

# Compliance and Risk Management

## Risk Management

Shiseido's basic policy of risk management.

## Activities to Enhance Corporate Ethics

Here are our activities to ensure an environment for employees to work with a high-level sense of ethics.

## Information Security Management

Measures for cyber security and data protection initiatives of Shiseido Group.

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# Risk Management

The risk management of the Group is primarily focused on "building trust with multiple stakeholders and achieving our medium-to-long-term strategies". We thus consider risks as "uncertainties" that may impact achievement, both potential threats to business as well as potential opportunities. Based on this approach, we have established a risk management structure and have put into place measures for managing such risks proactively and expeditiously.

We have placed the Risk Management Department in the Global HQ which reports to CLO (Chief Legal Officer), and RMO (Risk Management Officer) in each regional headquarters to centrally manage related information. The Global Risk Management & Compliance Committee, composed of Executive Officers/Regional CEOs and chaired by the CEO, meets on a regular basis to discuss risks and countermeasures. In addition to this, we have identified "risk owners" for each risk category to clarify responsibility for countermeasures. Moreover, we have implemented a transparent monitoring and communicative framework within the Global Risk Management & Compliance Committee and the Board of Directors to regularly discuss and assess our progress in addressing these risks.

## Risk Management

In fiscal year 2021, risks with potential impact on "WIN 2023 Key Strategies\*" execution were identified through Risk Management Department analysis based on risk perception interviews with the Group CEO, Executive Officers, and Regional CEOs. Regional risk assessments and input from related functional divisions were also taken into consideration, as well as insight from external experts.

We then set three evaluation axes for the risks: "the impact on business in case of risk manifestation", "likelihood and timing of risk manifestation", and "preparedness to the risk". Through the above-mentioned Committees and related meetings, the risks were prioritized, and status of countermeasures were considered.

Reflecting our corporate policies, risk assessment plans have been designed to attach due weight to issues related to personal health (and safety), company assets, business continuity, and reputation.

Risks identified through our risk assessment have been organized into three categories: "Consumer and Social-related Risks" stemming from external factors, "Operation & Fundamental Risks" stemming from internal activities, and "Other Risks".

As a noteworthy point of the risk assessment results mentioned above, individual risks identified are more interlinked than in the past and interdependency of countermeasures is increasing. In addition, "Changes in Consumer Values" and "Corporate Culture and Acquisition /Securing Outstanding Human Resources" have a large impact on the other identified risks.

For details on Business and Other Risks, please refer to the Annual Securities Report on the URL link below.

\* WIN 2023 Key Strategies

<b>Improve Profitability</b>	<ol style="list-style-type: none"><li>1. Rebuild profit structure through fundamental reforms</li><li>2. Increase cost competitiveness and improve factory productivity</li><li>3. Accelerate growth in Asia, especially China</li></ol>
<b>Focus on Skin Beauty</b>	<ol style="list-style-type: none"><li>4. Build a powerful portfolio centered on skin beauty brands</li><li>5. Accelerate innovation through external collaborations</li></ol>

	6. Develop the inner beauty category
<b>Rebuild Business Foundation</b>	7. Become a truly sustainability-focused company 8. Strengthen brands through innovative marketing and robust organization 9. Build a digitally driven business model and organization 10. Enhance talent and organization through diversity and upskilling

From a long-term perspective, we identified "Decline in purchasing demands for cosmetics" and "Tighter regulations on R&D, manufacturing, and sales of cosmetics" as "Emerging Risks" with increasing importance and impact on our business.

We are taking or have taken appropriate response measures to mitigate these risks as described below, along with other risks, including changes in our business model.

<b>Emerging Risk</b>	<b>Description</b>	<b>Impact on Business</b>	<b>Mitigating Actions</b>
Decline in purchasing demands for cosmetics	As the values, behaviors, and preferences of consumers rapidly change and diversify with the development of a highly technological and borderless society, there is a risk of declining demand for cosmetics, such as skincare and makeup.	If we are unable to appropriately formulate our corporate strategy to respond to changes in consumer's sense of value regarding beauty and health to develop cosmetics and services that match demand, it may have a significant impact on our business.	<ul style="list-style-type: none"> <li>• Shiseido is concentrating its resources on "Skin Beauty Brands", our area of strength where strong market growth is expected and aim to promote our brands, expand our portfolio, and develop new businesses in this area.</li> <li>• Strengthen brand portfolio to respond to diversifying consumer values (e.g. Drunk Elephant, development of new brands and M&amp;A)</li> <li>• Built Consumer and Market Intelligence Department to gather consumer information in an accurate and timely manner</li> <li>• Accelerate value creation and business development through open innovation with other companies</li> </ul>
Tighter regulations on R&D, manufacturing and sales of cosmetics	With growing global environmental awareness, regulations such as formulation development/UV care/containers & packaging are tightened. There is a risk of expanded restrictions on our technologies and cosmetics in various countries and regions, resulting in R&D stagnation or a ban on production and sales.	Many countries and regions have developed proposals for a sustainable society, such as the European Green Deal and Chemicals Strategy for Sustainability. The number of cosmetics and services offered by the Company may decrease and negatively affect the business plan if unable to formulate unique strategy and effectively develop sustainable products in response to the tightening regulations. In addition, inadequate efforts in this field could result in a loss of trust from society and consumers.	<ul style="list-style-type: none"> <li>• Regular meetings held by Sustainability Committee, medium-to-long-term strategy development and setting of KPIs, and monitoring of strategy implementation progress involving related departments of HQ and RHQs</li> <li>• Sustainability/SDG-related activities for each brand (SHISEIDO, Clé de Peau Beauté, etc.)</li> <li>• Adopt eco-friendly packaging (co-develop Kaneka biodegradable polymer Green Planet® and join "Loop" rollout in Japan)</li> <li>• Promote switch to certified palm oil and paper</li> <li>• Set and disclose medium-term targets for major environmental load reduction items (CO<sub>2</sub>, palm oil, paper, water, waste) and work toward their achievement</li> <li>• Support Task Force on Climate-related Financial Disclosures (TCFD); prepare scenario analyzing climate change risk impact on business and disclose information based on TCFD recommendations</li> </ul>

At the same time, compliance programs are being or have been prepared for four priority areas: personal data protection, anti-bribery, anti-cartel, and supplier risk reduction.

## Incident Response

Shiseido has established the Shiseido Group Crisis Management Policy, a guide for incident response to enable swift and appropriate actions, effective damage control, and early recovery. In Japan, departments in which an incident occurs take initial actions to understand the situation and prevent damage from spreading while promptly reporting to the Risk Management Department. After determining the incident level from the perspectives of severity of damage, possibility of spread, social impact, and other factors, the Risk Management Department assigns members from necessary HQ functions to organize a task force. The task force examines a range of actions to prevent damage from spreading, respond to those affected, and disclose information, while continuously monitoring investigation into cause, progress, and response results and implements reoccurrence prevention measures. Outside of Japan, regional CEOs and RMOs are responsible for leading incident response activities. Significant incidents, such as those which pose a high risk of affecting operations in other regions, are immediately reported to the Risk Management Department at headquarters to enable quick action.

### Shiseido Group Crisis Management Policy

1. Ensure the safety of employees and their families
2. Preserve company assets
3. Continue operations
4. Earn the trust of stakeholders

## Business Continuity Management (BCM)

We have formulated a Business Continuity Plan (BCP) to prepare for major natural disasters and other emergency situations. To enable prompt and appropriate actions by employees according to the BCP in the event of an emergency, we provide regular training and education programs and use the findings from these programs to periodically revise the BCP.

### Business Continuity Plan (BCP)

Our BCP is formulated based on the Shiseido Group Crisis Management Policy and the Shiseido Group BCP Concept as described below.

#### Shiseido Group basic approach to formation of BCP

1. Protecting peoples' lives is the most important thing. Place the highest priority on ensuring the safety of employees and their families and confirm whether they are safe.  
After this, when conducting business operations, consider the safety of employees, and prevent secondary disasters.
2. Protect finances, IT systems, buildings, equipment, and other company assets.
3. Perform operations essential to recovery and operations that should be continued in the event of an emergency by the target time, without fail.
4. Through the above, minimize the impact on customers, business partners (clients and suppliers, etc.), shareholders, employees, society, and other stakeholders; prevent damage to corporate value, and earn the trust of society by providing various forms of support to the local community, etc.

Our BCP consists of a "basic plan" serving as a general guide and "action plans" to specifically describe recovery activities to be carried out by each department.

The BCP is designed primarily for natural disasters and other emergency situations, such as large earthquakes, that can seriously affect business continuity. In order to minimize damage and facilitate early recovery, the plan describes

"restoration tasks" (necessary actions to restore basic operations) and "business continuity tasks during an emergency" (actions that must be taken to maintain business operations during disaster situations) and sets "recovery time objectives" to complete said tasks. The plan also specifies in phases the information to be collected, items to be decided, and reporting lines. This plan is executed under the leadership of the HQ Emergency Task Force, with the Executive Officer in charge of Risk Management as director and members appointed from necessary divisions to address issues related to employees, facilities, communication systems, information disclosure, funding, and consumer relations. The task force undertakes overall management in cooperation with two other special functions: the Product Supply Continuity Task Force (to recover and sustain supply networks) and the SJ Emergency Task Force (to be responsible for Japan Region operations). In addition to the BCP, for sudden and unexpected incidents such as earthquakes, we have separately developed a business continuity plan for emergencies with gradual/long-term impact, such as infectious disease outbreaks, which sets out matters to be considered and implemented by each phase (infectious disease BCP).

#### **HQ Emergency Task Force Drill**

The HQ Emergency Task Force Drill is held on a regular basis as training for effective command and appropriate execution of the BCP. Findings from the drill are used to review and revise existing action plans and BCP-related documents. Relevant parties are notified of changes, ensuring the BCP is updated and all are prepared for immediate action.

#### **Emergency education for employees**

To promote individual employee awareness and knowledge of emergency preparedness, we run various training and education programs. BCP briefings are given to heads of departments/offices to increase their understanding and ensure swift action by all staff under their leadership in the event of major emergency, under HQ Emergency Task Force instructions. Additionally, safety confirmation drills are conducted for all employees twice a year, and new hire orientation programs include lectures to raise knowledge and awareness of emergency preparedness.

## **Shiseido Group Policy on Anti-Corruption**

Shiseido Group (“Shiseido”) hereby establishes the Shiseido Group Policy on Anti-Corruption (“the Policy”) by which it will promote efforts to ensure anti-corruption measures and fulfil its social responsibilities.

### **1. Basic Ideas on Anti-Corruption**

Shiseido proclaims in its “Shiseido Code of Conduct and Ethics” that it abides by the laws of each country and region in which it operates, and maintains sound ethical behavior as well as respecting human rights, in order to be the most trusted beauty company in the world. In particular, Shiseido’s basic principles relating to business activities are to engage in fair, transparent, and free competition and appropriate transactions. Therefore, Shiseido proclaims in its “Shiseido Code of Conduct and Ethics” that it will not provide or accept gifts or entertainment that may cause suspicion regarding our fairness, whether or not the provision or acceptance of such items violates applicable laws and regulations, and whether or not the counterparties are public officials or private entities.

Corruption is against Shiseido’s basic principles, and Shiseido simply will not tolerate any corruption whatsoever.

This Policy is Shiseido’s promise to engage in the prevention of corruption, as well as to deliver Shiseido’s basic principles on anti-corruption, based on the “Shiseido Code of Conduct and Ethics” with due consideration for the current state of affairs, under which corruption still remains a global issue.

### **2. Scope and Application**

The Policy will apply to all executives and employees of Shiseido. Shiseido also will require its business partners relating to Shiseido’s products and services to comply with the Policy.

### **3. Prohibition Against Bribery**

Shiseido does not give, offer, or promise a bribe, in any form, to any person, whether direct or indirect, nor will it receive, request, or promise to receive any kind of a bribe, irrespective of the name given to it, including without limitation political contributions, donations, charitable activities, sponsorship activities, and kickbacks. Shiseido prohibits all of its executives and employees from engaging in the activities above.

### **4. Measures for the Prevention of Bribery**

Shiseido engages in the measures below to prevent bribery, and continues to promote and enhance such measures in implementing the Policy.

#### **■ Development of a System for the Prevention of Bribery**

Shiseido has developed and implemented an effective system for the prevention of bribery, including the development of relevant internal rules and procedures, to ensure the thorough prevention of bribery. The measures include the Framework of Empowerment, credit checks on new accounts, and due diligence in acquisitions.

#### **■ Education and Training**

Shiseido offers education and training to all of its executives and employees for purposes of preventing bribery, such as familiarizing such executives and employees with the Policy and relevant internal rules.

■ Risk Assessments and Periodic Reviews

Shiseido periodically evaluates bribery risks and monitors the status of operation of the system for the prevention of bribery, and reviews and improves measures relating to, and control of, the prevention of bribery as required with respect thereto.

■ Proper Record Keeping

Shiseido records all transactions and assets accurately and fairly, and in reasonable detail, in its accounting books and records, to thoroughly prevent bribery and to fulfil accountability therefor.

■ Compliance with Applicable Laws and Regulations

Shiseido complies with the laws and regulations and the rules relating to the prohibition against bribery that are applicable in the countries and regions where it conducts its business activities, including the Foreign Corrupt Practices Act in the U.S., the Bribery Act in the U.K., the commercial bribery rules in the PRC, and the Unfair Competition Prevention Act in Japan.

< Revision History > Established in June 2021  
Revised in April 2022

# Activities to Enhance Corporate Ethics

In accordance with THE SHISEIDO PHILOSOPHY, Shiseido has put in place the Shiseido Code of Conduct and Ethics so that employees will act based on a stronger sense of ethics in all business activities. We also provide training and education to put the Code into actual practice, striving to build mutual respect among employees regardless of their background and to win the confidence of all our stakeholders. In addition, we have Whistleblowing and Consultation Hotlines for employees to report unethical behavior as quickly as possible. Reported information is investigated carefully and appropriate steps are taken to address any issues. Such ethical awareness initiatives and the framework to facilitate them are key to realizing a workplace where individuals can deliver their best performance, thereby promoting honest and ethical corporate behavior and business growth alike.

## Training for Employees

### (1) Enhancement of Corporate Ethics in Workplaces

At the global regional headquarters, Risk Management Officers take charge of ethics promotion in each region. The Risk Management Officers are supported by Business Ethics Officers assigned to each affiliate at the global level and Ethics & Compliance Leaders in Japan.

In 2022, we will hold the same training globally so that all employees can understand and act in line with the Shiseido Code of Conduct and Ethics.

### (2) Training for All Employees (Once a Year)

Training programs are carried out once a year for all employees of the Shiseido Group in Japan. We provide human rights awareness programs to address discrimination in workplaces, while our corporate ethics training curriculum includes harassment prevention and response. We also conduct training sessions to improve communication in various settings so as to build an open, encouraging workplace culture.

### (3) Position-specific Training (Once a Year)

We also provide group training sessions which are specific to a person's post and/or position in the corporate hierarchy (executive officer, manager, new recruit, etc.), as well as those tailored to the characteristics of each affiliate.

## Whistleblowing and Consultation Hotlines for Employees

We have established Whistleblowing and Consultation Hotlines at each regional affiliate globally for employees to voice their concerns about or report on words and/or actions which are or may be unethical or in violation of laws in the relevant countries/regions, the internal rules and the Shiseido Code of Conduct and Ethics, and a Shiseido Group Global Hotline at Company headquarters can receive reports directly from employees of our affiliates around the world.

The hotline system in Japan consists of the "Sodan Room (in-house Shiseido Hotline)" and an external Shiseido Hotline that deals with workplace issues in general and whistleblowing, as well as the Compliance Committee Hotline dedicated to whistleblowing, and a separate and direct e-mail route to the Audit & Supervisory Board members for reports from Japan and overseas relating to directors, executive officers and hotline staff members\*.

Shiseido also has a Business Partner Hotline for suppliers and business partners in Japan to voice any concerns on violations of human rights and compliance by Shiseido Group companies and employees.



For more details, please refer to Social Data.

\*The hotlines in Japan are available to everyone working at Shiseido Group companies in Japan (directors, Audit & Supervisory Board members, executive officers, employees, contract employees, dispatched employees, those who have retired from the company within the past year, and others who are protected pursuant to the Whistleblower Protection Act).

The hotlines described above are paired with fair problem-solving routes and rules which explicitly prohibit the disadvantageous treatment of whistleblowers and prescribe the confidentiality of reports and consultations. Information about the hotlines, which includes instructions on their use, is communicated to every employee via the distribution of digital leaflets, and Company intranet bulletin board messages, etc.

The Division in charge of the Whistleblowing and Consultation Hotlines handles reports and concerns with due care to protect the privacy of those concerned. As necessary, a fact-finding investigation is launched. If a survey reveals a compliance violation, the offender is taken disciplinary action per employment regulations. Management is alerted without delay if a case poses a business impact risk. Serious compliance-related concerns are reported to management at the Global Risk Management & Compliance Committee and/or HQ/SJ Compliance Committee, and steps are taken to prevent reoccurrence.

## Mitigating the Risk of Discrimination/Harassment

In addition to the employee hotlines, the Shiseido Group in Japan conducts regular surveys of employees to identify workplace discrimination/harassment/compliance issues and challenges, and to mitigate such risks. Our process for mitigating the risks of discrimination, harassment, and compliance issues includes sharing survey results with companies, affiliates and departments identified by the survey as having problems and proposing corrective measures that should be implemented, as well as incorporating issues/challenges identified through an analysis of survey results into employee education.

The Risk Management Department reports to management and the Audit & Supervisory Board members on whistleblowing records and employee survey results and receives supervision for risk mitigation.

# Information Security Management

## 1. Policy Related to Information Security

The Shiseido Group (hereafter "Group") establishes "Shiseido Group Information Security Policy" for all people working in the Group to protect and maintain various essential information assets owned by business sites of the Group by setting robust information security. Under this Group-wide basic policy, we strive to manage and operate various information assets.

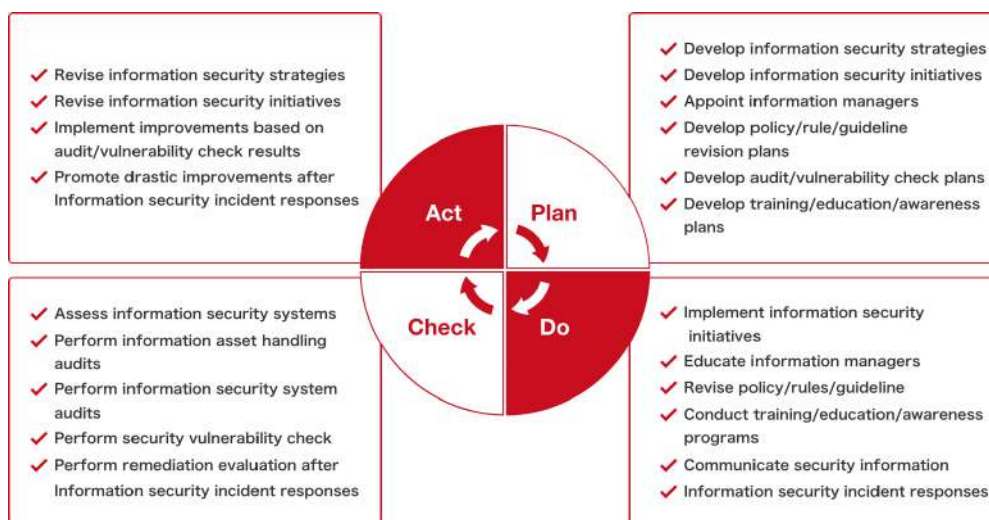
## 2. Information Security Management Systems

### (1) Management structure

The Shiseido Group has established information security management systems, and the Chief Information Security Officer (CISO) has been appointed our representative. The CISO assumes overall responsibility for the handling of information assets and information systems and engages in the planning and implementation of information security strategies and initiatives while communicating with the management team. In the Shiseido Group, the Chief Financial Officer (CFO) has ultimate responsibility for information security.

The CISO also supervises the activities carried out by each Group company to promote information security management. Those activities are related to the development and enforcement of rules and guidelines regarding confidential information management, information systems management and information security measures, installing safety measures, and providing training/education/awareness programs.

The heads of offices, departments, and affiliates are appointed as Information Managers responsible for the implementation of information security-related initiatives at their respective organizations. As for the regional headquarters outside Japan, information security contacts have been installed to regularly communicate with the CISO and HQ's Information Security department in order to ensure continued efforts to maintain and improve the Group's overall information security activities.



Shiseido Information Security Management

### (2) Development of policies and rules

To promote information security management systems, we refer to several major related guidelines or best practices such as the ISO 31000 international standard for risk management, the ISO 27001 international standard for information security management systems, the NIST Cybersecurity Framework of the National Institute of Standards

and Technology, the CIS Controls of the Center for Internet Security, and the Cybersecurity Management Guidelines of Ministry of Economy, Trade and Industry.

Furthermore, specific guidelines and rules have been formulated. These include the above-mentioned "Shiseido Group Information Security Policy," in addition to rules and regulations regarding information asset handling/management and information systems development, operation, and management. We are working to promote compliance with these guidelines and rules on a global scale by encouraging the engagement of overseas offices.

To ensure information security in activities involving external business partners, we ask them to observe the "Shiseido Group Supplier Code of Conduct", which includes requirements for proper handling of confidential information and protection of personal information. When outsourcing important operations, we check the information security management systems of the companies before we execute a service agreement requesting them to take appropriate safety management measures.



Structure of Information Security Rules

### 3. Information Security Enhancement Initiatives

#### (1) Employee training/education/awareness

The Shiseido Group conducts information security e-learning programs and group sessions on a regular basis to help employees increase their awareness and knowledge of information security. We provide guidance to new graduate and mid-career hires during orientation sessions to instill the importance of information security management in our personnel from the time they start with the Group.

To keep employees updated on information security issues, the latest information is posted on our internal portal.

#### (2) Promotion of security by design

The Shiseido Group has developed internal systems and processes that enable the Information Security department to be involved in the development of new business or services from scratch so that necessary information security measures can be taken at the planning/designing stage.

#### (3) Monitoring activities

At the Shiseido Group, we ensure the proper handling of information assets as well as the implementation of appropriate information security measures for information systems development, operation, and management. Audits on information systems and related operations are performed on the risk basis, where supervision is conducted over improvements to any issue detected.

Also, we periodically perform vulnerability checks on information system infrastructures and application programs, and if vulnerability issues are detected, instructions and improvement advice are provided. In addition, we constantly monitor information security using external threat intelligence services.

For business partners to whom we outsource important operations, we regularly check their information security management systems even after contracts are concluded.

#### (4) Information security incident response

At the Shiseido Group, the Information Security department responds to accidents and emergency situations involved in information security. It executes the necessary actions in cooperation with the Risk Management and Information Systems departments depending on the impact of specific situations. The Information Security department works to

improve emergency response capabilities through organizing periodic drills (provided more than twice a year by several organizations including the Nippon CSIRT Association and a forensic service provider) and revising associated sections of the manual based on issues revealed through such training opportunities. Shiseido has registered with the Nippon CSIRT Association (Shiseido CSIRT) to share information with relevant agencies and with similar departments at other companies.



Establishment of information security-related rules

#### (5) Third-party assessment

To verify that the Shiseido Group's implementation of its information security initiatives and management systems are appropriate, we enlist external experts to conduct an assessment if necessary. Issues and challenges identified through the assessment are then considered to develop information security strategies and initiatives.

# Privacy Protection

## 1. Privacy Principles

The Shiseido Group (hereafter "Group") is fully aware of the importance of personal information obtained through business activities, considers ensuring the safety of such information to be its social responsibility, and makes sure to implement privacy protection on a Group-wide basis under the "Shiseido Group Privacy Rules," which must be followed by all people working for the Group.

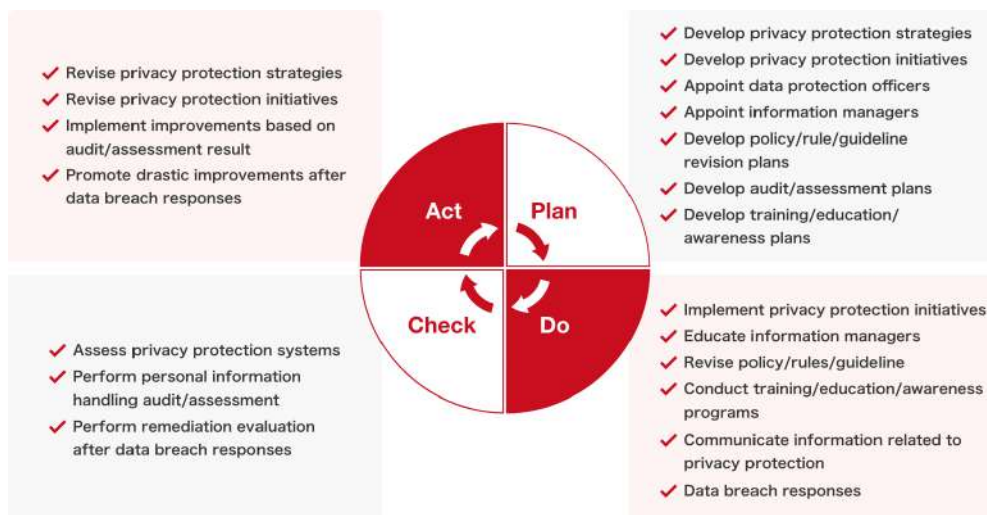
Also, the "Shiseido Global Privacy Principles," which were established as the Group's common privacy principles, as well as each Group company's privacy policies are publicly disclosed.

## 2. Privacy Protection Management Systems

### (1) Management structure

The Shiseido Group has privacy protection systems in place under the leadership of the Chief Information Security Officer (CISO) and Chief Legal Officer (CLO). The CISO and CLO assume overall responsibility for privacy protection and engage in the planning and implementation of related strategies and initiatives while communicating with the management team.

Also, the CISO and CLO jointly supervise the development and enforcement of rules and guidelines for privacy protection as well as the implementation of safety measures and education/training in each Group company. The heads of offices, departments, and affiliates are appointed as Information Managers responsible for the implementation of privacy protection-related initiatives at their respective organizations. As for the regional headquarters outside Japan, privacy protection contacts in the local Information Systems and Legal&Governance departments periodically communicate with the CISO and HQ's Information Security and Legal&Governance departments to ensure continued efforts to maintain and improve the Group's overall privacy protection activities.



### (2) Development of policies and rules

To promote privacy protection systems, we refer to several major related guidelines or best practices such as the ISO 31000 international standard for risk management, the ISO 27701 international standard for privacy protection, National Institute of Standards and Technology's Privacy Framework, and the Guidebook on Corporate Governance for Privacy in Digital Transformation (DX) promoted by the Ministry of Economy, Trade and Industry and the Ministry of International Affairs and Communications.

Furthermore, specific guidelines and rules have been formulated. These include the above-mentioned "Shiseido Group Privacy Rules," in addition to rules and regulations regarding information asset handling/management and information systems development, operation, and management. We are working to promote compliance with these guidelines and rules on a global scale by encouraging the engagement of overseas offices.

To ensure privacy protection, we check the information security management systems of the companies to which we outsource the handling of personal information before we execute a service agreement requesting that they take appropriate safety management measures.

### 3. Initiatives to Promote Privacy Protection

#### (1) Employee training/education/awareness

The Shiseido Group conducts e-learning programs and holds group sessions on a regular basis to help employees increase their awareness and knowledge of privacy protection. We provide guidance to new graduate and mid-career hires during orientation sessions to instill the importance of privacy protection in our personnel from the time they start with the Group.

To keep employees updated on privacy protection issues, the latest information is posted on our internal portal.

#### (2) Promotion of privacy by design

The Shiseido Group has developed internal systems and processes that enable the Information Security and Legal&Governance departments to be involved in the development of new business or services from scratch so that necessary privacy protection measures can be taken at the planning/designing stage.

#### (3) Monitoring activities

The Shiseido Group periodically checks and assesses its information assets including personal information. Also, to check if privacy protection measures have been implemented appropriately in all offices, departments, and affiliates, we conduct a risk-based assessment of their information systems and issue an order for improvement if a problem is detected. As for our business partners to whom we outsource the handling of personal information, we check their information security management systems and operational status thereof on a regular basis even after executing service agreements with them.

#### (4) Privacy incident response

At the Shiseido Group, the Information Security department responds to accidents and emergency situations related to privacy protection executing the necessary actions in cooperation with the Legal&Governance, risk management, and Information Systems departments depending on the impact of specific situations.

If a privacy incident such as personal information breach occurs, the Group will report to the authorities concerned and data subjects, following the laws and regulations of each country/region.

#### (5) Third-party assessment

To verify that the Shiseido Group's implementation of its privacy protection initiatives and management systems are appropriate, we enlist external experts to conduct an assessment if necessary. Issues and challenges identified through the assessments are then considered to develop privacy protection strategies and initiatives.

## Protection of Intellectual Properties

Shiseido Group invests in R&D and marketing to develop innovative technologies and increase our brands' value. Therefore, enhancing our Intellectual Property (IP) value is a crucial activity for our sustainable growth. IP includes intangible assets such as patents, trademarks, copyrights, industrial designs, trade secrets, etc. We protect our inventions, brands, marketing ideas and other IP outcomes properly, as these assets play key roles in our future success. We also respect third parties' IP rights and provide internal trainings for our employees to raise the awareness.

Note: Intellectual properties refer to intellectual property rights (patent rights, trademark, design rights, copyrights, etc.) and business confidentiality (know-how, etc.).

# Tax Policy

Shiseido's Tax Policy

Shiseido Group's Tax policy in the United Kingdom



# Global Tax Policy

Shiseido Group complies with the laws and regulations in all countries in which we run business. "Our Mission, Values and Way", our corporate philosophy, sets forth the code of conduct for all employees to ensure our compliance to the law. In addition, we set the global tax policy here to ensure the tax transparency. We aim to maximize the shareholder value by mitigating the tax risk globally.

## Tax Principles

### Compliance

We fully comply with the international guideline established by the OECD and the tax laws and regulations in all countries in which we run business. Furthermore, we also understand and respect the underlying intentions of the laws and regulations. We will not engage in abusive tax evasion through tax structure without commercial substance or shift profit to countries with low tax rates.

### Governance

The discipline for the compliance and accurate tax accounting is set forth in "Our Mission, Values and Way", our corporate philosophy, and shared with all employees to ensure the tax transparency. We will resolve the tax issues by managing the tax risk locally by each RHQ and sharing the tax information globally in a timely manner.

### Responsibilities and Organization for the Tax Compliance

Tax compliance is under the responsibility of the CFO. To manage the global tax risk effectively, tax team of global headquarters manages the tax compliance of the group, and CFOs at each regional headquarters manage the tax compliance in their region. Employees with tax expertise are assigned as necessary for the smooth operation of our global tax risk management organization. We provide trainings to employees to raise awareness on the tax compliance.

### Maximization of the Shareholder Value

In order to improve the shareholder value, we strengthen the governance and save tax by utilizing tax incentives where applicable in the ordinary course of business.

### Transfer Pricing

Our transfer pricing policy is in accordance with the OECD Transfer Pricing Guidelines and the laws and regulations of each country in which we run business. The pricing for the intercompany transaction is determined under the arm's length principle and based on the policy.

### Tax Havens

We do not utilize the tax havens to solely avoid tax.

## Relationship with the Tax Authorities

We cooperate with the tax authorities and build a good relationship with them.

# Shiseido UK Tax Policy

SHISEIDO Group complies with the laws and regulations in all countries in which we run businesses. THE SHISEIDO PHILOSOPHY, "OUR MISSION, DNA and PRINCIPLES" and Shiseido Code of Conduct and Ethics sets forth the code of conduct for all employees to ensure our compliance to the law. In addition, we set the global tax policy to ensure tax transparency. The following document lays out the company's strategy and approach in 2023 for the United Kingdom. We publish this statement to meet our obligation under Paragraphs 19(2) and 22(2) of Schedule 19 of FA2016."

## Governance and Responsibilities

The discipline for the compliance and accurate tax accounting is set forth in Shiseido Code of Conduct and Ethics and shared with all employees to ensure tax transparency.

The Chief Financial Officer (CFO) / The Finance Director (FD) and the Group Financial Controller(GFC) is ultimately responsible for Shiseido's overall tax risks. We will resolve the tax issues by managing the tax risk locally by each Regional Head Quarters (RHQ) and sharing the tax information globally in a timely manner.

Tax compliance is under the responsibility of the CFO and/or the FD. To manage the global tax risk effectively, the tax team of Global Head Quarters (HQ) manages the tax compliance of the group, and CFOs and/or the FDs at each RHQ manage the tax compliance in their region. Each RHQ assigns the employees with tax expertise as necessary. We provide trainings to employees to raise awareness on the tax compliance.

## Tax Planning

Shiseido's tax arrangements are based on its commercial business and economic activities. Shiseido monitors and reviews its operations in the UK and elsewhere to realign its tax arrangements when necessary to be compliant with the tax rules and regulations.

Globally, we comply with the international guideline established by the Organisation for Economic Co-operation (OECD) and the laws and regulations in all countries in which we run businesses.

Our transfer pricing policy is in accordance with the OECD Transfer Pricing Guidelines and the laws and regulations of each country in which we run business. The pricing for the intercompany transaction is determined based on the policy. We adhere to the UK Double Tax Treaties and the relevant guidance issued by the OECD for international tax matters.

## Tax Risk

We aim to maximize the shareholder value by mitigating the tax risk globally.

We will resolve the tax issues by managing the tax risk locally by each RHQ and sharing the tax information globally in a timely manner.

Where there is complexity or uncertainty we may seek support from external advisors.

## Relationship with Her Majesty's Revenue & Customs (HMRC)

We seek to build and sustain relationships with government and HMRC that are constructive and based on mutual respect. We work collaboratively wherever possible to resolve disputes and to achieve early agreement and certainty.