

Shiseido Modern Slavery Statement (Year ended December 31, 2025)

The statement below is the report for FY2025 as of December 31, 2025. Based on the statement of the previous fiscal year, this statement describes the actions taken in FY2025 and the initiatives planned for FY2026 and beyond.

1 About This Statement

Shiseido Company, Limited, (hereafter the “Company”) makes the following declaration based on Section 54 (1) of the UK Modern Slavery Act 2015 (hereafter the “Slavery Act”) and discloses the measures implemented by the Company and its subsidiaries (collectively referred to as the Shiseido Group, hereafter “Shiseido”) to ensure that neither Shiseido’s business operations nor its supply chains involve practices amounting to slavery and/or labour under conditions of slavery and human trafficking. The Company hereby declares that Shiseido entirely opposes slavery and human trafficking in its business and supply chain operations. With this statement, Shiseido follows the definitions and concepts of slavery and human trafficking stipulated in the Slavery Act.

2 Business Operations and Organization

The Company is a cosmetics manufacturer established in 1872 in Japan. While the core of Shiseido’s business operations revolves around cosmetics, such as skincare, makeup, and fragrance, the scope of our business activities extends into a wide range of areas, including restaurants and education/childcare. Our mission is to contribute to society through beauty innovations that enrich the lives of our stakeholders globally. Shiseido currently operates cosmetic businesses in more than 120 countries and areas with approximately 30,000 employees and a global turnover of approximately 970 billion yen in FY2025. In the UK, the Company currently sells cosmetics through its subsidiary, Shiseido UK Limited.

Business Overview: <https://corp.shiseido.com/en/company/business/>

Key Figures: <https://corp.shiseido.com/en/company/glance/>

3 Supply Chain

Shiseido is engaged in purchasing, factory production, and logistics in cooperation with the global headquarters and each region. Our relationship with our suppliers is based on the following philosophies stated in the Shiseido Group Procurement Policy: “Building a Good Partnership,” “Fair Purchasing Transactions,” “Toward Global Procurement,” “Performance of Contract,” “Promoting Responsible procurement,” and “Respecting diverse values.” Of these, we purchase materials from over 800* Tier 1

suppliers around the world. Our Tier 1 suppliers are all required to follow the Shiseido Group Supplier Code of Conduct, and they are responsible for adapting it to their Tier 2 and upstream suppliers.

* This is the total number of suppliers which provide direct materials such as raw materials and packaging for our products, sales support tools, OEM products and contract manufacturing goods.

4 Policies in Relation to Slavery and Human Trafficking

Shiseido strives to ensure that neither our business nor the supply chain related to it involves the practices of enslavement or human trafficking. This is done by establishing corporate policies applicable to Shiseido and thoroughly communicating them to employees and suppliers, including Tier 1 and upstream suppliers. These policies were drafted by the person responsible for human rights at the GHQ and were approved by the Company's Board of Directors. The Company's executive officer responsible for DE&I promotes the human rights policy, including human rights due diligence and risk assessments, and reports on these matters to the Sustainability Committee at its meetings to discuss sustainability-related issues. Designation of an Executive Officer responsible for human rights issues identified through human rights risk assessments, and the implementation of improvement activities are carried out to stop, prevent, and mitigate negative impacts on human rights.

Shiseido's policies include the following:

- **Shiseido Policy on Human Rights**
Adopted in 2017, the Shiseido Policy on Human Rights is based on the United Nations Guiding Principles on Business and Human Rights to prevent slave labour (e.g., child labour, forced labour, etc.) and other work under slavery and human trafficking. This Policy applies to Shiseido and its business partners.
<https://corp.shiseido.com/en/sustainability/human/pdf/policy01.pdf>
- **Shiseido Code of Conduct and Ethics**
The Shiseido Code of Conduct and Ethics stipulates the mandatory behaviours expected of every individual working for Shiseido. The Company has established a specific code of conduct to operate its business with high ethical standards, as well as to comply with the laws and regulations of the country, local government, and company rules. It declares the absolute prohibition of practices such as child labour, forced labour, human trafficking, and other activities that may lead to human rights abuses.
<https://corp.shiseido.com/en/company/standards/>
- **Shiseido Group Procurement Policy**
Our procurement policy, which was updated in 2022, is based on a consumer-oriented perspective including the following principles:

- We carry out our procurement activities to create better products through co-creation with business partners.
- We comply with all relevant laws and regulations, prioritizing respect for human rights and protection of the global environment.

<https://corp.shiseido.com/en/sustainability/ethical/procurement/pdf/1.pdf>

■ Shiseido Group Supplier Code of Conduct

Updated in 2019, this code of conduct clearly states that the use of child labour, forced labour, and human trafficking is prohibited. Shiseido takes any abuses of the code seriously, and an agreement entered into with the Shiseido Group may be cancelled depending on the nature and severity of the violation. Shiseido applies this code as a prerequisite for selecting Tier 1 suppliers, and Shiseido recommends that these suppliers request Tier 2 and upstream suppliers to also comply with the code. This code applies to purchasing contracts in order to strengthen solidarity and fulfil social responsibilities together with suppliers.

<https://corp.shiseido.com/en/sustainability/pdf/partner.pdf>

■ Shiseido Group Sustainable Raw Material Procurement Guidelines

We have created guidelines for palm-derived materials, paper and mica, which are associated with environmental and human rights problems in the countries of origin.

<https://corp.shiseido.com/en/sustainability/ethical/procurement/pdf/2.pdf>

In addition to the above policies, in 2004 the Company signed the United Nations Global Compact and endorsed the principles of the Global Compact for Shiseido. Furthermore, in September 2010, the Company signed the Women's Empowerment Principles developed by UN Women and the United Nations Global Compact as a set of practical guidelines for private business and non-governmental organizations working for women's empowerment.

5 Human Rights Due Diligence

Shiseido has taken the following steps to identify and assess the apparent and potential impact of our activities relating to human rights in order to prevent or mitigate such activities.

■ Listing of human rights issues

By referring to international codes on human rights, standards on non-financial disclosures, and the Corporate Human Rights Benchmark (CHRB), Shiseido has developed a list of human rights issues to be considered based on the advice of human rights experts. This list includes not only issues related to modern slavery, such as forced labour and child labour, but also a wide range

of issues related to human rights, such as freedom of association, the right to collective bargaining, and discrimination.

■ Assessment of human rights risks

Shiseido has assessed the status of our activities for our listed human rights issues by interviewing stakeholders (consumers, business partners, employees, and society*) in Japan and other countries and by investigating internal documents such as but not limited to questionnaires, surveys and certain report materials (along with referring to external documents for the potential impact on human rights). Based on the results of this investigation, Shiseido has assessed the severity and likelihood of both potential and apparent risks regarding impacts on human rights in Japan and abroad, as well as the status of preventive and corrective measures Shiseido has taken to address these impacts.

*Including women, children, indigenous people, migrant workers, and temporary workers, etc.

■ Human rights risk reduction activities

Based on risk assessments of human rights issues, we identify areas in our value chain where human rights risks are assumed to be relatively high, and plan and promote improvement activities to stop, prevent, and mitigate negative impacts. The status of the promotion of these activities has been confirmed, and activities to further reduce human rights risks are ongoing, as well as progress reports and disclosure.

■ Stakeholder Engagement

Through dialogue with domestic and global human rights experts, and various NGOs and NPOs, we have continuously deepened our understanding of human rights abuses and labour problems. Since 2017, Shiseido has consecutively participated in a stakeholder engagement program operated by the Caux Round Table Japan in Tokyo, Japan. Through discussions with experts, NGOs, and NPOs with reference to the human rights guidance tool produced by the United Nations Environmental Programme / Finance Initiative (UNEP FI), we identified key human rights issues relevant to each industry. As a result, we recognized that there is a potential risk of child labour and forced labour in the cosmetics industry supply chain. Through this activity, we recognised that the human rights risks of slavery (including child and forced labour) and other forms of labour under conditions of servitude exist upstream in our supply chain, including in the countries of origin of raw materials such as palm oil and mica. In response to this, Shiseido continues to actively engage with human rights experts to take preventative and corrective measures to reduce such risks.

6 Risk Assessment and Management

Shiseido continues to assess and manage human rights risks in our supply chain using the following three approaches:

- Approach 1: Assess and manage risks through human rights due diligence
In order to prevent or mitigate the impact that our activities have or could have on human rights, we have identified and assessed that impact through the process described in "5. Human Rights Due Diligence." As a result, the following areas in our supply chain were identified as key human rights issues (in no particular order):
 - Breach of working hours, breaks, and rest period (overtime work)
 - Harassment and discrimination
 - Non-payment of proper wages and living wage
 - Occupational safety and health issues (work-related accidents and poor working environments)
 - Privacy invasion and personal/confidential information leakages
 - Violation of rights of indigenous/local residents
 - Child labour and forced labour
 - Incomplete supplier management

For each human rights area, Shiseido will closely examine the risk level and the status of preventive and corrective measures that have already been introduced, and then determine appropriate actions based on the prioritization of risks.

- Approach 2: Risk identification in the supply chain as a whole
Shiseido assesses suppliers from the perspective of sustainability (human rights, occupational health and safety, the environment, and business ethics) and continuously confirms compliance with the Shiseido Group Supplier Code of Conduct through EcoVadis, Sedex, or our original Self-Assessment Questionnaire (SAQ). We identify high-risk suppliers in accordance with results of self-assessment. For high-risk suppliers, we conduct third-party audits and request corrective action for non-conformances identified during them. In the event of critical non-conformance, we confirm correction status through third-party audits again, and if the non-conformance is not corrected within a set period, we also consider suspension of business.
 - * Sedex and the original Self-Assessment Questionnaire (SAQ) were discontinued at the end of 2025.

- Approach 3: Direct approach in terms of raw materials
In addition to the activities described above, as a direct action for raw materials that Shiseido has determined to have a high human rights risk, we

have continued to promote the application of the certification system and participation in international initiatives.

The certification schemes and industry initiatives that the Company participates in are as follows:

- Roundtable on Sustainable Palm Oil (RSPO)
- Responsible Mica Initiative (RMI)
- Social Sustainability Working Group of The Consumer Goods Forum
- Action for Sustainable Derivatives (ASD)
- Harvesting the Future of the Jasmine Sector in Egypt, an initiative operated by the Fair Labor Association

7 Performance Assessment

Shiseido strives to prevent slavery (e.g. child labour and forced labour), other forms of labour under conditions of servitude, and human trafficking in its supply chain. We aim to establish traceability not only with Tier 1 suppliers but also with Tier 2 and upstream suppliers on a global basis. The assessment results were used to determine the status of risks in the supply chain related to labour rights, health and safety, the environment, business ethics, and to request corrective actions.

■ Approach 1: Human rights due diligence

Since 2020, Shiseido has established and operated a human rights due diligence framework under the oversight of the Sustainability Committee. As part of this framework, the Group conducts periodic human rights risk assessments to identify and mitigate potential adverse impacts on human rights across its operations and supply chains. For issues identified, the relevant departments develop corrective action plans and monitor progress, with updates reported to the Sustainability Committee and the Board of Directors.

In 2025, Shiseido conducted a human rights survey covering all subsidiaries across the Group and updated its Group-wide human rights risk assessment. Based on the findings, the Company has begun implementing improvements, including revising relevant policies. Going forward, Shiseido will continue to identify potential human rights risks across the entire value chain and drive continuous improvement.

<https://corp.shiseido.com/en/sustainability/rights/activity.html>

■ Approach 2: Supplier assessment results

Supplier Assessment Results for FY2025
(Direct material and sales support tool suppliers)

1. Percentage of Tier 1 suppliers assessed: 100% (28 suppliers)
2. Percentage of high-risk suppliers identified in 2025 that completed remediation: 100% (An audit was conducted for the single supplier identified as high risk, and completion of remediation was confirmed within FY2025.)
3. Percentage of strategic suppliers assessed: 100% (26 suppliers)
4. Upstream supplier assessment: In 2025, assessments were conducted for 27 upstream suppliers.

<https://corp.shiseido.com/en/sustainability/rights/procurement.html>

- Approach 3: Direct action on raw materials identified as high human rights risk
 - Palm oil: Shiseido works in close collaboration with global and regional teams to advance sustainable palm oil procurement. In 2025, 87% of palm oil-derived raw materials (palm oil equivalent, weight basis) were replaced with materials certified under RSPO's physical supply chain model.
 - Fragrance and extracts derived from natural ingredients: From 2025, Shiseido has begun identifying raw-material-specific origin risks for fragrances and extracts derived from natural ingredients and assessing raw-material-specific origin risks to further strengthen human rights risk management.

8 Education and Training

The Company provides training on the Shiseido Code of Conduct and Ethics and/or related policies and rules through various internal programmes, such as position-specific training, in order to promote the increase of knowledge and understanding of all Shiseido employees.

- Employees

We provide training for employees on the Shiseido Code of Conduct and Ethics, harassment prevention, and human rights awareness.

- Supply chain

In order to implement responsible procurement, Shiseido provides various training programmes for employees in the Procurement department in terms of human rights, occupational health and safety, and the environment. Furthermore, to support the development of suppliers' capabilities, we engage in initiatives such as providing feedback to suppliers on the results of their self-assessments.

9 For the Future

Shiseido is committed to the UN Guiding Principles on Business and Human Rights, actively working to prevent any involvement in human rights abuses within our operations and supply chain. Based on the human rights risk assessment conducted in 2025, Shiseido has identified priority human rights risks and is implementing initiatives to stop, prevent, and mitigate negative impacts related to those risks.

This statement was approved by the Board of Directors of the Company and signed by the following person:

A handwritten signature in black ink, appearing to be 'KF', with a long horizontal stroke extending to the right.

Kentaro Fujiwara
Director
Representative Corporate Executive Officer,
President and CEO
Shiseido Company, Limited
May 12, 2026