manufacturing sites in India as Medreich Group and in 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 30 employees based in the United Kingdom, and reports to Medreich Limited .

Medreich Group employs more than 3,200 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 wages prescribed as per the applicable labor laws and its employment is in accordance with laws and 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 agreements or manufacturing license agreements with approximately 2,700 suppliers globally, to procure raw materials, packaging materials, and semi-finished and finished food and pharmaceutical products.

The Meiji Group established the Meiji Group Supplier Code of Conduct in accordance with the Meiji Group Procurement Policy to ensure that our Group and our suppliers fulfill our social responsibilities, including the prohibition of slave labor and human trafficking. Last fiscal year, we worked to promote awareness and understanding by providing explanations concerning this Supplier Code of Conduct to the suppliers in Japan and obtain statements of acknowledgement from said suppliers. From fiscal year 2025, we began conducting similar activities for the suppliers in other countries.

### 4. Relevant Charters, Regulations, and Policies

The Board of Directors and/or the Executive Committee of Meiji HD 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 which are necessary for the implementation of the Meiji Group Corporate Behavior Charter, and makes it clear the conducts requested to each officer and employee associated with the Meiji Group. In the consolidated fiscal year 2024, we implemented revisions aimed at promoting respect for all differences, including gender identity and other diverse backgrounds, values, knowledge, and abilities.

(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, fairness and transparency, and to 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.

Previously, we applied a general policy on raw material procurement and outlined individual procurement guidelines for each raw material. In the consolidated fiscal year 2024, we consolidated the existing policy and guidelines into a Procurement Policy that, similar to other global enterprises, encompasses the social issues associated with each raw material.

(v) Meiji Group Supplier Code of Conduct

As initiatives expected to suppliers, this Code of Conduct provides with conducts including but not limited to, 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. If a negative impact on human rights is discovered, we will take appropriate measures towards corrective action, relief, and reoccurrence prevention.

## **7. Salient Human Rights Issues**

In fiscal year 2022, the Meiji Group defined the following as salient human rights issues.

During the consolidated fiscal year 2024, we worked to eliminate child labor at the production sites for cocoa, one of our main raw materials, and improve the labor environments of foreign workers at production sites in Japan.

- 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 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**

Since fiscal year 2020, we issue sustainable procurement questionnaires each year to Meiji Group suppliers and continued this activity in the consolidated fiscal year 2024 as well.

The questionnaire utilizes the EcoVadis evaluation system, as well as original questions by the Meiji Group. By conducting this questionnaire, we could have recognized any potential human rights or environment-related issues existing 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 2024, we engaged in dialogue with 21 suppliers in Japan based on the results from the questionnaire issued the previous year.

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

Since the fiscal year 2021, we have conducted sustainability evaluations using EcoVadis and our Meiji Group original questionnaire for Meiji Group companies worldwide. We have confirmed for the consolidated fiscal year 2024 that Group companies are applying these evaluation results towards initiatives related to human rights and labor.

(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 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. Based on the results of the questionnaire related to ascertaining labor environment conditions conducted the previous year, during the consolidated fiscal year 2024 we visited four dairy farmers employing foreign workers to confirm that the dairy farms were providing an environment for foreign workers, including installing placards in foreign languages, giving due consideration to occupational safety, and providing lifestyle support. The Meiji Group collaborates with industry associations and other dairy manufacturers in Japan 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. As a result of those initiatives, cocoa beans procured by the Meiji Group during the consolidated fiscal year 2024 were certified as Meiji Sustainable Cocoa Beans (beans produced in regions where we provide farmer support through these activities), resulting in a 100% procurement rate. In the Republic of Ghana, where there is a high risk of child labor, we promoted initiatives aimed at eliminating child labor by adopting the Child Labor Monitoring and Remediation Systems (CLMRS) developed by the International Cocoa Initiative, an NPO working to eliminate child labor and forced labor in cocoa-producing regions. Surveys for October 2023 through September 2024 indicated that the Republic of Ghana had a CLMRS adoption rate of 99%, with 7,871 farmers having adopted the system. The number of children identified as child laborers was 1,175, 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 (17 plants in Japan and six plants in other countries) 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 2024.

D) Paper

The Meiji Group promotes the use of environmentally friendly paper for materials used in product containers and packaging, and paper materials used in offices. This includes the use of forest-certified paper such as FSC certified paper, which has requirements concerning human rights accountability, and recycled paper.

During the consolidated fiscal year 2024, we continued the initiative from the previous fiscal year of using all environmentally friendly paper for the product containers and packaging used throughout the Meiji Group.

E) Soybeans

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

(4) Initiatives for Improving Labor Environments for Foreign Workers

In accordance with the Meiji Group Foreign Worker Employment Guidelines established in fiscal year 2022, we are promoting initiatives aimed at improving labor environments for foreign workers at production sites in Japan. These efforts include establishing multilingual consultation desks for foreign workers.

During the consolidated fiscal year 2024, we held seminars for managers of production sites in Japan on the importance of respecting the human rights of foreign workers. Based on the results of the questionnaire on foreign worker employment conditions conducted the previous year, we visited three production sites to confirm work sites, exchange opinions with managers, and check for any human rights risks related to foreign workers. Through this effort, we confirmed that there were no major risks.

## 9. Human Rights Training System

The Meiji Group is conducting educating activities endeavoring, based on the Meiji Group Policy on Human Rights, which clearly states respect for fundamental human rights; prohibition of discrimination, prohibition of forced labor, and child labor; prohibition of harassment and considering safety and health; and respect of the basic rights of employees; and other items.

### <Human Rights Education Targets and Results (Meiji Group consolidated)>

Targets	Consolidated fiscal year 2024 results
Human rights education (including e-learning) is provided to all Group employees in Japan at least once a year	participation rate: 94.7%
Rate of human rights education implementation for Group companies overseas (23 companies) (100% by fiscal year 2026)	Initial year implementation rate 34.8% (8 companies)

This Statement was approved by the Board of Directors of Meiji HD on August 6, 2025 and by the Board of Directors of Medreich Limited on July 31, 2025 and by the Board of Directors of Medreich Plc on July 31, 2025. This Statement is signed by duly authorized Representative of each company.

August 6, 2025

松田 克也

**Katsunari Matsuda**

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



**Pankaj Garg**

Managing Director  
Medreich Limited



**Pankaj Garg**

Director  
Medreich plc