

# 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 PIPL (Personal Information Protection Law of China).

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.

**"Personal Information Processor"** means the party that is mainly responsible for handling personal information and determines the methods and policies for handling personal information.

**"Entrusted Party"** 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 PIPL and the authority, including, but not limited to, information on certain identity (racial or ethnic origin), religious beliefs, biometric information, information on health, financial account information, location data, and personal information of individuals under the age of 14.

## 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 Personal Information Processor, 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 Entrusted Party, 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 authorities at their request.

### **4-2. 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

### **4-3. 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
- 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

### **4-4. SENSITIVE DATA**

The hotline may handle sensitive data. Some sensitive data may be required for reporting events such as accounting fraud, which is necessary to protect the Company, its employees, and its stakeholders from serious harm caused by fraud.

Like other personal information, Sensitive Data will not be used for purposes other than those specified in 4-1, nor will it be used as the basis for any decision, nor will the contents of this data cause any disadvantage or inconvenience.

## **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 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.

### **5-3. 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 4-1.

## **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 make a decision after receiving an explanation
- The right to restrict or refuse processing
- The right to access and reproduce the information being processed
- The right to correct
- The right to delete
- The right to receive an explanation such as rules of processing
- Right of next of kin to access, reproduce, correct and delete the information of data subject in the event of his/her death

### **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 or Section 3-3. Local Representative. 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

Date	Details
June 1, 2026	The first edition issued