

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 LGPD (Lei Geral de Proteção de Dados) of Brazil.

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.

“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.

“Sensitive data” means personal information defined in LGPD, including, but not limited to, information on racial or ethnic origin, religious beliefs, political opinions, labor union and religious, philosophical, or political organization membership, information on health or sex life, genetic information, and biometric 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.

D-Quest is jointly responsible with the Data Controller for the processing of personal data, but the Data Controller is fully responsible for the processing policy and the use of the information.

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 authorities at their request.

4-2. 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
- 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. 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

4-4. DURATION OF PROCESSING

Personal information will be processed within a reasonable period of time to the extent necessary, until the investigation and/or the handling of the reported event is completed.

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.

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.

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 acquire the information of companies or organizations with which is shared the personal information
- The right to be informed of the possible consequences of refusing consent
- The right to correct or delete their own information if it contains errors
- If the processing of their own information has serious adverse effects, the right to delete such information
- The right to withdraw consent
- The right to delete the information that was processed under own consent
- The right to receive their own information in a structured, commonly used, and machine-readable format, and 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.

6-4. REFUSAL OF CONSENT

To use this Hotline under your actual name, you need to give your consent to the handling of your personal information in accordance with our personal information protection policy described in this document.

However, if you fail to file a report under your actual name because you do not wish to give consent, and the Company or other relevant parties suffer any adverse effects as a result, you will not be punished or receive disadvantageous treatment in any way based on that fact.

You can also use this Hotline anonymously without providing personal information, such as your name.

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

June 1, 2026	The first edition issued