

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 GDPR (EU General Data Protection Regulation) and member states’ implementing laws.

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. HORIBA Stakeholder Hotline

2. DEFINITIONS

- “Hotline” means the hotline of the stakeholder reporting system.
- “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.
- “Special Category data” means personal information defined in GDPR, including, but not limited to, information on racial or ethnic origin, political opinions, religious or philosophical beliefs, labor union membership, genetic or biometric information, information on health, and information on sex life or sexual orientation.

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

3-2-1. OPERATOR'S HEAD OFFICE IN JAPAN

D-Quest, Inc.

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

3-2-2. OPERATOR'S AFFILIATED COMPANY IN EU AND THE PARTNER LAW FIRM

- D-Quest Europe GmbH
- Atsumi Sakai Janssen Rechtsanwalts und Steuerberatungsgesellschaft mbH

Address: OpernTurm (13th Floor) Bockenheimer Landstraße 2 4, 60306 Frankfurt am Main, Germany

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

3-3. SERVER LOCATION

Reports from the EU, UK, and EEA member states are stored on a server in the Republic of France.

4. PROCESSING OF PERSONAL INFORMATION

4-1. LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

The Company collects personal information on our hotline as a legitimate interest under Article 6(1)(f) of the GDPR and in accordance with EU Directive 2019/1937 “Protection of Whistleblowers” in order to ensure sound management by detecting and responding promptly to internal fraud and other non-compliance activities in advance.

4-2. 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 authorities of respective relevant countries at their request.

4-3. TYPES OF PERSONAL INFORMATION TO BE PROCESSED

Through this Hotline, the following types of personal information will be handled.

- Name
- Department
- Position
- Contact information
- Company
- Special Category 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

4-4. METHOD OF PROCESSING

The personal information received through this Hotline will be processed as follows:

- Translation of the contents of the report to Japanese
- Assigning of pseudonyms when conducting internal investigations or sharing information
- Preparation of investigation results reports

Registered reports are first processed by D-Quest Europe GmbH under the supervision of a partner law firm in Germany, which then forwards them to D-Quest Corporation in Japan. It is then processed, including translation, and forwarded to the recipient at HORIBA, Ltd.

4-5. PERSONAL INFORMATION OF THE ACCUSED

The Hotline may handle personal data of the Accused or the Parties relevant to the report without their consent. This will only be done as a legitimate interest in accordance with Article 6.1(f) of the GDPR, insofar as it does not exceed the purposes described in 4-2 and does not adversely affect the rights and interests of the Accused or the Parties relevant to the report.

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 law of each relevant country.

5-2. SHARING OF PERSONAL INFORMATION

For the purpose of investigating a report, personal information may be shared with the counterpart persons (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.

5-3. CROSS-BORDER TRANSFER OF PERSONAL INFORMATION

Personal information will be transferred across borders to Japan so that our Japan head office can investigate a reported event.

Japan is an EU adequacy-certified country and there is no cross-border transfer of personal information to any third country other than Japan.

5-4. CONFIDENTIALITY

The personal information in this Hotline is always disclosed to the Company with the explicit consent of the reporter. The data processor, D-Quest Inc. cannot release the information to unauthorized persons. The information will not be reused beyond the purposes specified in 4-2.

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 acquire the necessary information
- The right to know if their personal information is being processed, and access that information
- The right to correct or delete their own information
- The right to restrict the processing of personal information, and withdraw consent
- The right to object to the data protection authority

- The right to receive their own information in a structured, commonly used, and machine-readable format
- The right to transfer such information to another Data Controller

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. COMPLIANCE WITH LAWS OF RESPECTIVE COUNTRIES

This Hotline complies with the personal information protection law of each relevant country, as well as laws that protect whistleblowers.

10. AMENDMENTS HISTORY

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| June 1, 2026 | The first edition issued |
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