

HANDLING OF PERSONAL INFORMATION

1. INTRODUCTION

This document outlines the handling of personal information through the stakeholder reporting system of HORIBA, Ltd. (hereinafter “Company,” “we” or “us”) called the “HORIBA Stakeholder Hotline” (hereinafter “Hotline”), based on CPRA (California Privacy Rights Act).

This Hotline was established to ensure the sound management of the Company by obtaining prior information on any misconduct or other issues that may impact the Company. At the same time, we are keen on protecting any personal information received through the Hotline and will safeguard it to the maximum extent under the Hotline.

2. DEFINITIONS

“Hotline” means the hotline of the stakeholder reporting system established on the web.

“Report” means a report registered with the Hotline and received by the Company.

“Personal information” means information that can identify an individual that is specified in a report registered with the Hotline.

“Reported event” means an event reported to the Company in a report.

“Reporter” means an individual that files a report with the Hotline.

“Accused” means an individual reported in a report who has engaged in or otherwise been involved in a reported event.

“Parties relevant to the report” means individuals and organizations mentioned in a report.

“Data Controller” means the party that is mainly responsible for handling personal information and determines the methods and policies for handling personal information.

“Data Processor” means the party that actually collects, retains, and processes data on behalf of the Data Controller based on the instructions of the Data Controller.

“Sell” means selling personal information to a third party for commercial purposes.

“Share” means disclosing personal information to a third party for commercial purposes.

“Sensitive data” means personal information defined in CPRA, including, but not limited to, Social Security numbers, driver’s licenses, state identification cards, passport numbers, account information, bank account, debit and credit card numbers, location data, racial or ethnic origin, religious or philosophical beliefs, union membership information, the contents of postal mail, email, and text messages (unless the Company is the intended recipient), and genetic information.

3. ORGANIZATIONS IN CHARGE OF THIS HOTLINE

The following are the operators of this Hotline:

3-1. DEPARTMENT IN CHARGE

Administration Department

HORIBA, Ltd.

Address: 2 Miyanohigashi-cho, Kisshoin, Minami-ku, Kyoto, Japan

Contact: aiji.horii@horiba.com

As the Data Controller, HORIBA, Ltd. is responsible for handling personal information under the Hotline and is in a position to determine and implement policies and protection measures for handling personal information.

3-2. OPERATOR

D-Quest, Inc.

Address: Ryumeikan-Honten Bldg., 3-4 Kanda-Surugadai, Chiyoda-ku, Tokyo

As the Data Processor, D-Quest will, on behalf of HORIBA, Ltd., maintain and operate the Hotline system and perform translation and other procedures.

4. PROCESSING OF PERSONAL INFORMATION

4-1. PURPOSES OF PROCESSING PERSONAL INFORMATION

Personal information registered with this Hotline will be processed in order to conduct internal investigations into any misconduct and other acts of similar nature in the Company. It may also be processed in order for the Company to make reports, etc., to the state authorities at their request.

4-2. TYPES OF PERSONAL INFORMATION TO BE PROCESSED AND SOURCES

Through this Hotline, the following types of personal information will be handled. Personal information will only be collected and/or processed on the Hotline's website and will not be collected or processed by other tools, devices or methods.

- Name
- Department
- Position
- Contact information
- Company
- Sensitive data, as long as reasonably required
- Information listed above of the accused
- Information listed above of the parties relevant to the report
- Information of any other individuals that may be mentioned in the report

4-3. SELLING AND SHARING PERSONAL INFORMATION

No personal information submitted to this Hotline will be used for any secondary purposes, including commercial ones. It will not be collected, used, processed, stored, reused, sold, transferred, or shared beyond the purposes specified in 4-1. However, personal information may be disclosed to outside law firms or state and federal authorities for the purposes described in 4-1.

5. MANAGEMENT OF PERSONAL INFORMATION

5-1. DURATION OF DATA RETENTION

Personal information will be retained for the reasonable period of time necessary for handling a reported event that is within the period of time prescribed under the state and federal laws.

5-2. DISCLOSURE OF PERSONAL INFORMATION

For the purpose of investigating a report, personal information described in 4-2 may be disclosed with the counterparts (president or senior management) of each company and the Company's Board of Directors, etc. Personal information may also be disclosed to external law firms for investigation purposes.

6. YOUR RIGHTS TO THE PROTECTION OF PERSONAL INFORMATION

6-1. LIST OF RIGHTS

All individuals involved with the Hotline hold the following rights under the law:

- The right to access their own personal information that is being processed
- The right to correct their own information if it contains errors
- The right to delete
- The right to restrict or optout the selling or sharing of their own personal information
- The right to restrict their own sensitive data
- The right to not be discriminated for exercising any of the aforementioned rights

6-2. RESTRICTIONS ON THE RIGHTS OF THE ACCUSED

In order to protect the personal information of the reporter and to prevent any danger to his/her physical or mental health, even if a reporter has revealed his/her identity, the accused may not access the contents of the report or the reporter's personal information. Furthermore, the accused may not inquire whether he/she is the one accused in the relevant report.

6-3. EXERCISE OF RIGHTS

If you wish to exercise any of the aforementioned rights, please reach us through the contact information specified in Section 3-1. Department in Charge. You may need to provide us with the personal information that is necessary to exercise such rights. The handling of such personal information is also subject to this document.

7. COOKIES

We use cookies on the Hotline's website.

Cookies are small text data exchanged between a user's device and a server. This Hotline uses necessary cookies that only handle session IDs that are necessary for communication. No information collected through these cookies will be retained beyond the relevant session. At the end of a session, any collected cookies will be automatically erased.

8. ANONYMOUS REPORTING

You can make an anonymous report under this Hotline. Please bear in mind, however, that your anonymity may prevent us from conducting a proper investigation, and the issue you raised may not be resolved as a result. We ask for your kind understanding and cooperation in making reports under your actual name.

9. AMENDMENTS HISTORY

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| June 1, 2026 | The first edition issued |
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